

**ENGINEERING STATEMENT**  
**IN SUPPORT OF**  
**MINOR MODIFICATION OF LICENSED DIGITAL CLASS A TV STATION**  
**K31KK-D**  
**KINGSVILLE-ALICE, TX**

**Background**

Scripps Broadcasting Holdings LLC (Scripps), licensee of digital Class A station K31KK-D at Kingsville-Alice, TX, is seeking, in the instant application, to update the coordinates of the K31KK-D tower (ASR#1321281) for a slight change of 0.4 seconds in the longitude as a result of replacing the tower. The new, replacement tower is located approximately 10 ft from the location of the old tower.

The coordinates of the licensed facility and the coordinates of the replacement tower are:

Licensed Coordinates

27° 40' 11.0" N (NAD83)  
97° 55' 00.0" W

Replacement Tower Coordinates

27° 40' 11.0" N (NAD83)  
97° 55' 00.4" W

All other parameters of the licensed facility (i.e., antenna radiation center height, power, filter, etc.) remain the same as authorized after the transfer from the old tower to the new tower.

### **Interference Study Results**

An interference check study was run using the FCC TVStudy software (Version 2.2.5) for the K31KK-D facility parameters. The summary results of the study show that the facility is not predicted to cause more than 0.5% new interference to any other surrounding co-channel or adjacent channel facilities (see attached study results).

### **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 are beyond the scope of this report.

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 0.013179 mW/cm<sup>2</sup>, which is significantly less than the MPE limit for public exposure (0.383333mW/cm<sup>2</sup>) at Channel 31 (572-578 MHz).

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.

**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.



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Benjamin Pidek, P.E.  
December 13, 2021

Attached:  
K31KK-D Proposed Channel 31 TVStudy Interference Results

## K31KK-D Channel 30 TVStudy Summary Results

Study created: 2021.12.08 20:32:55

Study build station data: LMS TV 2021-11-12

Proposal: K31KK-D D31 DC LIC KINGSVILLE-ALICE, TX  
File number: K31KK-C31-RepTwr-15k  
Facility ID: 51374  
Station data: User record  
Record ID: 21  
Country: U.S.

Search options:  
Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	K09YZ-D	D30	DC	BL	BEEVILLE-REFUGIO, TX	DTVBL51373	93.5 km
No	KABB	D30	DT	LIC	SAN ANTONIO, TX	BLANK0000127068	183.5
No	KABB	D30	DT	LIC	SAN ANTONIO, TX	BLCDT20100527AFI	183.5
No	KBVO-CD	D31	DC	LIC	AUSTIN, TX	BLANK0000121392	295.5
No	KUBE-TV	D31	DT	LIC	BAYTOWN, TX	BLANK0000072353	315.9
No	KXOF-CD	D31	DC	LIC	LAREDO, TX	BLDTA20101216ABZ	159.0
No	KVDF-CD	D31	DC	CP	SAN ANTONIO, TX	BLANK0000127540	205.2
No	KVDF-CD	D31	DC	LIC	SAN ANTONIO, TX	BLANK0000001489	205.2
No	KMYS	D32	DT	LIC	KERRVILLE, TX	BLANK0000127058	235.8
No	KMYS	D32	DT	LIC	KERRVILLE, TX	BLCDT20060608ACW	235.8
No	KTFV-CD	D32	DC	CP	MCALLEN, TX	BLANK0000034457	176.3
No	KTFV-CD	D32	DC	BL	MCALLEN, TX	DTVBL28280	176.3
No	LICITACIOND30		DT	LIC	SABINAS HIDALGO, NL	BLANKBPFS20131125BGG	258.8
No	XHAB	D30	DT	LIC	MATAMOROS, TA	BLANKBPFS20160318AAM	192.0
No	XHPNH	D31	DT	LIC	PIEDRAS NEGRAS, CI	BLANKBPFS20160226ABE	281.6
No	LICITACIOND31		DT	LIC	SABINAS, CI	BLANKBPFSXXX0015XXX	315.7
No	XET	D31	DT	LIC	MONTERREY, NL	BLANKBPFS20100330AAG	322.9
No	XHTK	D31	DT	LIC	CIUDAD VICTORIA, TA	BLANKBPFS20160318AAE	456.0
No	LICITACIOND31		DT	LIC	REYNOSA-MATAMOROS, TA	BLANKBPFS20050721AFX	192.0
No	XHNAT	D32	DT	LIC	NUEVO LAREDO, TA	BLANKBPFS20160318AAX	157.5

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D31  
Mask: Stringent  
Latitude: 27 40 11.00 N (NAD83)  
Longitude: 97 55 0.40 W  
Height AMSL: 115.0 m  
HAAT: 0.0 m  
Peak ERP: 15.0 kW  
Antenna: AND-ALP8L1-HSBR-01 (ID 90452) 0.0 deg  
Elev Pattn: Generic  
Elec Tilt: 0.25

50.4 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	1.16 kW	77.6 m	27.7 km
45.0	0.048	86.7	13.6
90.0	1.09	91.0	29.1
135.0	9.49	93.1	40.3

180.0	9.82	87.4	39.7
225.0	1.35	77.5	28.4
270.0	9.62	67.9	36.8
315.0	9.79	69.4	37.1

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m    Computed HAAT: 81 m

Distance to Canadian border: 2073.8 km

\*\*Proposal is within coordination distance of Mexican border  
Distance to Mexican border: 155.3 km

Conditions at FCC monitoring station: Kingsville TX  
Bearing: 172.6 degrees    Distance: 25.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 336.0 degrees    Distance: 1537.8 km

Study cell size: 2.00 km  
Profile point spacing: 1.00 km

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

No IX check failures found.