

Nexstar Inc.

WOLP-CD, Grand Rapids, MI (Fac. ID 167892)

**Request for Special Temporary
Authority**

Nexstar Inc. (“Licensee”), licensee of WOLP-CD, Grand Rapids, Michigan (Facility ID 167892) (“WOLP”), hereby requests Special Temporary Authority in connection with the transition of WOLP’s transition to the ATSC 3.0 broadcast transmission standard and related proposal to broadcast WOLP’s non-primary programming streams (“multicast streams”) in ATSC 1.0 format on WWMT(TV), Kalamazoo, Michigan (Fac. ID 74195), RF Channel 8, licensed to WWMT License, LLC, and on WXMI(TV), Grand Rapids, Michigan (Fac. ID 68433), RF Channel 32, licensed to Scripps Broadcasting Holdings, LLC. Licensee requests that for purposes of enforcement and application of its rules, WOLP be treated as if it is airing the multicast streams over WOLP and be the responsible party under the Act and Commission rules and regulations akin to the manner that the Commission treats ATSC 1.0 primary simulcast streams under the Next Gen TV rules.¹

As indicated in Licensee’s WOLP-CD’s Form 2100 application, Licensee proposes to (1) commence ATSC 3.0 operations from the current facilities for WOLP and commonly owned station WXSP-CD, Grand Rapids, Michigan (Fac. ID 36851) which each broadcast the exact same programming, and (2) simulcast the WOLP primary stream (affiliated with MyNet) in ATSC 1.0 format on commonly owned station WOOD-TV, Grand Rapids, Michigan (Fac. ID 36838), RF Channel 7. To minimize the loss of over-the-air programming to its current ATSC 1.0 viewers resulting from the station’s transition to ATSC 3.0, Licensee proposes to broadcast one of its existing multicast streams, Court TV Mystery on WWMT, and the other multicast stream COZI TV on WXMI pursuant to hosting agreements.

Because of ATSC 1.0 capacity constraints, WOLP is not able to air its multicast streams on WOOD-TV, its primary ATSC 1.0 simulcast host. Furthermore, due to ATSC 3.0 capacity and other constraints attendant with the multi-station and multi-market coordination needed for a successful ATSC 3.0 deployment across the country, it is not feasible for Licensee to simulcast WOLP’s multicast streams in an ATSC 3.0 format without unduly minimizing, if not largely eliminating, the benefits to the public and the participating stations of transitioning to ATSC 3.0. Simulcasting those streams in ATSC 3.0 would reduce capacity available to NextGen stations for offering consumers the improved services that ATSC 3.0 enables. The types of services and improvements that would be precluded would include enhanced video featuring High Dynamic Range, Wide Color Gamut and High Frame Rate, immersive and multiple audio channels using Dolby AC-4, Advanced Emergency Alerting and Information functions as part of a broadcast receiver application, and non-real time interactive data delivery. Each of these requires a portion of the ATSC 3.0 capacity that would be unavailable were Licensee to carry multicast program streams as the ATSC 3.0 lighthouse. Even setting aside these impediments, significant additional engineering work and more equipment would be required to simulcast

¹ A request for Special Temporary Authority is being filed simultaneously herewith for commonly owned station WXSP-CD, Grand Rapids, MI (Facility ID 368451), which carries the same programming as WOLP-CD.

WOLP's multicast streams in ATSC 3.0 and ATSC 1.0 formats. Obtaining, installing and testing that equipment would, at minimum, delay rollout of ATSC 3.0 in the Grand Rapids market.

The hosting arrangements with WWMT and WXMI will serve the public interest by enabling most current over-the-air viewers to continue to have access to WOLP's multicast streams. Absent the arrangements with WWMT and WXMI, all over-the-air viewers would lose access to WOLP's multicast streams.

Licensee is requesting the instant authorization to make clear that Licensee will remain responsible for these streams' compliance with the Communications Act and the Commission's rules and regulations. To alleviate any viewer confusion, Licensee is airing notices to over-the-air viewers of WXSP and WOLP that it intends to discontinue ATSC 1.0 operations and begin broadcasting in the NextGen TV standard on both the WXSP and WOLP channels beginning April 22, 2021, and to instruct all over-the-air viewers to tune to Channel 15 (PSIP channel for WXSP) to continue receiving the programming in the ATSC 1.0 standard. We also note that Licensee does not currently, and does not intend to, rely on its multicast streams for compliance with the Commission's Children's Television Programming requirements, as WOLP averages at least three hours per week of core programming on its primary stream. As such, neither WOLP's compliance with the Commission's Children's Television Programming requirements nor viewers' access to the station's required core programming will be affected by deviations in coverage (as shown in the engineering exhibit included with the application) resulting from the relocation of WOLP's multicast signals to the WWMT and WXMI facilities as described herein. As noted Licensee has also aired and will do what is legally required as to further airing of WOLP consumer notices regarding the station's transition to the ATSC 3.0 standard and the need for over-the-air viewers to rescan for the planned April 22, 2021 transition date.

Grant of this STA request will serve the public interest, as it will advance the Commission's ATSC 3.0 policy goals while preserving WOLP's ability to air each of its programming streams in the ATSC 1.0 format to ensure that most of WOLP's current viewers can continue to receive the programming currently available to them. It will also make clear that WOLP is an authorized user of a portion of the channels for WWMT and WXMI and is the party responsible for ensuring compliance with the Communications Act and the Commission's rules and regulations.