

PURPOSE OF WKMG MINOR MODIFICATION APPLICATION

Graham Media Group (“GMG”) is the licensee of the WKMG-DT Channel 26 Orlando, FL facility which was not assigned a new channel in the recent FCC repack, and therefore, was not part of the post-incentive auction repack process. Accordingly, pursuant to DA 17-1086, WKMG is timely filing a maximization application to increase the WKMG-DT Channel 26 facility’s noise-limited contour in one or more azimuthal directions beyond the station's authorized facilities.

PROPOSED CHANGES

- Increase the WKMG-DT Channel 26 facility’s power from the licensed ERP of 944 kW to the proposed ERP of 1,000 kW using the licensed (existing) directional antenna.
- No other changes requested.

LARGEST STATION IN THE MARKET

Section 73.622(f)(5) of the FCC rules states that licensees and permittees assigned a DTV channel in the initial DTV Table of Allotments may request an increase in either ERP in some azimuthal direction or antenna HAAT, or both, that exceed the initial technical facilities specified in Appendix B, up to that needed to provide the same geographic coverage area as the Largest Station within their Market (“LSM”), whichever would allow the largest service area. It was determined that the licensed WESH-DT Channel 11 (54.9 kW ERP) Daytona Beach, FL facility is the largest station in the Orlando-Daytona Beach-Melbourne, FL market. The licensed WESH-DT Channel 11 facility’s F(50,90) 36.0 dBuV/m protected noise limited contour encompasses an area of 44,489.29 sq. km. With an ERP of 1,000 kW and an HAAT of 515.4 m using the licensed directional antenna, the WKMG

coverage area encompasses 37,091.8 sq. km which is well below the LSM. Therefore, pursuant to Section 73.622(f)(5) of the FCC rules, WKMG can increase its ERP to 1 MW. The attached TVStudy demonstrates that the proposed WKMG-DT Channel 26 facility would not cause impermissible interference with an ERP of 1,000 kW.

CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.


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