

Response to Question 43
Exhibit 1 – Description of Application for Earth Station Registration

TEGNA Broadcast Holdings, LLC (“TEGNA”) respectfully submits this application for a new earth station registration to preserve the interference protection for three C-band antennas at TEGNA’s station WZDX (the “WZDX Antennas”) that currently appear in Nexstar Media Inc.’s (“Nexstar’s”) registration for earth station Call Sign E191437.¹ These antennas are critical to the operations of TEGNA station WZDX, and a new registration is necessary to ensure that the antennas remain protected from interference following the C-band transition.

TEGNA has had ownership of and control over the WZDX Antennas since TEGNA’s September 2019 acquisition of the station from Nexstar.² However, because of administrative challenges associated with the C-band filing freeze³ and the format of Nexstar’s E191437 registration,⁴ the antennas were never assigned to TEGNA through the International Communications Filing System. As a result, the WZDX Antennas remain associated with

¹ See ICFS File No. SES-REG-20181005-05059. Attachment 1 identifies the WZDX Antennas as they currently appear in Nexstar’s E191437 registration.

² See *In re Applications of Tribune Media Co. (Transferor) and Nexstar Media Grp., Inc. (Transferee)*, et al., Memorandum Opinion and Order, 34 FCC Rcd 8436 (2019); CDBS File No. BALCDT-20190403ABX (granted Sept. 16, 2019).

³ See *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7–4.2 GHz Band*, Public Notice, 33 FCC Rcd 3841 (PSHSB, WTB Apr. 19, 2018); see also *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2407 ¶ 149 (2020) (“[W]e convert the freeze for new FSS earth stations in the 3.7-4.0 GHz band in the contiguous United States into an elimination of the application process for registrations and licenses for those operations . . .”).

⁴ Nexstar’s E191437 registration is one of several blanket authorizations for many different earth station sites. The E191437 registration includes forty-seven separate antenna Site IDs. See ICFS File No. SES-REG-20181005-05059.

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Nexstar, not TEGNA, even though TEGNA has been the owner and operator of these antennas since the 2019 acquisition.

To correct the Space Bureau's records and identify the appropriate registrant for the WZDX Antennas, these antennas need to be removed from Nexstar's E191437 registration. However, doing so will leave these antennas – each of which the Space Bureau classified as an incumbent earth station for the purposes of the C-band transition – without a corresponding registration, eliminating their interference protection in the repacked 4.0–4.2 GHz band. To avoid this result, TEGNA respectfully requests that the Space Bureau grant a new registration for the WZDX Antennas so that the Bureau's files properly identify TEGNA as the owner of record. To ensure the accuracy of the Bureau's records, TEGNA also requests that the new registration reflect certain administrative corrections. Grant of this new application – and the requested corrections – would be consistent with the Space Bureau's prior processing of a new registration for C-band antennas operating at TEGNA station WOI-DT, which, like the WZDX Antennas at issue, previously were covered by a Nexstar registration.⁵

To assist with the Space Bureau's review, this exhibit includes two Attachments. Attachment 1 lists the entries for the WZDX Antennas in Nexstar's E191437 registration. Attachment 2 lists the information for these same antennas as they appear in the accompanying

⁵ See ICFS File No. SES-AMD-20230920-02393 (filed Sept. 20, 2023). In response to TEGNA's original application for a new earth station registration for its WOI-DT antennas (ICFS File No. SES-REG-20211222-01939), the Space Bureau assigned these antennas Call Sign E210448. Each of these E210448 antennas appeared in the Bureau's March 3, 2023 Incumbent C-band Earth Station list, as well. See *Updated Incumbent C-Band Earth Station List March 3, 2023* at 76, attached to *International Bureau Releases Updated List of Incumbent Earth Stations in the 3.7-4.2 GHz Band in the Contiguous United States*, Public Notice, 38 FCC Rcd 1414 (IB Mar. 3, 2023).

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FCC Form 312, which includes updates to correct the administrative inaccuracies that currently appear in Nexstar's E191437 registration. To clarify, TEGNA does not seek to register any new antennas; all the information for which TEGNA seeks correction in its new registration relates to the same antennas that appear in the existing E191437 registration. TEGNA has no knowledge as to why this information may have been inaccurate in the original E191437 registration.

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Attachment 1

Attachment 1: TEGNA WZDX Antennas in Current Nexstar E191437 Registration

Antenna Number¹	Site ID	Antenna ID	Units	Diameter (Meters)	Manufacturer	Model Number
44	WZDX Studio1	Gal16, 3c	2	4.6	Andrews	Unknown
45	WZDX Studio2	Gal19, SES1	2	4.8	Unknown	Unknown
46	WZDX Studio3	Sat C	1	3.8	Comtech	Unknown
47	WZDX Studio4	Sat D	1	2.8	DH	Unknown

¹ This “Antenna Number” column reflects the entries for the WZDX Antennas in Section A (“Site Location(s)”) of Nexstar’s E191437 registration.

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Exhibit 1
Attachment 2

Attachment 2: Corrected Information for WZDX Antennas¹

Site ID	Antenna ID	Units	Diameter (Meters)	Manufacturer	Model Number
WZDX Studio	Gal19	1	5.0	AFC	Unknown
WZDX Studio	SES1	1	5.0	AFC	Unknown
WZDX Studio	Sat C	1	3.8	Comtech	Unknown

Please note that the two 5.0-meter antennas (Antenna ID “Gal19” and “SES1”) are the same antennas identified in Nexstar’s current E191437 registration under Site ID WZDX Studio2. TEGNA has no knowledge as to why these antennas originally were identified as 4.8-meter antennas rather than 5.0-meter antennas. As part of this new registration, TEGNA respectfully requests that the Space Bureau update the diameter of these antennas to ensure the accuracy of the Bureau’s records.

In addition, please note that TEGNA does not seek a new registration for three antennas currently identified as WZDX antennas in Nexstar’s E191437 registration: (1) Site ID WZDX Studio1, Ant ID “Gal16” (4.6-meter); (2) Site ID WZDX Studio1, Ant ID “3c” (4.6-meter); and (3) Site ID WZDX Studio4, Ant ID “Sat D” (2.8-meter). The only antennas currently operational at the WZDX studio site are the three antennas identified in this Attachment 2.

¹ The following table is a streamlined version of the information that appears in TEGNA’s accompanying Form 312 application. Please note that TEGNA only seeks registration for three antennas. Although Nexstar’s E191437 registration covers six WZDX antennas, only three antennas currently are operational at the site.