

TECHNICAL SUMMARY

TELEVISION STATION KSTP-TV
ST. PAUL, MINNESOTA
CHANNEL 35 1000 KW (H), 300 KW (V) 454 M HAAT

1. The instant application is to modify the construction permit for KSTP-TV, St. Paul, MN (Channel 35)(FCC File No. 0000036053). By means of this modification, the proposed KSTP-TV antenna will be mounted on the top of the stack on the existing tower adjacent to and south of the location authorized for KTSP-TV. There will be no change in the overall height of the existing antenna tower supporting structure.* The new top-mounted antenna for KSTP-TV will have an antenna radiation center that is 2.5 m lower in height AMSL than that authorized in the KSTP-TV construction permit.

2. The proposed facility is compliant with the ‘largest station in the market’ provision of Section 73.622(f)(5) of the FCC Rules. It is proposed to operate on Channel 35 with a non-directional ERP of 1000 kW and an antenna height above average terrain (HAAT) of 454 meters. These facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Minneapolis-St. Paul market is KARE, Minneapolis, MN, Channel 11, which is licensed to provide noise-limited 36 dBu, f(50,90) service to an area of 43,560 square kilometers.† The proposed KSTP-TV operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 38,700 square kilometers.‡ Therefore, the proposed KSTP-TV facility is compliant with the largest station provision of the FCC Rules.

3. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC’s *TVStudy* analysis are attached hereto as an exhibit.

* See FCC Antenna Structure Registration No. 1023882. (This is the Telefarm south tower.)

† KARE(TV) is authorized for operation with a non-directional ERP of 45.3 kW and an antenna HAAT of 455 m. See FCC File No. 0000001486.

‡ Clarification of the largest station provision is provided in the *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39 at paragraphs 73-74.