

**COMPLIANCE WITH §73.3801 (SIMULCASTING DURING ATSC 3.0 TRANSITION)**

This application is being filed to allow KPRC-TV and KIAH to effectuate an ATSC 3.0 simulcasting arrangement pursuant to FCC rules.

The KPRC-TV full-power television facility (File Number BLCDDT-19991022ABJ) is licensed to operate on Channel 35 with an ERP of 1,000 kW using a nondirectional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1047348 located in Missouri City, TX. The KIAH full-power television facility (File Number 0000071734) is licensed to operate on Channel 34 with an ERP of 1,000 kW using a nondirectional antenna mounted on a tower with ASRN 1047348 located in Missouri City, TX and collocated with KPRC-TV. Both stations are assigned to the same DMA (Houston, TX), as demonstrated in **Exhibit 1**. The stations plan to partner in a simulcasting arrangement whereby:

- KIAH operates as the ATSC 3.0 “Host” station and KPRC-TV operates as the ATSC 3.0 “Tenant” station on KIAH’s facilities (as set forth in this application) (the “ATSC 3.0 Simulcast”); and
- One of KIAH’s multicast streams will be broadcast from KPRC-TV’s facilities, so that KPRC-TV operates as the ATSC 1.0 “Host” station and KIAH is the ATSC 1.0 “Tenant” station.

In effectuating the simulcasting arrangement, KPRC-TV is not intending to make any changes that would affect coverage of its current ATSC 1.0 station that transmits Channel 35.

Pursuant to the foregoing, this application satisfies the requirements of §73.3801 with respect to the ATSC 3.0 Simulcast, including §73.3801(d), which requires that the ATSC 3.0 signal be established on a host station assigned to the same DMA as the

originating station. Accordingly, KPRC-TV respectfully requests that the Commission grant this application, and it requests the grant with expedited processing.

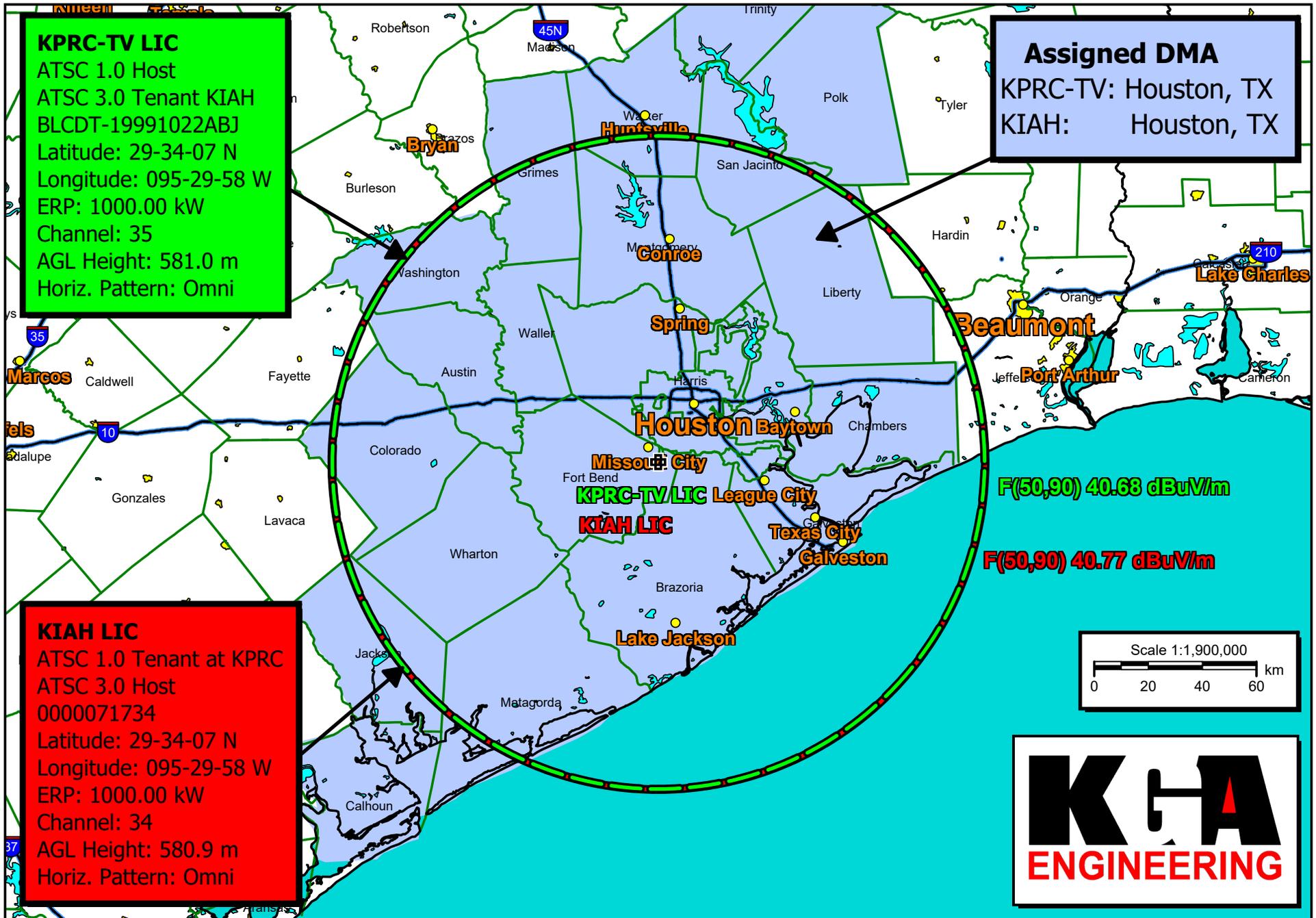
**CERTIFICATION**

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.

A handwritten signature in blue ink that reads 'William T. Godfrey, Jr.' with a stylized flourish at the end.

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

November 15, 2021



Coverage Comparison for KPRC-TV ATSC 1.0 & ATSC 3.0 Transmissions