Consulting Engineers
CTJC
CARL T. JONES CORPORATION

STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF A SUPPLEMENT TO A
PENDING APPLICATION FOR
CONSTRUCTION PERMIT
BPCDT-20121206AAP
KFSN-TV - FRESNO, CALIFORNIA
CH. 30 - 400 kW - 625 meters HAAT

Prepared for: KFSN TELEVISION, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by KFSN TELEVISION, LLC, licensee of KFSN-TV, channel 30, Fresno, California, to prepare this statement, and an update to two appendices as a supplement to a long pending appliction for a post-transition construction permit. The pending application, BPCDT-20121206AAP, seeks only to increase KFSN-TV's Effective Radiated Power (ERP) from its authorized 260 kW to 400 kW. The licensee requests no other change in KFSN-TV's authorized broadcast facility.

SUPPLEMENT TO UPDATE APPLICATION

The applicant herein provides up-to-date information in two appendices, A & B. Appendix A is an update of the environmental assessment and radio frequency radiation

safety compliance showing. Appendix B replaces the Longley/Rice interference study, using the FCC's former software *tv_process*, that was originallty submitted with the pending application. The new Appendix B, using the FCC's most recent version 2.2.3 of *tvstudy*, displays the most recent assessment of the potential for new interference by the pending application. The results show that KFSN-TV's proposed modified facility, the only change of which is the ERP from 260 kW to 400 kW, is predicted to cause no new interference in excess of 0.5% to any other authorized digital television facility, or any Class A digital LPTV station. (See Appendix B dated November 6, 2017)

DETERMINATION OF THE "LARGEST STATION IN THE MARKET"

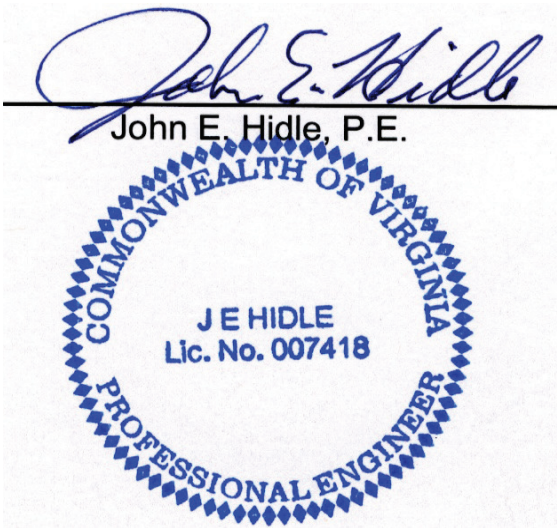
The study shown in Appendix B states that "ERP exceeds maximum, 292 kW". It appears from an analysis of the stations that are licensed to communities that are located in the Fresno-Visala, CA Designated Market Area (DMA) that the station with the largest geographic area is KNSO, channel 11, Merced, CA with a coverage area of 46,294 square kilometers. The pending application for an increase in ERP from 260 kW to 400 kW results in a coverage area for KFSN-TV of 33,972 square kilometers. Clearly KFSN-TV continues too be entitled, according to Section 73.622(f)(5), to the proposed increase in its ERP.

SUMMARY

It is submitted that the pending application for a post-transition construction permit, BPCDT-20121206AAP, seeking an increase in KFSN-TV's ERP from 260 kW to 400 kW, as supplemented herein, continues to comply with the Rules, Regulations, and Policies of

the Federal Communications Commission. This statement and the attached appendices A & B were prepared by me, or under my direct supervision, and are believed to be true and correct to the best of my knowledge and belief.

DATED: November 6, 2017



APPENDIX A

SUMMARY OF RADIOFREQUENCY
RADIATION STUDY
KFSN-TV, FRESNO, CALIFORNIA
CHANNEL 30, 400 kW ERP, 625 m HAAT
NOVEMBER, 2017

CALL	SERVICE	CHANNEL	FREQUENCY	POLARIZATION	ANTENNA HEIGHT ** mAGL	ERP (kW)	VERT. RELATIVE FIELD FACTOR	PREDICTED POWER DENSITY (mW/cm^2)	FCC UNCONTROLLED LIMIT (mW/cm^2)	PERCENT OF UNCONTROLLED LIMIT
KFSN-TV	DT	30	569	H	70.7	400.000	0.100	0.02673	0.379	7.05%
KFRE-TV	DT	36	605	H	38.8	360.000	0.080	0.05112	0.403	12.67%
KSKS	FM	229	93.7	H & V	37	68.000	0.150	0.07468	0.200	37.34%

TOTAL PERCENTAGE OF ANSI VALUE= 57.06%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.

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KFSN-TV - FRESNO, CALIFORNIA
Appendix B - Longley-Rice Interference Analysis
November 6, 2017

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tvstudy v2.2.3 (DAezu1)
Database: localhost,  Study: BPCDT20121206AAP (54),  Model: Longley-Rice
Start: 2017.11.06 11:38:12

Study created: 2017.11.06 11:37:21

Study build station data: LMS TV 2017-11-06 (14)

    Proposal: KFSN-TV D30 DT APP *P FRESNO, CA
 File number: BPCDT20121206AAP
 Facility ID: 8620
Station data: LMS TV 2017-11-06 (14)
   Record ID: 1070461fa5e743818f3dcf6212b6c0ea
     Country: U.S.
        Zone: II

Search options:
Non-U.S. records included
Stations affected by proposal:

Call      Chan  Svc Status  City, State               File Number            Distance
KXLA      D30   DT  CP      RANCHO PALOS VERDES, CA   BLANK0000026148        340.0 km
KQED      D30   DT  LIC     SAN FRANCISCO, CA         BLEDT20130104ACT       276.9
KDFS-CD   D30-  DC  LIC     SANTA MARIA, CA           BLANK0000001617        263.6

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

    Channel: D30
   Latitude:  37  4 36.00 N (NAD83)
  Longitude: 119 26  3.00 W
Height AMSL: 1457.7 m
       HAAT: 625.0 m
   Peak ERP: 400 kW
    Antenna: ERI-ATW30H6-HTCX-30H (ID 111219) 0.0 deg
Elev Pattrn: Generic
  Elec Tilt: 1.50

40.3 dBu contour:
Azimuth      ERP       HAAT   Distance
  0.0 deg   49.0 kW   564.9 m   93.4 km
 45.0       16.8      201.5     62.6
 90.0       19.4      -12.8     41.0
135.0        137      521.5     99.1
180.0        400      864.6    124.6
225.0        400     1050.1    130.9
270.0        400      939.3    127.0
315.0        253      979.3    123.6

Database HAAT does not agree with computed HAAT
Database HAAT: 625 m   Computed HAAT: 639 m

ERP exceeds maximum
ERP: 400 kW   ERP maximum: 292 kW

**Proposal service area extends beyond baseline plus 1.0%
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Appendix B - Interference Analysis
KFSN-TV - Fresno, California
Channel 30 - 400 kW - Page 2

Proposal service area population is more than 95.0% of baseline

Distance to Canadian border: 1283.3 km

Distance to Mexican border: 530.1 km

Conditions at FCC monitoring station: Livermore CA
Bearing: 290.1 degrees Distance: 217.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 70.3 degrees Distance: 1275.8 km

Study cell size: 2.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

Interference to BLANK0000026148 CP, scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KXLA	D30	DT	CP	RANCHO PALOS VERDES, CA	BLANK0000026148	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	340.1 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	340.0
	KBFX-CD	D29	DC	LIC	BAKERSFIELD, CA	BLTTA20101018ACF	144.5
	KFTR-DT	D29	DT	LIC	ONTARIO, CA	BLCDT20100401AFY	0.0
	KDFS-CD	D30-	DC	LIC	SANTA MARIA, CA	BLANK0000001617	242.8
	KBTF-CD	D31	DC	LIC	BAKERSFIELD, CA	BLDTA20100921ABW	144.7
	KCBS-TV	D31	DT	CP	LOS ANGELES, CA	BLANK0000025211	0.1
	KRET-CD	D31	DC	LIC	PALM SPRINGS, CA	BLDTA20140702ADK	155.5
	LICITACION	D30	DT	LIC	TIJUANA, BN	BLANKBPFSXXXX0004XXX	214.1

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
43764.3	17,653,508	34820.3	16,363,362	34213.0	16,181,117	34197.2	16,181,117	0.05	0.00

Undesired	Total IX		Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	7.9	0	0.0	0		
KFSN-TV D30 DT APP	27.8	0			15.9	0
KBFX-CD D29 DC LIC	7.9	0	0.0	0	0.0	0
KFTR-DT D29 DT LIC	44.0	5,933	0.0	0	0.0	0
KDFS-CD D30- DC LIC	20.0	1,696	20.0	1,696	20.0	1,696
KBTF-CD D31 DC LIC	11.9	0	0.0	0	0.0	0
KCBS-TV D31 DT CP	143.9	25,156	99.9	19,223	99.9	19,223
KRET-CD D31 DC LIC	8.0	5	8.0	5	8.0	5
LICITACION D30 DT LIC	423.4	155,388	423.4	155,388	423.4	155,388

Interference to BLANK0000026148 CP, scenario 2

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KXLA	D30	DT	CP	RANCHO PALOS VERDES, CA	BLANK0000026148	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	340.1 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	340.0
	KBFX-CD	D29	DC	LIC	BAKERSFIELD, CA	BLTTA20101018ACF	144.5
	KFTR-DT	D29	DT	LIC	ONTARIO, CA	BLCDT20100401AFY	0.0
	KDFS-CD	D30-	DC	LIC	SANTA MARIA, CA	BLANK0000001617	242.8
	KBTF-CD	D31	DC	LIC	BAKERSFIELD, CA	BLDTA20100921ABW	144.7
	KCBS-TV	D31	DT	APP	LOS ANGELES, CA	BLANK0000034593	0.8
	KRET-CD	D31	DC	LIC	PALM SPRINGS, CA	BLDTA20140702ADK	155.5
	LICITACION	D30	DT	LIC	TIJUANA, BN	BLANKBPFSXXXX0004XXX	214.1

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
43764.3	17,653,508	34820.3	16,363,362	33821.9	15,997,382	33806.1	15,997,382	0.05	0.00

Appendix B - Interference Analysis
KFSN-TV - Fresno, California
Channel 30 - 400 kW - Page 3

Undesired		Total IX	Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	7.9	0	0.0	0		
KFSN-TV D30 DT APP	27.8	0			15.9	0
KBFX-CD D29 DC LIC	7.9	0	0.0	0	0.0	0
KFTR-DT D29 DT LIC	44.0	5,933	20.0	2,369	20.0	2,369
KDFS-CD D30- DC LIC	20.0	1,696	20.0	1,696	20.0	1,696
KBTF-CD D31 DC LIC	11.9	0	0.0	0	0.0	0
KCBS-TV D31 DT APP	523.0	206,522	491.0	202,958	491.0	202,958
KRET-CD D31 DC LIC	8.0	5	8.0	5	8.0	5
LICITACION D30 DT LIC	423.4	155,388	423.4	155,388	423.4	155,388

Interference to BLANK0000026148 CP, scenario 3

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KXLA	D30	DT	CP	RANCHO PALOS VERDES, CA	BLANK0000026148	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	340.1 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	340.0
	KBFX-CD	D29	DC	LIC	BAKERSFIELD, CA	BLTTA20101018ACF	144.5
	KFTR-DT	D29	DT	APP	ONTARIO, CA	BPCDT20100426ACW	0.0
	KDFS-CD	D30-	DC	LIC	SANTA MARIA, CA	BLANK0000001617	242.8
	KBTF-CD	D31	DC	LIC	BAKERSFIELD, CA	BLDTA20100921ABW	144.7
	KCBS-TV	D31	DT	CP	LOS ANGELES, CA	BLANK0000025211	0.1
	KRET-CD	D31	DC	LIC	PALM SPRINGS, CA	BLDTA20140702ADK	155.5
	LICITACION	D30	DT	LIC	TIJUANA, BN	BLANKBPFSXXXX0004XXX	214.1

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
43764.3	17,653,508	34820.3	16,363,362	34193.1	16,177,629	34177.2	16,177,629	0.05	0.00

Undesired		Total IX	Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	7.9	0	0.0	0		
KFSN-TV D30 DT APP	27.8	0			15.9	0
KBFX-CD D29 DC LIC	7.9	0	0.0	0	0.0	0
KFTR-DT D29 DT APP	80.0	16,681	20.0	3,488	20.0	3,488
KDFS-CD D30- DC LIC	20.0	1,696	20.0	1,696	20.0	1,696
KBTF-CD D31 DC LIC	11.9	0	0.0	0	0.0	0
KCBS-TV D31 DT CP	143.9	25,156	83.9	11,963	83.9	11,963
KRET-CD D31 DC LIC	8.0	5	8.0	5	8.0	5
LICITACION D30 DT LIC	423.4	155,388	423.4	155,388	423.4	155,388

Interference to BLANK0000026148 CP, scenario 4

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KXLA	D30	DT	CP	RANCHO PALOS VERDES, CA	BLANK0000026148	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	340.1 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	340.0
	KBFX-CD	D29	DC	LIC	BAKERSFIELD, CA	BLTTA20101018ACF	144.5
	KFTR-DT	D29	DT	APP	ONTARIO, CA	BPCDT20100426ACW	0.0
	KDFS-CD	D30-	DC	LIC	SANTA MARIA, CA	BLANK0000001617	242.8
	KBTF-CD	D31	DC	LIC	BAKERSFIELD, CA	BLDTA20100921ABW	144.7
	KCBS-TV	D31	DT	APP	LOS ANGELES, CA	BLANK0000034593	0.8
	KRET-CD	D31	DC	LIC	PALM SPRINGS, CA	BLDTA20140702ADK	155.5
	LICITACION	D30	DT	LIC	TIJUANA, BN	BLANKBPFSXXXX0004XXX	214.1

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
43764.3	17,653,508	34820.3	16,363,362	33802.0	15,997,256	33786.1	15,997,256	0.05	0.00

Undesired		Total IX	Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	7.9	0	0.0	0		
KFSN-TV D30 DT APP	27.8	0			15.9	0
KBFX-CD D29 DC LIC	7.9	0	0.0	0	0.0	0
KFTR-DT D29 DT APP	80.0	16,681	40.0	2,495	40.0	2,495
KDFS-CD D30- DC LIC	20.0	1,696	20.0	1,696	20.0	1,696
KBTF-CD D31 DC LIC	11.9	0	0.0	0	0.0	0

KCBS-TV D31 DT APP	523.0	206,522	475.0	192,336	475.0	192,336
KRET-CD D31 DC LIC	8.0	5	8.0	5	8.0	5
LICITACION D30 DT LIC	423.4	155,388	423.4	155,388	423.4	155,388

Interference to BLEDT20130104ACT LIC, scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KQED	D30	DT	LIC	SAN FRANCISCO, CA	BLEDT20130104ACT	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	276.9 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	276.9
	KTVU	D31	DT	APP	OAKLAND, CA	BLANK0000034500	0.0

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
37935.5	8,195,398	32151.2	7,283,828	30727.9	6,926,647	30589.2	6,924,841	0.45	0.03

Undesired	Total IX		Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	1423.4	357,181	1423.4	357,181		
KFSN-TV D30 DT APP	1562.0	358,987			1562.0	358,987

Interference to BLANK0000001617 LIC, scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KDFS-CD	D30-	DC	LIC	SANTA MARIA, CA	BLANK0000001617	
Undesireds:	KFSN-TV	D30	DT	BL	FRESNO, CA	DTVBL8620	263.6 km
	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	263.6
	KQMM-CD	D29	DC	LIC	SANTA MARIA, CA	BLDTL20080423AEG	36.8
	KXLA	D30	DT	CP	RANCHO PALOS VERDES, CA	BLANK0000026148	242.8

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
10456.5	348,992	8913.1	319,815	8738.1	316,036	8730.1	316,031	0.09	0.00

Undesired	Total IX		Unique IX, before		Unique IX, after	
KFSN-TV D30 DT BL	12.1	0	12.1	0		
KFSN-TV D30 DT APP	20.1	5			20.1	5
KQMM-CD D29 DC LIC	150.9	3,779	150.9	3,779	150.9	3,779
KXLA D30 DT CP	12.0	0	12.0	0	12.0	0

Interference to proposal, scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KFSN-TV	D30	DT	APP	FRESNO, CA	BPCDT20121206AAP	
Undesireds:	KBFX-CD	D29	DC	LIC	BAKERSFIELD, CA	BLTTA20101018ACF	195.6 km
	KQED	D30	DT	LIC	SAN FRANCISCO, CA	BLEDT20130104ACT	276.9
	KBTF-CD	D31	DC	LIC	BAKERSFIELD, CA	BLDTA20100921ABW	195.4

Service area		Terrain-limited		IX-free		Percent IX	
34744.4	1,836,607	30716.1	1,819,585	30239.1	1,818,619	1.55	0.05

Undesired	Total IX		Unique IX		Prcnt Unique IX	
KBFX-CD D29 DC LIC	8.0	26	4.0	0	0.01	0.00
KQED D30 DT LIC	469.0	940	469.0	940	1.53	0.05
KBTF-CD D31 DC LIC	4.0	26	0.0	0	0.00	0.00