

ENGINEERING STATEMENT  
REQUEST FOR  
SPECIAL TEMPORARY AUTHORITY TO  
EXTEND ANALOG OPERATION OF  
K55CA, CODY, WYOMING  
CH.55 1.18 KW 2004 METERS RCAMSL  
FACILITY ID: 51609  
DECEMBER 2011

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington            )  
  ) ss  
District of Columbia         )

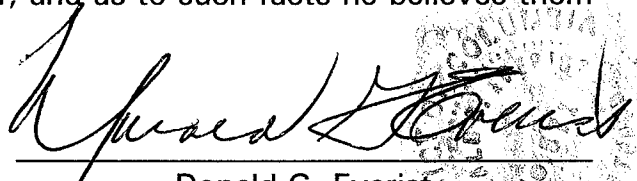
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1420 N Street, N.W., Suite One, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

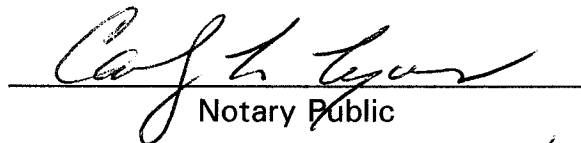
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

  
\_\_\_\_\_  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 20<sup>th</sup> day of December, 2011.



  
\_\_\_\_\_  
Notary Public

My Commission Expires: 2/28/2013

This filing supports a request by KTVQ Communications, Inc. for special temporary authority to operate K55CA beyond the December 31, 2011 deadline. As indicated in the *Second Report and Order*<sup>1</sup> in MB Docket No. 03-185 released July 15, 2011 and published in the Federal Register on July 27, 2011 (effective August 26, 2011) under Section III, Item B, announced (1) the December 31, 2011 out-of-core transition deadline; and (2) September 1, 2011 out-of-core displacement deadline and Notification and Termination Provision.

K55CA LD was assigned to KTVQ Communications, Inc. for DTV operation on Channel 55 for 15 kW non-directional at the same location as the analog facility. The FCC granted the assignment of facilities from Park County to KTVQ Communications, Inc. on October 3, 2011. Since the grant of the assignment application, KTVQ Communications, Inc.'s technical staff has been in contact with equipment vendors and manufacturers for the buildout of this DTV facility. A modification to the outstanding construction permit (FCC File No. BDISDTT-20090630AGM)) is being prepared and will be filed soon.

The transmitter manufacturer, Harris, currently has not promised delivery of a 100 watt transmitter until some time in late December 2011 or January 2012.

Waiver Request

Therefore in order to maintain the continuity of service:

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<sup>1</sup>*In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, Second Report and Order, Adopted: July 15, 2011, Released: July 15, 2011

- KTVQ Communications, Inc. received control of the station from the former licensee, Park County, on October 3, 2011.
- KTVQ Communications, Inc. technical staff proceeded with contacts with equipment vendors and manufacturers immediately after receiving the approval of assignment from Park County
- The KTVQ Communications, Inc. technical staff has been informed that it cannot expect transmitter shipment until sometime in late December 2011 or January 2012.
- KTVQ Communications, Inc. indicates that a modification to the outstanding construction permit will be required and that modification of technical parameters is being prepared.
- KTVQ Communications Inc. finds that based on the Census Bureau 2000 population in Park County the density is approximately 4 persons per square mile. Therefore, the very rural nature in this area does not lend itself to immediate wireless deployment
- KTVQ Communications, Inc. technical staff indicates that the site is located on an unimproved road and inclement winter weather is expected in this mountainous terrain
- KTVQ Communications, Inc. believes based on the available information that a ninety (90) day extension of the current analog operation is warranted in order to receive, install, and test equipment and to license the new digital facility.
- KTVQ Communications, Inc. believes that it has made a good faith effort to comply with the Commission's efforts to bring a digital television signal to this rural area.