

PURPOSE OF PRE-AUCTION ENGINEERING STA

The purpose of this pre-auction Engineering STA application seeks authority to remain on Pre-Auction Channel 44 until July 13, 2020. The station is left with no reasonable alternative other than going silent which would not serve the public. It is understood that the grant of this STA request will automatically extend the CP to correspond to the new transition deadline. The parameters requested in this STA are exactly the same as the parameters requested and approved in the previous Engineering STA having file number 0000113896.

This Engineering STA requests to continue operation on the KWKT-DT facility's pre-auction channel (44) using a Dielectric model TLP-24J (C) interim antenna and a 2.0 kW transmitter while the new post-auction main antenna is installed and the main facility continues to be built-out. The proposed KWKT pre-auction interim facility will completely encompass its community of license with the F(50,90) 48.0 dBu principal community contour and will slightly exceed its licensed F(50,90) 41.52 dBu pre-auction protected noise limited contour in several azimuthal directions (See Exhibit 1). In order for the KWKT-DT Channel 44 pre-auction interim facility to adequately serve its viewers while the main post-auction facility is built-out, it must operate with a minimum ERP of 49 kW which is the maximum ERP that can be generated using the existing 2.0 kW pre-auction transmitter. As demonstrated in the enclosed contour map (See Exhibit 1), an ERP of 49 kW will not fully replicate the KWKT-DT Channel 44 main pre-auction facility; therefore viewers will be lost; however, even with significantly reduced parameters, it will exceed the authorized F(50,90) 41.52 dBu protected noise limited contour along a few radials as shown in Exhibit 1 (See orange highlighted area) due to azimuth pattern disparities. The areas where the proposed interim facility would exceed the authorized F(50,90) 41.52 dBu protected noise limited contour would not result in impermissible interference as demonstrated in the enclosed TVStudy exhibit.

WAIVER REQUEST (§73.622(e)(1))

Referring to enclosed Exhibit 1, it can be seen that the proposed pre-auction interim facility's F(50,90) 41.52 dBu protected noise limited contour (red) will be completely encompassed by the licensed pre-auction facility's F(50,90) 41.52 dBu protected noise limited contour

(green) except along azimuths from approximately 85° through 110° and from approximately 145° through 170°; **therefore, a waiver of §73.622(e)(1) is hereby requested for this Engineering STA.** The enclosed TVStudy exhibit demonstrates that the proposed interim facility will not cause impermissible interference to any station and the public interest is benefited since significantly more off-air viewers who currently receive the KWKT pre-auction signal will be able to continue receiving an off-air pre-auction signal. Since the interim antenna pattern and main antenna pattern are not the same, it is unavoidable for the interim facility's contour to be fully encompassed by the main facility's contour in all azimuthal directions without having to reduce the power significantly which would adversely impact existing viewers who currently enjoy receiving the KWKT signal off the air. The proposed interim facility's F(50,90) 48.0 dBuV/m principal community contour will completely encompass its community of license.

TVSTUDY

The enclosed TVStudy report demonstrates that the proposed KWKT-DT Channel 44 pre-auction interim facility will not cause impermissible interference to any station.

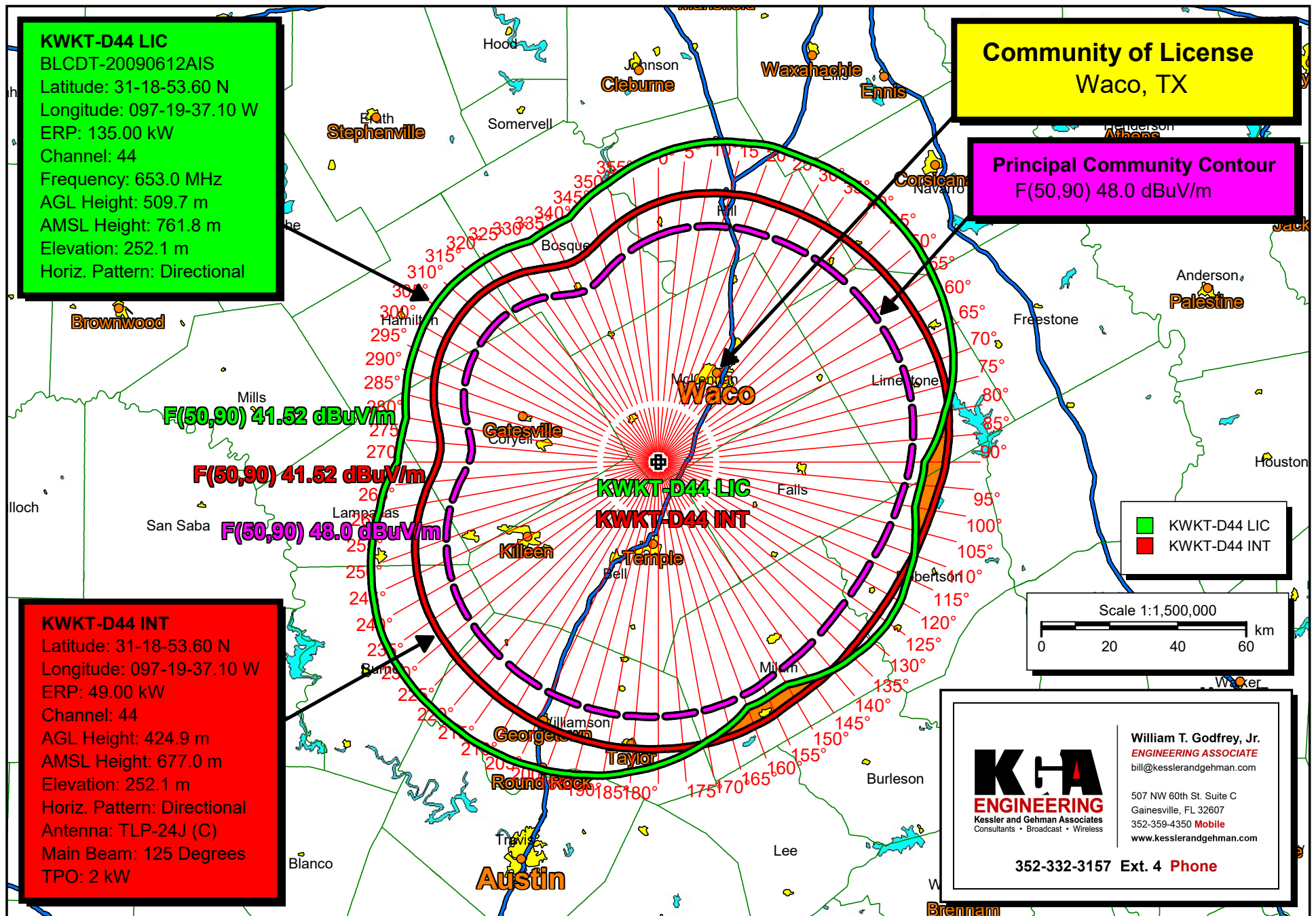
CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.



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Kessler and Gehman Associates, Inc.
Consulting Engineers

26 June, 2020



KWKT-D44 Pre-Auction LIC vs. KWKT-D44 Pre-Auction Interim (TLP-24J (C))