

TECHNICAL SUMMARY

TRANSLATOR STATION K38AI-D
COTTONWOOD, ARIZONA
CHANNEL 28 15 KW (MAX-DA) 2349 M AMSL

1. The instant application was prepared on behalf of KPHO Broadcasting Corporation (“KPHO”), licensee of television translator station K38AI-D, Cottonwood, AZ, in support of an application for displacement. The K38AI-D facility is licensed for operation on RF Channel 38. KPHO was notified by letter that the 600 MHz Band wireless band licensee in the market, T-Mobile, will be commencing operations that will result in the early displacement of the K38AI-D facility. The letter from T-Mobile is included with this application as an exhibit.

2. Due to the imminent displacement of K38AI-D, KPHO respectfully requests a waiver of the Displacement Freeze to allow it to continue its operations on Channel 28. This is pursuant to the FCC’s *Public Notice* providing tools available to LPTV/Translator stations displaced prior to the Special Displacement Window.* Grant of this waiver will allow K38AI-D to continue to provide service to the public with as little disruption as possible.

3. Pursuant to the FCC’s *Public Notice*, KPHO is also requesting operation pursuant to Special Temporary Authority (STA) for operation on Channel 28 with a facility identical to that proposed herein.

4. An interference analysis for the proposed K38AI-D facility on Channel 28 was conducted using the FCC’s *TVStudy* software. The results of this analysis are attached as an exhibit. The proposed facility meets the FCC’s interference protection requirements with respect to all protected facilities.

* See *Public Notice*, “Incentive Auction Task Force and Media Bureau Set Forth Tools Available to LPTV/Translator Stations Displaced Prior to the Special Displacement Window,” DA 17-584, Released: June 14, 2017.