

Supplemental 47 C.F.R. § 73.3801(f)(6) Information

Gray Television Licensee, LLC (“Gray”), licensee of full power television station WUPV(TV), Ashland, VA (Fac ID 10897), hereby provides this supplemental information pursuant to Section 73.3801(f)(6)(iii) of the FCC’s Rules to allow WUPV to begin transmitting a Next Gen TV (ATSC 3.0) broadcast signal and to transition its ATSC 1.0 signal to commonly owned host station WWBT(TV).

As demonstrated in the contour map prepared by Chesapeake RF Consultants, LLC and submitted as an attachment to the initial application:

- The predicted population within the noise limited service contour served by WUPV’s original ATSC 1.0 signal is 2,137,267.
- The predicted population within the noise limited service contour served by WUPV’s original ATSC 1.0 signal that will lose the station’s ATSC 1.0 service as a result of the simulcasting arrangement is 169,813, or 7.95% of the population currently reached by WUPV’s signal.

Because the proposed host facility, WWBT, does not meet the 95 percent standard for expedited processing in Section 73.3801(f)(6)(ii) of the FCC’s Rules, Gray provides the following information:

**1. Availability of Other Host Stations That Would Result in Less Service Loss to Existing Viewers
(47 C.F.R. § 73.3801(f)(6)(iii)(A)(i))**

There are no other viable host stations in the market that would result in less service loss to existing viewers than WWBT. The Richmond-Petersburg television market includes five other stations in addition to WUPV and WWBT: WRIC-TV, WRLH-TV, WTVR-TV, WVCE-TV, and WCVW(TV).

WWBT reaches a greater percentage of WUPV’s existing population served than any of the three commercial stations, WRIC-TV, WRLH-TV, and WTVR-TV.

Station	Service Loss¹
WWBT(TV)	7.95%
WRIC-TV	9.6%
WRLH-TV	11.3%
WTVR-TV	15.1%

Additionally, none of these stations would have the capacity to host WUPV’s stream without reducing the bitrate of WUPV’s stream or their own HD streams to SD quality (and potentially dropping one or more existing SD streams). WRIC-TV currently broadcasts one HD stream and three SD streams and, if authorized, will host two of WUPV’s SD streams. WRLH-TV and WTVR-TV each currently broadcast one HD stream and five SD streams and, if authorized, will each host one of WUPV’s SD streams. WUPV has contractual obligations requiring it to air its primary programming stream in ATSC 1.0 format in HD, and

¹ Gray provided an engineering statement and service loss analyses as an attachment to its application for special temporary authority to broadcast its ATSC 1.0 multicast streams on WRIC-TV, WRLH-TV, and WTVR-TV. File No. 0000185201.

the Commission has also encouraged broadcasters participating in the ATSC 3.0 transition that are currently transmitting in HD to find a way to continue to provide an HD signal to ATSC 1.0 viewers.²

Noncommercial television station WCVE-TV, meanwhile, is not a viable host for WUPV's ATSC 1.0 primary stream because : (1) WCVE-TV covers less of the predicted population within WUPV's current ATSC 1.0 signal than WWBT does; and (2) WCVE-TV will be serving as the host for commonly owned WCVW(TV).

In addition to the foregoing, a hosting arrangement between commonly owned WUPV and WWBT is more efficient because it obviates the need to negotiate and draft an additional hosting agreement that would not yield any meaningful benefit to viewers.

2. What Steps, If Any, The Station Plans To Take To Minimize The Impact Of The Service Loss (47 C.F.R. § 73.3801(f)(6)(iii)(A)(ii))

Under the circumstances, the impact of the service loss on viewers will be minimal. The proposed hosting arrangement will result in a population loss area that exceeds the Commission's 5% loss standard for expedited processing by a mere 2.95%. The majority of those persons who would lose WUPV's ATSC 1.0 signal are located outside the Richmond-Petersburg DMA. Only 12,149 persons located within the Richmond-Petersburg DMA would lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, constituting just 0.84% of the population within the noise limited service contour served by WUPV(TV)'s original ATSC 1.0 signal and located within the DMA.

Additionally, most of the area that would lose WUPV's ATSC 1.0 service would have access to the CW network programming broadcast on WUPV from another source, WDCW. When accounting for areas served by either WWBT or WDCW, only 31,177 persons would lose access to CW network programming, or just 1.51% of the population currently reached by WUPV's signal – an amount well below the 5% service loss that the Commission has deemed per se acceptable.

Gray will take appropriate steps to inform viewers of the availability of CW network programming on WWBT and WDCW.

3. The Public Interest Benefits Of The Simulcasting Arrangement (47 C.F.R. § 73.3801(f)(6)(iii)(A)(ii))

The simulcasting arrangement is in the public interest because it will allow viewers in the Richmond-Petersburg DMA to enjoy the benefits of ATSC 3.0 broadcasts, which may 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. These potential benefits of deploying ATSC 3.0 service in the Richmond-Petersburg television market outweigh the minimal service loss, which is largely offset by the location of the service loss outside the Richmond-Petersburg DMA and the presence of an alternate station providing CW network programming.

² *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, Report and Order and Notice of Proposed Rulemaking, 32 FCC Rcd. 9930, 9945 (2017).