

ENGINEERING REPORT

PROPOSED KXGR-DT

**CHANNEL 47
GREEN VALLEY, ARIZONA
[AMENDMENT TO BPCDT-20000501AEM]**

MARCH, 2002

C O N T E N T S

EXHIBIT A Engineering Statement

EXHIBIT B Predicted Service Contour

EXHIBIT C Allocation Data

FCC Form 301, Section III-D

SMITH AND FISHER • BROADCASTING AND TELECOMMUNICATIONS CONSULTANTS

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EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of SUNGILT CORPORATION, INC., licensee of KXGR-TV, Green Valley, Arizona, in support of its amendment to its application for a new digital television station to operate on Channel 47 as KXGR-DT (BPCDT-20000501AEM). This amendment specifies only a reduction in ERP.

Exhibit B is a map of the digital service contour. This proposal complies with §73.622, as explained in Exhibit C. It is not expected that the proposed facility would cause objectionable interference to any other authorized station, but KXGR-DT recognizes its obligation to correct any such interference that may occur.

We have studied the RF transmissions of this facility with regard to their environmental effect. Employing the methods set forth in *OST Bulletin No. 65* and considering the vertical pattern of the proposed Andrew antenna, we calculate maximum power density two meters above ground from the proposed facility to be 0.011 mw/cm^2 , at locations 15 meters from the tower base, which is but 2.4 percent of the 0.45 mw/cm^2 reference for uncontrolled areas at this frequency. Further, KXGR-DT will take whatever preventive steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive RF energy. On this basis, a grant of this application would clearly be a minor environmental action.

EXHIBIT A

I declare under penalty of perjury that the foregoing statements and the attached Engineering Report, which was prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, consisting of a stylized 'N' followed by a horizontal line.

NEIL M. SMITH

March 28, 2002

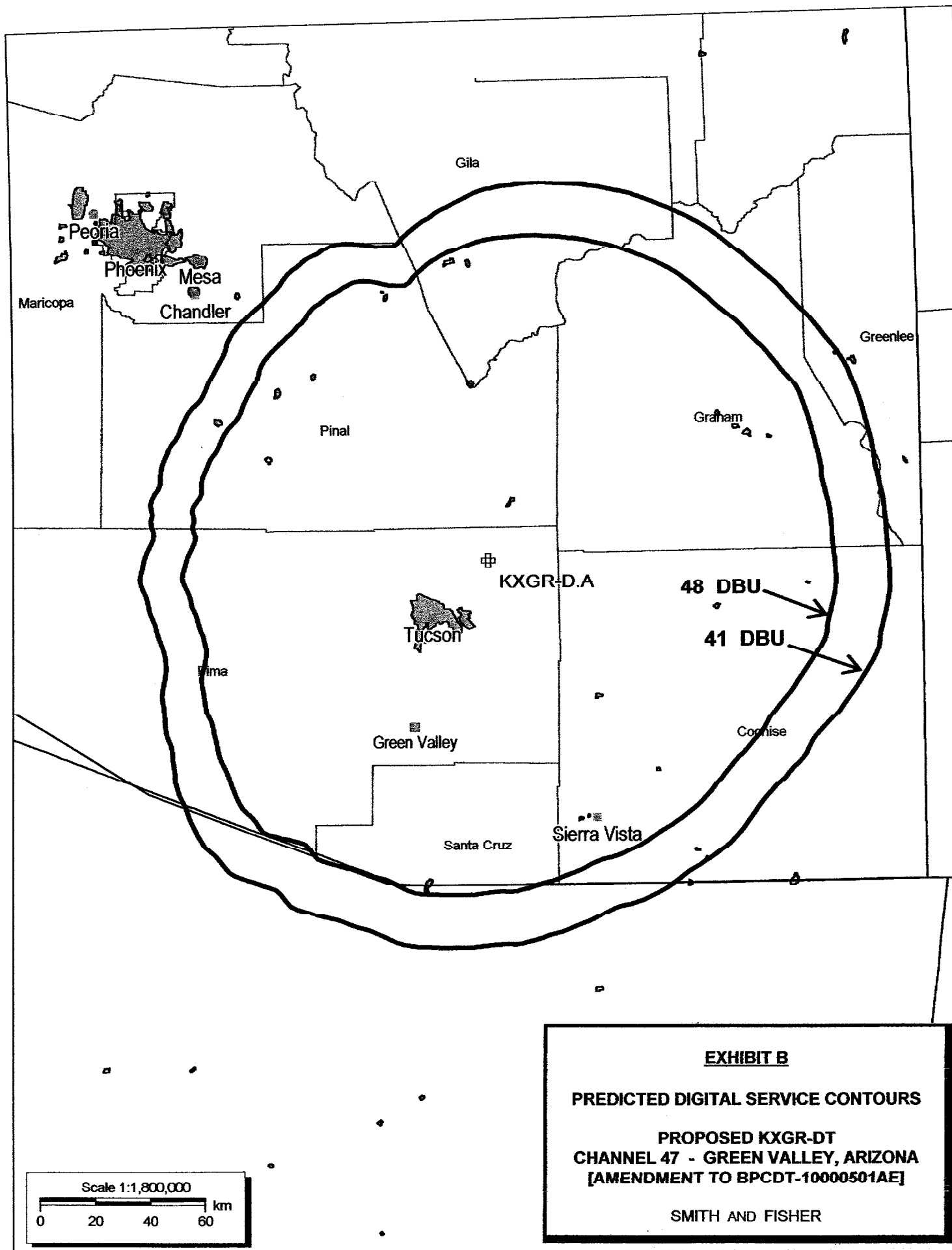


EXHIBIT B

PREDICTED DIGITAL SERVICE CONTOURS

**PROPOSED KXGR-DT
CHANNEL 47 - GREEN VALLEY, ARIZONA
[AMENDMENT TO BPCDT-10000501AE]**

SMITH AND FISHER

ALLOCATION AND INTERFERENCE STUDY

PROPOSED KXGR-DT
CHANNEL 47 - GREEN VALLEY, ARIZONA

The Commission allotted Channel 47 TO KXGR-DT with a nominal ERP of 72 kw at 1095 meters above average terrain. The instant application specifies an ERP of 660 kw at 1095 meters, which is allowable under the FCC's *de minimis* standards with respect to various NTSC and DTV facilities.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by KXGR-DT to other pertinent stations are tabulated in Exhibit F-2.

As indicated, the proposed KXGR-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its present service area.

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

It should be noted that another digital station in the Tucson market, KUAT-DT, has facilities of 667.5 kw at 1091 meters, which produces a 41 dbu contour distance of 137.3 kilometers. The proposed KXGR-DT facilities of 660 kw at 1095 meters likewise produces a 41 dbu contour distance of 137.3 kilometers. Therefore, this proposal is in compliance with §73.622(f)(5).

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KXGR-DT
CHANNEL 47 - GREEN VALLEY, ARIZONA
[AMENDMENT TO BPCDT-20000501AEM]

NTSC FACILITIES

Call	City of License	Ch.	Grade B Population F(50.50)	Interference Losses (Population)							
				NTSC & DTV Without		Unmasked		NTSC & DTV With		Unmasked	
				NTSC Only	KXGR-DT	DTV	% ¹	KXGR-DT	% ¹	DTV	% ¹
-- None --											

DTV FACILITIES

Call	City of License	Ch.	NTSC/DTV ³ Grade B Pop. Longley-Rice	Interference Losses (Population)							
				NTSC & DTV Without		Unmasked		NTSC & DTV With		Unmasked	
				NTSC Only	KXGR-DT	DTV	% ¹	KXGR-DT	% ¹	DTV	% ¹
-- None --											

¹ Cannot exceed 10%, under FCC *de minimis* interference standards.

² Cannot exceed 2%, under FCC *de minimis* interference standards.

³ Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.