

WES Broadcast Consultants, Inc.
Engineering Statement in Support for a
Minor Modification of a Construction Permit
for KMM30-D Gila River Indian Co, AZ Channel 30

Engineering Statement

1. General

Gila River Telecommunications, Inc. ("GRTI") hereby respectfully requests that its construction permit, K30MM-LD, Gila River Indian Community, Arizona, facility ID 187704 (File No .BNPDTL-20100707EBQ) to be modified as set forth herein.

2. Engineering

A. Proposed Site:

GRTI proposes relocating its transmitter site to the following NAD83 coordinates: N Latitude 33-19-57.19 W Longitude 112-03-59.50. As shown in Exhibit A this new site is 10.87 km from its current transmitter site with overlap to its existing 50/90 51dbu contour and meets the requirements of a minor modification pursuant to the Commission's rules.

Further, K30MM-LD Channel 30 will operate at 15kW ERP at the Horizon on a Directional Antenna as shown in Exhibit ANT-1 with the main lobe oriented at 30 degrees w/2.5 degrees electronic tilt. The Transmitter will operate with a Full Service Mask Filter.

The facility will operate with the following elevation parameters:

AGL 30m
GAMSL 807.7m
RCAMSL 837.7m

B. Interference Protection:

Exhibit B shows that there is no new interference created by the proposed move above de minimus.

3. Conclusion:

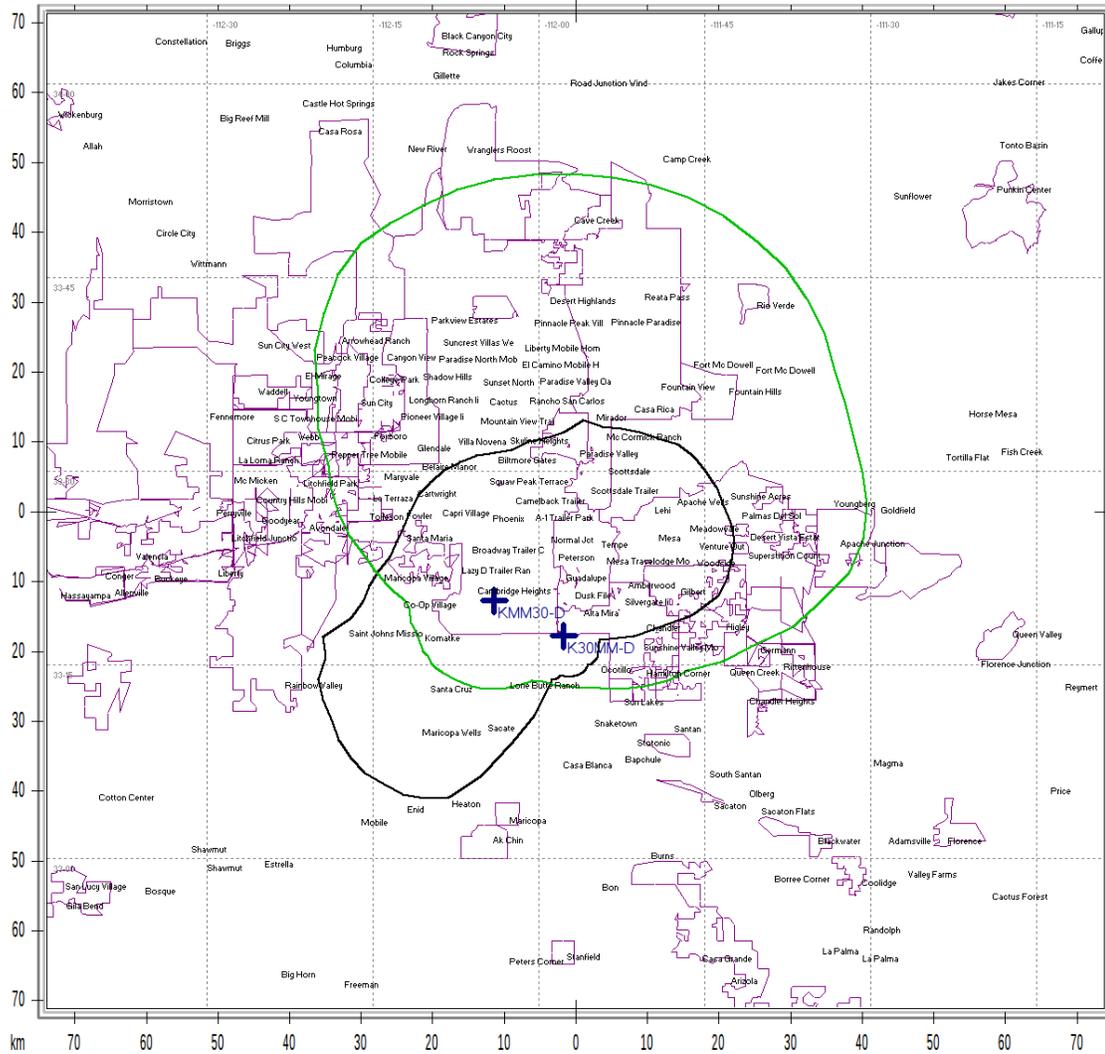
In short, this minor modification application to relocate K30MM-LD meets the requirements of a relocation of a digital LPTV construction permit, and GRTI hereby requests such change be GRANTED.

Respectfully submitted,

Wes Broadcast Consultants, Inc.

Jim McPhetridge Broadcast Engineer

Black= Current Location Green = Proposed New Location



State Borders City Borders Lat/Lon Grid

Map Scale: 1:899240 1 cm = 8.99 km V/H Size: 142.39 x 147.64 km

Exhibit B

Study created: 2018.08.22 18:28:21

Study build station data: LMS TV 2018-08-21 (136)

Proposal: K30MM-D D30 LD CP GLOBE, AZ
File number: BLANK0000055317
Facility ID: 187704
Station data: User record
Record ID: 522
Country: U.S.

Build options:
Protect records not on baseline channel

Stations affected by proposal:

Call	Chan	Svc	Status	City, State	File Number	Distance
KGRQ-LD	D29	LD	LIC	GILA RIVER INDIAN CO, AZ	BLANK0000001686	31.1 km
KTAZ	D29	DT	CP	PHOENIX, AZ	BLANK0000034901	0.5
K47IK	D30+	LD	CP	CAMP VERDE, AZ	BLANK0000037004	127.7
K30DT	D30	LD	CP	FLAGSTAFF, AZ	BDFCDTT20110422ABH	216.4
K30JD-D	D30	LD	LIC	PRESCOTT, AZ	BLDTT20130130AIN	135.7
KUAT-TV	D30	DT	LIC	TUCSON, AZ	BLEDT20040727ABR	162.2
KPPX-TV	D31	DT	LIC	TOLLESON, AZ	BLANK0000035245	0.5

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
Mask: Full Service
Latitude: 33 19 57.10 N (NAD83)
Longitude: 112 3 59.50 W
Height AMSL: 837.7 m
HAAT: 0.0 m
Peak ERP: 15.0 kW
Antenna: SIRA-UTV01 (ID 1003881) 0.0 deg
Elev Pattn: Generic
Elec Tilt: 2.50

50.3 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	8.66 kW	498.1 m	61.9 km
45.0	12.8	461.6	63.2
90.0	0.938	451.9	46.8

135.0	0.005	478.3	18.7
180.0	0.002	493.1	13.3
225.0	0.002	499.5	13.4
270.0	0.002	445.2	13.3
315.0	0.114	511.9	35.9

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 480 m

Distance to Canadian border: 1741.3 km

**Proposal is within coordination distance of Mexican border
Distance to Mexican border: 175.8 km

Conditions at FCC monitoring station: Douglas AZ
Bearing: 131.3 degrees Distance: 304.5 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 36.8 degrees Distance: 967.4 km

Study cell size: 1.00 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%

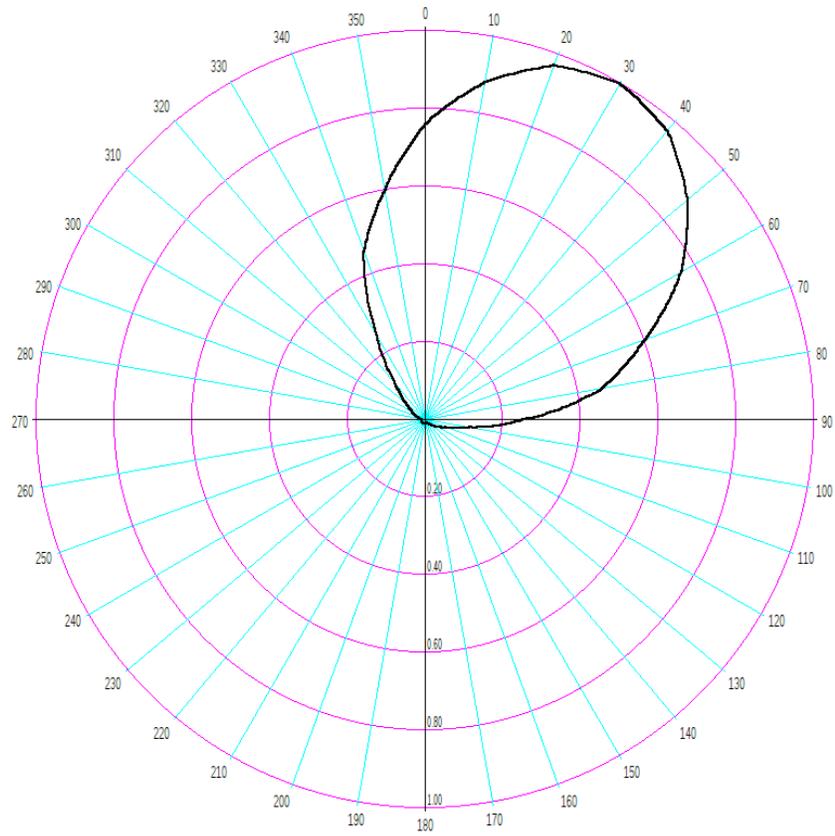
Proposal receives 74.40% interference from scenario 1
No IX check failures found.

Exhibit ANT-1

ComStudy

SIRUTV01

Horizontal Pattern



Azim	Rel.FS	ERP [kW]	dBk
0.0	0.760	8.664	9.377
5.0	0.820	10.086	10.037
10.0	0.880	11.616	10.651
15.0	0.924	12.807	11.074
20.0	0.969	14.084	11.487
25.0	0.984	14.524	11.621
30.0	1.000	15.000	11.761
35.0	0.984	14.524	11.621
40.0	0.969	14.084	11.487
45.0	0.924	12.807	11.074
50.0	0.880	11.616	10.651
55.0	0.820	10.086	10.037
60.0	0.760	8.664	9.377
65.0	0.679	6.916	8.398
70.0	0.599	5.382	7.309
75.0	0.529	4.198	6.230
80.0	0.460	3.174	5.016
85.0	0.355	1.890	2.765

Azim	Rel.FS	ERP [kW]	dBk
90.0	0.250	0.938	-0.280
95.0	0.182	0.497	-3.038
100.0	0.115	0.198	-7.025
105.0	0.087	0.114	-9.449
110.0	0.059	0.052	-12.822
115.0	0.048	0.035	-14.614
120.0	0.037	0.021	-16.875
125.0	0.029	0.013	-18.991
130.0	0.022	0.007	-21.391
135.0	0.018	0.005	-23.134
140.0	0.015	0.003	-24.717
145.0	0.013	0.003	-25.960
150.0	0.011	0.002	-27.411
155.0	0.010	0.002	-28.239
160.0	0.010	0.002	-28.239
165.0	0.010	0.002	-28.239
170.0	0.010	0.002	-28.239
175.0	0.010	0.002	-28.239

Azim	Rel.FS	ERP [kW]	dBk
180.0	0.010	0.002	-28.239
185.0	0.010	0.002	-28.239
190.0	0.010	0.002	-28.239
195.0	0.010	0.002	-28.239
200.0	0.010	0.002	-28.239
205.0	0.010	0.002	-28.239
210.0	0.010	0.002	-28.239
215.0	0.010	0.002	-28.239
220.0	0.010	0.002	-28.239
225.0	0.010	0.002	-28.239
230.0	0.010	0.002	-28.239
235.0	0.010	0.002	-28.239
240.0	0.010	0.002	-28.239
245.0	0.010	0.002	-28.239
250.0	0.010	0.002	-28.239
255.0	0.010	0.002	-28.239
260.0	0.010	0.002	-28.239
265.0	0.010	0.002	-28.239

Azim	Rel.FS	ERP [kW]	dBk
270.0	0.011	0.002	-27.411
275.0	0.013	0.003	-25.960
280.0	0.015	0.003	-24.717
285.0	0.018	0.005	-23.134
290.0	0.022	0.007	-21.391
295.0	0.029	0.013	-18.991
300.0	0.037	0.021	-16.875
305.0	0.048	0.035	-14.614
310.0	0.059	0.052	-12.822
315.0	0.087	0.114	-9.449
320.0	0.115	0.198	-7.025
325.0	0.182	0.497	-3.038
330.0	0.250	0.938	-0.280
335.0	0.355	1.890	2.765
340.0	0.460	3.174	5.016
345.0	0.529	4.198	6.230
350.0	0.599	5.382	7.309
355.0	0.679	6.916	8.398