

**47 C.F.R. § 73.3801(f)(6)(iii) Exhibit**

Baltimore (WNUV-TV) Licensee, Inc., licensee of WNUV(TV), Baltimore, MD (Facility ID 7933; RF Channel 25) (“Licensee”), proposes simulcasting WNUV(TV)’s primary stream (affiliated with the CW Network) in ATSC 1.0 format on WMPT(TV), Annapolis, MD (Facility ID 65942; RF Channel 21). As shown in the attached engineering exhibit, the service contour of WMPT(TV)’s facility covers 90.3% of the predicted population within the noise limited service contour of WNUV(TV)’s facility, which falls slightly below the 95% threshold established in Section 73.3801 of the Commission’s Rules for expedited processing. Licensee therefore submits this exhibit in accordance with Section 73.3801(f)(6)(iii) of the Commission’s Rules.

To minimize the loss of ATSC 1.0 service to existing WNUV(TV) viewers, Licensee proposes to simulcast WNUV(TV)’s primary stream on a supplemental host station, WMPB(TV), Baltimore, MD (Facility ID 65944; RF Channel 22). WMPT(TV) and WMPB(TV) are both licensed to the Maryland Public Broadcasting Commission (“MPBC”) and, combined, cover **97.7%** of the predicted population within the noise limited service contour of WNUV(TV)’s facility.

There are no other viable host stations in the market that would result in less service loss to existing viewers than Licensee’s hosting arrangement with WMPT(TV) and WMPB(TV). The designation of WMPT(TV) and WMPB(TV) as the host stations for WNUV(TV)’s primary stream is the result of extensive and complex negotiations between Licensee and the four other full-power TV station licensees in the market that were willing to participate in WNUV(TV)’s ATSC 3.0 transition. The resulting hosting arrangements optimize the resources these parties were collectively able and willing to contribute to the project to preserve ATSC 1.0 carriage of each of WNUV(TV)’s programming streams for as many viewers as possible and in the same transmission standard as such viewers are accustomed to, while permitting the launch of ATSC 3.0 service in the Baltimore market. (The remaining full-power TV licensee in the market was approached but declined to participate.) In particular, the practical limits on capacity, along with WNUV(TV)’s contractual obligation to air its primary programming stream in ATSC 1.0 format in high definition (“HD”), along with the Commission’s encouragement of stations currently transmitting in HD to find a way to continue to provide an HD signal to ATSC 1.0 viewers, made the choice of WMPT(TV) and WMPB(TV) as the hosting stations for WNUV(TV)’s HD CW stream an optimal one.<sup>1</sup> Ultimately, it was based on these respective hosting arrangements that each of the participating licensees was able to contractually commit to the project and make ATSC 3.0 in Baltimore a reality, while minimizing disruption of program service to WNUV(TV)’s viewers.

The proposed simulcasting arrangement with MPBC will serve the public interest, as it will advance the Commission’s ATSC 3.0 policy goals while enabling WNUV(TV) to continue to provide an HD-quality ATSC 1.0 signal to more than 95% of the predicted population within its current service contour. It will also enable public television stations to participate in and reap the benefits associated with the ATSC 3.0 rollout. Deployment of ATSC 3.0 service will unlock the potential for consumers to benefit from innovative features made possible by the ATSC 3.0 technology, such as advanced emergency alerting and information functions, enhanced video

---

<sup>1</sup>See *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, Report and Order and Notice of Proposed Rulemaking, 32 FCC Rcd 9930, 9945 (2017).

featuring High Dynamic Range, Wide Color Gamut and High Frame Rate, immersive and multiple audio channels, and interactive data services. Given that the Commission has determined that an ATSC 3.0 applicant's provision of ATSC 1.0 service to at least 95% of its existing service population qualifies for expedited processing, Licensee respectfully submits that the public interest benefits of the instant proposal—which preserves ATSC 1.0 service for **97.7%** of WNUV(TV)'s service population—outweigh any potential harm associated with the *de minimis* 2.3% loss.