

Tribune Media Company
KWGN-TV, Denver, Colorado (Facility ID 35883)

**Request for Extension of Special
Temporary Authority**

Tribune Media Company (“Licensee”), licensee of KWGN-TV, Denver, Colorado (Facility ID 35883), hereby requests an extension of the Special Temporary Authority granted on December 9, 2020 (File No. 0000128312) in connection with KWGN-TV’s transition to the ATSC 3.0 broadcast transmission standard. The STA also allowed KWGN-TV’s to broadcast its non-primary programming streams (“multicast streams”) in ATSC 1.0 format on KMGH(TV), Denver, Colorado (Fac. ID 40875), RF Channel 7, licensed to Scripps Broadcast Holdings, LLC; and KUSA(TV), Denver, Colorado (Fac. ID 23074), RF Channel 9, licensed to Multimedia Holdings Corporation. KWGN is the 3.0 host for the other broadcast stations in the Denver, Colorado DMA (as defined by Nielsen) and simulcasts its primary programming stream in ATSC 1.0 format on commonly owned station KDVR(TV), Denver, Colorado (Fac. Id. No. 126), RF Channel 36. *See* File No. 0000128311.

As noted in the STA, because of ATSC 1.0 capacity constraints, KWGN-TV is not able to air its multicast streams on KDVR, 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 KWGN-TV’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. Granting this extension would ensure that all over-the-air viewers would continue to receive access to the ATSC 1.0 signals of KWGN-TV’s multicast streams. Licensee reiterates as well that it will remain responsible for these streams’ compliance with the Communications Act and the Commission’s rules and regulations.

An extension of this STA request will serve the public interest, as it will advance the Commission’s ATSC 3.0 policy goals while preserving KWGN-TV’s ability to air each of its programming streams in the ATSC 1.0 format to ensure that KWGN-TV’s current viewers can continue to receive the programming currently available to them. It will also continue to make clear that KWGN-TV is an authorized user of a portion of the channels for KUSA and KMGH¹ and is the party responsible for ensuring compliance with the Communications Act and the Commission’s rules and regulations and regulations akin to the manner that the Commission treats ATSC 1.0 primary simulcast streams under the Next Gen TV rules.²

¹ As already noted, Licensee has agreed to indemnify Scripps and Multimedia Holdings Corporation from and against all liabilities or claims resulting from or arising out of the programming and advertising broadcast on Licensee’s program streams using the facilities of KMGH and KUSA (as applicable).

² Pursuant to the Media Bureau’s request that all ATSC 3.0 licensees formally seek modification or clarification of the of the FCC ATSC rules prior to seeking an extension, Licensee notes and supports the Petition for Declaratory Ruling and Petition for Rulemaking filed by the National Association of Broadcasters on November 9, 2020 in GN Docket No. 16-142.