

Tribune Media Company
WTTK(TV), Kokomo, IN
(Fac. ID 56526)

**Request for Extension of Special
Temporary Authority**

Tribune Media Company (“Licensee”), licensee of WTTK(TV), Kokomo, Indiana, RF Channel 15 (Fac. ID 56526) (“WTTK”), hereby requests an extension of the Special Temporary Authority (“STA”) granted on August 26, 2022 (File No. 0000197446) , in connection with the transition of WTTK’s transition to the ATSC 3.0 broadcast transmission standard and related proposal to broadcast WTTK’s non-primary programming streams (“multicast streams”) in ATSC 1.0 format as noted herein.

Licensee requests that for purposes of enforcement and application of its rules, WTTK be treated as if it is airing the multicast streams over WTTK and be the responsible party under the Act and Commission rules and regulations akin to the manner that the Commission treats ATSC 1.0 primary simulcast streams under the Next Gen TV rules.

As indicated in Licensee’s WTTK’s Form 2100 application, Licensee proposes to (1) commence ATSC 3.0 operations from the current WTTK facilities and (2) simulcast the 15.1 primary stream CBS programming to commonly owned station WXIN(TV), Indianapolis, Indiana (FAC ID 146). To minimize the loss of over-the-air programming to its current ATSC 1.0 viewers resulting from the station’s transition to ATSC 3.0, Licensee proposes to continue to broadcast its existing multicast streams as follows:

Independent programming, airing on RF 15.2, to station WRTV(TV), Indianapolis, Indiana, RF Channel 25 (Fac ID 40877), licensed to Scripps Broadcasting Holdings, LLC.

COZI TV, airing on RF 15.3, to WRTV(TV), Indianapolis, Indiana, RF Channel 25 (Fac ID 40877), licensed to Scripps Broadcasting Holdings, LLC.

As noted in the STA, because of ATSC 1.0 capacity constraints, WTTK is not able to air its multicast streams on WXIN(TV) , 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 WTTK’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 WTTK’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.

Although Licensee has agreed to indemnify the licensee of WRTV 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 WRTV, Licensee is requesting the instant authorization to make clear that Licensee will remain responsible for the Independent and COZI

TV 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 WTTK's ability to air each of its programming streams in the ATSC 1.0 format to ensure that most of WTTK's current viewers can continue to receive the programming currently available to them. It will also make clear that WTTK is an authorized user of a portion of the channels for WRTV and is the party responsible for ensuring compliance with the Communications Act and the Commission's rules and regulations.¹

¹ 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.