



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN AMENDMENT TO A
PETITION TO AMEND THE DIGITAL
TELEVISION TABLE OF ALLOTMENTS
KECI-TV - MISSOULA, MONTANA
DTV - CH. 20 - 925 kW - 610 m HAAT**

Prepared for: Sinclair Media Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

GENERAL

This office has been authorized by Sinclair Media Licensee, LLC, licensee of KECI-TV channel 13, licensed to Missoula, Montana, to prepare this statement in support of an amendment to a Petition to Amend the Digital Television (DTV) Post Repack Table of Allotments, §73.622(i) of the FCC Rules. The petitioner requests that §73.622(i) of the Commission's Rules be modified to change KECI-TV's allotted channel and requests herein to substitute DTV channel 20 for DTV channel 13.

FCC staff has requested additional information regarding the population predicted to be served by the proposed channel 20 facility versus the population currently served by KECI-TV's authorized pre-DTV-transition channel 13 facility, file number BPCDT-20080327AFR. The instant amendment provides only the requested information. Otherwise there is no proposed change in the pending application and all other elements of the application remain valid.

DEMONSTRATION OF RETENTION OF PREDICTED POPULATION

As required by FCC policy, when an existing station proposes to change its facilities in a manner that could affect the population that is located within its protected Noise Limited coverage contour, that station's licensee must demonstrate that the proposed change will not result in an unacceptable loss of existing potential viewers.

For KECI-TV the relevant comparison is the pre-DTV- transition authorized channel 13 facility, file number BPCDT-20080327AFR. As demonstrated in the contour map exhibit the Noise Limited contour of the proposed channel 20 facility does not entirely encompass the existing channel 13 Noise Limited contour. However, as the exhibit also shows there are only two small areas that are defined where the channel 20 contour does not extend beyond the channel 13 contour. The total count of predicted population that resides within those two areas is 65 persons.

This number represents only 0.0304% of the total population of 213,810 persons that are currently served by KECI-TV's channel 13 facility, and is considered a minimal loss of area and/or population as a result of the proposed channel change. In addition, KECI-TV's proposed channel 20 facility is predicted to serve a total of 252,689 persons, a net gain of 38,879 potential viewers over the existing KECI-TV channel 13 facility.

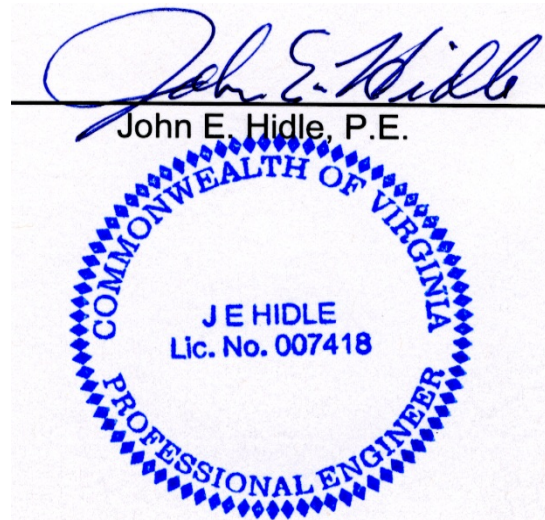
SUMMARY

It is submitted that the instant Amendment to its Petition to Amend the DTV Table of Allotments to substitute DTV channel 20 for DTV channel 13 in Missoula, Montana, that is intended to provide requested additional population prediction data, as described herein,

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complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement was prepared by me, or under my direct supervision, and its contents are believed to be true and correct to the best of my knowledge and belief.

DATED: February 25, 2021



KECI-TV CH13 to CH20 - Loss Area Study Comparing BPCDT-20080327AFR to Channel 20 Application

- KECI-TV (13)
- KECI-TV.A (20)

KECI-TV - CH13
 Missoula, MT - 213.0 MHz
 FACID:18084
 File:BPCDT-20080327AFR
 Lat: 47-01-04 N
 Long: 114-00-50 W
 ERP: 26.70 kW HAAT: 610.0
 RCAMSL: 2152.0 m
 Ground Elev: 2078.0 m
 Pattern: Omni

KECI-TV.A - CH20
 Missoula, MT - 509.0 MHz
 FACID:18084
 File:0000127630
 Lat: 47-01-04 N
 Long: 114-00-50 W
 ERP: 925.00 kW HAAT: 610.0
 RCAMSL: 2151.8 m
 Ground Elev: 2077.8 m
 Pattern: Omni

Loss Area 1
 2010 US Census
 Total Population: 0
 Housing Units: 0
 Total Area: 85.1 sq. km

Loss Area 2
 2010 US Census
 Total Population: 65
 Housing Units: 48
 Total Area: 505.9 sq. km

Population Report for All Contours

Population Database: 2010 US Census

	Population	Housing Units	Area (sq. km)
KECI-TV (13) [Missoula, MT]			
FCC F(50-90) 36.00 dBu (213,810	107,708	43991.0
KECI-TV.A (20) [Missoula, MT]			
FCC F(50-90) 39.36 dBu (252,689	126,016	47471.2



Scale 1:2,200,000

