

MEMO

Date: Thursday, March 21, 2019

To: Hossein Hashemzadeh

From: Larry E. Morton

Subject: KHMF-LP Channel 33 Re-Location

In the Fort Smith - Fayetteville – Springdale – Rogers DMA, KCAF-LD and KHMF-LP will provide the same signal over 90% of the DMA. In this DMA there is a mountain range between Fort Smith and Fayetteville-Springdale-Rogers, so we must have good coverage on both sides of the mountain to provide our audience with a strong over-the-air signal.

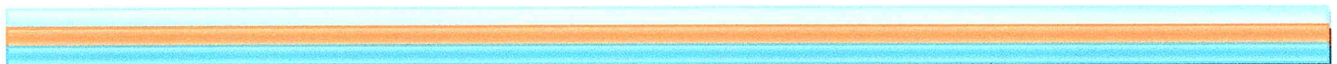
Attached as Exhibit 1 is a map showing the different locations of KHMF-LP. On this map, I show the original location and coverage (Red Contour); the displaced location and coverage (Green Contour) and the requested location and coverage (southern Blue Contour). The northern Blue Contour is KHMF-LP's companion station, KCAF-LD.

As you can see, this station was originally licensed to and covered Fort Smith as K52FJ. When channel 52 was displaced, the only location where we could find an available channel was more than 30 miles away on Channel 33. Internet is not available at this remote location and it can only rebroadcast another local (Fort Smith) signal. It currently replicated KRAH-CD that is co-located at the same site. This is effectively a wasted signal providing duplicate coverage.

By moving back to our original location, we have the ability to rebroadcast KCAF-LD out of Fayetteville providing a unique broadcast stream to the Ft. Smith side of the market. This move back to our original location will provide better service to our viewers, actually cover our City of License and at the same time we can correct the forced move we experienced by our previous analog displacement.

As you are probably aware, we have been required to spend large amounts of money because of the auction displacement and other interference issues. For example:

1. KPBI-CD was on Channel 14 and had to move to Channel 32 at a new location because of interference with the Bentonville Fire Department without reimbursement



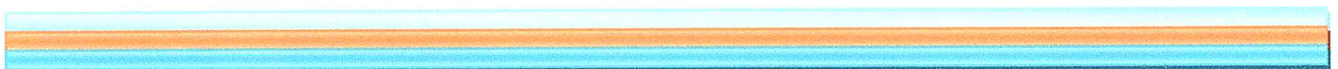
2. KKAJ-LD, Channel 30 in Fayetteville, had to make antenna changes to avoid interference with KWOJ-TV Channel 29 without reimbursement;
3. KKYK-CD, channel 16, was displaced and had to rebuild on Channel 21 without reimbursement;
4. KUFS-LP in Fort Smith, had to move off Channel 7 because of interference, but didn't qualify for reimbursement;
5. KWFT-LP, Channel 34 in Fort Smith, was displaced, but had a companion digital channel so we couldn't file in the LPTV window, so we had to build out on Channel 6 at a new site with no reimbursement; and
6. KXUN-LP, Channel 48 originally in Fort Smith, was displaced and rebuilt on Channel 26 at a new location with possible reimbursement next year).

In the process of rebuilding our stations in Fort Smith, we built out a Channel 33 at the KWFT-LP site that we have been using as a temporary STA site for our stations that were displaced by T-Mobile or other protected stations. This STA was required so that we did not take any of our local Fort Smith channels off the air and disrupt our local viewers. Both KXUN-LP and KWFT-LP have operated on this STA channel. We did not receive any reimbursement for building this STA. The above unreimbursed expenditures are in addition to the unreimbursed costs we incurred on three Class A stations in the Fort Smith – Fayetteville-Springdale-Rogers DMA that we rebuilt last year.

As you can see, we have actively been working and spending money in our local market to comply with the repack and improve our over-the-air coverage for our local viewers. I do not think the intent of the Media Bureau's "30 mile policy" was to limit broadcasters from providing better coverage in their current market or not allowing a broadcaster to actually cover their City of License after being previously displaced.

I realize that it might be possible to move in two steps. However this option is not realistic for us in our situation. There are several reasons for this that include:

- a. Although the path may be clear when we start, there is no guarantee that it will be available when we get our interim site licensed.
- b. The availability of viable "Broadcast Tower" sites is limited and many if not all Wireless and Cell site managers in our area prohibit TV Broadcast facilities from locating on their towers.
- c. As a result of the FCC Repack we are finding that Broadcast Tower space and tower crews are in short supply and priced at a premium. Most Broadcast Tower operators do not want to enter in to short term leases and if they do they require tower studies, payments for any modifications required and a guaranteed minimum term at a premium price.
- d. In rural areas like we have in Northwest Arkansas, Broadcast Towers are not spaced conveniently to accommodate the 30 mile policy. Many of these towers and sites are not strategically positioned to accommodate Broadcast TV based on site elevation and their placement in and around the communities.



- e. Another major problem we are currently facing is that this double build approach will result in more than \$100,000 of additional expenses if we have to build an interim facility. I have attached Exhibit 2 showing our cost estimate for the interim site based on our current construction experience.

Based upon these facts and more importantly the fact that we are a local LPTV broadcaster trying to better serve our viewers, I am requesting that you grant our application.

Sincerely



Larry Morton

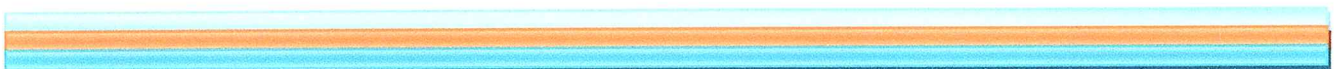


EXHIBIT 1

KKAF - Channel 30 & KHMJ - Channel 33

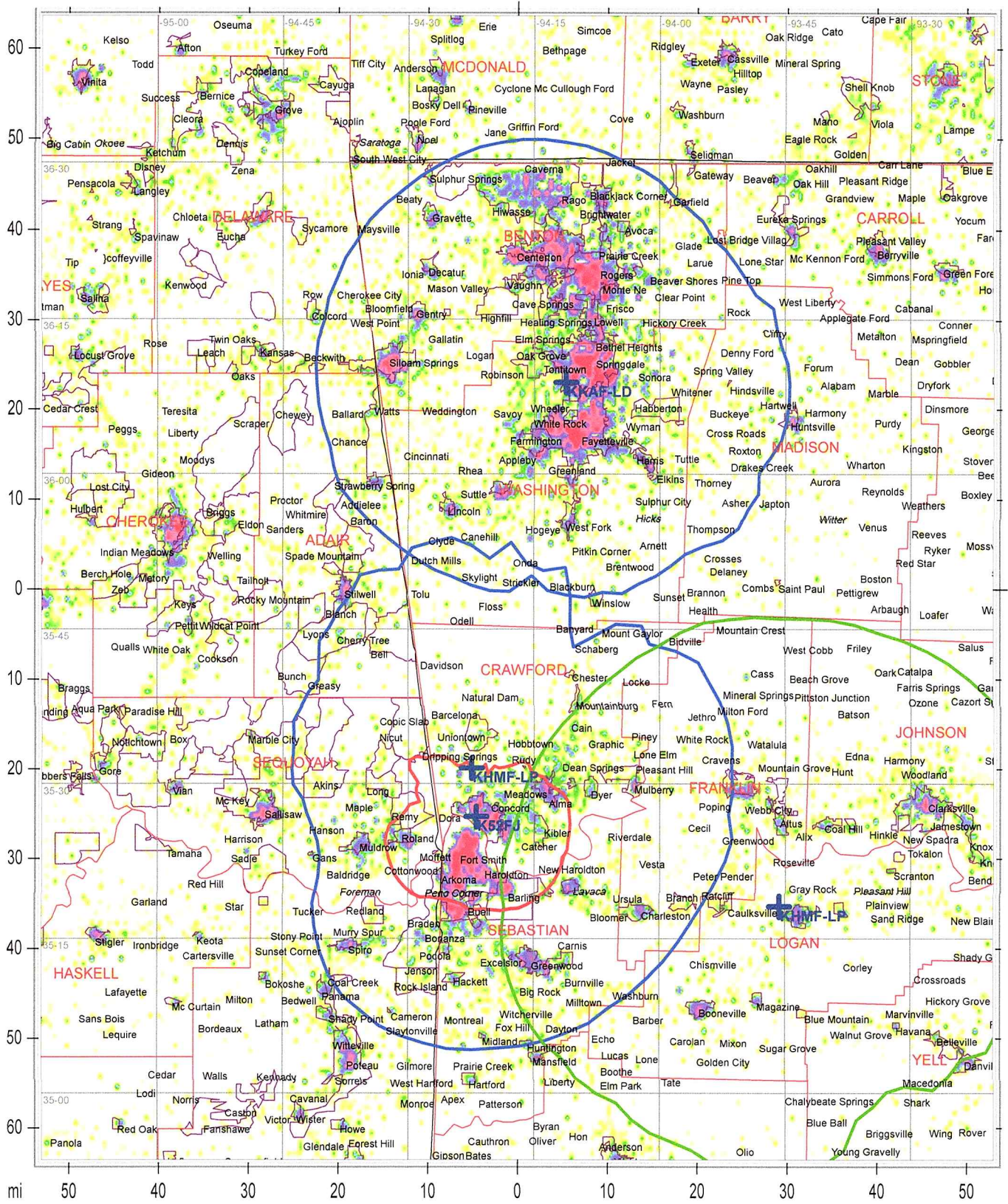


EXHIBIT 2

KTV MEDIA, LLC

	KMHF-LD Channel 33			
	Estimate	Actual	Variance	Comments
Transmitter				
Filter				
Site Survey & Installation	\$ 10,000.00			Based on interim site at Winslow
Transmitter Building modifications	\$ 5,000.00			Based on interim site at Winslow
Increased Air Conditioning	\$ 1,300.00			Based on interim site at Winslow
STL - IP &/or RF costs				
Interior RF Systems & connectors	\$ 1,500.00			Set up to get signal at the site
Antenna	\$ 10,000.00			Current antenna shared with KRAH we have a Ch33 antenna at proposed site
Tower Rigging & Disposal	\$ 25,000.00			Based on current tower crew prices
Tower Mapping/Load study (if required)	\$ 10,000.00			Most tower owners will require this
Tower Reinforcement (if required)				
Antenna Sweep	\$ 1,000.00			Limited sweep
Antenna Line	\$ 3,000.00			200 ft @ \$15/ft
Engineering Costs:				
New Channel Assignment	\$ 2,800.00			Site Location
Construction Permit	\$ 3,000.00			Based on current prices
License	\$ 1,500.00			Based on current prices
Prepare Form 601				
Site Engineering	\$ 8,000.00			\$100/hr
Project Management Management		Included in Site Engineering		\$150/hr
Prepare & Review Reimbursement Form				
Form 399 Assistance				25 HRs X \$50/HR
Transition Coordination				
Field Coverage Verification				
RF Exposure Measurement				
Legal Costs:				
Construction Permit	\$ 2,000.00			
License	\$ 1,000.00			
STA (or Minor Modification)				
Interim CP/License				
Tower Lease Negotiations/Rent	\$ 12,000.00			Tower Lease for 1 Year
Fees & Licenses:				
License	\$ 170.00			
CP Modification				
STA - For interim operations				
Local Permits	\$ 500.00			
Travel	\$ 500.00			
Equipment Storage				
Disposal Costs				
Sale & Other Taxes	\$ 4,015.00			
Shipping				
Contingencies				
Construction Interest				
Total Costs	\$ 102,285.00	\$ -	\$ -	