

**COMPLIANCE WITH §73.3801 (ATSC 1.0 SIMULCASTING)**

The WKRG-DT Channel 20 licensed facility (0000080989) and the WFNA-DT Channel 27 licensed facility (0000080990) are co-located at the same tower site (ASRN 1035771) and plan to partner in a simulcasting arrangement for purposes of airing an ATSC 1.0 signal where WKRG is the ATSC 1.0 “Host” station and WFNA is the ATSC 1.0 “Tenant” station.

Pursuant to section 73.3801(f)(6)(i) of FCC Rules, the following information is required for this type of application.

- Station serving as the host: WKRG ([0000080989](#))
- Technical facilities of the host station:
  - Frequency: 509 MHz (Channel 20)
  - ERP: 961 kW
  - Antenna: Directional
  - Antenna Center Height: 561.0 m AGL
  - Antenna Model: TFU-20GTH/VP-R 4C160
  - Antenna Polarization: Elliptical
  - Antenna Beam Tilt: 0.75°
  - Coordinates: 30° 41' 20.4" N, 087° 49' 50.6" W
  - ASRN: 1035771
- DMA: Mobile-Pensacola (both stations)

Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the following information is also required for this type of application.

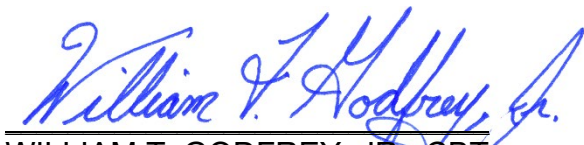
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **1,387,690 persons (See Exhibit 1)**
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **0 Persons (See Exhibit 2)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 100% (See Exhibit 3)**

Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Referring to Exhibit 3, it can be seen that the WFNA-DT ATSC 1.0 "Tenant" station will continue to completely encompass its community of license with the WKRG-DT F(50,90) 48.0 dBu "Host" station's principal community contour. Also pursuant to §73.3801(c) of FCC Rules, the WFNA-DT "Tenant" station and the WKRG-DT "Host" station are both assigned to the same DMA (Mobile-Pensacola).

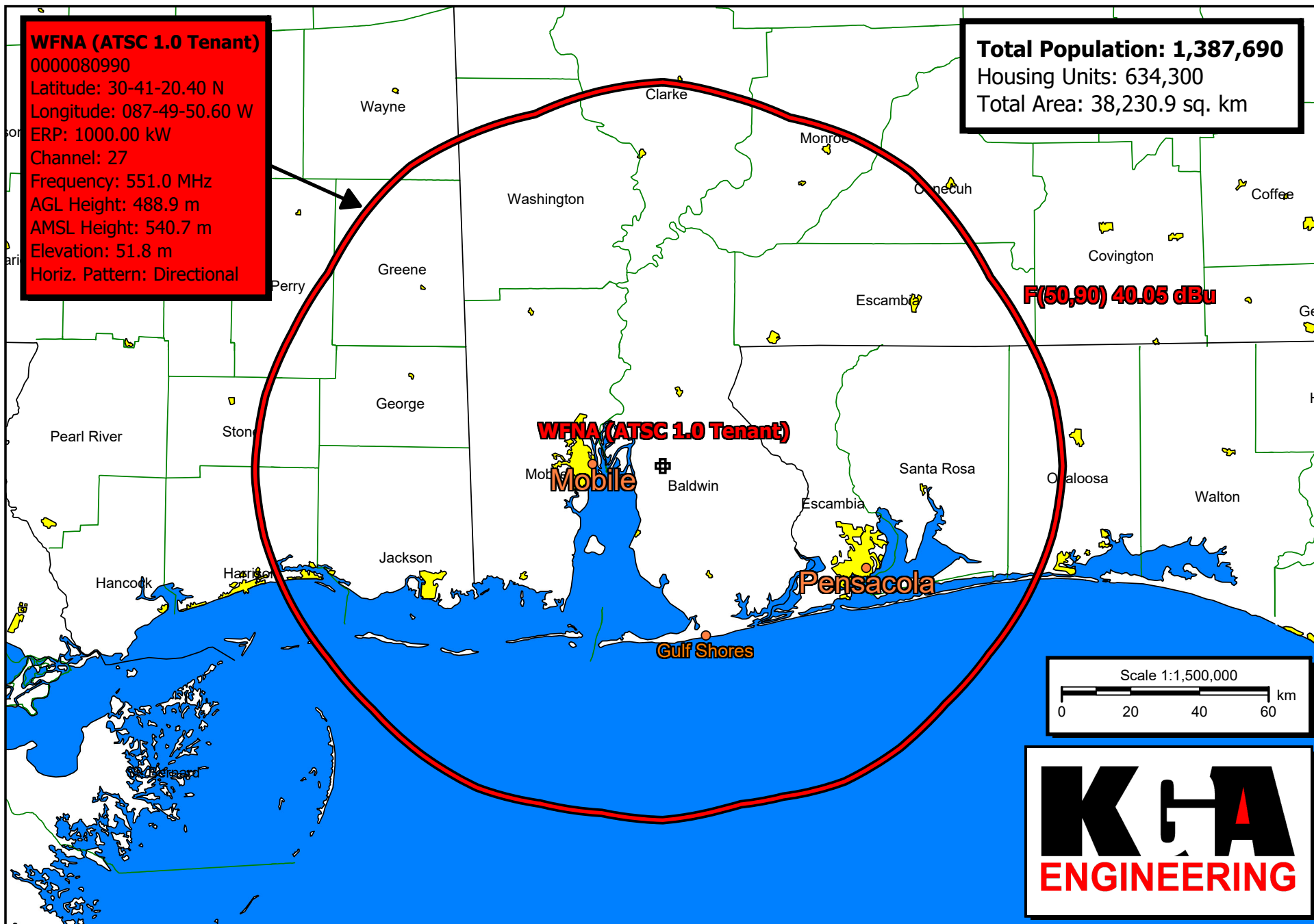
Accordingly, as demonstrated above and in enclosed Exhibits 1-3, the proposed WFNA-DT "tenant" facility operating with an ATSC 1.0 signal and sharing the frequency with the WKRG-DT ATSC 1.0 "host" station fully satisfies the FCC rules specified in §73.3801 and the application should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

### **CERTIFICATION**

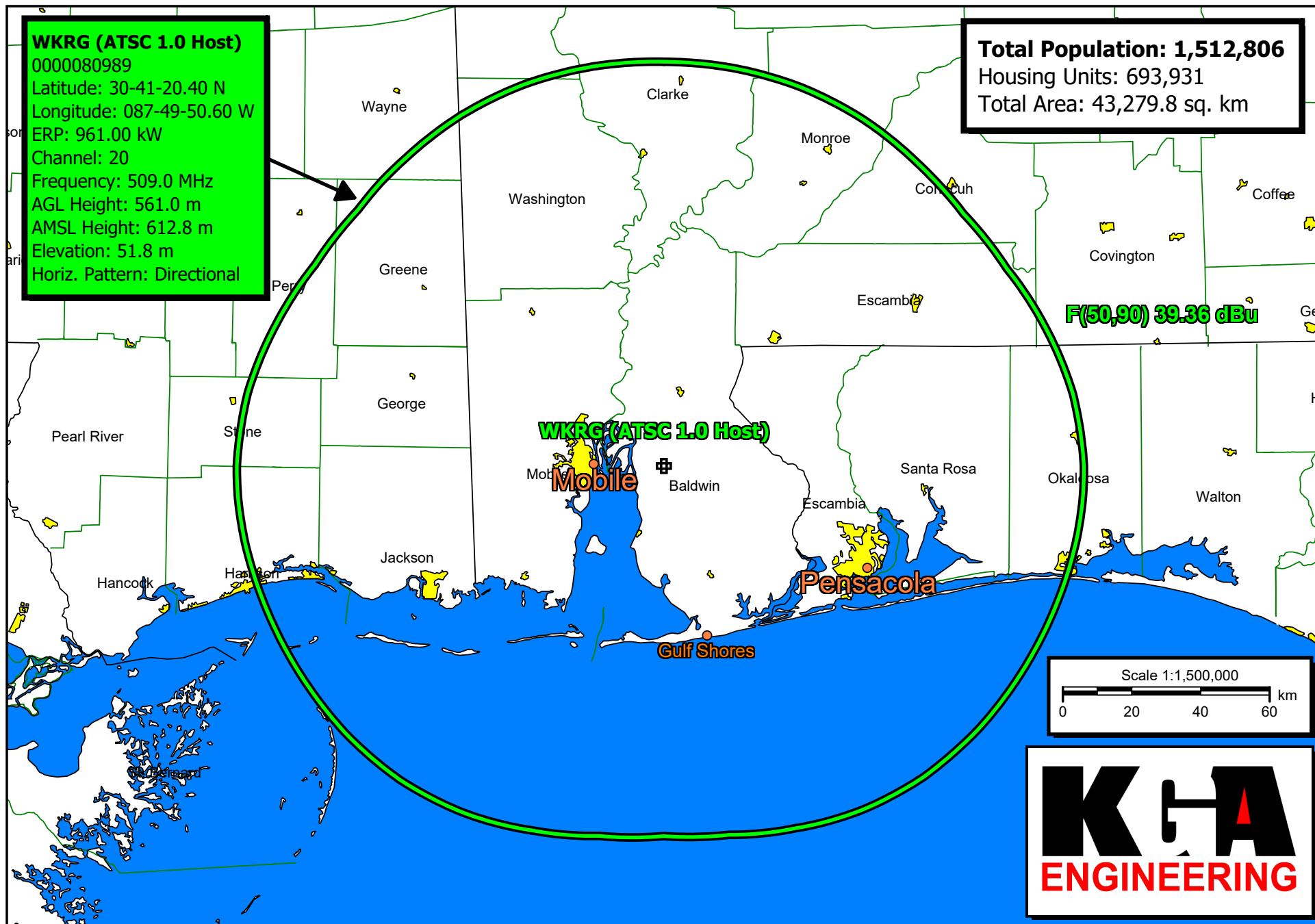
This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a 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.

  
WILLIAM T. GODFREY, JR., CBT  
Kessler and Gehman Associates, Inc.  
Consulting Engineers

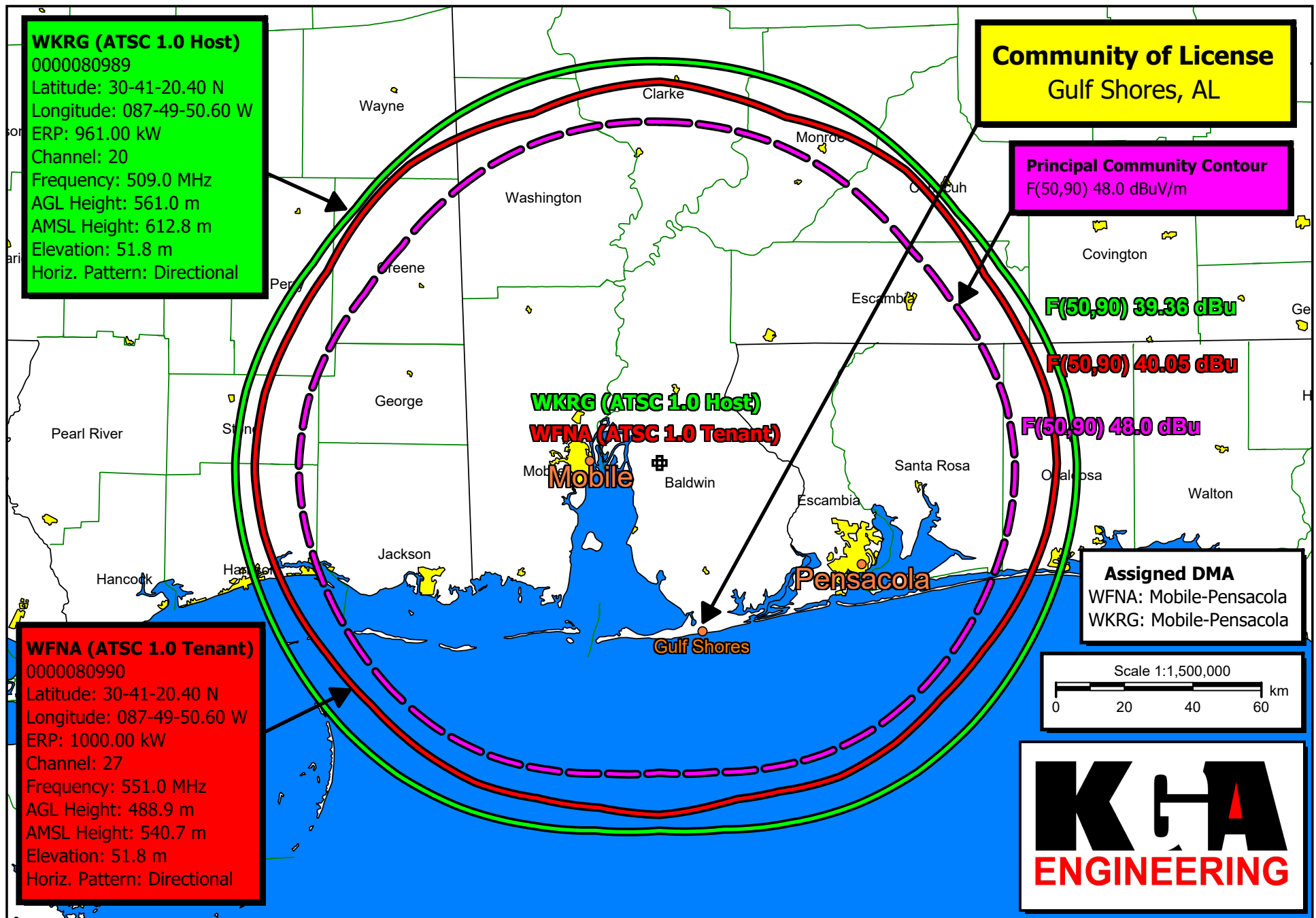
August 13, 2020



**WFNA-DT Channel 27 License Population Within Protected Noise Limited Contour**



**WKRG-DT Channel 20 License Population Within Protected Noise Limited Contour**



WFNA Original ATSC 1.0 Population Loss as Tenant Station (0% Loss)