

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NRJ TV SAN FRAN LICENSE CO, LLC, licensee of full-power digital television station KCNS-DT, Channel 39 in San Francisco, California, in support of its application for modification of Construction Permit 0000029156, which authorizes operation on its post-repack channel, Channel 32. The purpose of this amendment is to address the fact that the upgrade proposed in LMS-0000029156 exceeds the Commission's power/height limits for UHF television stations located in Zone 2 of the United States.

Although the above-referenced proposal exceeds the power/height limits set forth in Section 73.622(f)(8)(i) of the Commission's Rules, we note herein that the coverage of the proposed KCNS-DT facility does not exceed that of KGO-DT, Channel 12 in San Francisco, as authorized in LMS-0000029842, one of the largest stations in the San Francisco DMA. Attached is a map on which the noise-limited service contours of proposed KCNS-DT, and authorized KGO-DT are plotted. As shown, the proposed coverage area of KCNS-DT (37,029 square kilometers) is less than that of KGO-DT (41,727 square kilometers), meaning that the KCNS-DT proposal in LMS-0000029156 meets the requirements of Section 73.622(f)(5) of the Rules.

I declare under penalty of perjury that the foregoing statements and the attached exhibit are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher".

February 27, 2018

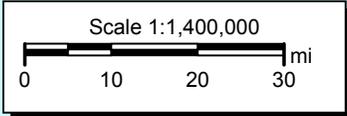
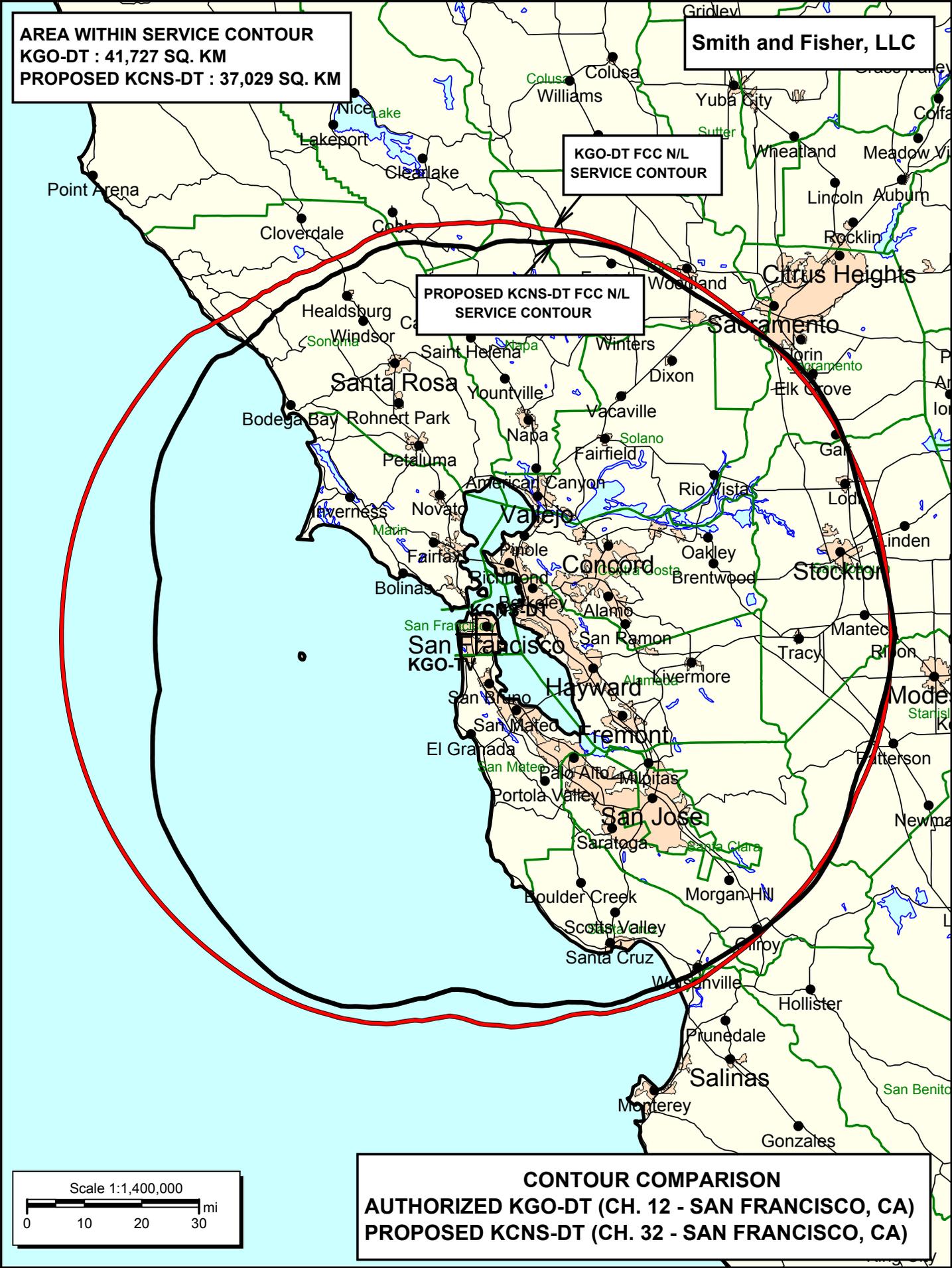
KEVIN T. FISHER

**AREA WITHIN SERVICE CONTOUR**  
**KGO-DT : 41,727 SQ. KM**  
**PROPOSED KCNS-DT : 37,029 SQ. KM**

**Smith and Fisher, LLC**

**KGO-DT FCC N/L SERVICE CONTOUR**

**PROPOSED KCNS-DT FCC N/L SERVICE CONTOUR**



**CONTOUR COMPARISON**  
**AUTHORIZED KGO-DT (CH. 12 - SAN FRANCISCO, CA)**  
**PROPOSED KCNS-DT (CH. 32 - SAN FRANCISCO, CA)**