

TECHNICAL SUMMARY

TELEVISION STATION KSTP-TV
ST. PAUL, MINNESOTA
CHANNEL 35 1000 KW (H), 300 KW (V) 457 M HAAT

1. The instant application is for an expanded facility for the licensed facility of KSTP-TV, St. Paul, MN (Channel 35).^{*} By means of this application, it is proposed to relocate the KSTP-TV transmitting antenna to an adjacent tower, increase the antenna height, and an increase the effective radiated power.

2. The proposed facility is compliant with the ‘largest station in the market’ provision of Section 73.622(f)(5) of the FCC Rules. It is proposed to operate on Channel 35 with a non-directional ERP of 1000 kW and an antenna height above average terrain (HAAT) of 457 meters. These facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Minneapolis-St. Paul market is KARE(TV), Minneapolis, MN, Channel 11, which is licensed to provide noise-limited 36 dBu, f(50,90) service to an area of 43,560 square kilometers.[†] The proposed KSTP-TV operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 38,900 square kilometers.[‡] Therefore, the proposed KSTP-TV facility is compliant with the largest station provision of the FCC Rules.

3. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC’s *TVStudy* analysis are attached hereto as an exhibit.

^{*} See FCC File No. BLCDDT-20090622ABR.

[†] KARE(TV) is authorized for operation with a non-directional ERP of 45.3 kW and an antenna HAAT of 455 m.

[‡] Clarification of the largest station provision is provided in the *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39 at paragraphs 73-74.