

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KSAZ LICENSE, INC., licensee of Digital Television Station KSAZ-DT, Channel 31 in Phoenix, Arizona, in support of its request for Special Temporary Authority to operate post-transition on Channel 10 with its digital auxiliary facility, authorized in BXPCDT-20080310ADX until such time as it can finish construction of its final post-transition DTV facility (BMPCDT-20080616AAM) on Channel 10. No changes in the operating parameters of the auxiliary facility are proposed herein. It is important to note that the auxiliary facility is under construction.

This STA is necessary because the present analog Channel 10 transmitter cannot be retrofitted for digital operation until after analog sunset (February 17, 2009). KSAZ-DT will proceed to expeditiously modify the main transmitter to operate in digital mode after the final transition date of February 17, 2009.

Exhibit B is a map upon which the noise-limited contours of analog KSAZ-TV, digital KSAZ-DT on Channel 31, and the proposed KSAZ-DT STA facility on Channel 10 are plotted. We have performed a Longley-Rice-based coverage analysis for the proposed facility and find that the interference-free service population is 3,214,712 (based on the 2000 U. S. Census). This value is 99.9% of the analog interference-free service population (3,216,171) calculated by the FCC and reported in their allotment table (dated December 21, 2004). In addition, the service population of the proposed STA facility represents 99.7% of the 3,234,335 people residing within the interference-free service area of presently licensed KSAZ-DT on Channel 31. On these bases, this proposal meets the Commission's 85% coverage requirement for post-transition STA facilities.

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Finally, we have conducted a Longley-Rice interference study (based on the methodology contained in the FCC's *OET Bulletin 69*). The results of that study are provided in Exhibit C. It concludes that the proposed temporary post-transition operation of the KSAZ-DT auxiliary facility will not cause more than 0.5 percent interference to any post-transition digital television facility or Class A low power television station.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.



KYLE T. FISHER

September 12, 2008

Smith and Fisher

- ANALOG KSAZ-TV CH. 10 NOISE-LIMITED CONTOUR
- KSAZ-DT STA CH.10 NOISE-LIMITED CONTOUR
- DIGITAL KSAZ-DT CH. 31 NOISE-LIMITED CONTOUR

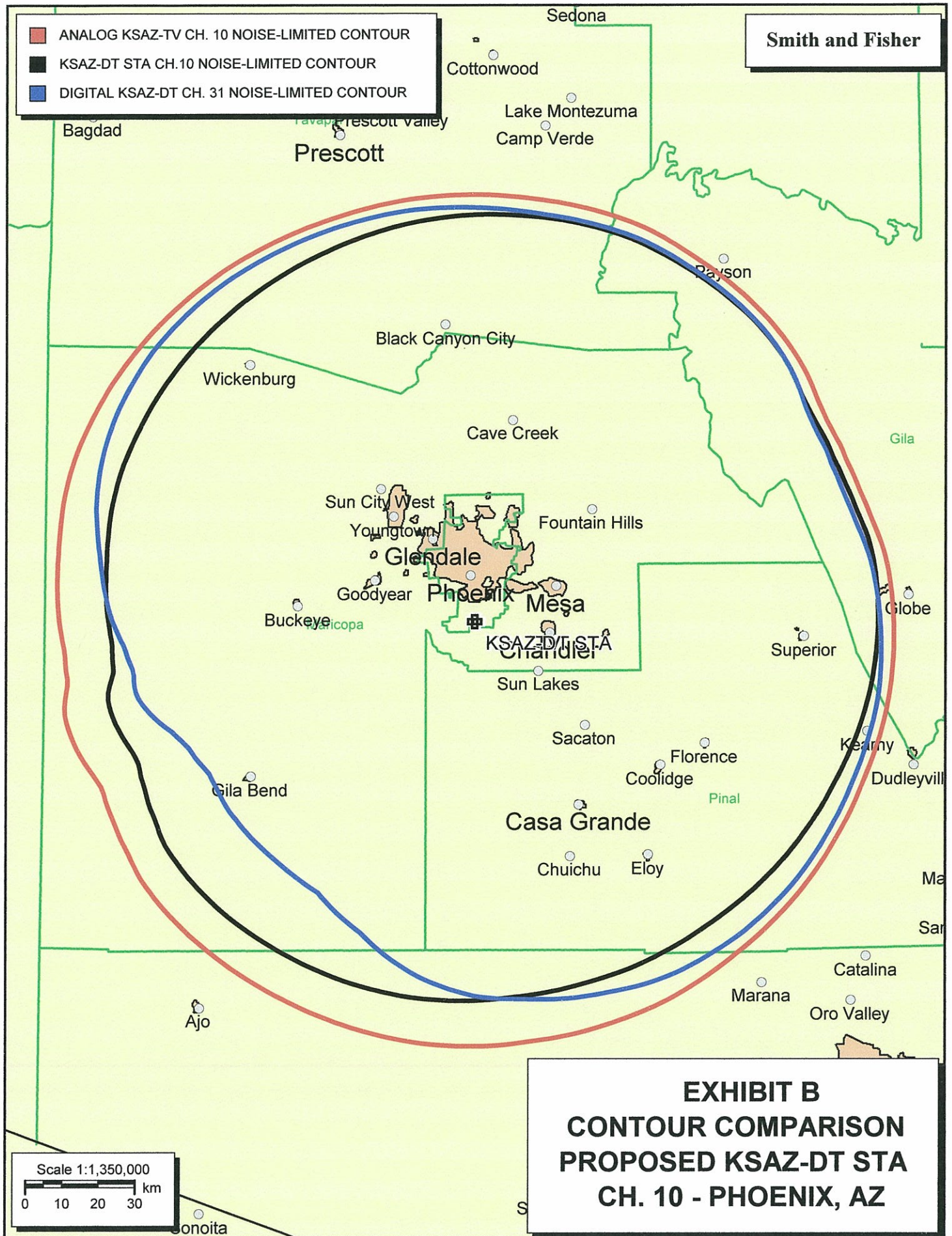


EXHIBIT B
CONTOUR COMPARISON
PROPOSED KSAZ-DT STA
CH. 10 - PHOENIX, AZ

INTERFERENCE STUDY
PROPOSED KSAZ-DT
CHANNEL 10 – PHOENIX, ARIZONA

The instant application specifies an ERP of 20 kw (directional) at 500 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 1.0 kilometer and an increment spacing of 0.1 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KSAZ-DT STA facility to other pertinent stations are tabulated in Exhibit C-2.

As shown, the proposed KSAZ-DT facility would not contribute more than 0.5% interference (beyond that which is caused by the allotted KSAZ-DT facility) to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KSAZ-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT C-2

INTERFERENCE STUDY SUMMARY

PROPOSED KSAZ-DT STA
CHANNEL 10 – PHOENIX, ARIZONA

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From KSAZ-DT*</u>	<u>%</u>
KDTP-DT BMPEDT-20080616ACH	Holbrook, AZ	11	287,868	0	0
KGUN-DT BPCDT-20080213AGK	Tucson, AZ	9	1,000,035	0	0
KGUN-DT Allotment	Tucson, AZ	9	1,011,087	0	0
KCFG-DT BPRM-20080620AOF	Flagstaff, AZ	9	2,010,416	694	<0.1

*Above that caused by the allotment facility.

Note: This study utilized a cell size of 1.0 km and an increment spacing of 0.1 km.