Statement in Support of Request for Temporary Extension of Experimental Authorization for KSTR-DT ATSC 3.0 Single Frequency Network Operations

Unimas Dallas LLC ("Applicant"), licensee of Full Power television station KSTR-DT, Irving, TX (the "Station"), hereby requests that the Commission grant a single, three-month extension of its experimental authorization (the "Experimental Authorization," File No. 0000069539) to allow for the continuation of testing of ATSC 3.0 Single Frequency Network operations on RF channel 34 in Dallas TX DMA. This extension request enjoys the support of Univision's partners in the Dallas ATSC 3.0 market; SpectrumCo, Sinclair Broadcast Group, One Media, and American Tower Corporation, MSW, and Smith and Fisher.

The current Experimental Authorization is set to expire on April 5th, 2020. Applicant recognizes and appreciates that the Media Bureau began accepting ATSC 3.0 license applications in LMS on May 28, 2019, having revised FCC Form 2100, and applicable schedules thereto, to enable stations to seek an ATSC 3.0 license.[1] The Media Bureau accordingly announced at that time that it would "no longer grant new experimental authorizations or extend existing authorizations, absent unique and compelling circumstances."[2]

Such unique and compelling circumstances exist for this Extension Request. Applicant has submitted application and received approval on March 13, 2020 to modify the Station's license to specify ATSC 3.0. However, the application was submitted and granted to operate under KSTR-DT's existing construction permit, not as an SFN, with the anticipation that SFN testing would complete on March 31, 2020—but as discussed below, unforeseen circumstances have delayed the completion date. If the Station were unable to obtain the Extension Request, it would be forced to cease SFN operations. Discontinuance of the Station's ATSC 3.0 SFN operations would undermine the public interest, however. In particular:

1. *The Station is key to the Dallas testing and the development of ATSC 3.0. SFN.* The Station hosts the main transmitter for the Dallas SFN. This SFN serves as a model, a test bed, and a place for industry to learn and grow ATSC 3.0's SFN capability. The Dallas SFN is an industry development initiative that will mature one of the promising capabilities of ATSC 3.0, the Single Frequency Network. There is a stream of stations converting to ATSC 3.0 but very few stations establishing an ATSC 3.0 SFN. The partners in the Dallas SFN are investing in work that will benefit the U.S. broadcasting industry and the viewing public.

2. *Nearly $4 million has been invested in this Dallas SFN by numerous and diverse members of the industry.* Univision and Sinclair Broadcast Group along with broadcast engineers from stations in Texas, Kansas, and Oklahoma as well as

[1] *Media Bureau Announces That it Will Begin Accepting Next Generation Television (ATSC 3.0) License Applications in the Commission's Licensing and Management System on May 28, 2019*, GN Docket No. 16-41 at ¶ 8 (May 23, 2019) (the "ATSC 3.0 PN").

[2] *Id*.

transmission vendors, and consumer electronics manufacturers have invested in the Dallas SFN.

3. An extension is necessary to ensure that the important development and testing work ongoing in the Dallas SFN can continue.

As recently as January 2020 the participants in the Dallas ATSC 3.0 SFN anticipated completing testing no later than March 31, 2020. However, several unforeseen circumstances are causing delays and setbacks in the testing schedule.

1. COVID-19. Travel restrictions imposed by Dallas SFN partners to protect the health of their employees and the general public is limiting the availability of test teams and engineers to travel to Dallas.

2. Unlicensed Interference. During testing the team discovered a signal spike around 593 MHz that they could not account for. Several days were spent isolating the anomaly, where it was finally determined a security camera internal to the test van was causing the interference. This interference nullified the results of over 100 test sites. In order to get meaningful data each site will have to be observed again.

3. Equipment Limitations: Much of the equipment from our vendor partners are early models. During testing it was noticed that the ATSC 3.0 receivers do not process signals outside a 198 micro second guard interval. This has significantly impacted the ability to test the SFN signals received from the two most distant sites. While we think the physical layer signal, as described by ATSC, is correct; the limitations of vendor hardware must be documented and addressed before we can continue.

Despite the current challenges, Univision does not anticipate seeking a further extension of the Experimental Authorization beyond the three-month extension sought herein. Thus, the extension sought will be limited in duration and will not undermine the Bureau's general policy of no longer granting experimental authorizations for ATSC 3.0 operation.

In light of the above, the Applicant respectfully requests a single, three-month extension of the Experimental Authorization, until July 4th, 2020.