October 29, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
GN Docket No. 16-142

Dear Ms. Dortch:

On behalf of the Low Power Television Broadcasters Association ("LPTVBA"), we write in response to the October 26, 2026, Notice of Ex Parte Communication filed by Patrick McFadden of Sinclair Inc. regarding the Commission's Further Notice of Proposed Rulemaking to accelerate the transition to ATSC 3.0 in GN Docket No. 16-142.

LPTVBA supports all broadcast standards—ATSC 1.0, ATSC 3.0, 5G Broadcast, and any future standard. It is up to the individual licensee to decide the best standard to meet their community needs and the public interest. If full-power stations wish to mandate a standard for full-power television, we stand behind the National Association of Broadcasters (NAB). However, we do not believe Class A stations should be included in any such request, as they are LPTV at heart with more regulatory requirements and contour protection, but not with all the benefits of full power. LPTVBA is strongly opposed to any mandate for translators, LPTV, or Class A stations.

In its February 26, 2025 Petition for Rulemaking filed with the FCC in GN Docket No. 16-142 seeking a mandatory transition to ATSC 3.0, the NAB explicitly stated that it "does not recommend subjecting low power television stations or television translator stations to any requirement to transition to ATSC 3.0." Under the NAB's proposed two-phase plan, full-power stations in the top 55 markets would be required to complete the transition by February 2028, with remaining full-power and Class A stations following by February 2030, while LPTV and translator stations would be excluded from any such mandatory deadline. This position is reflected in the petition itself and in the NAB's accompanying materials describing the timeline as applying to full-power and Class A stations.

Sinclair's call for a coordinated, organized nationwide transition and a sunset of ATSC 1.0 signals, while consistent with its comments in this proceeding, must not be construed or applied in a manner that imposes a mandatory transition or sunset on LPTV, Class A, or translator stations. These stations constitute a distinct service under the Commission's rules, typically operated as small businesses serving local communities, rural areas, and specialized audiences. A mandatory transition would impose prohibitive costs on many such licensees, potentially forcing stations out of business and reducing free over-the-air local television options for viewers who rely on ATSC 1.0 receivers.

Importantly, LPTV stations will continue to serve all the broadcast television viewers left behind by ATSC 3.0, which currently comprises 85-90% of television viewers.[1] Maintaining ATSC 1.0 service on LPTV channels ensures that free, over-the-air local television remains universally available during and after any full-power transition, protecting the large majority of viewers who continue to rely exclusively on legacy ATSC 1.0 receivers.

LPTVBA continues to urge that any Commission action accelerating the transition to ATSC 3.0 or directing a sunset of ATSC 1.0 apply solely to full-power stations, consistent with the NAB's stated position. Licensees of LPTV, Class A, and translator stations must retain the flexibility to choose the transmission standard—whether ATSC 1.0, ATSC 3.0, 5G Broadcast, or another approved standard—that best serves the public interest in their communities.

Please do not hesitate to contact us with any questions.

Respectfully Submitted,

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cc: Allison Howell
Alex Sanjenis

[1]Pearl TV, October 19, 2026; ATSC industry reporting, June 2026.