



ENGINEERING STATEMENT

IN SUPPORT OF
MODIFICATION OF A LICENSED FACILITY
K25PA-D
SANTA CLARA, UT

Background

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of digital low-power television translator station K25PA-D (LMS File No. 0000115847, Facility ID. 22205) near Santa Clara, UT. The station currently operates from a tower site located at the following coordinates:

37° 09' 18.7" N (NAD83)
113° 52' 59.5" W

Scripps intends to move the K25PA-D to a new tower site near St. George, UT, and in the instant application, it seeks to modify the K25PA-D license to specify the new site for its transmit facility.

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Proposed Facility Parameters

Scripps is proposing the following parameters for the K25PA-D digital operation at the new site:

Coordinates:	37° 03' 49.0" N (NAD83) 113° 34' 24.0" W
ASR:	1262082
ERP:	0.3 kW
RCAMSL:	960.1m
RCAGL:	11.0m
Antenna:	Kathrein/Scala SL-8 (omni-directional)
Mask:	Stringent

Figure 1, attached hereto, is a map of the FCC F(50,90) 51 dBu protected service contour of the current licensed facility and the proposed facility. As can be seen from the map, the two contours overlap.

Interference

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5) with the default parameters. The results of the study (copy attached hereto) show that potential interference is not predicted to exceed 0.49% to any full-service DTV or Class A stations or 1.99% to any low power stations as required by the Commission's Rules.

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA

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are beyond the scope of this report; since the structure is existing and registered, such conditions should not be an issue requiring further consideration.

The location of the proposed facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.011137 mW/cm^2 , which is less than 5% of the MPE for public exposure (0.359333 mW/cm^2) at Ch. 25 (536-542 MHz). Per Section 1.1307(b) of the FCC Rules, the proposed operation would be categorically excluded from taking corrective action in areas with levels above the MPE limit where the contribution to the RFR from the proposed facility is less than 5%.

Scripps agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure.

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Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

A handwritten signature in black ink, appearing to read "B. Pidek", written over a horizontal line.

Benjamin L. Pidek, P.E.
July 7, 2021

Attached:
TVStudy Interference Check Report
Figure 1 –Service Contour of Licensed K25PA-D Facility vs. Service Contour of Proposed Facility.

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TVStudy TV Interference Check Report for Proposed K25PA-D on Ch. 25

Study created: 2021.07.07 09:33:53

Study build station data: LMS TV 2021-07-07

Proposal: K25PA-D D25 LD LIC SANTA CLARA, UT
 File number: K25PA_C25_StGeorge_Check
 Facility ID: 22205
 Station data: User record
 Record ID: 1847
 Country: U.S.

Build options:
 Protect pre-transition records not on baseline channel

Search options:
 Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	K17JQ	N17z	TX	LIC	ST. GEORGE, UT	BLTTL20121207ACG	0.5 km
No	KEGS-LD	D24	LD	LIC	LAS VEGAS, NV	BLDTL20100104ABL	180.8
No	K24NE-D	D24	LD	LIC	OVERTON, NV	BLANK0000137688	94.1
No	K24FE-D	D24	LD	LIC	BEAVER, ETC, UT	BLDTT20070301AAJ	163.6
No	K24MY-D	D24	LD	LIC	KANARRAVILLE, UT	BLANK0000091241	57.3
No	K47MF-D	D24	LD	LIC	ORDERVILLE, UT	BLANK0000059976	87.0
Yes	K24CY-D	D24	LD	LIC	ST. GEORGE, UT	BLANK0000146926	0.1
Yes	K24CY-D	N24	TX	LIC	ST. GEORGE, UT	BLTT19930730JE	0.1
No	K25HD-D	D25	LD	LIC	BULLHEAD CITY, AZ	BLDTA20111128FZD	227.6
No	K25MK-D	N25	TX	LIC	CAMP VERDE, AZ	BLTT20120316AAL	326.5
No	K25MK-D	D25	LD	CP	CAMP VERDE, AZ	BDFCDTT20110914ABR	326.5
No	K25PJ-D	D25	LD	LIC	CHLORIDE, AZ	BLANK0000071721	192.9
No	K25MG-D	D25	LD	LIC	FLAGSTAFF, AZ	BLDTT20111101AAX	269.3
No	K25AL	N25	TX	LIC	LAKE HAVASU CITY, AZ	BLTTL19850927IA	294.0
No	K25DH-D	D25	LD	LIC	MEADVIEW, AZ	BLDTT20130308ABY	141.4
No	K25OM-D	D25	LD	LIC	PRESCOTT, AZ	BLANK0000058628	301.0
No	KJPO-LD	D25	LD	LIC	TONOPAH, AZ	BLANK0000151024	394.8
No	K25QB-D	D25+	LD	LIC	LUCERNE VALLEY, CA	BLANK0000082018	415.2
No	K43MT-D	D25	LD	CP	EUREKA, NV	BLANK0000054894	339.3
No	K25PX-D	D25	LD	LIC	LUND & PRESTON, NV	BLANK0000087555	272.7
No	K25LU-D	D25	LD	LIC	MESQUITE, NV	BLDTT20101228ABT	50.3
No	KPVM-LD	D25	LD	LIC	PAHRUMP, NV	BLANK0000112505	180.8
No	K25GY-D	D25	LD	LIC	BERYL, MODENA, NEW C, UT	BLDTT20110729AKN	72.7
No	K25JT-D	D25	LD	LIC	BLANDING/MONTICELLO, UT	BLDTT20091222AMI	372.8
No	K25PF-D	D25	LD	LIC	DELTA, OAK CITY, ETC, UT	BLANK0000123482	275.9
No	K25OZ-D	D25	LD	LIC	EAST PRICE, UT	BLANK0000093936	371.5
No	K25JJ-D	D25	LD	LIC	FILLMORE,MEADOW,ETC., UT	BLDTT20100812ADI	244.9
No	K25LH-D	D25	LD	LIC	FISHLAKE RESORT, UT	BLDTT20100803ABA	227.6
No	K25PM-D	D25	LD	LIC	HELPER, UT	BLANK0000093665	376.1
No	K25GS-D	D25	LD	LIC	MANTI AND EPHRAIM, UT	BLDTT20080722AAL	296.3
No	K25OW-D	D25	LD	LIC	MARYSVALE, UT	BLANK0000080751	200.9
No	K25NN-D	D25	LD	LIC	NEPHI, UT	BLDTT20120611AAB	309.9
No	K25NN-D	D25	LD	CP	NEPHI, UT	BPDTT20120723ACU	328.9
No	KSVN-CD	D25	DC	LIC	OGDEN, UT	BLDTL20100119ADN	416.9

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No	K25PD-D	D25	LD	LIC	PAROWAN, ENOCH, PARA, UT	BLANK0000091056	101.3
No	K28GQ-D	D25	LD	LIC	RURAL IRON, ETC., UT	BLANK0000063186	163.9
No	K26GF-D	D26	LD	LIC	PEACH SPRINGS, AZ	BLDTT20130308ACF	170.3
No	KGNL-D	D26	LD	LIC	LAS VEGAS, NV	BLANK0000126700	180.8
No	KTNV-TV	D26	DT	APP	LAS VEGAS, NV	BLANK0000145120	180.8
No	K26NP-D	D26	LD	LIC	OVERTON, NV	BLANK0000137690	94.1
No	K20EC-D	D26	LD	LIC	KANAB, UT	BLANK0000059985	93.4
No	K26NZ-D	D26	LD	LIC	KANARRAVILLE, NEW HA, UT	BLANK0000091051	57.3
No	K26EA-D	D26	LD	LIC	MILFORD, ETC., UT	BLDTT20090611ACL	163.9
No	K26OA-D	D26	LD	LIC	PAROWAN, ENOCH, PARA, UT	BLANK0000091052	101.3
Yes	KVBT-LP	D26	LD	CP	SANTA CLARA, ETC., UT	BLANK0000054544	29.1
No	KDLU-LP	N26	TX	LIC	ST. GEORGE, UT	BLTTL19961024JB	0.0
No	KMBU-LP	N32	TX	LIC	ENTERPRISE, UT	BLTT19940325IF	50.4

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25
Mask: Stringent
Latitude: 37 3 49.00 N (NAD83)
Longitude: 113 34 24.00 W
Height AMSL: 960.1 m
HAAT: 0.0 m
Peak ERP: 0.300 kW
Antenna: Omnidirectional
Elev Pattn: Generic
Elec Tilt: 0.75

49.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.300 kW	-65.3 m	13.2 km
45.0	0.300	109.5	25.1
90.0	0.300	-21.9	13.2
135.0	0.300	86.9	22.6
180.0	0.300	74.5	21.0
225.0	0.300	117.7	25.8
270.0	0.300	3.9	13.2
315.0	0.300	110.6	25.2

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 52 m

Distance to Canadian border: 1326.5 km

Distance to Mexican border: 494.1 km

Conditions at FCC monitoring station: Douglas AZ

Bearing: 148.7 degrees Distance: 715.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 62.3 degrees Distance: 798.1 km

Study cell size: 1.00 km

Profile point spacing: 1.00 km

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Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

No IX check failures found.

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Mid-State Consultants

K25PA-D

0000115847

Latitude: 37-09-18.70 N

Longitude: 113-52-59.50 W

ERP: 0.30 kW

Channel: 25

Frequency: 539.0 MHz

AMSL Height: 2373.2 m

K25PA-D (Prop)

0000115733

Latitude: 37-03-49 N

Longitude: 113-34-24 W

ERP: 0.30 kW

Channel: 25

Frequency: 539.0 MHz

AMSL Height: 960.1 m

Protected 51 dBu Service Contours of K25PA-D Licensed (Black) and Proposed (Red) Facilities

