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Re: Request for Special Temporary Authority and
Channel Sharing Experimental Authorizations
KLCS (Fac. ID 38430) & KJLA (Fac. ID 14000)
File number: BPEXDT-20140128AHV

Dear Licensees,

This is with reference to the Request for Special Temporary and Channel Sharing Experimental Authorizations filed jointly by the Los Angeles Unified School District, licensee of noncommercial station KLCS, channel 41, Los Angeles, CA (the Sharer) and KJLA, LLC, licensee of commercial station KJLA, channel 49, Ventura, CA (the Sharee). KLCS is a primary PBS station while KJLA is the flagship station for a network distributing multicultural and multilingual content serving that area's Latino population. The stations state that they are responding to the Commission's expression of interest in authorizing one or more channel sharing pilots in order to demonstrate the technical and legal arrangements necessary to implement a successful channel sharing operation.

Both stations request broadcast operations at variance to their presently authorized facilities to implement a Channel Sharing Pilot trial during which the KLCS facilities will host the operations of KJLA. The stated purpose of the experiment is to demonstrate the necessary technical and legal steps for a successful channel sharing operation and advance understanding of channel sharing systems. Because KJLA's signal will also remain on-air at its present location and under its current operating parameters, the trial is not anticipated to have any negative impact on viewers.

The Proposed Channel Sharing Pilot

Both licensees have entered into a Pilot Agreement under which KLCS and KJLA will engage in testing up to and including shared use of the channel rights held by KLCS. This testing will explore the feasibility and practicality of over-the-air channel sharing as follows:

- Technical feasibility testing for multiplexing of signals on a single bitstream off-air involving a variety of content combinations (for example, multiple HD streams as well as HD and SD streams); transmission in the H.264 video compression format in addition to the standard MPEG-2 format.
- The development of reliable methodologies for modifying the Program and System Information Protocol ("PSIP") information to limit consumer disruption and ensure reliable data during over-the-air testing.
- Channel sharing using of a variety of configurations with replication during off-peak hours. (For example, KJLA will provide content to KLCS and KLCS will transmit the shared bitstream to determine the level of reception of the shared channel streams.) During these tests, KLCS will continue to transmit its unaltered signal with all of its broadcast streams pursuant to its licensed operating parameters.
- In the final phase, implementation of full-time channel sharing, with KJLA remaining on-air, while KLCS transmits a shared bitstream with content from both stations using different virtual channels.

Both licensees state that, during each phase of the trial, the stations will monitor performance of the pilot through a study of their actual video bitstreams, and will attempt a variety of video feeds (for example, multiple HDTV streams, multiple HDTV streams plus additional SDTV streams, etc.) to ascertain the feasibility of channel sharing between two unaffiliated broadcast stations. Before proceeding to each successive phase of testing, the stations will agree that any video degradation occurring will be within acceptable bounds.

The licensees represent that during the Channel Sharing Pilot they will utilize their portion of the transport stream consistent with Commission rules, including subdividing their use

into multiple sub-channels. Further, the stations intend to experiment with implementation of statistical multiplexing to improve the delivered picture quality of their multicast channels. They propose to capture video and audio data during the testing that will allow analysis of the effects of channel sharing on video and audio quality.

During the Channel Sharing Pilot, both stations note that they will retain their respective licenses and continue to operate their channels to provide over-the-air service to their respective viewing audiences. Each station pledges to continue to comply with the Commission's rules and policies for broadcast television stations.

Discussion

The Spectrum Act¹ authorizes channel sharing by television licensees as one possible means of participation in the incentive auction of broadcast television spectrum. As the applicants note, the Commission has stated that "participation in a channel sharing arrangement has the potential to benefit broadcasters and the viewing public in addition to freeing spectrum for new wireless services."² These public interest benefits include the potential reduction in operating costs, additional income to broadcasters that can be directed into better programming choices, and providing small, minority-owned, and other "niche" stations with an opportunity to enhance or preserve their local program offerings.³

We find that the Channel Sharing Pilot is in the public interest, as it may help to demonstrate the feasibility of successful channel sharing between two independently owned stations. It also may serve as a model for other stations contemplating participation in the incentive auction, using the channel sharing option, and provide information about the technical implementation of channel sharing agreements. We do not anticipate enforcement issues that would impede the accomplishment of the experiment.

Accordingly, the Request for Special Temporary Authority and Channel Sharing Experimental Authorizations ARE GRANTED subject to the following conditions:

1. Pursuant to Section 5.207, a report will be filed with each application for renewal of this authorization, containing the information required by that Section and any other relevant information deemed appropriate by the licensees. In addition, should any unusual problems or conditions arise during the authorization period, the licensees shall inform the Commission of them at the time they occur.
2. Consistent with our rules pertaining to channel sharing in conjunction with the reverse auction, we will consider Channel 41 to be separately licensed to KLCS and KJLA during the limited duration of this experiment, and each will be separately subject to all of the Commission's obligations, rules, and policies. 47 C.F.R. § 73.7300(a), (b)(4). Because KLCS will remain an

¹ Pub. L. No. 112-96, §§ 6402, 6403, 125 Stat 156 (2012).

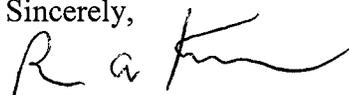
² *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Report and Order, 27 FCC Rcd 4616, para. 12 (2012).

³ *Id.*

NCE licensee, it is prohibited from broadcasting advertisements on its portion of the shared channel. 47 U.S.C. § 399b (b)(2). Any advertisements broadcast on a portion of the shared channel during the course of this experiment must be limited to KJLA's portion of the shared channel.

3. The experiment may be terminated at any time, upon notification to the Commission. During the Channel Sharing Pilot KJLA may operate on the KLCS digital streams to the extent necessary to conduct the test.
4. A report of the research, experimentation, and results, showing both positive and/or negative aspects of this experiment, shall be submitted to the Commission six months from the date of this letter and at the conclusion of this experimental operation should this authorization be renewed.
5. This experimental operation shall be conducted in compliance with Section 1.1307(b) of the Commission's radio frequency radiation rules.
6. This authority expires **six months** from the date of this letter.

Sincerely,



Barbara A. Kreisman
Chief, Video Division
Media Bureau