

**EXHIBIT IN SUPPORT OF  
PROCESSING PURSUANT TO RULE 73.3801(f)(6)(iii)  
(Amended February 22, 2024)**

Graham Media Group, San Antonio, Inc. (the “Licensee”), licensee of KSAT-TV, San Antonio, Texas (Facility ID No. 53118) (“KSAT-TV”), submits this exhibit in support of the instant application and under the Commission’s “case-by-case” processing standard for ATSC 3.0 applications that do not meet the 95% standard for expedited processing. *See* 47 C.F.R. § 73.3801(f)(6)(iii).

As set forth in the instant application, KSAT-TV’s primary programming stream would be simulcast in the ATSC 1.0 standard as a guest on KLRN, San Antonio, Texas (FCC Facility ID No. 749). Both KSAT-TV and KLRN are assigned to the San Antonio Designated Market Area (“DMA”).

As demonstrated in the accompanying Engineering Statement,<sup>1</sup> the noise limited service contour (“NLSC”) of KLRN’s ATSC 1.0 signal covers 2,374,472, or 92.6%, of the 2,563,309 predicted population covered by the NLSC of KSAT-TV’s ATSC 1.0 signal. Thus KLRN, as the proposed ATSC 1.0 simulcast host for KSAT-TV’s primary stream, does not satisfy the 95% coverage standard for expedited processing of the instant application. *See* 47 C.F.R. §§ 73.3801(f)(5), (6)(ii)(C).

Pursuant to 47 C.F.R. § 73.3801(f)(6)(iii), the Licensee requests grant of the accompanying application under the Commission’s “case-by-case” processing standard and provides the following information in support of this request:

- I. There Is No Other Possible ATSC 1.0 Host Station in the DMA That Would Result in Less Service Loss (47 C.F.R. § 73.3801(f)(6)(iii)(A)(1))*

The proposed ATSC 3.0 deployment of KSAT-TV as an ATSC 3.0 lighthouse would result in KSAT-TV being the second ATSC 3.0 lighthouse in the San Antonio DMA—KMYS (Deerfield Media) already serves as an ATSC 3.0 lighthouse and hosts 3 other San Antonio stations, in addition to KMYS, in ATSC 3.0. As such, the availability of other stations to serve as the ATSC 1.0 host station for KSAT-TV’s primary stream in the San Antonio DMA is already limited by the earlier ATSC 3.0 deployment in the market.

The following television stations in the San Antonio DMA are able to participate as ATSC 1.0 hosts with KSAT-TV’s planned ATSC 3.0 deployment:

KLRN (Alamo Public Telecommunications)

KVDA (Comcast/NBC)

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<sup>1</sup> The Engineering Statement demonstrates each of the categories of information set out in 47 C.F.R. § 73.3801(f)(6), including a contour overlap map demonstrating areas of service loss.

KENS (TEGNA)

KNIC-DT (TelevisaUnivision)

However, other than KLRN, none of the above available stations are able to host KSAT-TV's primary ATSC 1.0 stream due to capacity and contractual constraints. And there are no other stations in the San Antonio DMA that are willing to serve as ATSC 1.0 hosts (or to replace KSAT-TV as the ATSC 3.0 lighthouse).

Capacity to host KSAT-TV's primary ATSC 1.0 stream is very limited:

KLRN currently broadcasts 1 high definition ("HD") stream and 3 standard definition ("SD") streams;

KVDA currently broadcasts 1 HD stream and 4 SD streams;

KENS currently broadcasts 1 HD stream and 5 SD streams; and

KNIC-DT currently broadcasts 2 HD streams and 3 SD streams.

Accordingly, KLRN has the most available capacity to host KSAT-TV. To accommodate KSAT-TV's primary ATSC 1.0 stream on a participating station other than KLRN would require reducing the bitrate of a station's existing HD stream(s) or dropping one or more existing SD streams, which the stations are unable to do due to contractual constraints or without disenfranchising viewers of HD programming or entire programming streams.<sup>2</sup> These constraints similarly make adding a multicast replicate service of KSAT-TV's primary ATSC 1.0 stream in SD or using ATSC 1.0 same-service lateral hosting options infeasible.

In short, there are no other "possible host station(s) in the market that would result in less service loss to existing viewers," thus making KLRN the best available simulcast host. *See* 47 C.F.R. § 73.3801(f)(6)(iii)(A)(1).

*II. The Impact of the Service Loss Would be Minimal (47 C.F.R. § 73.3801(f)(6)(iii)(A)(2))*

Under the circumstances, the impact of the service loss on viewers would be minimal. The proposal would result in coverage of 92.6% of the predicted population covered by the NLSC of KSAT-TV's current ATSC 1.0 signal. Such service loss of 7.4% only exceeds the Commission's 5% loss standard by a mere 2.4%, which the Licensee submits is *de minimis*.

Moreover, the majority of those persons who would lose KSAT-TV's ATSC 1.0 signal are located outside of the San Antonio DMA. As shown in the Engineering Statement, the proposal would result in coverage of **97.9%** of the predicted population covered by the NLSC of KSAT-TV's current ATSC 1.0 signal who are also located inside the San Antonio DMA. As such,

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<sup>2</sup> Prior to filing the instant application, the Licensee did stop airing two SD programming streams on KSAT-TV in order to facilitate the ATSC 3.0 deployment because there were no other stations available to host those SD streams in ATSC 1.0.

the proposal would exceed the 95% coverage standard relative to viewers in the San Antonio DMA.

Furthermore, the service loss areas are served by other stations affiliated with KSAT-TV's television network—ABC. As demonstrated in the attached predicted coverage contour map, **98.9%** of the population covered by KSAT-TV's current ATSC 1.0 signal would continue to have access to ABC network programming. In particular, the ABC affiliate in the Austin DMA, KVUE, serves 109,709 persons in the loss areas, the ABC affiliate in the Corpus Christi DMA, KIII, serves 33,315 persons in the loss areas, and the ABC affiliate in the Victoria DMA, KAVU-TV, serves 17,215 persons in the loss areas.

Accordingly, most of the areas that would lose KSAT-TV's ATSC 1.0 service would have access to ABC network programming from another source. The Licensee will take appropriate steps to inform viewers of the availability of ABC network programming from other sources as necessary.

*III. The Public Interest Benefits Outweigh the Minimal Service Loss (47 C.F.R. § 73.3801(f)(6)(iii)(A)(3))*

The benefits of granting this application far outweigh any potential harms, thus making a grant in the public interest. Again, as demonstrated above, the service loss is negligible given that (a) the loss exceeds the 5% standard by only 2.4%, (b) the majority of the loss areas are outside of the San Antonio DMA, and (c) the loss areas are served by other stations affiliated with the ABC television network.

The benefits that would flow from granting this application are significant. It would result in the second ATSC 3.0 lighthouse in the San Antonio DMA, thus increasing the number of ATSC 3.0 stations available to the public in the market. This would also further advance the deployment and adoption of ATSC 3.0 and its attendant benefits, including the potential for enhanced video and audio, advanced emergency alerting, and wide-ranging data transmission capabilities. These potential benefits to viewers in the San Antonio DMA outweigh the minimal service loss to viewers who are largely located outside of the San Antonio DMA and served by other ABC television network affiliates.

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For the foregoing reasons, the applicant respectfully requests the grant of the instant application to authorize KSAT-TV to commence broadcasting with an ATSC 3.0 signal.

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Population Inside KSAT Licensed ATSC 1.0 Contour					Coverage in Loss Area from other ABC Stations					
St	County	Population		Difference	Coverage	Inside Loss Area			Net	
		KSAT-TV	KLRN			KAVU-TV	KVUE	KIII	Difference	Coverage
TX	Atascosa	44,911	44,911	0	100.0%	0	0	0	0	100.0%
TX	Bandera	19,690	18,171	-1,519	92.3%	0	0	0	-1,519	92.3%
TX	Bastrop	916	0	-916	0.0%	0	916	0	0	100.0%
TX	Bee	29,163	1,690	-27,473	5.8%	0	0	27,473	0	100.0%
TX	Bexar	1,714,773	1,714,773	0	100.0%	0	0	0	0	100.0%
TX	Blanco	8,823	5,783	-3,040	65.5%	0	3,040	0	0	100.0%
TX	Caldwell	37,994	32,526	-5,468	85.6%	0	5,468	0	0	100.0%
TX	Comal	108,472	108,472	0	100.0%	0	0	0	0	100.0%
TX	DeWitt	16,478	4,771	-11,707	29.0%	11,673	0	0	-34	99.8%
TX	Frio	17,201	12,493	-4,708	72.6%	0	0	0	-4,708	72.6%
TX	Gillespie	2,548	39	-2,509	1.5%	0	1,910	0	-599	76.5%
TX	Goliad	5,525	331	-5,194	6.0%	4,453	0	756	15	100.3%
TX	Gonzales	18,287	17,177	-1,110	93.9%	306	804	0	0	100.0%
TX	Guadalupe	131,533	131,533	0	100.0%	0	0	0	0	100.0%
TX	Hays	155,484	135,216	-20,268	87.0%	0	20,268	0	0	100.0%
TX	Karnes	14,824	14,824	0	100.0%	0	0	0	0	100.0%
TX	Kendall	33,410	33,355	-55	99.8%	0	19	0	-36	99.9%
TX	Kerr	23,417	4,828	-18,589	20.6%	0	0	0	-18,589	20.6%
TX	La Salle	179	10	-169	5.6%	0	0	0	-169	5.6%
TX	Lavaca	310	0	-310	0.0%	310	0	0	0	100.0%
TX	Live Oak	9,287	4,187	-5,100	45.1%	0	0	5,084	-16	99.8%
TX	McMullen	673	554	-119	82.3%	0	0	2	-117	82.6%
TX	Medina	46,006	45,907	-99	99.8%	0	0	0	-99	99.8%
TX	Travis	77,797	3	-77,794	0.0%	0	77,284	0	-510	99.3%
TX	Uvalde	2,197	0	-2,197	0.0%	0	0	0	-2,197	0.0%
TX	Victoria	473	0	-473	0.0%	473	0	0	0	100.0%
TX	Wilson	42,918	42,918	0	100.0%	0	0	0	0	100.0%
TX	Zavala	20	0	-20	0.0%	0	0	0	-20	0.0%
Total:		2,563,309	2,374,472	-188,837	92.6%	17,215	109,709	33,315	-28,598	98.9%

