

**Request for Extension of Special Temporary Authority**

Flint (WBSF-TV) Licensee, Inc. (“Licensee”), licensee of WBSF(TV), Bay City, MI (Facility ID 82627), hereby requests an extension of the Special Temporary Authority (“STA”) that was granted on March 14, 2022 (and most recently extended on September 23, 2022) in connection with WBSF(TV)’s launch of ATSC 3.0 broadcast service. *See* File Nos. 0000185120 and 0000199536. On March 15, 2022, Licensee commenced ATSC 3.0 operations from WBSF(TV)’s facility, which serves as the ATSC 3.0 host for stations in the Flint, MI market, and began simulcasting its primary stream in ATSC 1.0 format from the facilities of WEYI-TV, Saginaw, MI (Facility ID 72052), pursuant to Licensee’s Next Generation license (*see* File No. 0000185142) and written hosting agreement with HSH Flint (WEYI) Licensee, LLC. Additionally, Licensee began airing its *Charge!* multicast stream from the facilities of WSMH(TV), Flint, MI (Facility ID 21737) pursuant to a written hosting agreement with WSMH Licensee, LLC (“WSMH Licensee”). This request seeks an extension of STA to allow WBSF(TV) to continue the hosting arrangement for its multicast stream affiliated with *Charge!* from the facilities of WSMH(TV) in ATSC 1.0 format.

As explained in Licensee’s original request for STA, WBSF(TV) is not able to air its multicast stream on WEYI-TV, its primary ATSC 1.0 simulcast host, due to ATSC 1.0 capacity constraints. 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 WBSF(TV)’s multicast stream 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. Absent an extension of STA authorizing WBSF(TV) to air its multicast stream using the facilities of the WSMH(TV), all over-the-air viewers would lose access to an ATSC 1.0 signal of WBSF(TV)’s multicast stream. Although Licensee has agreed to indemnify WSMH Licensee from and against all liabilities or claims resulting from or arising out of the programming and advertising broadcast on Licensee’s program stream using the facilities of WSMH(TV), Licensee is requesting extension of the STA to make clear that Licensee will remain responsible for the *Charge!* stream’s compliance with the Communications Act and the Commission’s rules and regulations.

As such, Licensee respectfully requests an extension of the STA. Grant of this STA extension would serve the public interest because it would advance the Commission’s ATSC 3.0 policy goals while preserving WBSF(TV)’s ability to air its multicast programming stream in ATSC 1.0 and ensure access to the programming currently received for over-the-air viewers. It will also continue to make clear that WBSF(TV) is an authorized user of a portion of WSMH(TV)’s channel and is the party responsible for ensuring compliance with the Communications Act and the Commission’s rules and regulations.