ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of GILA RIVER TELECOMMUNICATIONS, INC., the licensee of digital Low Power Television Station KGRQ-LD, Channel 29, serving the Gila River Indian Community in Arizona, in support of its displacement Application for Construction Permit to specify operation on Channel 21 from a new site. This station is being displaced as a result of the spectrum auction and significant predicted interference to and from KTAZ-DT, which has been assigned repack Channel 29 in Phoenix, Arizona, just 31 kilometers from the transmitter site of KGRQ-LD.

It is proposed to mount a broadband directional antenna at the 33.5-meter level of an existing 36.5-meter tower atop Sacaton Peak. The proposed effective radiated power for the facility is 15.0 kW in horizontal plane. Exhibit B is a map upon which the predicted 51 dBu service contour for the proposed Channel 21 facility is plotted.

Attached, as Exhibit C, is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed a cell size of 1.0 kilometer and increment spacing of 1.0 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed KGRQ-LD facility on Channel 21 meets the Commission's interference requirements to all full-power, Class A, translator and low-power co-channel and adjacent-channel television facilities, except for two.

As shown in the study, the facility proposed herein causes predicted impermissible interference to KGRY-LD, Channel 21 in Gila River Indian Community (BLDTL-20150107ADW) and a pending application for a new LPTV station on Channel 21 in the same community (BNPDT-20100713APP), but at a different site than that of KGRY-LD. However, both KGRY-LD

SMITH AND FISHER

EXHIBIT A

and the pending application are co-owned by the licensee of KGRQ-LD and the interference between these facilities is acknowledged and accepted. Therefore, these situations can be ignored by the Commission and do not adversely affect the grantability of the facility proposed herein.

In addition, it is believed that the proposed facility causes no predicted interference to any Mexican television station or allotment.

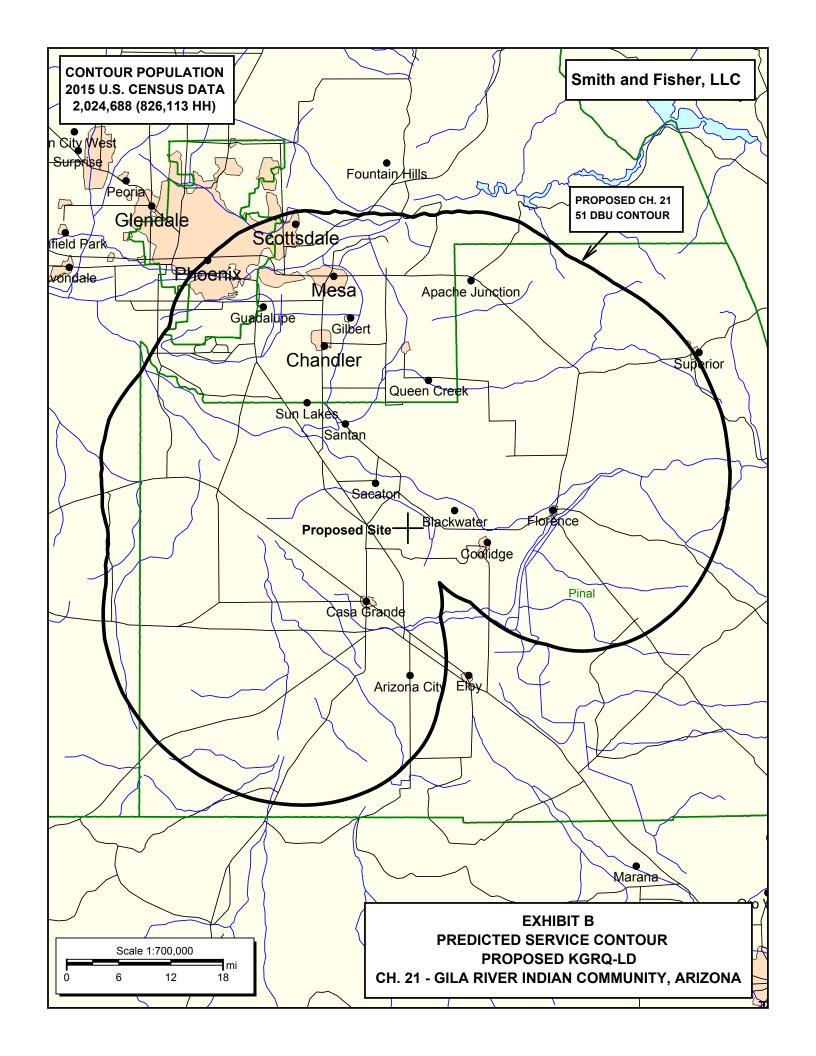
A detailed power density calculation is provided in Exhibit D.

Since no change in the overall height or location of an existing tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC antenna structure registration is not required for the tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

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TVSTUDY INTERFERENCE ANALYSIS RESULTS PROPOSED KGRQ-LD CHANNEL 21 – GILA RIVER INDIAN COMMUNITY, ARIZONA

Study created: 2018.04.25 12:03:55

Study build station data: LMS TV 2018-04-07

Proposal: KGRQ-LD D21 LD LIC GILA RIVER INDIAN CO, AZ

File number: BLANK0000001686

Facility ID: 187708

Station data: User record

Record ID: 182 Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX Call Chan S	vc Status (City, State Fil	e Number Distance	е
Yes KPAZ-TV D20	DT LIC	PHOENIX, AZ	BLCDT20131121AHS	51.6 km
No K21GE N21-	TX LIC	CAMP VERDE, AZ	BLTT20040830AAI	164.2
Yes K21GE D21	LD CP	CAMP VERDE, AZ	BDFCDTL20120524A	AC 164.2
No K42IQ-D D21	LD APP	FLAGSTAFF, AZ	BLANK0000029581	249.0
Yes NEW D21	LD APP	GILA RIVER INDIAN	CO, AZ BNPDTL2010071	3APP 21.3
Yes KGRY-LD D21	LD LIC	GILA RIVER INDIAN	CO, AZ BLDTL20150107	ADW 9.8
No K21EG-D D21	LD LIC	GOLDEN VALLEY, A	Z BLDTT20130308AF	3B 340.4
No K21EA-D D21	LD LIC	LAKE HAVASU CITY	, AZ BLDTT20130308A	BO 306.1
No NEW D21	LD APP	PARKER, AZ	BNPDTL20100514ADI	248.7
No KRPO-LD D21	LD LIC	QUARTZSITE, AZ	BLDTL20110926AEA	197.6
No KRPO-LD D21	LD APP	QUARTZSITE, AZ	BPDTL20120606AA	C 150.4
Yes K21GC N21-	TX LIC	SAFFORD, AZ	BLTT20060215AAV	174.9
Yes KWBA-TV D21	DT CP	SIERRA VISTA, AZ	BLANK0000026780	160.6
No K21FU-D D21	LD LIC	TOPOCK, AZ	BLDTT20130308ACK	335.9
Yes K21CX-D D21	LD LIC	TUCSON, AZ	BLDTL20110727AGJ	110.9
No NEW D21	LD APP	WINTERHAVEN, CA	BNPDTL20100510A	AG 308.5
No NEW D21	LD APP	LUFKIN, TX	BMJADTL20100517AAU	358.8
No KNAZ-TV D22	DT LIC	FLAGSTAFF, AZ	BLCDT20091210AAC	219.1
No K22JD-D N22-	TX LIC	MADERA PEAK, AZ	BLTT20091029ABD	83.7
No K22JD-D D22	LD LIC	MADERA PEAK, AZ	BLANK0000033767	83.7
No KPSN-LD D22	LD LIC	PAYSON, AZ	BLDTL20120430AAZ	150.0
Yes KPDF-CA D22	DC CP	PHOENIX, AZ	BLANK0000034612	51.6
Yes KTVP-LD D22	LD LIC	PHOENIX, AZ	BLDTL20140813AAG	51.8

 No
 KCOS-LP
 N28 TX
 LIC
 PHOENIX, AZ
 BLTTL19990325JD
 54.8

 No
 KPCE-LP
 N29 TX
 LIC
 TUCSON, AZ
 BLTTL20080605AAT
 98.7

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D21

Mask: Full Service

Latitude: 33 0 6.90 N (NAD83) Longitude: 111 40 28.00 W Height AMSL: 859.3 m

HAAT: 0.0 m Peak ERP: 15.0 kW Antenna: 0.0 deg Elev Pattrn: Generic

49.5 dBu contour:

Azimuth ERP **HAAT** Distance 0.0 deg 8.57 kW 423.6 m 60.4 km 45.0 11.4 451.9 63.3 90.0 7.97 451.2 61.1 135.0 0.050 446.2 30.3 180.0 0.713 435.0 45.9 225.0 12.7 438.1 63.4 270.0 8.57 378.8 58.3 315.0 11.4 454.8 63.4

Database HAAT does not agree with computed HAAT Database HAAT: 0 m Computed HAAT: 435 m

Distance to Canadian border: 1777.8 km

**Proposal is within coordination distance of Mexican border

Distance to Mexican border: 154.0 km

Conditions at FCC monitoring station: Douglas AZ Bearing: 130.8 degrees Distance: 252.8 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone: Bearing: 34.1 degrees Distance: 976.2 km

No land mobile station failures found

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%

- **MX with BNPDTL20100713APP APP scenario 1, 78.06% interference caused
- **IX check failure to BLDTL20150107ADW LIC scenario 1, 78.05% interference caused
- ---- Below is IX received by proposal BLANK0000001686 ----
- **MX with BNPDTL20100713APP APP scenario 1, 86.01% interference received

EXHIBIT D

POWER DENSITY CALCULATION

PROPOSED KGRQ-LD CHANNEL 21 – GILA RIVER INDIAN COMMUNITY, ARIZONA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to the facility proposed herein. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kW, an antenna radiation center 33.5 meters above ground, and assuming a vertical relative field value of 10 percent at the steeper elevation angles for the existing MCI antenna, maximum power density two meters above ground of 0.0051 mW/cm² is calculated to occur near the south-southwest base of the tower. Since this is only 1.5 percent of the 0.34 mW/cm² reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 21 (512-518 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.