

## **Public Interest Showing in Support of KRTN-TV Facilities Modification Application**

By this application, Ramar Communications, Inc. (“Ramar”) seeks Federal Communications Commission approval to relocate the transmitter site of KRTN-TV, Durango, Colorado (“KRTN”).

Because implementation of this site move would both result in a slight extension of KRTN’s relevant noise limited service (“NLSC”) contour and create a loss in predicted NLSC contour coverage, Ramar demonstrates in this exhibit and in the Engineering Exhibit of Chesapeake RF Consultants, LLC (“Engineering Exhibit”) which also accompanies this application the very minor nature of both the NLSC contour extension and the loss in population coverage, as well as the multiple substantial public interest benefits grant of this proposal will generate. As explained in this exhibit and in the Engineering Exhibit, an application grant is amply justified in this instance.

As to engineering specifics, the analysis in the Engineering Exhibit makes clear that the proposed extension of KRTN’s 41dBu NLSC in certain directions is inconsequential in context – i.e., the *overall* area encompassed by that contour will shrink upon construction and operation of the new KRTN facilities proposed herein.

The Engineering Exhibit also employs Longley Rice predicted signal coverage analysis and cites the presence of Ramar television translator station K23KL-D, Farmington, New Mexico (which carries KRTN-TV’s programming in a different primary and multicast configuration) in support of its conclusion that only 13 persons are projected to lose KRTN service as a result of this proposed move, a number that is clearly de minimis under any reasonable standard, and falls within well established Commission precedent. *See, e.g., Seabrook, Huntsville, et al., Texas*, Memorandum Opinion and Order, 10 FCC Rcd 9360, 9362 (1992) (provision of a second aural service to a population of 455 persons deemed de minimis in case context).

With regard to other public interest factors, the Commission, in the analogous context of the proceeding which resulted less than a year ago in elimination of the main studio rule, described several benefits that are relevant here:

The *cost savings* broadcasters may achieve following elimination of the main studio rule will enable them to allocate greater resources to local programming and other matters such as community outreach, newsgathering, equipment upgrades, and attracting new talent and personnel. According to some commenters, such savings could even prevent some stations from going dark. Stations will have the flexibility to operate studios *in the most efficient manner*, and some stations that are co-owned or jointly operated may find it to be more efficient for them to co-locate their studios.

*Elimination of Main Studio Rule*, FCC 17-137, rel. Oct. 24, 2017, at ¶ 14 (footnotes omitted) (emphasis added).

Similar cost savings and other factors are in play here and clearly support grant of this application.

First and foremost, a grant will allow Ramar to colocate the transmitter sites of commonly-owned stations KRTN and KREZ-LD (“KREZ”), both Durango, Colorado. This colocation promises to produce well-recognized operational efficiencies and financial savings through the elimination of cost redundancies. As the Commission has recognized, such efficiencies/savings help stations, particularly those serving smaller communities and markets like Durango (total population served by KRTN of less than 100,000), survive and compete in an increasingly crowded competitive video marketplace.

Second, the particular efficiencies/savings that will flow from grant of this application will be substantial and tangible, the result of a *shared* KRTN/KREZ antenna, *shared* KRTN/KREZ transmission line, and *shared* KRTN/KREZ transmitter building.

Third, colocation of these two stations will eliminate the operational uncertainties that attend Ramar’s month-to-month leasehold status at the current KRTN transmitter site. Colocation will also permit Ramar to more efficiently utilize KREZ’s existing studio-to-transmitter site fiber connectivity. Fiber is expensive and difficult to find in such comparatively remote locations. Ramar notes in this regard that the KREZ site is better suited overall for television station signal transmission than is the current KRTN site, as the KREZ site is also the transmitter site of full power television station KREZ-TV, licensed to Nexstar Broadcasting, Inc.

Fourth, better mountaintop road access exists to the KREZ site than to the KRTN site. This is particularly important during the winter months when superior site access allows safer site visits.

Finally, construction of the facilities proposed herein will not adversely affect vendor or tower crew resources currently deployed in implementing the post-incentive auction transition. For example, adding KRTN-TV to the KREZ-LD antenna already being fabricated for installation at the site, due to the latter station’s displacement, has no meaningful incremental impact on such resources. In addition, in the letter attached hereto, Ramar’s transmitter vendor, Anywave Communication Technologies Inc., confirms that fulfillment of the KRTN-TV transmission equipment order will not impair Anywave’s ability to meet its overall obligations during the FCC’s repack transition schedule.

As the foregoing makes clear, from multiple important perspectives, grant of the proposed relocation of the KRTN transmitter site would serve the public interest, as it will significantly enhance KRTN’s potential to continue to provide over-the-air service to the viewing public in and around Durango, Colorado.

For all of these reasons and for those set forth elsewhere in this application, Ramar respectfully requests expeditious processing and grant of this application as well as any necessary waivers.



**Anywave Communication Technologies**  
**300 Knightsbridge Parkway Suite 150**  
**Lincolnshire IL 60069**

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October 30, 2018

KRTN-TV Durango Colorado  
Brad Moran  
President / CEO  
9800 University Ave  
Lubbock, TX 79452

Subject: New Transmitter for the co-location of KRTN-TV and its impact on Anywave Communication Technologies

Project: KRTN-TV Durango Colorado

Dear Mr. Moran,

Anywave Communication Technologies is aware that station KRTN-TV is wishing to co-locate with another Ramar owned and operated re-pack transitioning translator.

This letter is to confirm that the co-location transmitter move, and consequent purchase of a new transmitter, will not impair the ability of Anywave Communication Technologies' to provide the required transmitter and resources needed for stations during all phases of the FCC's channel reassignment transition schedule.

You and your employees of KRTN-TV and Ramar are permitted to share this letter with the FCC, as required.

Sincerely,

Perry V. PRIESTLEY  
Chief Executive Officer