

TV Station KUBD • Channel 13 • Ketchikan, Alaska

Waiver Exhibit for FCC Form 2100, Schedule A

Background

TV Station KUBD is licensed to serve Ketchikan, Alaska, with an effective radiated power of 0.413 kilowatts ERP utilizing a directional transmitting antenna with radiation center at 100 meters AMSL, -71 meters HAAT. It is proposed to relocate the transmitting facilities 180 meters west of the licensed site, using the same transmitting antenna at 0.41 kilowatts ERP, with radiation center at 42.1 meters AMSL, -129.9 meters HAAT. There would be no impact on the maximum facilities defined in the 2008 U.S.-Canada DTV Agreement.

Requested Waiver of April 5, 2013 DTV Freeze Order

This technical exhibit supplements additional included materials in support of a waiver of the FCC's announcement of limitations on filings for full power and Class A TV stations (DA 13-618, dated April 5, 2013). As demonstrated in the accompanying figure "KUBD-COV," the proposed facilities extend the F(50,90) 36 dBu noise-limited contour by less than 0.5 kilometers in some directions. Because of the low operating power of the facility, it is not possible to further reduce power such that the proposed contour is placed entirely within the licensed contour without reducing service to the principal community. Additionally, the facility is not in a frequency-congested area and operates on a VHF channel, so any effect on future channel repacking would be exceptionally small. Thus, a waiver of the contour extension provision of the April 2013 order limiting facilities modifications is specifically requested.

Principal Community Service

Also shown in the map figure, the proposed operation maintains 100% F(50,90) 43 dBu city-grade coverage to Ketchikan city limits land area.

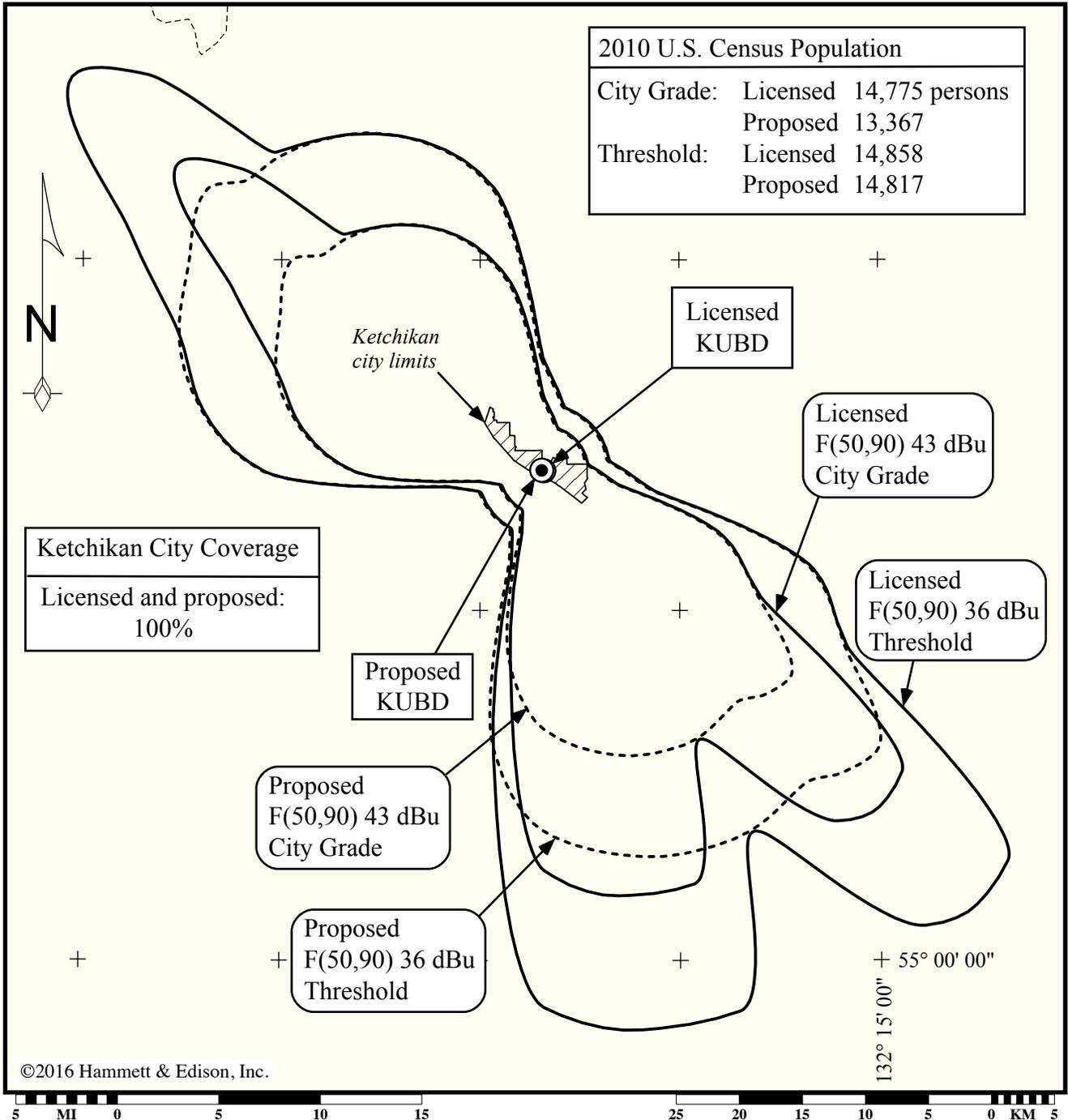


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Comparison of Licensed and Proposed Threshold and City Grade Contours

Licensed: 413 watts ERP, C.O.R. 100 meters AMSL, Directional

Proposed: 410 watts ERP, C.O.R. 42.1 meters AMSL, Directional



Lambert conformal map projection. Geographic coordinate marks shown at 15-minute increments. City limits shown taken from U.S. Census Bureau TIGER/Line 2010 data.