

Request for Special Temporary Authority

By this request for Special Temporary Authority, Mako Communications, LLC (“Licensee”), licensee of UHF low-power broadcast digital television station KVPX-LD, Las Vegas, NV (Facility ID No. 8887; FCC File No. BLDL-20111006ACC) (“KVPX”), seeks authority from the Federal Communications Commission (“FCC” or “Commission”) to operate KVPX at a variance from its license from December 16, 2014, through January 9, 2015. During two periods within this timeframe, Licensee desires to conduct broadcasts on KVPX’s licensed channel 28 using the draft version of the ATSC 3.0 standard currently under development, which involves OFDM emissions. Specifically, Licensee plans to operate at a variance from its license between December 16th-20th, 2014, for purposes of testing, and from January 1st-9th, 2015, for purposes of demonstrating ATSC 3.0 broadcasts during the Consumer Electronics Show (“CES”), which will be held in Las Vegas, Nevada.¹ During the remainder of the STA period, KVPX intends to remain off the air.² In collaboration with Samsung Electronics America (“Samsung”), Licensee proposes to operate using ATSC 3.0 during the STA periods in connection with Samsung’s demonstration at CES of new Samsung products, including fixed TVs and tablets.³

¹ For more information about CES, see <http://www.cesweb.org/>.

² Although Licensee anticipates operating at a variance from its license only during the two discrete periods stated in the text, Licensee requests authority to operate at variance from its license during the entire period from December 16, 2014, through January 9, 2015 to accommodate schedule changes resulting from inclement weather, equipment problems, or other unforeseen circumstances.

³ KVPX was selected by Samsung for purposes of this collaboration because of its coverage of downtown Las Vegas, its geographic proximity to the CES conference where Samsung’s product

During the aforementioned testing and demonstration periods, KVPX will use a 0.6kW capable UHF transmitter system in which the transmitter includes the RF spectrum emission mask filter (to meet the ATSC stringent mask requirement). The transmitter will emit an OFDM-modulated waveform of less than 6MHz bandwidth and the transmitted signal will be received by the brand new Samsung TV product with ATSC 3.0 Demodulator FPGA near the Las Vegas Convention Center. KVPX will not exceed its currently-licensed power, nor will its directional service contour change. The average transmitter power output (“TPO”) will be no greater than the 0.8 kW TPO currently authorized by KVPX’s license. The waveform has been designed to have the same spectral occupancy of the 8-VSB waveform, and the emission will be compliant with the emission mask for out-of-channel radiation set forth in Section 73.622(h) of the Commission’s rules.⁴ Consequently, no interference to adjacent channels or any other facility or licensee is predicted.

During the periods of testing and Samsung’s product demonstration, KVPX’s viewers will be unable to receive KVPX’s broadcast signal using their conventional television receivers. However, KVPX airs the same programming that Licensee airs on another of its Las Vegas stations, UHF digital low-power digital broadcast television station KEGS-LD, Las Vegas, Nevada (Facility ID No. 168004; FCC File No. BLDTL-20100104ABL) (“KEGS”) operating on channel 24. The noise-limited service contour of KEGS fully encompasses the contour of KVPX. As a result, no viewer will be deprived of the KVPX programming during the requested STA

demonstration will be held, and the fact that no KVPX viewer will be deprived of access to programming during the STA period.

⁴ 47 C.F.R. § 73.622(h).

period.

The Media Bureau has previously granted similar requests for testing and demonstration of new and evolving broadcast technologies, such as ATSC 3.0, including at least one grant of experimental authority for ongoing operations extending, in the aggregate, for two years. *See, e.g.,* FCC File No. BPEXDT-20130116AFF (granting experimental authority to WNUV, Baltimore, Maryland on Feb. 15, 2013), extended in FCC File Nos. BEPEXDT-20130815ACX and BEPEXDT-20140226AGS. In contrast to the authority for ongoing, regular experimental operations granted to WNUV, the instant request is for a very limited period of time—14 days. *See also* FCC File No. BLDSTA-20140729ACG (granting an STA to WKOW(TV) on August 22, 2014 to conduct tests to evaluate the performance of OFDM).

Licensee requests prompt Commission approval of this STA request. Such approval is consistent with the public interest because it will enable real-world testing of ATSC 3.0 transmissions by Samsung, a leading global television manufacturer, and will enable Samsung to introduce the benefits of this transmission standard to CES attendees—an audience of important technology industry leaders and participants. Further, the proposed operations will be for a very short period of time over a limited number of days, no interference is predicted to be caused to any other licensee or facility, and no viewers will be deprived of programming during the STA period. Accordingly, grant of this STA request will not result in any public interest harms.