

**ENGINEERING TECHNICAL STATEMENT**  
**COMPLIANCE WITH §73.3801 OF FCC RULES**  
***SIMULCASTING DURING ATSC 3.0 TRANSITION***

The **KOZL-DT** (ATSC 3.0 Host) full-power digital television broadcast facility (File Number BLCDDT-20070213ABB) is licensed to operate on Channel 28 with an ERP of 1,000 kW using a nondirectional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1028721 located in Marshfield, MO. The **KRBK-DT** (ATSC 1.0 Host #1) full-power television facility (File Number 0000063419) is licensed to operate on Channel 22 with an ERP of 1,000 kW using a directional antenna mounted on a tower with ASRN 1028721 located in Marshfield, MO and collocated with KOZL. The **KOLR-DT** (ATSC 1.0 Host #2) full-power television facility (File Number BLCDDT-20090810ACN) is licensed to operate on Channel 10 with an ERP of 26 kW using a nondirectional antenna mounted on a tower with ASRN 1028721 located in Marshfield, MO and collocated with KOZL and KRBK. The **KYTV-DT** (ATSC 1.0 Host #3) full-power television facility (File Number 0000073156) is licensed to operate on Channel 19 with an ERP of 1,000 kW using a nondirectional antenna mounted on a tower with ASRN 1218324 located in Fordland, MO.

The aforementioned stations plan to partner in a simulcasting arrangement for purposes of airing ATSC 1.0 and ATSC 3.0 programming streams as follows:

- KOZL-DT ATSC 1.0 Tenant at KRBK-DT ATSC 1.0 Host
- KOZL-DT ATSC 1.0 Tenant at KOLR-DT ATSC 1.0 Host
- KOZL-DT ATSC 1.0 Tenant at KYTV-DT ATSC 1.0 Host
- KRBK, KOLR & KYTV ATSC 3.0 Tenants at KOZL-DT ATSC 3.0 Host

All four stations are assigned to the same DMA (Springfield, MO).

Pursuant to section 73.3801(f)(6)(i) of FCC Rules, the following information is required for these types of applications.

## **Stations serving as the ATSC 1.0 Hosts:**

- ATSC1.0 Host #1: KRBK-DT (0000063419)
- ATSC1.0 Host #2: KOLR-DT (BLCDT-20090810ACN)
- ATSC1.0 Host #3: KYTV-DT (0000073156)

## **Technical Facilities of ATSC 1.0 Host #1 Station:**

- Station: KRBK-DT
- Frequency: 521 MHz (Channel 22)
- ERP: 1,000 kW
- Antenna: Directional
- Antenna Center Height: 551.9 m AGL
- Antenna Model: TFU-28DSC/VP-R W
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 0.75°
- Coordinates: 37° 13' 09.4" N, 092° 56' 57.4" W
- ASRN: 1028721
- DMA: Springfield, MO (all stations)

## **Technical Facilities of ATSC 1.0 Host #2 Station:**

- Station: KOLR-DT
- Frequency: 195 MHz (Channel 10)
- ERP: 26 kW
- Antenna: Nondirectional
- Antenna Center Height: 592.9 m AGL
- Antenna Model: RCA 15A10-R
- Antenna Polarization: Horizontal
- Antenna Beam Tilt: 0.60°
- Coordinates: 37° 13' 09.4" N, 092° 56' 57.4" W
- ASRN: 1028721

- DMA: Springfield, MO (all stations)

**Technical Facilities of ATSC 1.0 Host #3 Station:**

- Station: KYTV-DT
- Frequency: 503 MHz (Channel 19)
- ERP: 1,000 kW
- Antenna: Nondirectional
- Antenna Center Height: 600.5 m AGL
- Antenna Model: TFU-24JTH/VP-R O4
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 1.0°
- Coordinates: 37° 10' 26.0" N, 092° 56' 28.1" W
- ASRN: 1218324
- DMA: Springfield, MO (all stations)

Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the following information is also required for these types of applications.

**KOZL-DT ATSC 1.0 Tenant at KRBK-DT ATSC 1.0 Host**

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **1,027,509 persons** based on U.S. Census 2020 data (See Exhibit 1).
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **40,686 Persons (See Exhibits 2-3)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 96.0% (See Exhibits 1-3).**

**KOZL-DT ATSC 1.0 Tenant at KOLR-DT ATSC 1.0 Host**

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **1,027,509 persons** based on U.S. Census 2020 data (See Exhibit 1).
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **0 Persons (See Exhibits 4-5)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 100% (See Exhibits 1, 4, 5)**

**KOZL-DT ATSC 1.0 Tenant at KYTV-DT ATSC 1.0 Host**

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **1,027,509 persons** based on U.S. Census 2020 data (See Exhibit 1).
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **0 Persons (See Exhibits 6-7)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 100% (See Exhibits 1, 6, 7).**

Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station(s) for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Referring to Exhibits 3, 5 and 7 it can be seen that the

KOZL-DT ATSC 1.0 “Tenant” station will continue to completely encompass its assigned Springfield, MO community of license with the KRBK-DT F(50,90) 48.0 dBu “Host #1” station’s principal community contour, the KOLR-DT F(50,90) 43.0 dBu “Host #2” station’s principal community contour and the KYTV-DT F(50,90) 48.0 dBu “Host #3” station’s principal community contour. Also pursuant to §73.3801(c) and §73.3801(d) of FCC Rules, the KOZL-DT, KRBK-DT, KOLR-DT and KYTV-DT stations are all assigned to the same DMA (Springfield, MO).

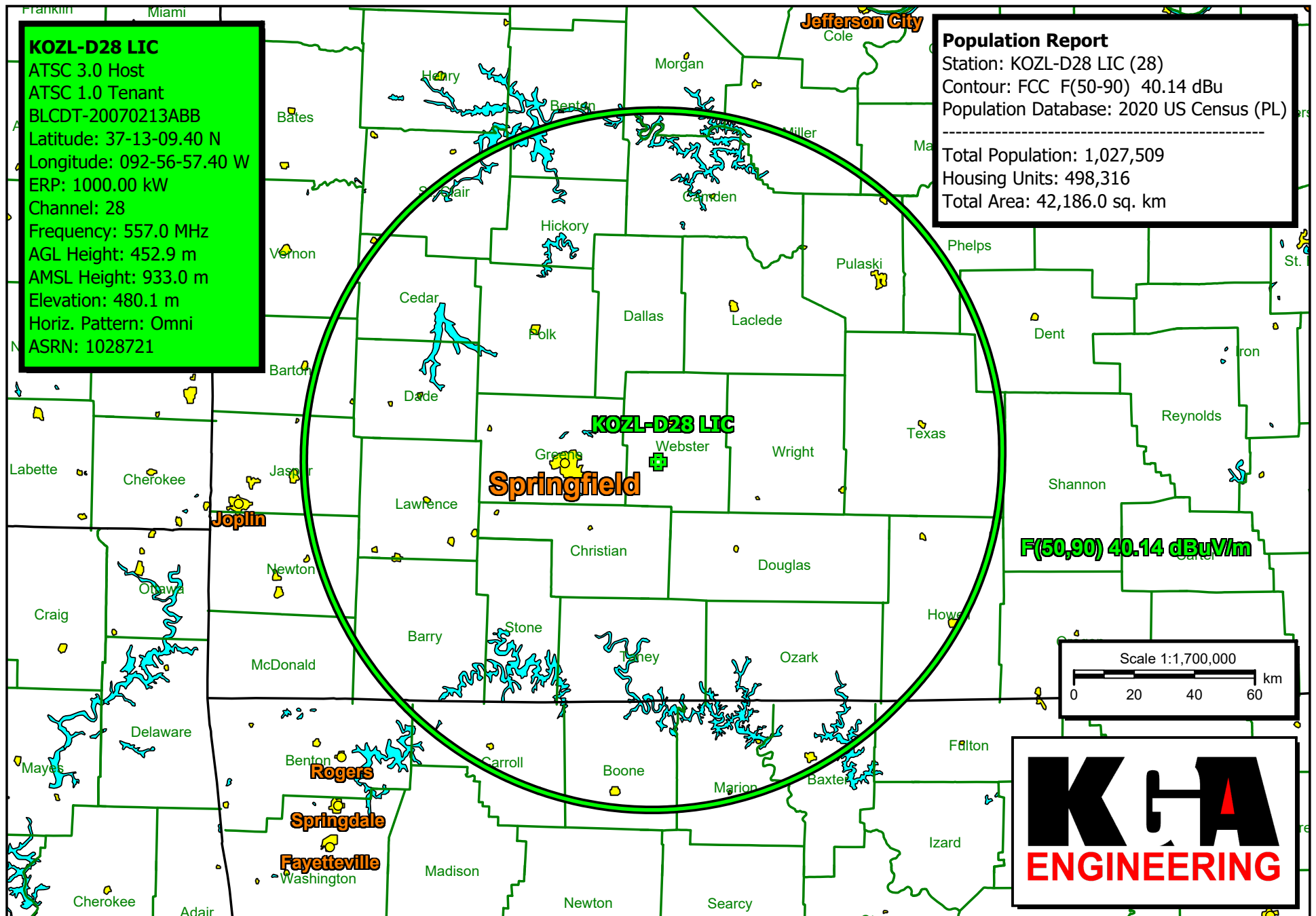
Accordingly, as demonstrated above and in enclosed Exhibits 1-7, the proposed KOZL-DT “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing frequencies with the KRBK-DT, KOLR-DT and KYTV-DT “ATSC 1.0 Host” facilities (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed KRBK-DT, KOLR-DT and KYTV-DT “ATSC 3.0 Tenant” facilities operating with an ATSC 3.0 signal and sharing frequencies with the KOZL-DT “ATSC 3.0 Host” facility (Coverage requirements for ATSC 3.0 signals) fully satisfy the FCC rules pursuant to §73.3801 and these applications should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

### **CERTIFICATION**

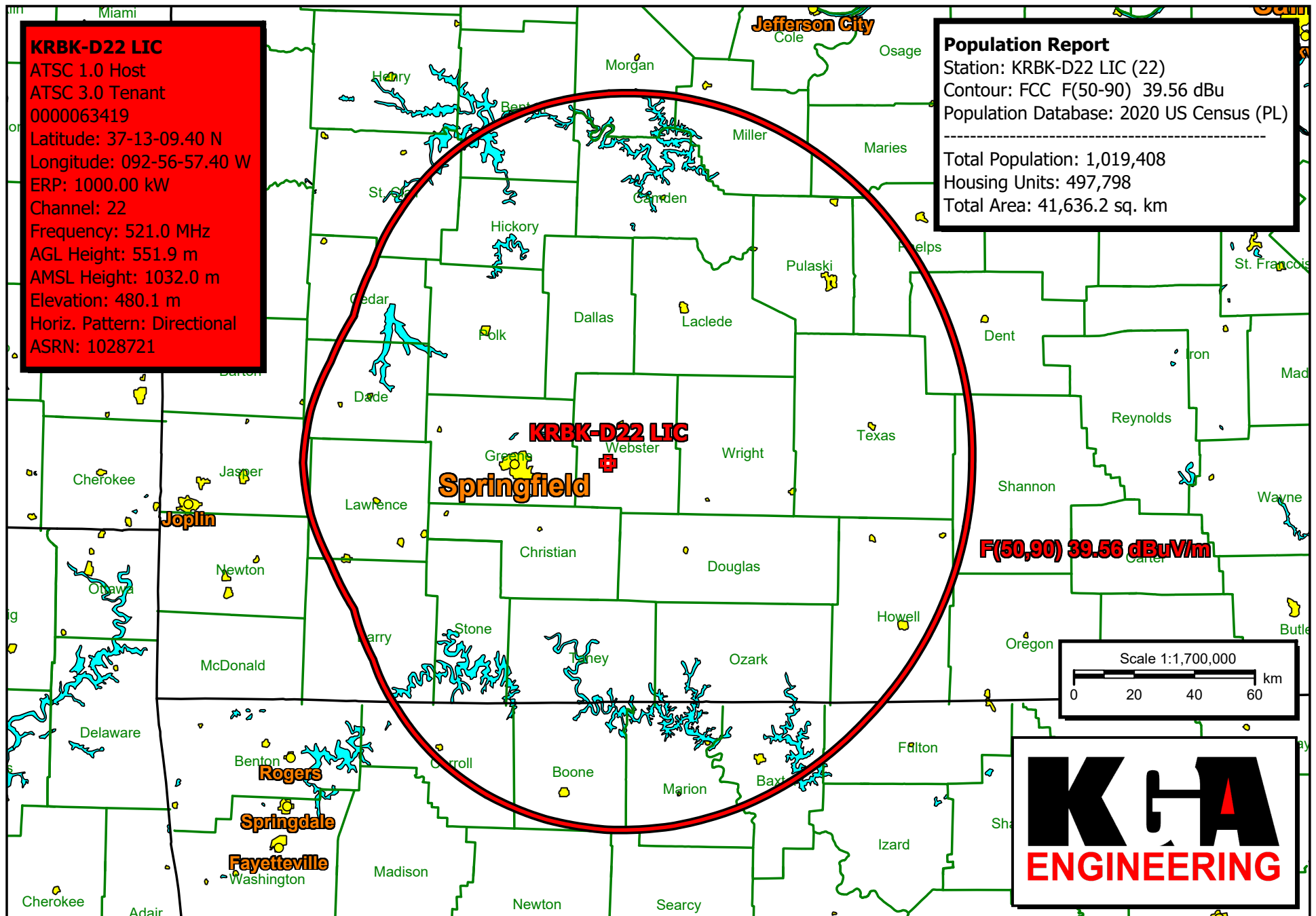
This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a 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.

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

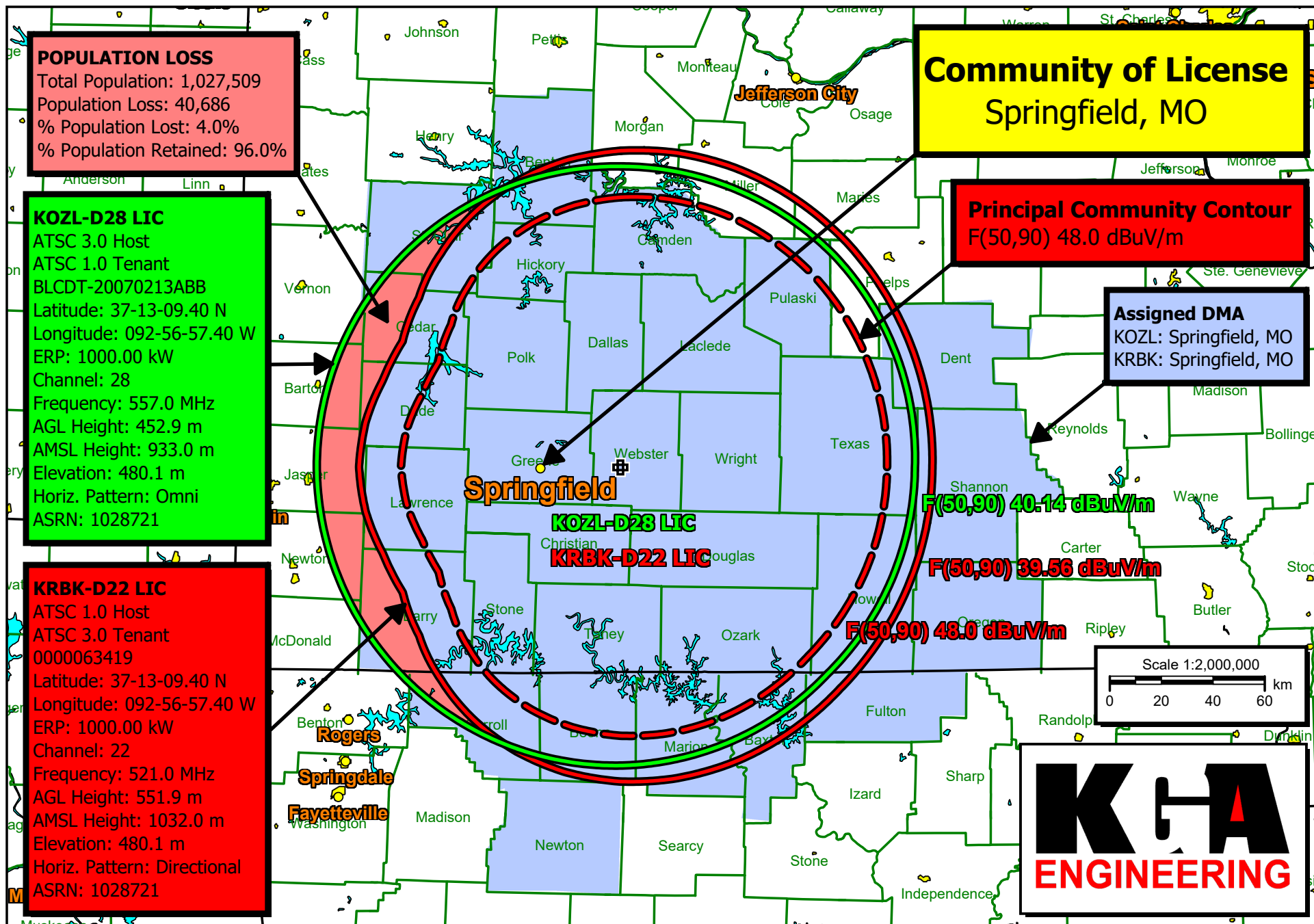
November 8, 2021



Population Within KOZL-D28 Licensed Protected Noise Limited Contour

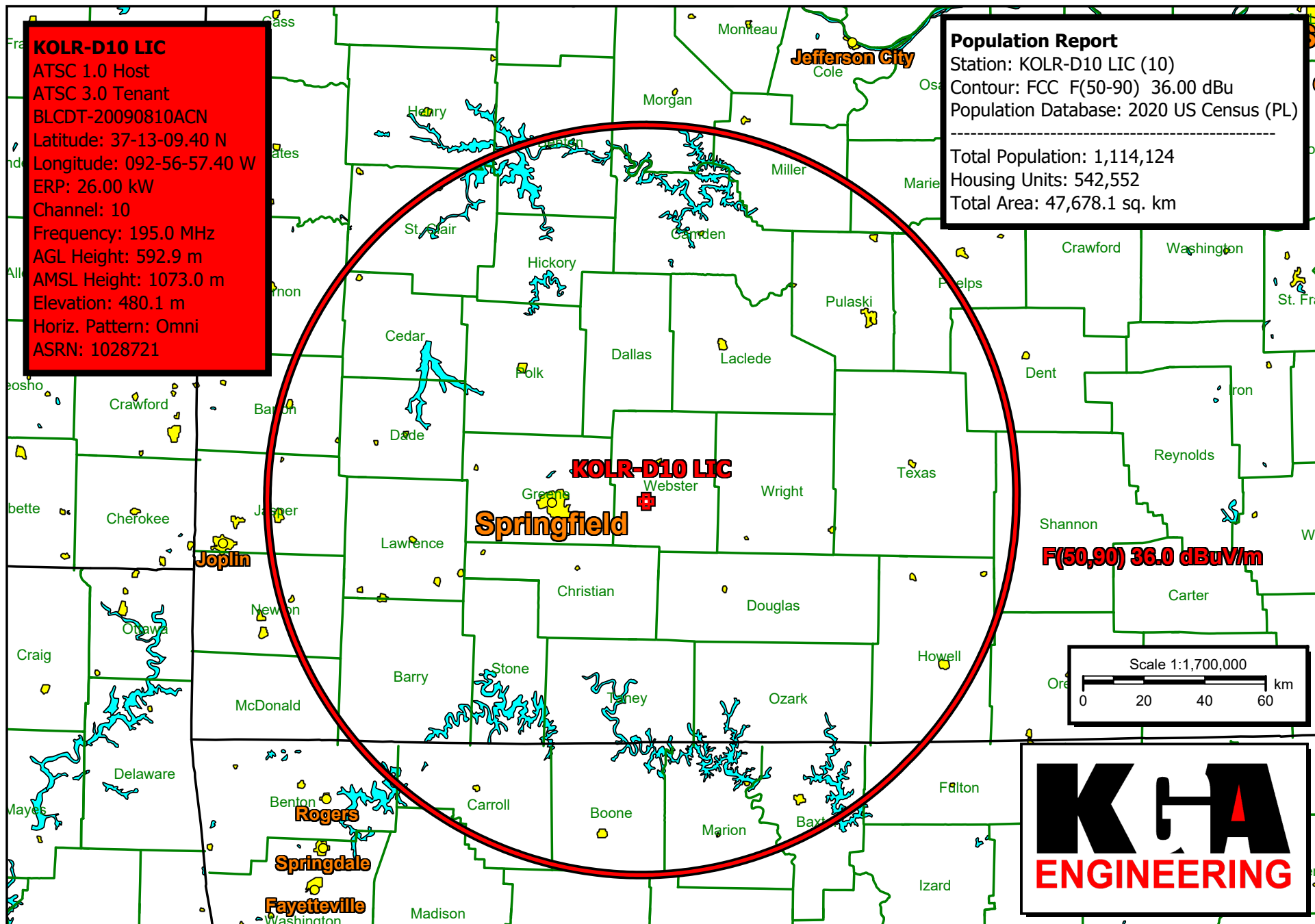


Population Within KRBK-D22 Licensed Protected Noise Limited Contour

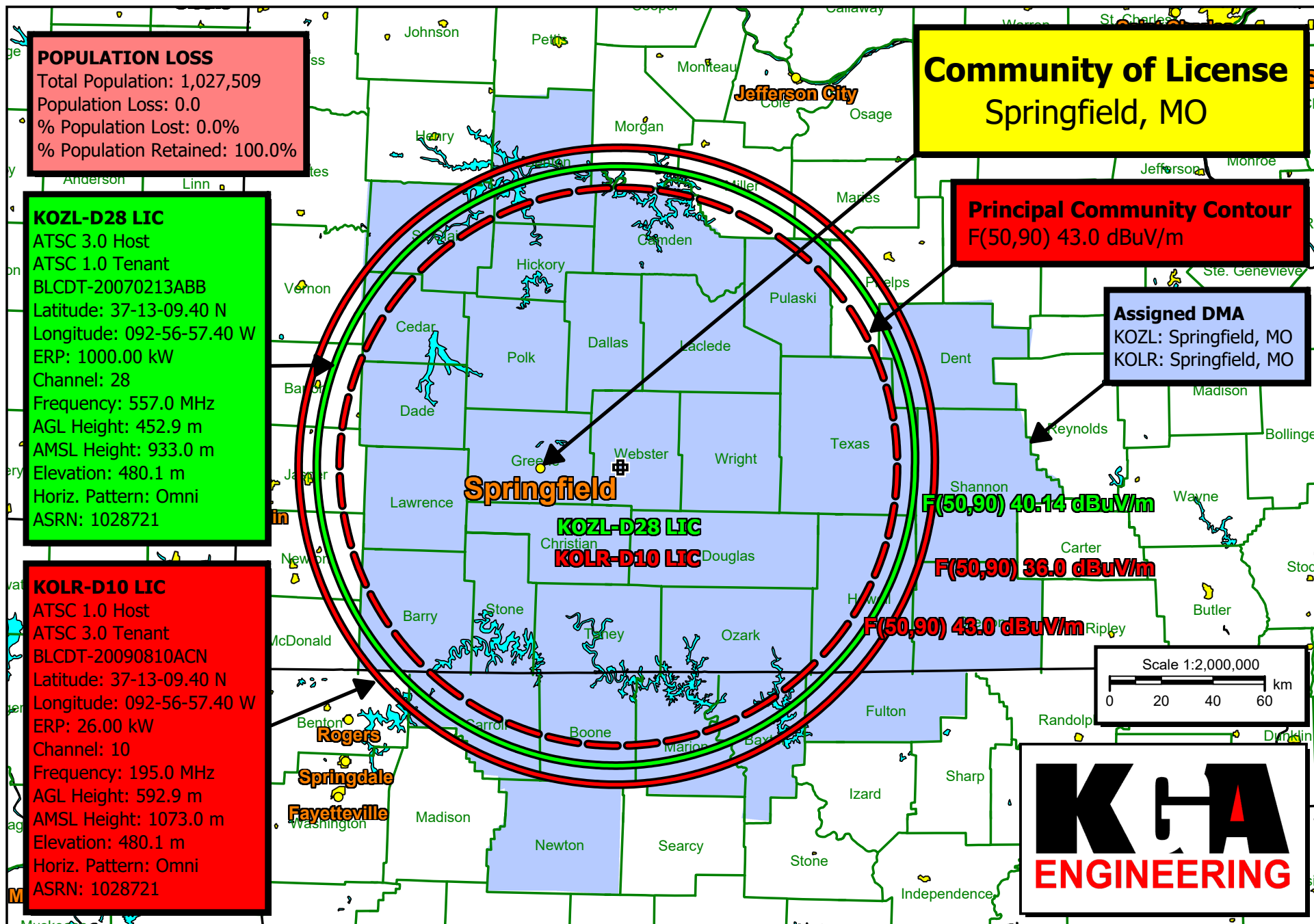


ATSC 1.0 Host: KRBK-D22 / ATSC 1.0 Tenant: KOZL-D28 (ATSC 3.0 Host)

EXHIBIT 3

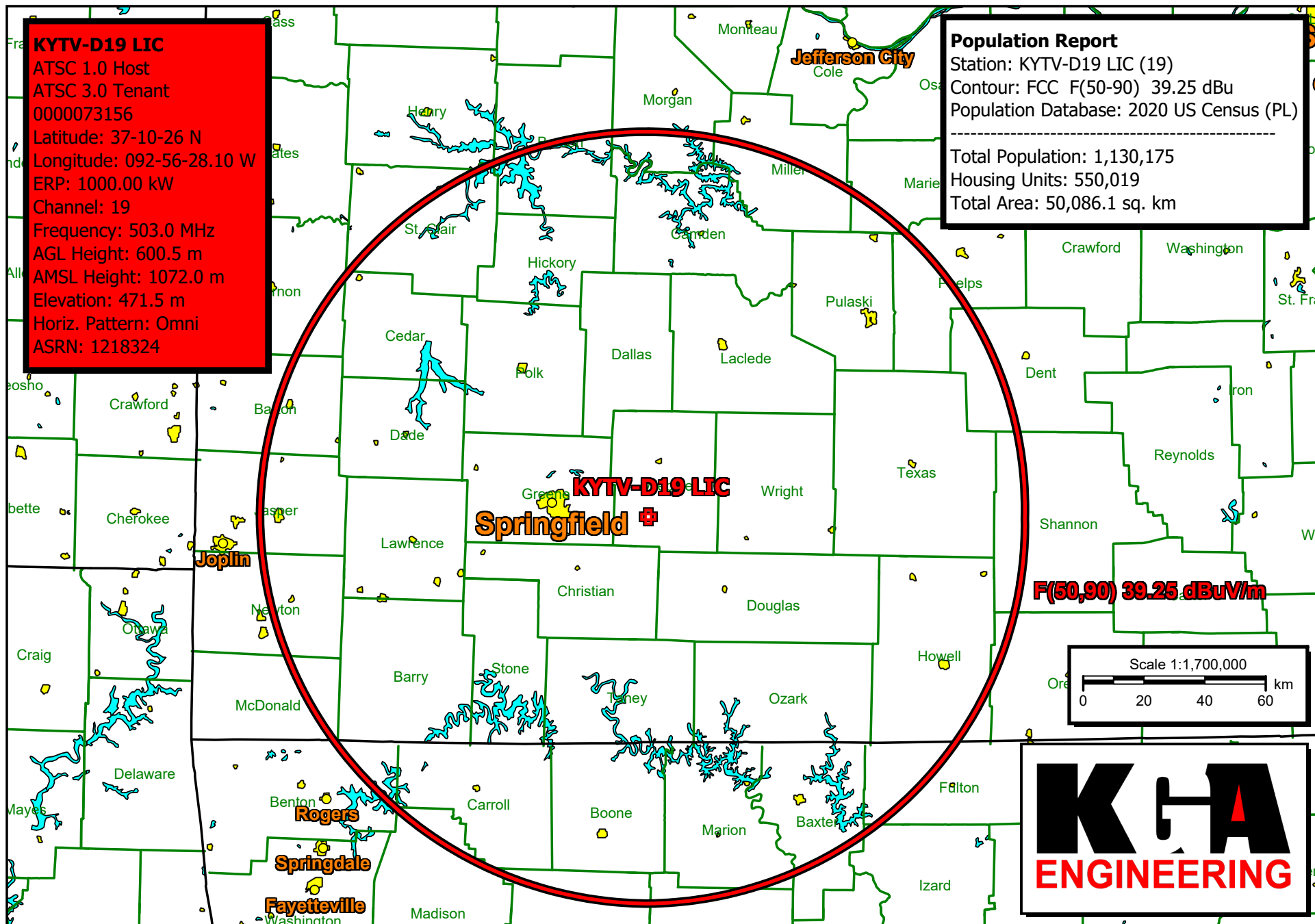


Population Within KOLR-D10 Licensed Protected Noise Limited Contour

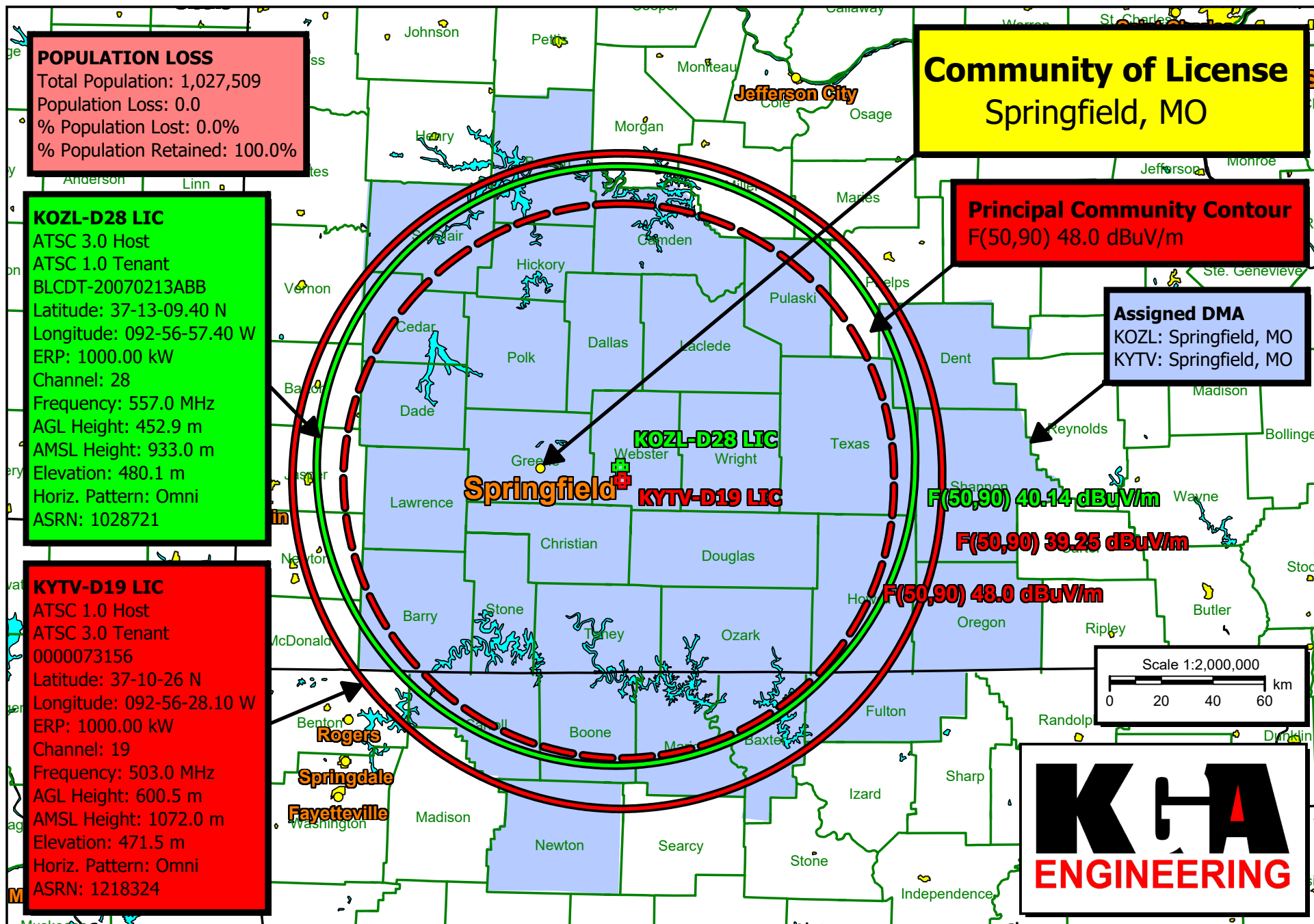


ATSC 1.0 Host: KOLR-D10 / ATSC 1.0 Tenant: KOZL-D28 (ATSC 3.0 Host)

EXHIBIT 5



Population Within KYTV-D19 Licensed Protected Noise Limited Contour



ATSC 1.0 Host: KYTV-D19 / ATSC 1.0 Tenant: KOZL-D28 (ATSC 3.0 Host)

EXHIBIT 7