

**Application to Convert to ATSC 3.0 and Move ATSC 1.0 Signal to a Host Station**

Independence Television Company (“Block”), licensee of full power television station WBKI(TV), Salem, IN (Facility ID 34167) (“WBKI”), hereby requests authority to begin transmitting a Next Gen TV (ATSC 3.0) broadcast signal and to transition its primary ATSC 1.0 signal to host station WAVE(TV), Louisville, KY (Facility ID 13989) (“WAVE”), owned by Gray Television Licensee, LLC (“Gray”). WBKI is a CW network affiliate located in the Louisville, KY DMA.

**Coverage Requirements for ATSC 3.0 Signals.** Pursuant to Section 73.3801(c) of the Commission’s Rules, 47 C.F.R. § 73.3801(c), Block hereby certifies that WBKI and the proposed ATSC 1.0 host station, WAVE, are assigned to the same Designated Market Area. Moreover, as demonstrated by the attached contour map, the ATSC 1.0 signal originating from WAVE’s transmitter site covers WBKI’s community of license, Salem, Indiana, in its entirety.

**Simulcasting Agreements.** Block hereby certifies that WBKI and WAVE have entered into simulcasting agreements that comply with all of the requirements of Section 73.3801(e) of the Commission’s Rules, 47 C.F.R. § 73.3801(e).

**ATSC 1.0 Simulcast Coverage.** Pursuant to Section 73.3801(f)(6) of the Commission’s Rules, 47 C.F.R. § 73.3801(f)(6), Block hereby certifies that, as demonstrated by the attached contour map:

- The predicted population within the noise limited service contour served by WBKI’s original ATSC 1.0 signal is 2,187,161; and
- The predicted population within the noise limited service contour served by WBKI’s original ATSC 1.0 signal that will lose the station’s ATSC 1.0 service as a result of the simulcasting arrangement with WAVE is 216,240, or 9.9% of the population currently reached by WBKI’s signal.

Block notes, however, that the majority of those persons who would lose WBKI’s ATSC 1.0 signal are located outside the Louisville, KY DMA. Only 20,728 persons located within the Louisville, KY DMA would lose the station’s ATSC 1.0 service as a result of the simulcasting arrangement, constituting just 0.95% of the population within the noise limited service contour served by WBKI’s original ATSC 1.0 signal and located within the DMA.

Additionally, the primary programming stream on WBKI carries programming from the CW network and most of the area that would lose WBKI’s ATSC 1.0 service would have access to the CW network programming from other CW affiliates in adjacent markets. As the attached contour map shows, when accounting for areas served by either WAVE or the surrounding CW affiliates, only 19,510 persons would lose access to CW network programming, or just 0.89% of the population currently reached by WBKI’s signal. In addition, when looking at service loss within the Louisville, KY DMA, only 4,553 persons located within the DMA, or 0.21% of the population within the noise limited service contour served by WBKI’s original ATSC 1.0 signal

and located within the DMA, will lose access to CW network programming when considering areas served by either WAVE or the surrounding CW affiliates.

Due to ATSC 3.0 capacity and other constraints attendant with the multi-station and multi-market coordination needed for successful ATSC 3.0 deployment across the country, no other host station in the Louisville market would have resulted in less service loss to existing viewers. The simulcasting arrangement will allow viewers in the Louisville, KY 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 outweigh the minimal service loss, which is largely offset by the presence of alternative stations providing CW network programming.

**Consumer Education and MVPD Notices.** Block hereby certifies that it will provide the consumer education notices required under Section 73.3801(g) and it has provided the MVPD notices required under Section 73.3801(h) of the Commission's rules. 47 C.F.R. §§ 73.3801(g) and (h).

#### **Section 47 C.F.R. § 73.3801(f)(6) Information**

As demonstrated in the attached contour map and as discussed above:

- The predicted population within the noise limited service contour served by WBKI's original ATSC 1.0 signal is 2,187,161; and
- The predicted population within the noise limited service contour served by WBKI's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement with WAVE is 216,240, or 9.9% of the population currently reached by WBKI's signal.

Because the proposed host facility, WAVE, does not meet the 95 percent standard for expedited processing in Section 73.3801(f)(6)(ii) of the FCC's Rules, Block 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 WAVE. The Louisville, KY television market includes only four other full power commercial television stations in addition to WBKI and WAVE: WDRB(TV), WLKY(TV), WHAS-TV and WBNA(TV). The market also contains one full power non-commercial station, WKPC-TV, and that station did not elect to join the market's commercial stations for the ATSC 3.0 transition.

Under the market's original channel plan, WBKI's sister station, WDRB(TV), was to have hosted the WBKI primary programming stream. If WDRB(TV) had been WBKI's 1.0 host, the service loss would have been 2.30%. That channel plan would have required WDRB(TV) to host two HD signals and five SD signals. While Block believes that channel plan would have been technically feasible, WDRB(TV)'s primary network, FOX, would not agree to that channel plan. After FOX rejected the market's original channel plan, Block reviewed its options and the market agreed upon the final channel plan, which is attached.

The final channel plan is the result of extensive and complex negotiations between the in-market station participants and their respective primary networks. The resulting hosting arrangements optimize the resources the partner stations are collectively able and willing to contribute to the project to preserve ATSC 1.0 carriage of each of WBKI's programming streams for as many viewers as possible while permitting the launch of ATSC 3.0 service in the Louisville, KY market. In Louisville, the practical limits on capacity for the stations participating in the transition, along with WBKI's contractual obligation to air its primary programming stream in ATSC 1.0 format in high definition, make the choice of WAVE as the host station for WBKI's CW stream an optimal one. Indeed, the Commission has 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.<sup>1</sup>

Because WBKI needed a 1.0 host that could accommodate an HD stream, WHAS and WBNA were not options, as those stations each already carry 10 or more programming streams. That left WAVE and WLKY as possible host stations for the WBKI primary channel stream and neither WAVE nor WLKY meet the 95% coverage threshold. After a review of the technical and operational requirements for the ATSC 3.0 transition, WAVE was chosen as the 1.0 host station, a decision that was influenced in part by the fact that WAVE currently carries fewer programming streams than does WLKY. All of these factors show that WAVE, in this instance, is the optimal host station for WBKI's primary CW programming stream.

**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 total population loss area that exceeds the Commission's 5% loss standard for expedited processing by only 4.9%. However, the majority of those persons who would lose WBKI's ATSC 1.0 signal are located outside the Louisville, KY DMA. In fact, only 20,728 persons located within the Louisville, KY DMA would lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, constituting just 0.95% of the population within the noise limited service contour served by WBKI's original ATSC 1.0 signal and located within the DMA.

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<sup>1</sup> *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard, Report and Order and Notice of Proposed Rulemaking, 32 FCC Rcd 9930, 9945 (2017).*

Additionally, as discussed above, most of the area that would lose WBKI's ATSC 1.0 service will have access to the CW network programming from other CW affiliates in adjacent markets. When accounting for areas served by either WAVE or adjacent CW network affiliate stations, only 19,510 persons would lose access to CW network programming, or just 0.89% of the population currently reached by WBKI's signal – an amount well below the five percent service loss that the Commission has deemed *per se* acceptable. And, when looking at persons within the Louisville, KY DMA, only 4,553 persons within the DMA will lose access to CW network programming.

To ensure viewers are informed of their options, Block will take appropriate steps to inform viewers of the availability of CW network programming on WAVE and the other CW affiliates.

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

The simulcasting arrangement and final channel plan is in the public interest because it will allow viewers in the Louisville, KY 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 Louisville, KY television market outweigh the minimal service loss, which is largely offset by the location of the service loss outside the Louisville, KY DMA and the presence of alternate stations providing CW network programming.

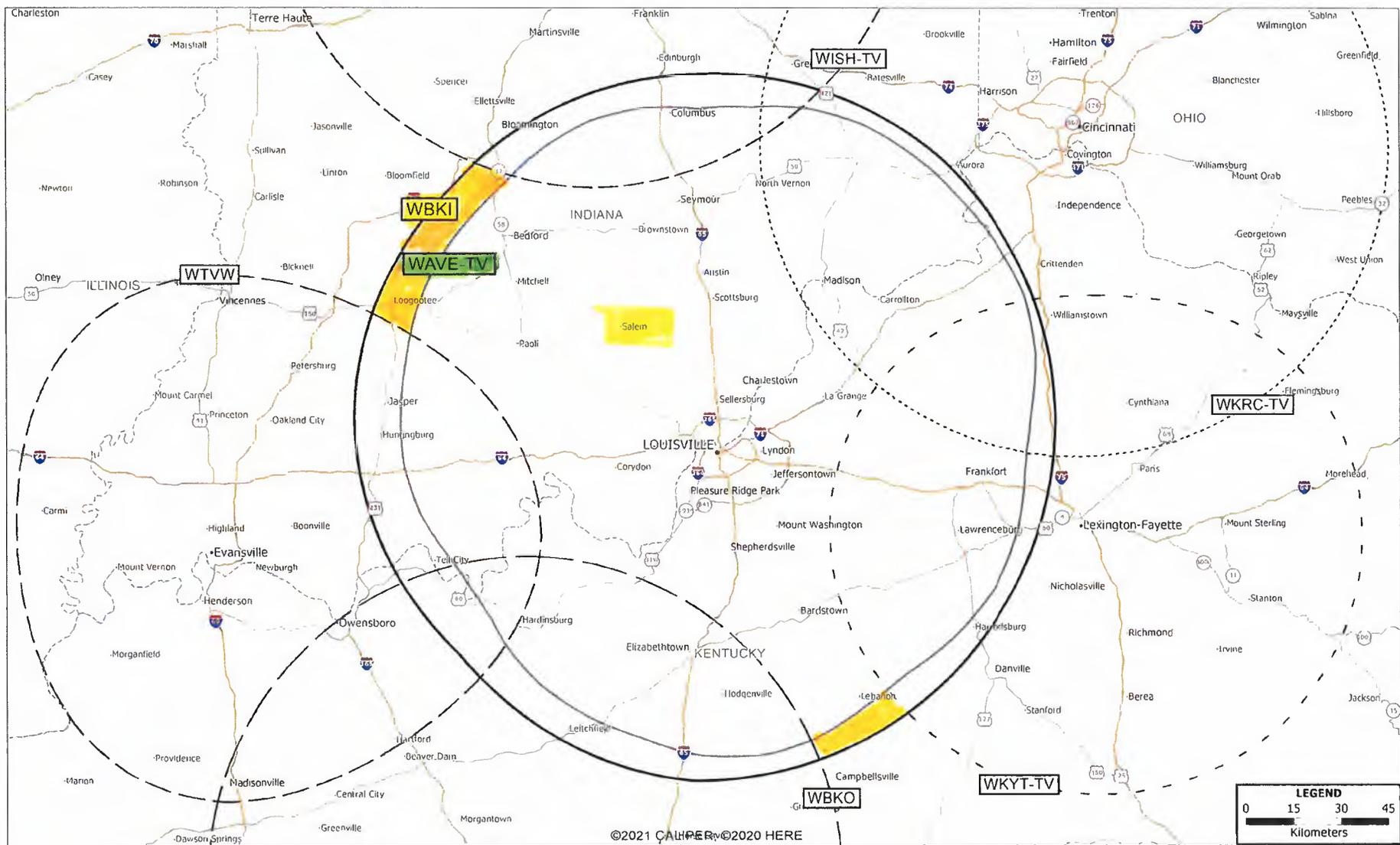
## Channel Map

LOUISVILLE						
Current 1.0 Broadcast Lineups						
1.0 Host:	WBKI Block Comm.	WDRB Block Comm.	WAVE Gray	WLKY Hearst	WHAS Tegna	WBNA Word
HD 1:	CW 720p	FOX 720p	NBC 1080i	CBS 1080i	ABC 720p	Ind. 720p
HD 2:	MyNetwork 720p					
SD 1:	Cozi 480i	Antenna 480i	Bounce 480i	MeTV 480i	True Crime 480i	Start TV 480i
SD 2:	Movies! 480i	ION 480i	Circle 480i	Shop LC 480i	Quest 480i	This TV 480i
SD 3:	True Real 480i	Newsy 480i	Grit 480i	The Grio 480i	Court TV 480i	RTV 480i
SD 4:	Defy 480i			Story TV 480i	Twist 480i	CBN News 480i
SD 5:					Get TV 480i	H & I 480i
SD 6:					HSN 480i	Ion Mystery 480i
SD 7:					Future 480i	This TV 480i
SD 8:					Future 480i	QVC 480i
SD 9:					Future 480i	HSN 480i
SD 10:						WBN 480i
VHF / UHF Repacked?	UHF Repacked	UHF Repacked	UHF Repacked	UHF Repacked	VHF-Hi Not Repacked	UHF Repacked

Louisville Transition Plan				
Transition Mapping - WBKI (Block - CW/MyNetwork) as 3.0 Host				
1.0 Host:	WDRB Block Comm.	WAVE Gray	WLKY Hearst	
HD 1:	FOX 720p	NBC 1080i	CBS 1080i	
HD 2:		CW 720p		
SD 1:	Antenna 480i	Bounce 480i	MeTV 480i	
SD 2:	ION 480i	Circle 480i	Shop LC 480i	
SD 3:	Newsy 480i	Grit 480i	The Grio 480i	
SD 4:	True Real 480i	Cozi 480i	Story TV 480i	
SD 5:	Defy 480i		Movies! 480i	
SD 6:	MyNetwork 480i			
SD 7:				
SD 8:				
SD 9:				

3.0 Broadcast	
3.0 Host:	WBKI - CW Block Communications
Call 2:	WDRB - FOX
Avg. Mbps Allot:	WAVE - NBC
Call 3:	WLKY - CBS
Avg. Mbps Allot:	WHAS - ABC
Call 4:	WBNA - Ind.
Avg. Mbps Allot:	

\*Note: Avg. Mbps uses base mod-cod assumptions and is illustrative to determine technical feasibility.



 = Loss area with no CW network coverage