

COMPLIANCE WITH §73.3801 (ATSC 1.0 SIMULCASTING)

The KXAN-DT Channel 21 full power television licensed facility (BLCDT-20050630AAG) and the KBVO-CD Channel 31 Class A licensed facility (0000001127) are co-located at the same tower site (ASRN 1050398) and plan to partner in a simulcasting arrangement for purposes of airing the KBVO-CD facility's ATSC 1.0 Diginet signals where KXAN is the ATSC 1.0 "Host" station and KBVO-CD is the ATSC 1.0 "Tenant" station. The KEYE-DT Channel 34 full power television licensed facility (0000075005) is located at another tower site (ASRN 1234758) approximately 0.6 km to the SW and also plans to partner in a simulcasting arrangement for purposes of airing the KBVO-CD facility's ATSC 1.0 Diginet signals where KEYE is the ATSC 1.0 "Host" station and KBVO-CD is the ATSC 1.0 "Tenant" station. All three stations are assigned to the same DMA (Austin, TX).

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

- Stations serving as the host for KBVO-CD ATSC 1.0 Diginets:

1) KXAN ([BLCDT-20050630AAG](#))

Technical facilities of the ATSC 1.0 Diginet Host #1station:

- Frequency: 515 MHz (Channel 21)
- ERP: 700 kW
- Antenna: Nondirectional (Omni)
- Antenna Center Height: 354.4 m AGL
- Antenna Model: TFU-24GTH-R 04
- Antenna Polarization: Horizontal
- Antenna Beam Tilt: 0.75°
- Coordinates: 30° 19' 34.0" N, 097° 47' 59.0" W
- ASRN: 1050398
- DMA: Austin, TX

2) KEYE ([0000075005](#))

Technical facilities of the ATSC 1.0 Diginet Host #2 station:

- Frequency: 593 MHz (Channel 34)
- ERP: 1,000 kW
- Antenna: Nondirectional (Omni)
- Antenna Center Height: 361.0 m AGL
- Antenna Model: TFU-24JTH/VP-R-O6
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 0.75°
- Coordinates: 30° 19' 19.3" N, 097° 48' 12.6" W
- ASRN: 1234758
- DMA: Austin, TX

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: **1,678,974 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:
 - **KBVO-CD Diginets at KXAN Host: 0 Persons (See Exhibits 1 thru 4)**
 - **KBVO-CD Diginets at KEYE Host: 0 Persons (See Exhibits 1 thru 4)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population?
 - **KBVO-CD Diginets at KXAN Host: Yes, it will serve 100% (See Exhibits 1 thru 4)**
 - **KBVO-CD Diginets at KEYE Host: Yes, it will serve 100% (See Exhibits 1 thru 4)**

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 4, it can be seen that the KBVO-CD ATSC 1.0 "Tenant" station will continue to completely encompass its community of license (Austin, TX) with the KXAN-DT F(50,90) 48.0 dBu and KEYE-DT F(50,90) 48.0 dBu "Host" station's principal community contours. Also pursuant to §73.3801(c) of FCC Rules, the KBVO-CD "Tenant" station, the KXAN-DT "Host" station and the KEYE-DT "Host" station are all assigned to the same DMA (Austin, TX).

Accordingly, as demonstrated above and in enclosed Exhibits 1-4, the proposed KBVO-CD "tenant" facility operating with an ATSC 1.0 Diginet signals and sharing the frequency with the KXAN-DT ATSC 1.0 "host" station and the KEYE-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.

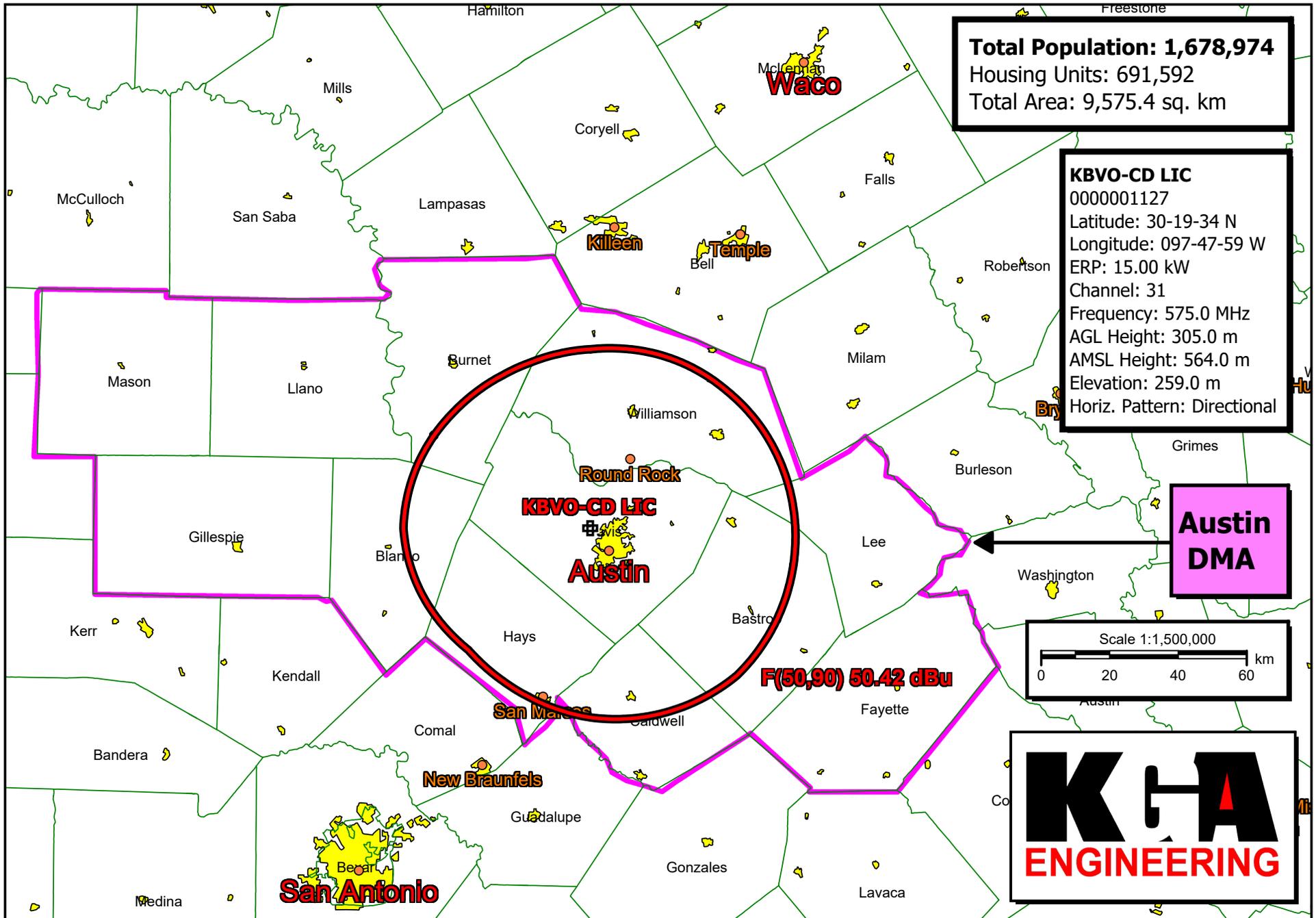
CERTIFICATION

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.

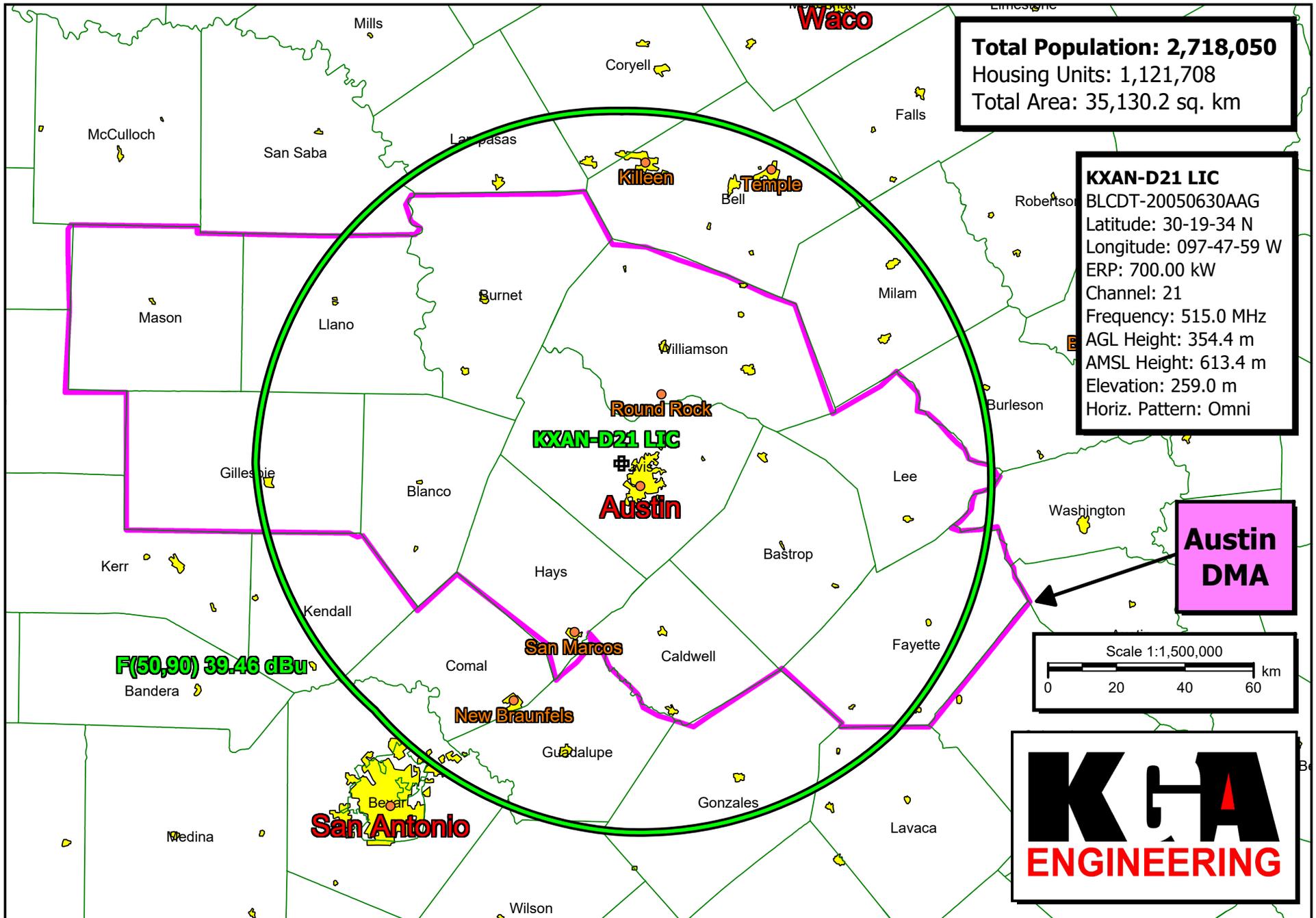


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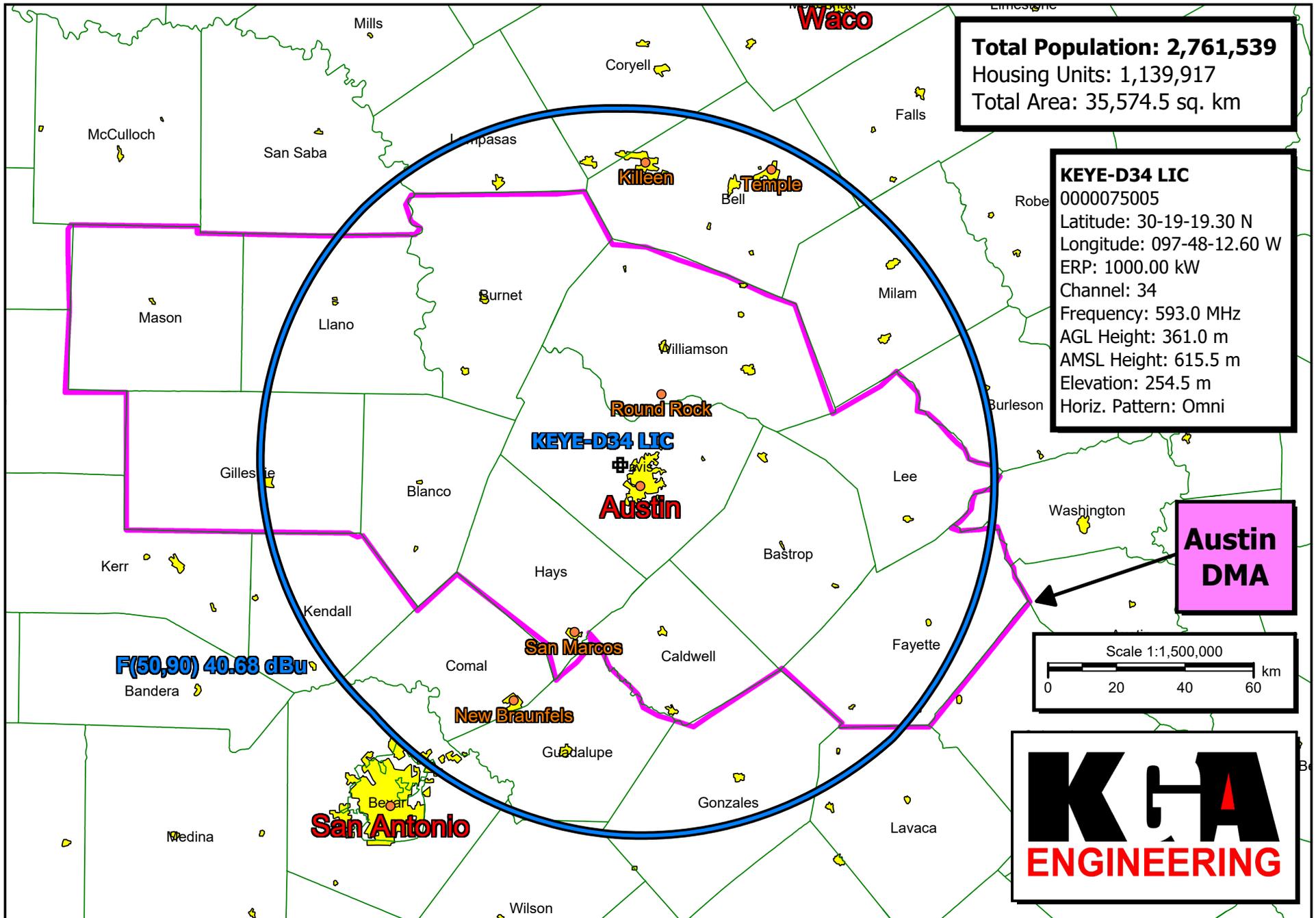
September 9, 2020



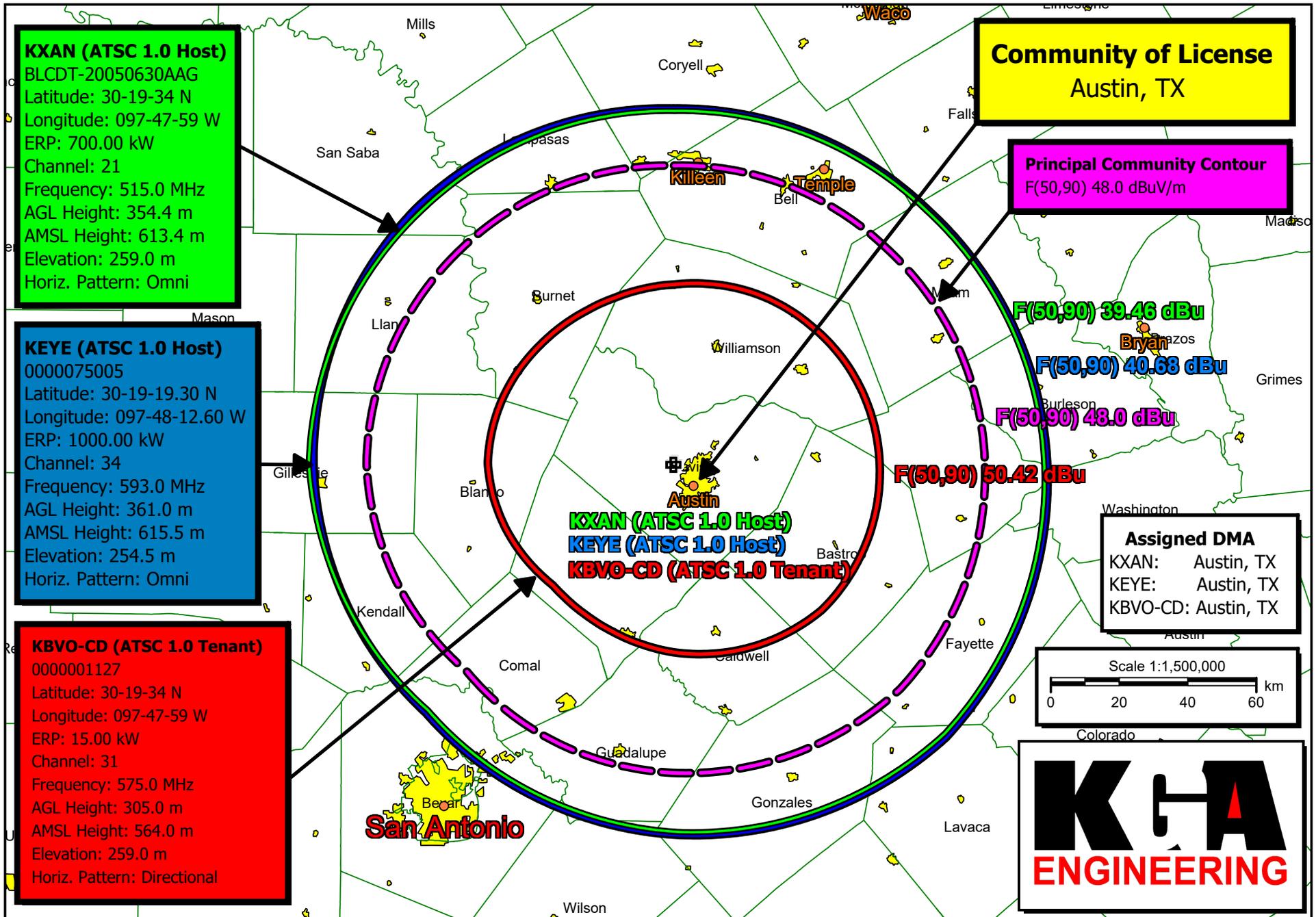
KBVO-CD Channel 31 License Population Within Protected Noise Limited Contour EXHIBIT 1



KXAN-D21 License Population Within Protected Noise Limited Contour



KEYE-D34 License Population Within Protected Noise Limited Contour



KBVO-CD Original ATSC 1.0 Population Loss as Tenant Station (0% Loss)