

ATSC 1.0 Multicast Host

Exhibit

WRBW

December 8, 2023

Fox Television Stations, LLC (FTS), licensee of WRBW, Orlando Florida (Facility ID 54940) (Station) hereby requests modification of its license¹ to air the Station's non-primary multicast streams using the ATSC 1.0 standards, with no ATSC 3.0 simulcast, on WFTV (Facility ID 72076) and WRDQ (Facility ID 55454), Orlando Florida, licensed to WFTC, LLC (a subsidiary of Cox) (herein Cox Stations), and WKMG-TV (Facility ID 71293), Orlando, Florida, licensed to Graham, Media Group, Orlando, Inc. (Graham Station). The current Special Temporary Authority ("STA") for the multicast streams expires on December 28, 2023 (See File No. 0000216281).

FTS confirms and clarifies that:

- (1) The broadcast ownership rules do not apply to the extent this arrangement would otherwise be in potential violation of those rules; and
- (2) The Station is the licensee originating the non-primary multicast streams and considered the responsible party for compliance with obligations under the Communications Act of 1934, as amended, and the Commission rules and regulations in the same matter as an ATSC 1.0 primary simulcast stream is treated under the Commission's ATSC 3.0 rules and regulations.

As indicated in the Station's NextGen TV license (File No. 0000143935) FTS is operating the Station's facility using the ATSC 3.0 standard and, as required under the Commission's ATSC 3.0 rules, is simulcasting the Station's primary programming stream in the ATSC 1.0 standard as a guest on WOFL (Facility ID 41225).²

In addition to its primary programming stream, the Station broadcasts three non-primary multicast streams: Heroes & Icons, Movies!, and TheGrio-TV. In order to avoid the loss of the

¹ FTS makes this request pursuant to the rules established in the Third Next Gen TV Report and Order, FCC 23-53 (rel. June 23, 2023); see also Media Bureau Announces that All Next Gen TV "Multicast Licensing" Rules are Now in Effect and Next Gen TV License Applications for Multicast Streams Will Now Be Accepted, Public Notice, MB DA 23-1086 (rel. Nov. 16, 2023).

² WOFL is also owned by Fox Television Stations, LLC and is a FOX O&O network station. The Station is a MyNetworkTV network station.

Station's over-the-air non-primary multicast streams to its ATSC 1.0 viewers, FTS entered into written hosting agreements with the Cox Stations and the Graham Station to broadcast those streams using the ATSC 1.0 facilities of the Cox Stations and the Graham Station respectively.

WRBW's 1.0 multicast streams will continue to be relocated on following stations as described below:

Multicast Stream	Resolution	Multicast Host Station	Facility ID	RF Channel	Licensee/Affiliate	Virtual Channel Position
Movies!	480i	WRDQ	55454	27	Cox/Independent	65.2
Heroes & Icons	480i	WKMG-TV	71293	26	Graham/CBS	65.3
The Grio TV	480i	WFTV	72076	35	Cox/ABC	65.4

As part of that same arrangement, FTS is providing the Cox Stations and the Graham Station capacity as ATSC 3.0 guest stations on the Station's ATSC 3.0 facility.

Due to ATSC 1.0 capacity constraints, the Station continues to be unable to air its nonprimary multicast streams on the same host station (WOFL) as its primary ATSC 1.0 programming stream. 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 the Station's ATSC 3.0 facility to simulcast the Station's non-primary multicast streams in the ATSC 3.0 standard without unduly minimizing, if not largely eliminating, the benefits to the public and the participating stations transitioning to ATSC 3.0. The Station's ATSC 3.0 facility is hosting five NextGen TV stations – the Station, WOFL, the Cox Stations and the Graham Station.

Simulcasting the Station's non-primary multicast streams in ATSC 3.0 would reduce capacity available for the NextGen TV stations to offer consumers the improved services that ATSC 3.0 enables. The types of services and improvements that would be precluded would be 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. Each of these require a portion of the ATSC 3.0 capacity that would be unavailable were the Station's ATSC 3.0 facility to simulcast the Station's non-primary multicast streams in ATSC 3.0. Even setting aside these impediments, significant additional engineering work and more equipment would be required to simulcast the Station's non-primary multicast streams using ATSC 3.0 and ATSC 1.0 standards. Obtaining, installing, and testing that equipment would delay and distract from the testing and deployment of improved services that ATSC 3.0 enables.

The ATSC 1.0 non-primary multicast hosting arrangements with the Cox Stations and the Graham Station have enabled FTS to continue providing these streams in the Orlando market.

In that the host stations are in close proximity to WRBW and have similar facilities, there is very little difference in the service provided as shown in the contour comparison maps provided below. In addition, studies of the predicted service provided by the host station facilities inside the licensed WRBW noise limited contour show that two of the host stations provide slightly better service (0.06%) while the other host station provides service to 99.9 % of the previously provided service. See the detailed predicted service results attached below.

Absent this arrangement, and without the grant of the instant licensing request, FTS may not be able to continue to provide the Station's non-primary multicast streams over-the-air, which would request in a complete loss of service to all of the over-the-air viewers of these streams.

FTS provided timely notice to the relevant MVPDs when it relocated its ATSC 1.0 non-primary multicast streams and aired the requisite consumer notices. In order to alleviate any viewer confusion, the PSIP (virtual) channels for each of the Station's program streams remained unchanged and are identified as being associated with the Station.

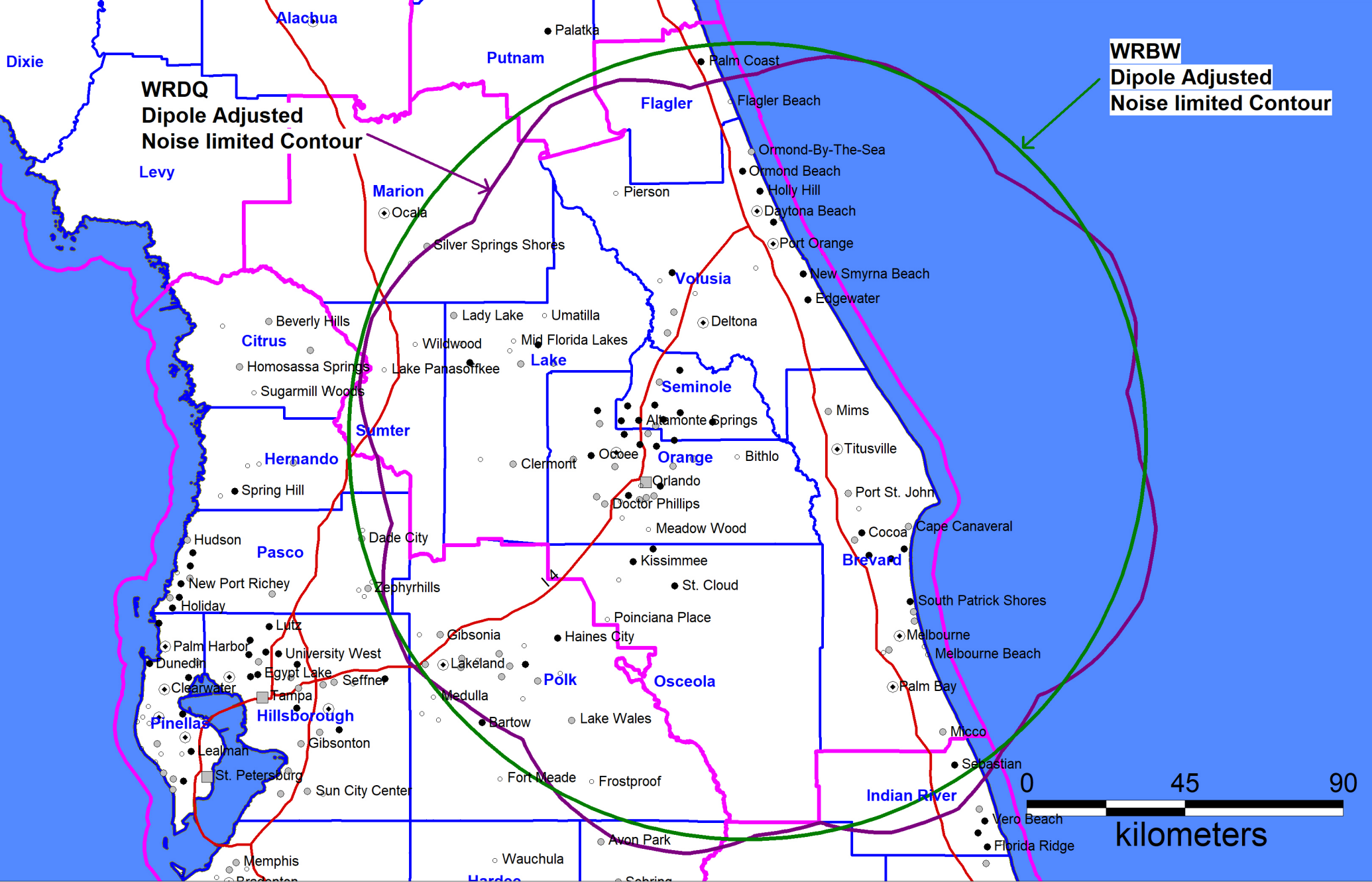
FTS understands that the Station is the licensee originating the non-primary multicast streams and considered the responsible party for compliance with any obligations under the Communications Act of 1934, as amended, and the Commission rules and regulations, is consistent with the arrangements between FTS and each of the Cox Stations and the Graham Station, in connection with which FTS will indemnify the Cox Stations and the Graham Station from all liabilities or claims resulting from the airing of the Station's non-primary streams over their ATSC 1.0 facilities.

FTS understands that grant of the licensing request will make clear that FTS is the sole party responsible for ensuring compliance with all statutory and regulatory requirements with regards to the Station's non-primary multicast streams, including the Commission's rules regarding political broadcasting, children's programming, equal employment opportunities, public inspection file, indecency, sponsorship identification, station identification, contests, the CALM Act, and the Emergency Alert System. With respect to children's programming, the Station schedules one hour per week of regularly scheduled children's core programming and at least 52 hours per year of nonregularly scheduled core programming on its primary programming stream, and thus intends to rely on its non-primary multicast streams for its second hour per week of regularly scheduled core programming in order to comply with the Commission's television programming requirements.³

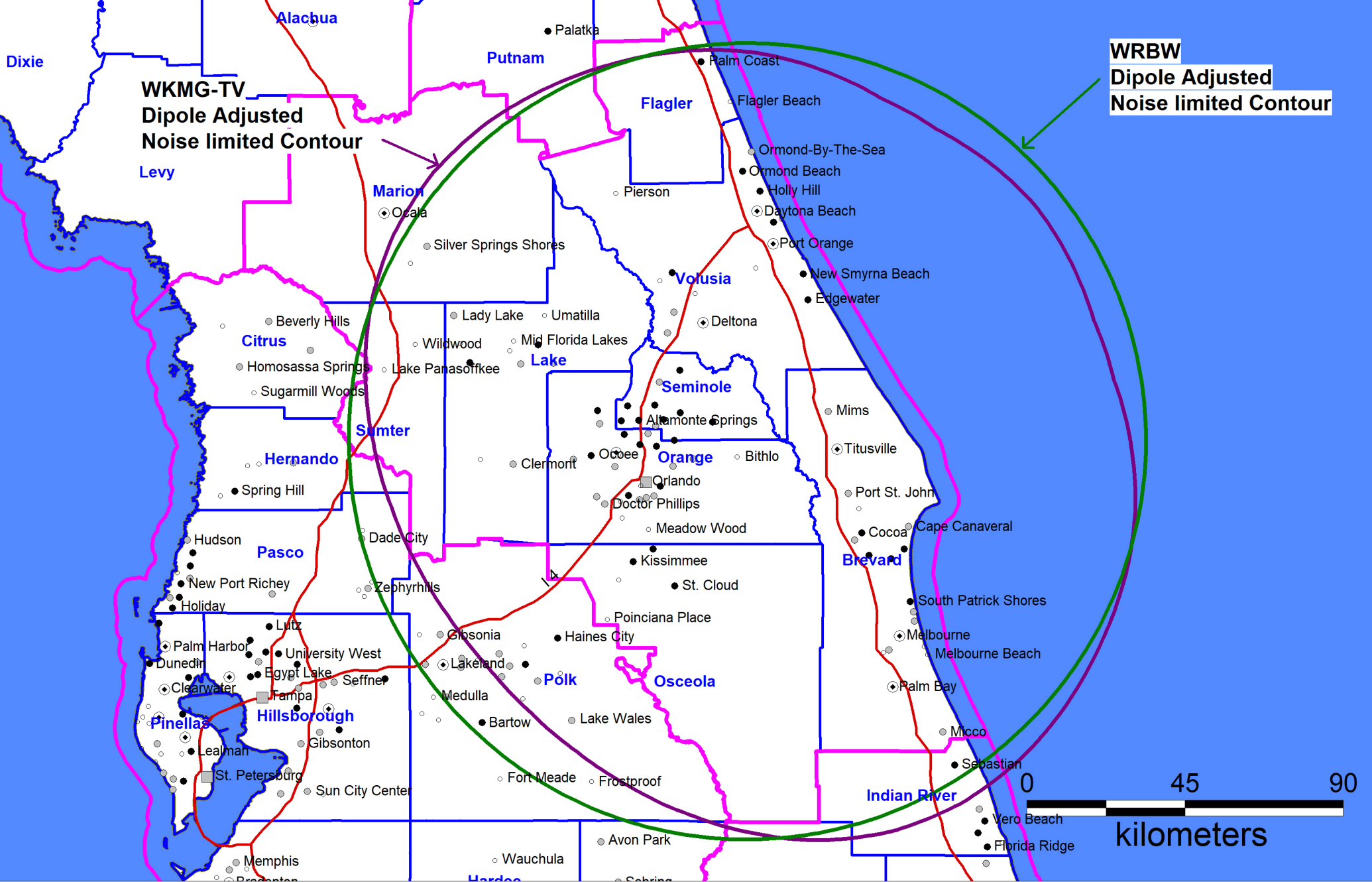
Grant of the licensing request will serve the public interest as it will advance the Commission's ATSC 3.0 policy goals, facilitate the deployment of ATSC 3.0 in light of the evolving nature of

³ See 47 CFR §73.671(d). In its 2022 Children's Television Programming Report (File Number 0000207978), the Station elected to report under Category A, Option 2. The Station has elected the same category for the 2023 calendar year. The Station reports all core programming aired on multicast streams, even though only one hour per week qualifies towards the safe harbor processing guidelines. The Station certifies that WFTV, WRDQ and WKMG-TV are host stations that serve at least 95 percent of the predicted population served by the Station's 1.0 signal as required by 47 CFR § 73.3801(i)(3).

NextGen deployment, and promote the continued over-the-air transmission of the Station's non-primary multicast streams in the ATSC 1.0 standard.

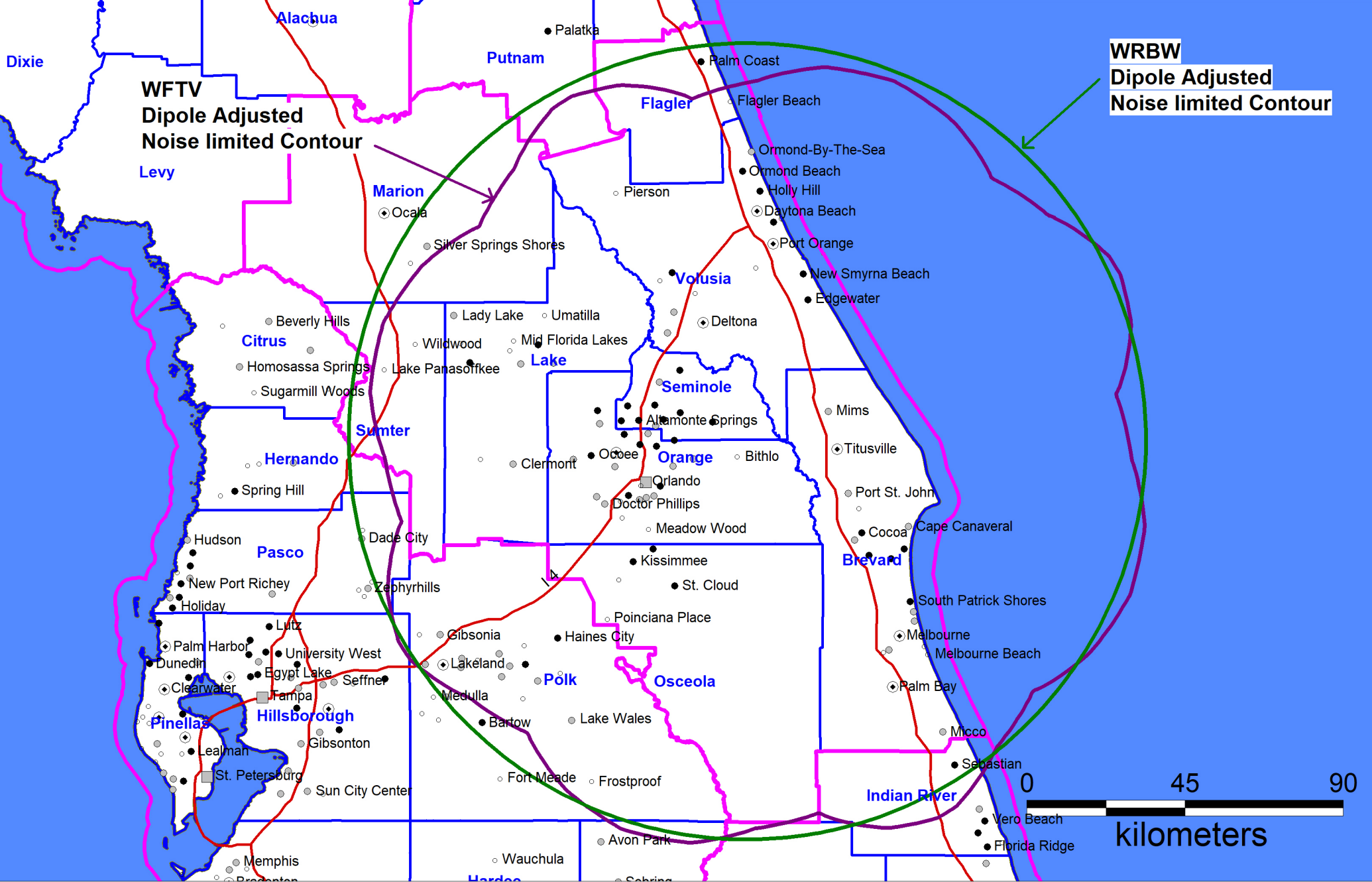


WBRW Orlando, FL - WRDQ Orlando, FL
Noise Limited Contour Compare



WBRW Orlando, FL - WKMG-TV Orlando, FL
Noise Limited Contour Compare

DMA Boundry



WBRW Orlando, FL - WFTV Orlando, FL
Noise Limited Contour Compare

Predicted Service Comparison

WRBW Channel 28 Orlando, FL

Licensed Facility

Versus

Proposed ATSC 1.0 Diginet Hosts

WRDQ Channel 27 Orlando, FL

WKMG-TV Channel 26 Orlando, FL

WFTV Channel 35 Orlando, FL

Based on the predicted service analysis results detailed in the tabulations shown below, there will be a service gain for two of the dignets and an insignificant loss in service for the third, between that now provided by WRBW and the proposed ATSC 1.0 diginet hosts.

Predicted Service Gain/Loss Percentages

WRBW vs. WRDQ 0.06%

WRBW vs. WKMG-TV -0.1%

WRBW vs. WFTV 0.06%

Noise Limited Predicted Service Comparison
WRBW CH 28 Orlando, FL vs WRDQ CH 27 Orlando, FL Inside WRBW NLC

State	County	WRBW Licensed ERP 1,000 kW OMNI HAAT 446 m		WRDQ Licensed ERP 1,000 kW DA HAAT 490 m		Gain / Loss	
		Population	Households	Population	Households	Population	Households
FL	BREVARD	543,376	229,692	543,376	229,692	0	0
FL	CITRUS	426	206	426	206	0	0
FL	FLAGLER	92,705	37,899	92,705	37,899	0	0
FL	HERNANDO	6,362	2,573	6,362	2,573	0	0
FL	HIGHLANDS	96	49	96	49	0	0
FL	HILLSBOROUGH	297	157	297	157	0	0
FL	INDIAN RIVER	37,742	14,885	37,742	14,885	0	0
FL	LAKE	297,052	121,289	297,052	121,289	0	0
FL	MARION	103,914	44,069	103,914	44,069	0	0
FL	OKEECHOBEE	225	66	225	66	0	0
FL	ORANGE	1,145,956	421,847	1,145,956	421,847	0	0
FL	OSCEOLA	268,685	90,603	268,685	90,603	0	0
FL	PASCO	19,646	7,559	19,646	7,559	0	0
FL	POLK	538,617	204,477	541,211	205,452	2,594	975
FL	PUTNAM	11,882	4,709	11,882	4,709	0	0
FL	SEMINOLE	422,718	164,706	422,718	164,706	0	0
FL	SUMTER	92,035	40,731	92,035	40,731	0	0
FL	VOLUSIA	494,593	208,236	494,593	208,236	0	0
TOTALS		4,076,327	1,593,753	4,078,921	1,594,728	2,594	975

Noise Limited Predicted Service Comparison
WRBW CH 28 Orlando, FL vs WKMG-TV CH 26 Orlando, FL Inside WRBW NLC

State	County	WRBW Licensed ERP 1,000 kW OMNI HAAT 446 m		WKMG-TV Licensed ERP 1,000 kW DA HAAT 515.4 m		Gain / Loss	
		Population	Households	Population	Households	Population	Households
FL	BREVARD	543,376	229,692	543,376	229,692	0	0
FL	CITRUS	426	206	426	206	0	0
FL	FLAGLER	92,705	37,899	92,705	37,899	0	0
FL	HERNANDO	6,362	2,573	5,998	2,425	-364	-148
FL	HIGHLANDS	96	49	96	49	0	0
FL	HILLSBOROUGH	297	157	297	157	0	0
FL	INDIAN RIVER	37,742	14,885	37,742	14,885	0	0
FL	LAKE	297,052	121,289	297,052	121,289	0	0
FL	MARION	103,914	44,069	103,914	44,069	0	0
FL	OKEECHOBEE	225	66	225	66	0	0
FL	ORANGE	1,145,956	421,847	1,145,956	421,847	0	0
FL	OSCEOLA	268,685	90,603	268,685	90,603	0	0
FL	PASCO	19,646	7,559	19,129	7,384	-517	-175
FL	POLK	538,617	204,477	535,279	203,118	-3,338	-1,359
FL	PUTNAM	11,882	4,709	11,882	4,709	0	0
FL	SEMINOLE	422,718	164,706	422,718	164,706	0	0
FL	SUMTER	92,035	40,731	92,035	40,731	0	0
FL	VOLUSIA	494,593	208,236	494,593	208,236	0	0
TOTALS		4,076,327	1,593,753	4,072,108	1,592,071	-4,219	-1,682

Noise Limited Predicted Service Comparison
WRBW CH 28 Orlando, FL vs WFTV CH 35 Orlando, FL Inside WRBW NLC

State	County	WRBW Licensed ERP 1,000 kW OMNI HAAT 446 m		WFTV Licensed ERP 1,000 kW DA HAAT 489 m		Gain / Loss	
		Population	Households	Population	Households	Population	Households
FL	BREVARD	543,376	229,692	543,376	229,692	0	0
FL	CITRUS	426	206	426	206	0	0
FL	FLAGLER	92,705	37,899	92,705	37,899	0	0
FL	HERNANDO	6,362	2,573	6,362	2,573	0	0
FL	HIGHLANDS	96	49	96	49	0	0
FL	HILLSBOROUGH	297	157	297	157	0	0
FL	INDIAN RIVER	37,742	14,885	37,742	14,885	0	0
FL	LAKE	297,052	121,289	297,052	121,289	0	0
FL	MARION	103,914	44,069	103,914	44,069	0	0
FL	OKEECHOBEE	225	66	225	66	0	0
FL	ORANGE	1,145,956	421,847	1,145,956	421,847	0	0
FL	OSCEOLA	268,685	90,603	268,685	90,603	0	0
FL	PASCO	19,646	7,559	19,646	7,559	0	0
FL	POLK	538,617	204,477	541,211	205,452	2,594	975
FL	PUTNAM	11,882	4,709	11,882	4,709	0	0
FL	SEMINOLE	422,718	164,706	422,718	164,706	0	0
FL	SUMTER	92,035	40,731	92,035	40,731	0	0
FL	VOLUSIA	494,593	208,236	494,593	208,236	0	0
TOTALS		4,076,327	1,593,753	4,078,921	1,594,728	2,594	975