

**Request for Modification of
Special Temporary Authority**

Scripps Broadcasting Holdings LLC (“Scripps Broadcasting”), licensee of NextGen TV station KASW(TV), Phoenix, Arizona (Facility ID No. 7143) (“KASW”), hereby requests modification of its legal special temporary authority granted on September 24, 2020, in LMS File No. 0000120506 (the “Legal STA”)¹.

Pursuant to LMS File No. LMS File No. 0000106570, Scripps Broadcasting is authorized to operate KASW’s facility using the ATSC 3.0 standard with the simulcast of KASW’s primary programming stream (affiliated with the CW network) in the ATSC 1.0 standard as a guest on KNXV-TV, Phoenix, Arizona (Facility ID No. 59440), which is also owned by Scripps Broadcasting. The Legal STA authorizes KASW’s broadcast of KASW’s non-primary multicast streams of HSN, GRIT, and Court TV Mystery using the ATSC 1.0 standard, with no ATSC 3.0 simulcast, on KSAZ-TV, Phoenix, Arizona (Facility ID No. 35587) (“KSAZ-TV”), licensed to NW Communications of Phoenix, Inc. (a subsidiary of Fox Corporation, “Fox”). Pursuant to the Legal STA, the Commission considers those multicast streams to be originated by KASW even though they are being aired over KASW’s facilities.

The broadcasters in the Phoenix market are planning to reconfigure the ATSC 3.0 sharing arrangement for the market in order to add two additional Phoenix stations. Specifically, the Phoenix market reconfiguration will permit independent station KTVK(TV), Phoenix, Arizona (Facility ID No. 40993) (“KTVK”), licensed to KPHO Broadcasting Corporation (a subsidiary of Meredith Corporation, “Meredith”), and Telemundo station KTAZ(TV), Phoenix, Arizona (Facility ID No. 81458) (“KTAZ”), licensed to NBC Telemundo License LLC (“Telemundo”), to each launch ATSC 3.0 service.² The Phoenix broadcasters plan to deploy the reconfigured market plan and launch KTVK and KTAZ in ATSC 3.0 on July 8, 2021.

In connection with revised ATSC 3.0 sharing arrangement, KASW’s GRIT multicast programming stream will be relocated to the ATSC 1.0 facility of KPNX(TV), Mesa, Arizona (Facility ID No. 35486) (“KPNX”), licensed to Multimedia Holdings Corporation (a subsidiary of TEGNA Inc. (“TEGNA”), and KASW’s Court TV Mystery multicast programming stream will be relocated to the ATSC 1.0 facility of Meredith’s KTVK. Scripps Broadcasting is entering into written hosting agreements with TEGNA and Meredith to broadcast the GRIT and Court TV Mystery multicast streams using the ATSC 1.0 facilities of KPNX and KTVK, respectively. KASW’s HSN multicast programming stream will remain on KSAZ-TV, and Scripps Broadcasting is entering into a written amended and restated hosting agreement with Fox accordingly.

¹ A request for extension of the Legal STA is pending in LMS File No. 0000139602.

² KTVK and KTAZ will launch ATSC 3.0 as guests on Univision’s KFPH-CD, and TEGNA’s KPNX and Meredith’s KPHO’s ATSC 3.0 guest signals will be relocated from KFPH-CD to KASW.

Pursuant to the Legal STA, the relocation of KASW's GRIT and Court TV Mystery multicast streams to new ATSC 1.0 multicast hosts requires a new legal special temporary authority.

As shown in the composite coverage map attached as Exhibit A, 100% of the viewers that previously received KASW's GRIT and Court TV Mystery multicast streams over-the-air from KASW's prior ATSC 1.0 facility will retain access to those programming streams respectively from KPNX's ATSC 1.0 facility and KTVK's ATSC 1.0 facility.

In connection with the launch of the reconfigured market plan, the Phoenix broadcasters will notify relevant MVPDs of the revised channel map. And the Phoenix broadcasters will air consumer notices about the need for over-the-air viewers to rescan their television sets in order to continue to receive KASW's ATSC 1.0 GRIT and Court TV Mystery programming streams. The PSIP (virtual) channels for each of KASW's program streams will remain unchanged and will continue to be identified as being associated with KASW.

Except for the relocation of relocation of KASW's GRIT and Court TV Mystery multicast streams to new ATSC 1.0 multicast hosts as set forth herein, the basis for the current Legal STA remains the same. Specifically, because of ATSC 1.0 capacity constraints, KASW is not able to air its non-primary multicast streams on the same host station as its primary ATSC 1.0 programming stream. 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 KASW's ATSC 3.0 facility to simulcast KASW's non-primary multicast streams in the ATSC 3.0 standard without unduly minimizing, if not largely eliminating, the benefits to the public and the participating stations of transitioning to ATSC 3.0. Absent the ATSC 1.0 non-primary multicast stream hosting arrangement with other stations in the market, and without the clarity that the Legal STA provides, Scripps Broadcasting may not be able to continue to provide KASW's non-primary multicast streams over the air, which could result in a complete loss of service to all of the over-the-air viewers of those streams.

Accordingly, Scripps Broadcasting respectfully requests modification of the Legal STA to authorize KASW's broadcast of KASW's non-primary multicast streams using the ATSC 1.0 standard, with no ATSC 3.0 simulcast as follows:

- GRIT on TEGNA's KPNX ATSC 1.0 facility;
- Court TV Mystery on Meredith's KTVK ATSC 1.0 facility; and
- HSN on Fox's KSAZ-TV's ATSC 1.0 facility (unchanged).

Grant of this request will serve the public interest as it will advance the Commission's ATSC 3.0 policy goals, facilitate the deployment of ATSC 3.0 in light of the evolving nature of ATSC 3.0 deployment, including the launch of ATSC 3.0 service by Meredith's KTVK and Telemundo's KTAZ, and promote the continued over-the-air transmission of KASW's non-primary multicast streams in the ATSC 1.0 standard.

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EXHIBIT A
(Attached)

Mid-State Consultants

KASW 0000106570 Latitude: 33-20-01 N Longitude: 112-03-47 W ERP: 445.00 kW Channel: 27 Frequency: 551.0 MHz AMSL Height: 908.5 m	KPNX BLCDT-20090618AAM Latitude: 33-20-00 N Longitude: 112-03-51 W ERP: 39.00 kW Channel: 12 Frequency: 207.0 MHz AMSL Height: 912.6 m	KTVK 0000107396 Latitude: 33-20-01 N Longitude: 112-03-48 W ERP: 1000.00 kW Channel: 24 Frequency: 533.0 MHz AMSL Height: 866.7 m	KSAZ-TV 0000106827 Latitude: 33-20-03 N Longitude: 112-03-46 W ERP: 48.00 kW Channel: 10 Frequency: 195.0 MHz AMSL Height: 915.0 m	Noise-Limited Contours <div> <div>KASW</div> <div>KPNX</div> <div>KTVK</div> <div>KSAZ-TV</div> </div>
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Figure 1 -Noise-Limited Contours of Licensed KASW, KPNX, KTVK and KSAZ-TV Facilities

