

Explanation Of Application

By this application, KQDS Acquisition Corp., the licensee of KQDS-TV, Duluth, Minnesota ("KQDS"), requests authority from the Commission to permanently reduce its Effective Radiated Power ("ERP").

KQDS for many years has broadcast with an ERP of 1,000 kW. Starting on August 15, 2015, the Commission granted KQDS special temporary authority ("STA") for a reduced power operation at 600 kW because of damage to the KQDS transmitter. (*See* File No. 0000004522) KQDS continues to operate under the STA. At no time has KQDS received any viewer complaints about any loss of broadcasting service during the time that the STA has been in effect. That period of time now has spanned far more than one year, including all four seasons, with no evidence of any loss of service to the over-the-air viewing public.

Based upon this lengthy experience under real-world conditions, KQDS is confident that permanently reducing its ERP to 600 kW will cause no material harm to its viewers. That conclusion is supported by engineering analysis in the form of the coverage map and population served, attached hereto.

As this application demonstrates, the licensed 1,000 kW operation at serves a population 292,586 at 41 dBu and 237,062 at 48 dBu. (*See* Exhibit 1) At 600 kW, KQDS currently is serving 274,544 at 41 dBu and 230,399 at 48 dBu. (*See* Exhibit 2) The predicted loss of population served would be approximately six percent and three percent, respectively. These predicted losses in persons served should be considered *de minimis* under these circumstances where no complaints have been received in more than a year under the proposed 600 kW operation.

In addition, KQDS has almost completed conversion of its TV translators from analog to digital operations. These digital conversions include the five TV translators shown on Exhibit 3. All five of these translators will provide excellent over-the-air digital rebroadcast of KQDS. As shown in Exhibit 3, these translators will significantly reduce the population theoretically predicted to lose service due to the reduced power operation. Furthermore, the conversion of these translators to digital will have an additive effect to the population served by KQDS and will increase the number of viewers served overall by KQDS with improved digital service, transmitted locally within their viewing area.

Consequently, KQDS respectfully submits that granting this application and permitting KQDS to make 600 kW its permanent ERP would not materially harm over-the-air broadcast service, indeed should be considered *de minimis*, and would be consistent with the public interest in efficient television broadcasting services.