

**Narrative Statement**  
**KUPN Licensee, LLC**  
**Request for Media Bureau Part 5 Experimental Authority**

On behalf of KUPN Licensee, LLC, and pursuant to the Part 5 Experimental Radio Service rules and regulations of the FCC, the applicant hereby respectfully requests approval for the instant ATSC 3.0 experimental application for special temporary authority (“STA”) to conduct additional experimental testing and public demonstration using full-power DTV facilities in order evaluate and improve means to provide enhanced ATSC 3.0 services to the public during the upcoming National Association of Broadcasters Show April 23-April 27, 2022, in Las Vegas, NV (“NAB Show”).

The applicant is convinced that such a public demonstration of the capabilities of the ATSC 3.0 technologies during the NAB Show will be a great benefit to the television industry and provide opportunities to create new compatible devices that will be useful to the ultimate television viewing public, including mobile services. The applicant hereby respectfully requests expedited Media Bureau approval of the STA for a period between **April 11 and May 1, 2022**.

Specifically, the applicant is proposing to broadcast the Channel 33 signal in the Las Vegas market, using an existing antenna that has been previously used for demonstration purposes on multiple and approved experimental occasions by licensed station KSNV(TV), Las Vegas, Nevada. The applicant intends to utilize Channel 33 as requested to support demonstrations of ATSC 3.0 capabilities and use cases by a variety of companies at the NAB Show to a broad range of different entities and many types of users – e.g., equipment manufacturers, streaming services, content providers to domestic and international visitors alike – who have expressed interest in ATSC 3.0 technologies.

In addition, the requested STA will be used to test the latest ATSC 3.0 technologies and standards and improved operational equipment developed recently to compare to the current operational standard and equipment. The applicant would like to begin the required testing for the planned demonstrations as soon as possible and far enough in advance of the NAB Show to ensure successful demonstrations.

As the Commission is aware, manufacturer programming and other technologies are being aligned for anticipated and continued commercial migrations to "NextGenTV" services in even more markets throughout the coming year. This request is made to accommodate this broad industry activity and to ensure a more efficient transition for the public and manufacturers alike going forward. The request is also being made to provide the Commission and industry representatives with the latest updates in the progress of ATSC 3.0 technology.

As described in the Engineering Statement submitted along with the instant application and prepared by John E. Hidle of Carl T. Jones Corporation (Mr. Hidle’s experience is a matter of record before the FCC), the instant proposal fully complies with the relevant

technical rules and regulations of the Commission and will not adversely impact the operations of any other DTV facility with the sole exception of K33MJ-D which is currently licensed as a secondary facility LPTV facility on channel 33, which is licensed to Pahrump, Nevada. The licensee, Sinclair Media II, Inc. has agreed to accept the predicted interference from the requested STA facility to 80.08% of the population predicted to receive service from the K33MJ-D licensed facility during the pendency of the requested STA.

The applicant submits that a grant of the instant STA application is in the public interest because the information and data obtained from the tests will be valuable in evaluating the future use and development of ATSC 3.0 technology, equipment, systems, and services for use by the public, television licensees, and many different use cases going forward.