

TECHNICAL STATEMENT
SUPPORTING REQUEST FOR AUTHORIZATION TO
ESTABLISH ATSC 3.0 SERVICE AND ATSC 1.0 SIMULCAST HOST
KPDY, VANCOUVER, WA (FACILITY ID NO. 35460)
KPTV, PORTLAND, OR (FACILITY ID NO. 50633)
PORTLAND, OR DMA

Background

This statement was prepared on behalf of KPTV-KPDY Broadcasting Corporation ('Meredith'), licensee of stations KPDY(TV), Vancouver, WA; and KPTV(TV), Portland, OR. Meredith requests authorization for ATSC 3.0 service on KPDY (RF Channel 30) with KPTV (RF Channel 12) to be established as an ATSC 1.0 simulcast host station.

Compliance with Coverage Requirements

The proposal is compliant with the coverage requirements for an ATSC 1.0 simulcast signal as outlined in Section 73.3801(c) of the FCC Rules. Specifically, the KPTV predicted principal community service contour entirely encompasses the KPDY city of license of Vancouver, WA. In addition, both stations are licensed within the same DMA* (Portland, OR), as required. This is illustrated in the Predicted Coverage Analysis Map, which is attached hereto as an exhibit.

Compliance with Expedited Processing

The instant proposal qualifies for expedited processing according to the requirements outlined in Section 73.3801(f)(5) of the FCC Rules. Under a comparison of the predicted noise-limited service contours alone, the predicted noise-limited service contour of the KPTV licensed facility encompasses 100% of the predicted noise-limited service contour of the KPDY licensed facility.

* Nielsen Designated Market Area.

On the basis of an analysis utilizing the FCC's *TVStudy* Predicted Service and Interference Model,[†] the KPTV Host station will provide service to 99.2% of the KPDX predicted service population as computed on a cell by cell analysis.

Specifically, based on the *TVStudy* model studies, the predicted terrain-limited interference-free population within the KPDX predicted noise-limited service contour is 2,816,051. Based on the *TVStudy* model studies, the KPTV facility will provide predicted terrain-limited interference-free service to the KPDX predicted terrain-limited interference-free service cells of 2,794,709 persons. This is a service percentage of 99.2%, which exceeds the FCC's minimum 95% level. The attached map illustrates the results of the analysis. Summaries of the *TVStudy* results for both stations are attached hereto for reference.

All studies were conducted utilizing the same cell size and terrain profile point spacing so as to make a consistent service comparison between the respective facilities.

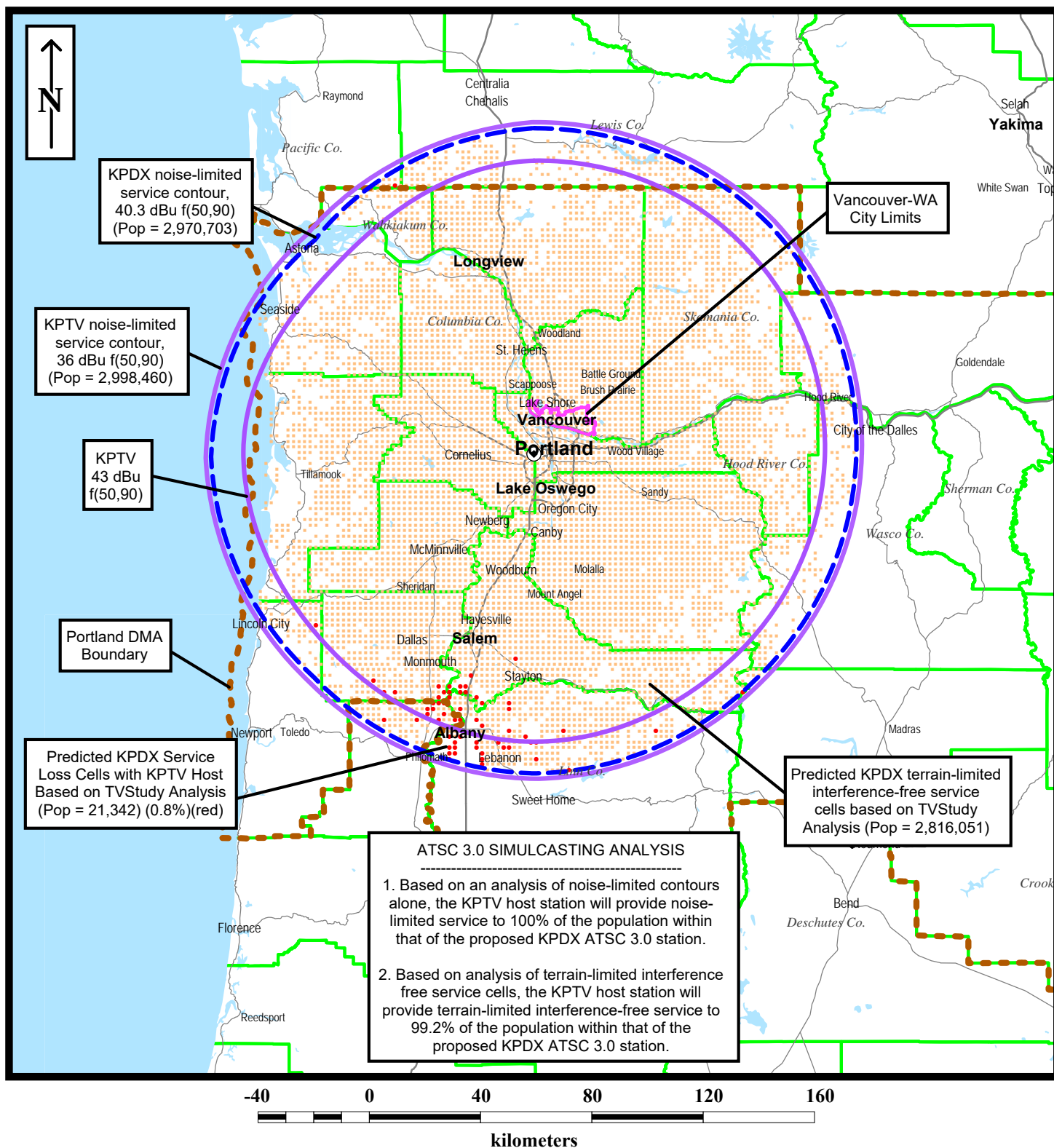


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[†] Version 2.2.5



PREDICTED COVERAGE ANALYSIS MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TVSTUDY ANALYSIS FOR KPDX, VANCOUVER, WASHINGTON (CHANNEL 30) LICENSED FACILITY

vstudy v2.2.5 (4uoc83)

Database: localhost, Study: kpdx_lic, Model: Longley-Rice

Study build station data: LMS TV 2019-08-30

Proposal: KPDX D30 DT LIC VANCOUVER, WA
File number: BLCDT20090612ADJ
Facility ID: 35460
Station data: LMS TV 2019-08-30
Record ID: 9c3603100fe443c99006cf6212b6c0ea
Country: U.S.
Zone: II

Stations potentially affected by proposal:

| IX | Call | Chan | Svc | Status | City, State | File Number | Distance |
|-----|---------|------|-----|--------|-----------------|------------------|----------|
| Yes | KEPB-TV | D29 | DT | LIC | EUGENE, OR | BLEDT20050127AHY | 171.4 km |
| No | KBLN-TV | D30 | DT | LIC | GRANTS PASS, OR | BLCDT20090224AAX | 351.5 |
| Yes | KOMO-TV | D30 | DT | CP | SEATTLE, WA | BLANK0000034249 | 236.5 |
| No | KUNW-CD | D30 | DC | LIC | YAKIMA, WA | BLDTL20090923ACQ | 206.1 |
| Yes | KLSR-TV | D31 | DT | LIC | EUGENE, OR | BLCDT20070104ADQ | 171.5 |
| No | KONG | D31 | DT | LIC | EVERETT, WA | BLANK0000001601 | 236.5 |
| No | KONG | D31 | DT | CP | EVERETT, WA | BPCDT20080617AEE | 236.5 |

Record parameters as studied:

Channel: D30
Latitude: 45 31 18.00 N (NAD83)
Longitude: 122 44 57.00 W
Height AMSL: 599.7 m
HAAT: 528.0 m
Peak ERP: 741 kW
Antenna: Omnidirectional
Elev Pattn: Generic
Elec Tilt: 0.75

40.3 dBu contour:

| Azimuth | ERP | HAAT | Distance |
|---------|--------|---------|----------|
| 0.0 deg | 741 kW | 567.3 m | 117.4 km |
| 45.0 | 741 | 573.8 | 117.7 |
| 90.0 | 741 | 537.7 | 115.6 |
| 135.0 | 741 | 513.9 | 114.1 |
| 180.0 | 741 | 528.9 | 115.1 |
| 225.0 | 741 | 497.8 | 113.0 |
| 270.0 | 741 | 538.4 | 115.7 |
| 315.0 | 741 | 456.7 | 109.7 |

Study cell size: 2.00 km
Profile point spacing: 1.00 km

Interference to proposal scenario 1

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|-------------|--------------|---------|-----------------|---------|---------------|------------------|----------|
| Desired: | KPDX | D30 | DT | LIC | VANCOUVER, WA | BLCDT20090612ADJ | |
| Undesireds: | KEPB-TV | D29 | DT | LIC | EUGENE, OR | BLEDT20050127AHY | 171.4 km |
| | KOMO-TV | D30 | DT | CP | SEATTLE, WA | BLANK0000034249 | 236.5 |
| | KUNW-CD | D30 | DC | LIC | YAKIMA, WA | BLDTL20090923ACQ | 206.1 |
| | KLSR-TV | D31 | DT | LIC | EUGENE, OR | BLCDT20070104ADQ | 171.5 |
| | Service area | | Terrain-limited | | IX-free | Percent IX | |
| 41468.3 | 2,970,703 | 30587.5 | 2,848,423 | 30064.1 | 2,816,051 | 1.71 | 1.14 |

| Undesired | Total IX | Unique IX | Prcnt Unique IX |
|--------------------|----------|-----------|-----------------|
| KEPB-TV D29 DT LIC | 194.6 | 25,511 | 11.9 |
| KOMO-TV D30 DT CP | 320.9 | 5,954 | 316.9 |
| KUNW-CD D30 DC LIC | 4.0 | 0 | 0.0 |
| KLSR-TV D31 DT LIC | 190.6 | 26,022 | 7.9 |
| | | 907 | 0.03 |

Note: Based on cell by cell analysis, KPTV will provide IX-free service to a population of 2,794,709 (99.2%) of the KPDX IX-free service cells.

TVSTUDY ANALYSIS FOR KPTV, PORTLAND, OREGON (CHANNEL 12) LICENSED FACILITY

tvstudy v2.2.5 (4uoc83)
Database: localhost, Study: kptv_lic, Model: Longley-Rice

Study build station data: LMS TV 2019-08-30

Proposal: KPTV D12 DT LIC PORTLAND, OR
File number: BLCDT20090612ADH
Facility ID: 50633
Station data: LMS TV 2019-08-30
Record ID: 5555e3ebb3704af39987cf6212b6c0ea
Country: U.S.
Zone: II

Stations potentially affected by proposal:

| IX | Call | Chan | Svc | Status | City, State | File Number | Distance |
|-----|---------|------|-----|--------|-------------|------------------|----------|
| No | KOAB-TV | D11 | DT | LIC | BEND, OR | BLEDT20060823AAP | 195.5 km |
| No | KSTW | D11 | DT | LIC | TACOMA, WA | BLCDT20091117AAX | 235.1 |
| No | KUID-TV | D12 | DT | LIC | MOSCOW, ID | BLEDT20060804AFK | 463.5 |
| Yes | KDRV | D12 | DT | LIC | MEDFORD, OR | BLCDT20090303ACL | 316.9 |
| Yes | KVAL-TV | D13 | DT | LIC | EUGENE, OR | BLCDT20090612AGY | 171.4 |
| No | KCPQ | D13 | DT | LIC | TACOMA, WA | BLCDT20090918ABR | 225.2 |

Record parameters as studied:

Channel: D12
Latitude: 45 31 18.00 N (NAD83)
Longitude: 122 44 57.00 W
Height AMSL: 615.7 m
HAAT: 529.0 m
Peak ERP: 24.5 kW
Antenna: Omnidirectional
Elev Pattn: Generic
Elec Tilt: 0.80

36.0 dBu contour:

| Azimuth | ERP | HAAT | Distance |
|---------|---------|---------|----------|
| 0.0 deg | 24.5 kW | 583.3 m | 119.6 km |
| 45.0 | 24.5 | 589.8 | 120.0 |
| 90.0 | 24.5 | 553.7 | 117.6 |
| 135.0 | 24.5 | 529.9 | 116.2 |
| 180.0 | 24.5 | 544.9 | 117.0 |
| 225.0 | 24.5 | 513.8 | 115.3 |
| 270.0 | 24.5 | 554.4 | 117.6 |
| 315.0 | 24.5 | 472.7 | 113.1 |

Study cell size: 2.00 km
Profile point spacing: 1.00 km

Interference to proposal scenario 1

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|--------------------|---------|------|-----|--------|--------------|------------------|----------|
| Desired: | KPTV | D12 | DT | LIC | PORTLAND, OR | BLCDT20090612ADH | |
| Undesireds: | KOAB-TV | D11 | DT | LIC | BEND, OR | BLEDT20060823AAP | 195.5 km |
| | KDRV | D12 | DT | LIC | MEDFORD, OR | BLCDT20090303ACL | 316.9 |
| | KVAL-TV | D13 | DT | LIC | EUGENE, OR | BLCDT20090612AGY | 171.4 |

| | Service area | Terrain-limited | IX-free | Percent IX |
|---------|--------------|-----------------|-----------|------------|
| 43001.3 | 2,998,460 | 23265.2 | 2,847,263 | 1.19 |

| Undesired | Total IX | Unique IX | Prcnt Unique IX |
|--------------------|----------|-----------|-----------------|
| KOAB-TV D11 DT LIC | 4.0 | 0 | 0.01 |
| KDRV D12 DT LIC | 286.1 | 13,904 | 0.63 |
| KVAL-TV D13 DT LIC | 178.7 | 21,760 | 0.29 |
| KLSR-TV D31 DT LIC | 190.6 | 26,022 | 0.03 |
