ENGINEERING STATEMENT
IN SUPPORT OF AN APPLICATION FOR CONSTRUCTION PERMIT
FOR THE PROPOSED DIGITAL TV OPERATION OF
KSFY-TV, SIOUX FALLS, SOUTH DAKOTA
CHANNEL 13 22.7 KW 610 METERS
MARCH 2008

This engineering statement has been prepared on behalf of Hoak Media of Dakota License, LLC, licensee of TV station KSFY-TV, Sioux Falls, South Dakota, in support of its application for a construction permit for post-transition digital TV (DTV) operation on Channel 13.

At present KSFY-TV, Facility ID Number 48658, operates its analog TV facilities on Channel 13 (210-216 MHz) with 316 kW effective radiated power (ERP) and 610 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. In the Seventh Report and Order (MB Docket No. 87-268) the Commission has allotted Channel 13 for the KSFY-TV's post-transition DTV operation. KSFY-TV is filing its application for a construction permit to operate following the DTV transition on DTV Channel 13 with 22.7 kW ERP and 610 meters HAAT using a non-directional TV antenna.

The following information provides pertinent data for the proposed KSFY-DT operation.

Name of the Licensee:	Hoak Media of Dakota License, LLC
Station Location:	SD-Sioux Falls
Channel:	13
Hours of Operation:	Unlimited
Transmitter:	Type Accepted
Antenna Type:	RCA, TF-12-AH
Beam Tilt:	0.7

Antenna Coordinates:	North Latitude:	43 deg	31 min	07 sec
	West Longitude:	96 deg	32 min	05 sec

Transmitter output power: As required to achieve authorized ERP

Maximum effective radiated power (Average): 22.7 kW
13.56 dBk

Elevation of site above mean sea level: 444.8 meters

Overall height of the tower above ground: 605 meters

Height of radiation center above ground (meters): 595 meters

Height of radiation center above mean sea level (meters): 1039.8 meters

Height of radiation center above average terrain (meters): 610 meters

Antenna Structure Registration Number: 1035413

Response to questions for Post Transition Expedited Processing listed on the FCC Form 301, Section III-D-DTV Engineering

Question 1. (a)

KSFY-TV will operate its DTV operation on Channel 13 as established in 47 C.F.R. Section 73.622.

Question 1. (d)

KSFY-TV is proposing to operate its post-transition facilities which are slightly different than established in Appendix B of the Seventh Report and Order (MB Docket No. 87-268). The minor difference is due to the use of a non-directional DTV antenna which is currently used for analog TV operation while the Appendix B facilities specify a directional DTV antenna. The proposed noise-limited service contour extends no more than 0.2 km in any direction beyond that established by

Appendix B of the Seventh Report and Order in MB Docket 87-268. In addition, an electromagnetic interference study conducted according FCC OET Bulletin 69 indicates the proposed KSFY-DT operation would not cause interference to other DTV stations above the levels specified in Appendix B. The attached Tables I and II show the results of these studies for the Appendix B and proposed KSFY-DT facilities, respectively.

Question 1. (e)

The population within the proposed DTV service area would not be less than 5% of the predicted population defined in the new DTV Table Appendix B.

Waiver Request for Questions 1. (d) and 1. (e)

The proposed KSFY-DT operation complies with the Commission's Filing Freeze Waiver Policy as described in paragraph 151 of the Report and Order in MB Docket 07-91 since it meets the following three conditions:

1. It would allow the station to use its analog TV antenna for its digital TV operation
2. The expansion in service area would be less than 5 miles in any direction than authorized service area as defined by Appendix B facilities
3. It would not cause impermissible interference to other stations. An electromagnetic interference study conducted according to FCC OET Bulleting 69 indicates the proposed KSFY-DT operation on DTV Channel 13 will not cause more than 0.5% new interference to other stations.

Question 2.

The attached environmental statement demonstrates that there will not be any significant environmental impact from the proposed DTV operation in accordance with 47 C.F.R. Section 73.1307.

Question 3.

The attached map shows the proposed KSFY-DT contour will encompass the allotted principal community of Sioux Falls, South Dakota.

Question 4.

The proposed KSFY-DT facility complies with Section 73.1030 of the Commission's rules; therefore, notification to radio astronomy installations, radio receiving installations and FCC monitoring stations is not required.

Question 5.

The existing KSFY-DT tower is registered (ASR No. 1035413) by the Commission and no changes are proposed to require a change in the registration.

TABLE I

OET BULLETIN 69 INTERFERENCE STUDY

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Census data selected 2000

 Post Transition Data Base Selected
/space/software/cdbs/tvdb.sff_G
              TV INTERFERENCE and SPACING ANALYSIS PROGRAM


 Record Selected for Analysis

 KSFY-TV  USERRECORD-01               SIOUX FALLS          SD US
 Channel 13 ERP 22.7   kW   HAAT  610. m  RCAMSL 01040 m
 Latitude 043-31-07  Longitude 0096-32-05
 Status APP       Zone 2    Border
 Dir Antenna Make usr  Model KSFY_FCC        Beam tilt N  Ref Azimuth 0.
 Last update           Cutoff date           Docket
 Comments
 Applicant



 Cell Size for Service Analysis 2.0 km/side

 Distance Increments for Longley-Rice Analysis 1.00 km


 Facility meets maximum height/power limits

    Azimuth     ERP        HAAT   36.0 dBu F(50,90)
     (Deg)      (kW)       (m)        (km)
      0.0       22.383     609.1      120.2
     45.0       22.271     602.0      119.8
     90.0       22.203     593.9      119.2
    135.0       22.271     602.5      119.8
    180.0       22.609     622.6      121.0
    225.0       22.677     626.0      121.2
    270.0       22.293     603.3      119.8
    315.0       22.609     622.9      121.0

                    Evaluation toward Class A Stations


No Spacing violations or contour overlap to Class A stations

                    Class A Evaluation Complete

                    SPACING VIOLATION FOUND BETWEEN STATION

 KSFY-TV  13 SIOUX FALLS          SD USERRECORD01

 and station

 SHORT TO: KPLO-TV  13 RELIANCE             SD BLCDT     20030519AER
 043-57-57  0099-36-11
 Req. separation 273.6 Actual separation 252.1 Short  21.5 km

 SHORT TO: KSFY-TV  13 SIOUX FALLS          SD BDTV      00000121
  43-31-07    96-32-05
 Req. separation 273.6 Actual separation   0.0 Short 273.6 km

 Proposed facility OK to FCC Monitoring Stations

 Proposed facility OK toward West Virginia quiet zone

 Proposed facility OK toward Table Mountain
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Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
13	KSFY-TV	SIOUX FALLS SD	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	KEYC-TV	MANKATO MN	176.8	CP MOD	BMPCDT	-20010223AAQ
12	KTTM	HURON SD	161.4	CP	BPCDT	-19991029ADD
13	WHO-TV	DES MOINES IA	303.5	CP	BPCDT	-19990805LD
13	KFME	FARGO ND	391.8	CP	BDTV	-00000117
13	KPLO-TV	RELIANCE SD	251.3	LIC	BLCDT	-20030519AER

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Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	KEYC-TV	MANKATO MN	BMPCDT	-20010223AAQ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
11	KARE	MINNEAPOLIS MN	160.6	LIC	BLCDT	-20010917ABZ
11	KELO-TV	SIOUX FALLS SD	176.8	LIC	BLCDT	-20030417AAE
12	KIIN	IOWA CITY IA	351.0	CP	BDTV	-00000107
12	KCCW-TV	WALKER MN	333.2	CP	BDTV	-00000097
12	KUON-TV	LINCOLN NE	353.2	CP	BDTV	-00000106
12	KTTM	HURON SD	313.4	CP	BPCDT	-19991029ADD
13	KSFY-TV	SIOUX FALLS SD	176.8	APP	USERRECORD	-01

Proposal causes no interference

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	KTTM	HURON SD	BPCDT	-19991029ADD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
11	KQSD-TV	LOWRY SD	178.2	CP	BDTV	-00000083
11	KELO-TV	SIOUX FALLS SD	161.4	LIC	BLCDT	-20030417AAE
12	KEYC-TV	MANKATO MN	313.4	CP MOD	BMPCDT	-20010223AAQ
12	KCCW-TV	WALKER MN	427.7	CP	BDTV	-00000097
12	KXMB-TV	BISMARCK ND	329.4	CP	BDTV	-00000099
12	KUON-TV	LINCOLN NE	372.2	CP	BDTV	-00000106
12	KRNE-TV	MERRIMAN NE	321.5	CP	BDTV	-00000095
13	KPLO-TV	RELIANCE SD	105.7	LIC	BLCDT	-20030519AER
13	KSFY-TV	SIOUX FALLS SD	161.4	APP	USERRECORD	-01

Proposal causes no interference

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     Analysis of Interference to Affected Station   3


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      WHO-TV     DES MOINES IA             BPCDT     -19990805LD

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KIIN     IOWA CITY IA              188.9  CP     BDTV      -00000107
 13   WREXTV   ROCKFORD IL              364.7  LIC    BLCT      -1372
 13   WCFN     SPRINGFIELD IL            412.7  CP     BPCDT     -19991026ABC
 13   WIBW-TV  TOPEKA KS                 375.4  CP     BDTV      -00000126
 13   WEAU-TV  EAU CLAIRE WI             381.3  CP     BDTV      -00000125
 13   KSFY-TV  SIOUX FALLS SD            303.5  APP    USERRECORD-01

 Total scenarios =   1


Result key:        1
Scenario        1  Affected station        3
Before Analysis

Results for: 13A IA DES MOINES           BPCDT     19990805LD   CP
   HAAT  609.0 m, ATV ERP   36.1 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     1077046      49353.0
   not affected by terrain losses   1062380      48200.1
   lost to NTSC IX                        0         0.0
   lost to additional IX by ATV       23201        297.3
   lost to ATV IX only                23201        297.3
   lost to all IX                     23201        297.3

 Potential Interfering Stations Included in above Scenario     1

13A IL ROCKFORD             BLCT      1372         LIC
13A KS TOPEKA               BDTV      00000126     CP
13A WI EAU CLAIRE           BDTV      00000125     CP

After Analysis

Results for: 13A IA DES MOINES           BPCDT     19990805LD   CP
   HAAT  609.0 m, ATV ERP   36.1 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     1077046      49353.0
   not affected by terrain losses   1062380      48200.1
   lost to NTSC IX                        0         0.0
   lost to additional IX by ATV       23841        494.1
   lost to ATV IX only                23841        494.1
   lost to all IX                     23841        494.1

 Potential Interfering Stations Included in above Scenario     1

13A IL ROCKFORD             BLCT      1372         LIC
13A KS TOPEKA               BDTV      00000126     CP
13A WI EAU CLAIRE           BDTV      00000125     CP
13A SD SIOUX FALLS          USERRECORD01           APP

Percent new IX =    0.0616%

Worst case new IX    0.0616% Scenario      1

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     Analysis of Interference to Affected Station   4


Analysis of current record
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Channel     Call           City/State        Application Ref. No.
   13      KFME       FARGO ND                  BDTV      -00000117

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KCCW-TV  WALKER MN                207.7  CP     BDTV      -00000097
 12   KNRR     PEMBINA ND               220.9  CP     BPCDT     -19991101AKT
 13   WIRT     HIBBING MN               322.7  CP     BPCDT     -19991027ABC
 13   KXMC-TV  MINOT ND                 331.9  CP     BDTV      -00000127
 13   KPLO-TV  RELIANCE SD              387.2  LIC    BLCDT     -20030519AER
 13   KSFY-TV  SIOUX FALLS SD           391.8  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   5


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      KPLO-TV    RELIANCE SD               BLCDT     -20030519AER

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KRNE-TV  MERRIMAN NE              222.6  CP     BDTV      -00000095
 12   KTTM     HURON SD                 105.7  CP     BPCDT     -19991029ADD
 13   KFME     FARGO ND                 387.2  CP     BDTV      -00000117
 13   KTNE-TV  ALLIANCE NE              367.1  CP     BDTV      -00000118
 13   KPSD-TV  EAGLE BUTTE SD           243.0  CP     BDTV      -00000119
 13   KSFY-TV  SIOUX FALLS SD           251.3  APP    USERRECORD-01

 Total scenarios =   1


Result key:        2
Scenario        1  Affected station        5
Before Analysis

Results for: 13A SD RELIANCE             BLCDT     20030519AER  LIC
   HAAT  318.0 m, ATV ERP   40.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour       56183      31241.4
   not affected by terrain losses     53474      30097.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        1669       1754.1
   lost to ATV IX only                 1669       1754.1
   lost to all IX                      1669       1754.1

 Potential Interfering Stations Included in above Scenario     1

12A SD HURON               BPCDT     19991029ADD  CP
13A ND FARGO               BDTV      00000117     CP
13A NE ALLIANCE            BDTV      00000118     CP
13A SD EAGLE BUTTE         BDTV      00000119     CP

After Analysis

Results for: 13A SD RELIANCE             BLCDT     20030519AER  LIC
   HAAT  318.0 m, ATV ERP   40.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour       56183      31241.4
   not affected by terrain losses     53474      30097.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        3553       2797.8
   lost to ATV IX only                 3553       2797.8
   lost to all IX                      3553       2797.8

 Potential Interfering Stations Included in above Scenario     1
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12A SD HURON                BPCDT     19991029ADD  CP
13A ND FARGO                BDTV      00000117     CP
13A NE ALLIANCE             BDTV      00000118     CP
13A SD EAGLE BUTTE          BDTV      00000119     CP
13A SD SIOUX FALLS          USERRECORD01           APP

 The following station failed the de minimis interference criteria.
 13D SD SIOUX FALLS          USERRECORD01
 ERP   22.70 kW  HAAT   610.0 m  RCAMSL  1040.0 m
 Antenna usr KSFY_FCC

 Due to interference to the following station and scenario:     1
 13D SD RELIANCE             BLCDT     20030519AER
 ERP   40.00 kW  HAAT   318.0 m  RCAMSL   844.0 m
 Antenna CDB 00000000045870

 Percent Service lost without proposal:     0.0  to BLCDT     20030519AER
 Percent Service lost with proposal:        3.6  to BLCDT     20030519AER


Worst case new IX    3.6367% Scenario      1

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     Analysis of Interference to Affected Station   6


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      KSFY-TV    SIOUX FALLS SD            USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KEYC-TV  MANKATO MN               176.8  CP MOD BMPCDT    -20010223AAQ
 12   KTTM     HURON SD                161.4  CP     BPCDT     -19991029ADD
 13   WHO-TV   DES MOINES IA           303.5  CP     BPCDT     -19990805LD
 13   KFME     FARGO ND                391.8  CP     BDTV      -00000117
 13   KPLO-TV  RELIANCE SD             251.3  LIC    BLCDT     -20030519AER

 Total scenarios =   1


Result key:        3
Scenario        1  Affected station        6
Before Analysis

Results for: 13A SD SIOUX FALLS          USERRECORD01           APP
   HAAT  610.0 m, ATV ERP   22.7 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      618420      45418.7
   not affected by terrain losses    580289      43695.1
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV       37875       2579.5
   lost to ATV IX only                37875       2579.5
   lost to all IX                     37875       2579.5

 Potential Interfering Stations Included in above Scenario     1

12A MN MANKATO              BMPCDT    20010223AAQ  CP
12A SD HURON                BPCDT     19991029ADD  CP
13A IA DES MOINES           BPCDT     19990805LD   CP
13A ND FARGO                BDTV      00000117     CP
13A SD RELIANCE             BLCDT     20030519AER  LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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TABLE I

OET BULLETIN 69 INTERFERENCE STUDY

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Census data selected 2000

 Post Transition Data Base Selected
/space/software/cdbs/tvdb.sff_G
              TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Record Selected for Analysis

 KSFY-TV  USERRECORD-01               SIOUX FALLS          SD US
 Channel 13 ERP 22.7   kW   HAAT  610. m  RCAMSL 01040 m
 Latitude 043-31-07  Longitude 0096-32-05
 Status APP       Zone 2    Border
 Last update           Cutoff date           Docket
 Comments
 Applicant

 Cell Size for Service Analysis 2.0 km/side

 Distance Increments for Longley-Rice Analysis 1.00 km

 Facility meets maximum height/power limits

    Azimuth     ERP        HAAT   36.0 dBu F(50,90)
     (Deg)      (kW)       (m)        (km)
      0.0       22.700     609.1      120.3
     45.0       22.700     602.0      120.0
     90.0       22.700     593.9      119.5
    135.0       22.700     602.5      120.0
    180.0       22.700     622.6      121.0
    225.0       22.700     626.0      121.2
    270.0       22.700     603.3      120.0
    315.0       22.700     622.9      121.1

                    Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

                    Class A Evaluation Complete

                    SPACING VIOLATION FOUND BETWEEN STATION

 KSFY-TV  13 SIOUX FALLS          SD USERRECORD01

 and station


 SHORT TO: KPLO-TV  13 RELIANCE             SD BLCDT     20030519AER
 043-57-57  0099-36-11
 Req. separation 273.6 Actual separation 252.1 Short  21.5 km

 SHORT TO: KSFY-TV  13 SIOUX FALLS          SD BDTV      00000121
  43-31-07    96-32-05
 Req. separation 273.6 Actual separation   0.0 Short 273.6 km

 Proposed facility OK to FCC Monitoring Stations

 Proposed facility OK toward West Virginia quiet zone

 Proposed facility OK toward Table Mountain

 Proposed facility is beyond the Canadian coordination distance

 Proposed facility is beyond the Mexican coordination distance
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 Proposed station is OK toward AM broadcast stations

**************************************************************************
                        Start of Interference Analysis


              Proposed Station
Channel     Call         City/State              ARN
   13      KSFY-TV    SIOUX FALLS SD             USERRECORD01

     Stations Potentially Affected by  Proposed Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KEYC-TV  MANKATO MN               176.8  CP MOD BMPCDT    -20010223AAQ
 12   KTTM     HURON SD                 161.4  CP     BPCDT     -19991029ADD
 13   WHO-TV   DES MOINES IA            303.5  CP     BPCDT     -19990805LD
 13   KFME     FARGO ND                 391.8  CP     BDTV      -00000117
 13   KPLO-TV  RELIANCE SD              251.3  LIC    BLCDT     -20030519AER

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     Analysis of Interference to Affected Station   1


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   12      KEYC-TV    MANKATO MN               BMPCDT    -20010223AAQ

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 11   KARE     MINNEAPOLIS MN           160.6  LIC    BLCDT     -20010917ABZ
 11   KELO-TV  SIOUX FALLS SD           176.8  LIC    BLCDT     -20030417AAE
 12   KIIN     IOWA CITY IA             351.0  CP     BDTV      -00000107
 12   KCCW-TV  WALKER MN                333.2  CP     BDTV      -00000097
 12   KUON-TV  LINCOLN NE               353.2  CP     BDTV      -00000106
 12   KTTM     HURON SD                 313.4  CP     BPCDT     -19991029ADD
 13   KSFY-TV  SIOUX FALLS SD           176.8  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   2


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   12      KTTM       HURON SD                 BPCDT     -19991029ADD

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 11   KQSD-TV  LOWRY SD                178.2  CP     BDTV      -00000083
 11   KELO-TV  SIOUX FALLS SD           161.4  LIC    BLCDT     -20030417AAE
 12   KEYC-TV  MANKATO MN               313.4  CP MOD BMPCDT    -20010223AAQ
 12   KCCW-TV  WALKER MN                427.7  CP     BDTV      -00000097
 12   KXMB-TV  BISMARCK ND              329.4  CP     BDTV      -00000099
 12   KUON-TV  LINCOLN NE               372.2  CP     BDTV      -00000106
 12   KRNE-TV  MERRIMAN NE              321.5  CP     BDTV      -00000095
 13   KPLO-TV  RELIANCE SD              105.7  LIC    BLCDT     -20030519AER
 13   KSFY-TV  SIOUX FALLS SD           161.4  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   3
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Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      WHO-TV     DES MOINES IA            BPCDT     -19990805LD

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KIIN     IOWA CITY IA              188.9  CP     BDTV      -00000107
 13   WREXTV   ROCKFORD IL               364.7  LIC    BLCT      -1372
 13   WCFN     SPRINGFIELD IL            412.7  CP     BPCDT     -19991026ABC
 13   WIBW-TV  TOPEKA KS                 375.4  CP     BDTV      -00000126
 13   WEAU-TV  EAU CLAIRE WI             381.3  CP     BDTV      -00000125
 13   KSFY-TV  SIOUX FALLS SD            303.5  APP    USERRECORD-01

 Total scenarios =   1


Result key:        1
Scenario        1  Affected station        3
Before Analysis

Results for: 13A IA DES MOINES           BPCDT     19990805LD   CP
   HAAT  609.0 m, ATV ERP   36.1 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     1077046      49353.0
   not affected by terrain losses   1062380      48200.1
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV       23201        297.3
   lost to ATV IX only                23201        297.3
   lost to all IX                     23201        297.3

 Potential Interfering Stations Included in above Scenario     1

13A IL ROCKFORD             BLCT      1372         LIC
13A KS TOPEKA               BDTV      00000126     CP
13A WI EAU CLAIRE           BDTV      00000125     CP

After Analysis

Results for: 13A IA DES MOINES           BPCDT     19990805LD   CP
   HAAT  609.0 m, ATV ERP   36.1 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     1077046      49353.0
   not affected by terrain losses   1062380      48200.1
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV       23871        510.2
   lost to ATV IX only                23871        510.2
   lost to all IX                     23871        510.2

 Potential Interfering Stations Included in above Scenario     1

13A IL ROCKFORD             BLCT      1372         LIC
13A KS TOPEKA               BDTV      00000126     CP
13A WI EAU CLAIRE           BDTV      00000125     CP
13A SD SIOUX FALLS          USERRECORD01           APP

Percent new IX =    0.0645%

Worst case new IX    0.0645% Scenario      1

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     Analysis of Interference to Affected Station   4


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      KFME       FARGO ND                 BDTV      -00000117

     Stations Potentially Affecting This Station
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```
Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KCCW-TV  WALKER MN                207.7  CP     BDTV      -00000097
 12   KNRR     PEMBINA ND               220.9  CP     BPCDT     -19991101AKT
 13   WIRT     HIBBING MN               322.7  CP     BPCDT     -19991027ABC
 13   KXMC-TV  MINOT ND                 331.9  CP     BDTV      -00000127
 13   KPLO-TV  RELIANCE SD              387.2  LIC    BLCDT     -20030519AER
 13   KSFY-TV  SIOUX FALLS SD           391.8  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   5


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      KPLO-TV    RELIANCE SD              BLCDT     -20030519AER

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KRNE-TV  MERRIMAN NE              222.6  CP     BDTV      -00000095
 12   KTTM     HURON SD                 105.7  CP     BPCDT     -19991029ADD
 13   KFME     FARGO ND                 387.2  CP     BDTV      -00000117
 13   KTNE-TV  ALLIANCE NE              367.1  CP     BDTV      -00000118
 13   KPSD-TV  EAGLE BUTTE SD           243.0  CP     BDTV      -00000119
 13   KSFY-TV  SIOUX FALLS SD           251.3  APP    USERRECORD-01

 Total scenarios =   1


Result key:        2
Scenario        1  Affected station        5
Before Analysis

Results for: 13A SD RELIANCE             BLCDT     20030519AER  LIC
   HAAT  318.0 m, ATV ERP   40.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour       56183      31241.4
   not affected by terrain losses     53474      30097.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        1669       1754.1
   lost to ATV IX only                 1669       1754.1
   lost to all IX                      1669       1754.1

 Potential Interfering Stations Included in above Scenario     1

12A SD HURON               BPCDT     19991029ADD  CP
13A ND FARGO               BDTV      00000117     CP
13A NE ALLIANCE            BDTV      00000118     CP
13A SD EAGLE BUTTE         BDTV      00000119     CP

After Analysis

Results for: 13A SD RELIANCE             BLCDT     20030519AER  LIC
   HAAT  318.0 m, ATV ERP   40.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour       56183      31241.4
   not affected by terrain losses     53474      30097.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        3561       2801.8
   lost to ATV IX only                 3561       2801.8
   lost to all IX                      3561       2801.8

 Potential Interfering Stations Included in above Scenario     1

12A SD HURON               BPCDT     19991029ADD  CP
13A ND FARGO               BDTV      00000117     CP
13A NE ALLIANCE            BDTV      00000118     CP
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13A SD EAGLE BUTTE          BDTV      00000119     CP
13A SD SIOUX FALLS          USERRECORD01           APP

 The following station failed the de minimis interference criteria.
 13D SD SIOUX FALLS          USERRECORD01
 ERP   22.70 kW  HAAT   610.0 m  RCAMSL  1040.0 m
 Antenna     none

 Due to interference to the following station and scenario:     1
 13D SD RELIANCE             BLCDT     20030519AER
 ERP   40.00 kW  HAAT   318.0 m  RCAMSL   844.0 m
 Antenna CDB 00000000045870

 Percent Service lost without proposal:     0.0  to BLCDT     20030519AER
 Percent Service lost with proposal:        3.7  to BLCDT     20030519AER


Worst case new IX    3.6522% Scenario      1

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     Analysis of Interference to Affected Station   6


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   13      KSFY-TV    SIOUX FALLS SD            USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 12   KEYC-TV  MANKATO MN               176.8  CP MOD BMPCDT    -20010223AAQ
 12   KTTM     HURON SD                 161.4  CP     BPCDT     -19991029ADD
 13   WHO-TV   DES MOINES IA            303.5  CP     BPCDT     -19990805LD
 13   KFME     FARGO ND                 391.8  CP     BDTV      -00000117
 13   KPLO-TV  RELIANCE SD              251.3  LIC    BLCDT     -20030519AER

 Total scenarios =   1


Result key:        3
Scenario        1  Affected station        6
Before Analysis

Results for: 13A SD SIOUX FALLS          USERRECORD01           APP
   HAAT  610.0 m, ATV ERP   22.7 kW
                                POPULATION   AREA (sq km)
   within Noise Limited Contour      620582      45506.4
   not affected by terrain losses    575089      43758.7
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV       42087       2583.5
   lost to ATV IX only                42087       2583.5
   lost to all IX                     42087       2583.5

 Potential Interfering Stations Included in above Scenario     1

12A MN MANKATO              BMPCDT    20010223AAQ  CP
12A SD HURON                BPCDT     19991029ADD  CP
13A IA DES MOINES           BPCDT     19990805LD   CP
13A ND FARGO                BDTV      00000117     CP
13A SD RELIANCE             BLCDT     20030519AER  LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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ENVIRONMENTAL PROTECTION ACT

Since KSFY-TV will be using its currently licensed analog TV antenna, located on tower (ASR No. 1035413), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 22.7 kW and a radiation center of 595 meters above ground level, the proposed Channel 13 DTV operation would have less than 1 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.5 in the downward direction.

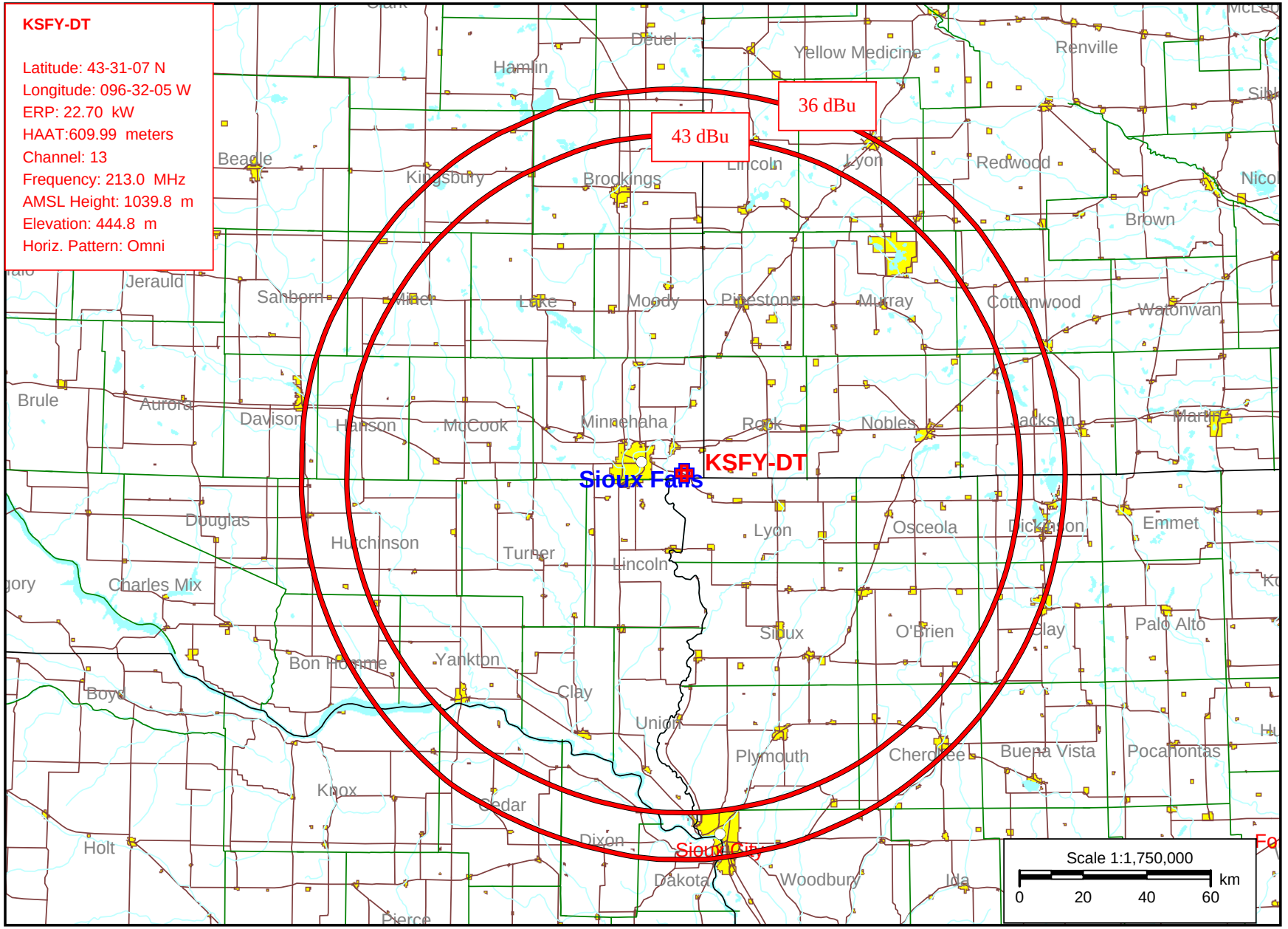
The Commission's guidelines for the Channel 13 TV are 1000 $\mu W/cm^2$ for the occupational/controlled, and 200 $\mu W/cm^2$ for the general population/uncontrolled environment.

The above analysis indicates that members of the public and personnel working around the KSFY-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, KSFY-DT will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.

KHANNA & GUILL, Inc. - Consulting Engineers

MARCH 2008



COMPUTED NOISE LIMITED CONTOURS FOR THE RPOPOSED DTV OPERATION OF KSFY-DT, SIOUX FALLS, SOUTH DAKOTA