

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

The **KRON-TV** (ATSC 1.0 Tenant / ATSC 3.0 Host) full-power digital television broadcast facility (File Number 0000112902) is licensed to operate on Channel 7 with an ERP of 50 kW using a directional antenna mounted on Sutro Tower with Antenna Structure Registration Number (ASRN) 1001289 located in San Francisco, CA. The **KTVU** (ATSC 1.0 Host #1) full-power television facility (File Number 0000107584) is licensed to operate on Channel 31 with an ERP of 1,000 kW using a directional antenna co-located with KRON-TV on Sutro Tower. The **KNTV** (ATSC 1.0 Host #2) full-power television facility (File Number 0000112999) is licensed to operate on Channel 13 with an ERP of 95 kW using a nondirectional antenna mounted on a tower with ASRN 1010567 located in Daly City, CA. The **KBCW** (ATSC 1.0 Host #3) full-power television facility (File Number 0000112987) is licensed to operate on Channel 28 with an ERP of 1,000 kW using a directional antenna co-located with KRON-TV on Sutro Tower. The **KGO-TV** (ATSC 1.0 Host #4) full-power television facility (File Number 0000113050) is licensed to operate on Channel 12 with an ERP of 47 kW using a directional antenna co-located with KRON-TV on Sutro Tower.

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:

- KRON-TV ATSC 1.0 Tenant at KTVU ATSC 1.0 Host
- KRON-TV ATSC 1.0 Tenant at KNTV ATSC 1.0 Host
- KRON-TV ATSC 1.0 Tenant at KBCW ATSC 1.0 Host
- KRON-TV ATSC 1.0 Tenant at KGO-TV ATSC 1.0 Host
- KTVU, KNTV, KBCW & KGO-TV ATSC 3.0 Tenants at KRON-TV ATSC 3.0 Host

All five stations are assigned to the same DMA (San Francisco - Oak - San Jose, CA).

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: KTVU (0000107584)
- ATSC1.0 Host #2: KNTV (0000112999)
- ATSC1.0 Host #3: KBCW (0000112987)
- ATSC1.0 Host #4: KGO-TV (0000113050)

Technical Facilities of ATSC 1.0 Host #1 Station:

- Station: KTVU
- Frequency: 575 MHz (Channel 31)
- ERP: 1,000 kW
- Antenna: Directional
- Antenna Center Height: 288.0 m AGL
- Antenna Model: TUM20-C5SP-14/60H-2-R-T
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 0.9°
- Coordinates: 37° 45' 19.0" N, 122° 27' 10.0" W
- ASRN: 1001289
- DMA: San Francisco - Oak - San Jose, CA (all stations)

Technical Facilities of ATSC 1.0 Host #2 Station:

- Station: KNTV
- Frequency: 213 MHz (Channel 13)
- ERP: 95 kW
- Antenna: Nondirectional
- Antenna Center Height: 77.5 m AGL
- Antenna Model: THV-11A13/VP-R O4
- Antenna Polarization: Elliptical

- Antenna Beam Tilt: 1.0°
- Coordinates: 37° 41' 06.5" N, 122° 26' 06.6" W
- ASRN: 1010567
- DMA: San Francisco - Oak - San Jose, CA (all stations)

Technical Facilities of ATSC 1.0 Host #3 Station:

- Station: KBCW
- Frequency: 557 MHz (Channel 28)
- ERP: 1,000 kW
- Antenna: Directional
- Antenna Center Height: 267.2 m AGL
- Antenna Model: TFU-24DSC/VP-R C140 DC
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 0.75°
- Coordinates: 37° 45' 19.0" N, 122° 27' 10.0" W
- ASRN: 1001289
- DMA: San Francisco - Oak - San Jose, CA (all stations)

Technical Facilities of ATSC 1.0 Host #4 Station:

- Station: KGO-TV
- Frequency: 207 MHz (Channel 12)
- ERP: 47 kW
- Antenna: Directional
- Antenna Center Height: 290.7 m AGL
- Antenna Model: THV-6A12/CP-R 4C160
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 1.5°
- Coordinates: 37° 45' 19.0" N, 122° 27' 10.0" W
- ASRN: 1001289
- DMA: San Francisco - Oak - San Jose, CA (all stations)

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

KRON-TV ATSC 1.0 Tenant at KTVU ATSC 1.0 Host

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **9,292,327 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: **407,500 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% (See Exhibits 1 - 3)**.

KRON-TV ATSC 1.0 Tenant at KNTV ATSC 1.0 Host

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **9,292,327 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: **172,136 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 98% (See Exhibits 1, 4 & 5)**

KRON-TV ATSC 1.0 Tenant at KBCW ATSC 1.0 Host

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **9,292,327 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: **488,898 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 95% (See Exhibits 1, 6 & 7)**

KRON-TV ATSC 1.0 Tenant at KGO-TV ATSC 1.0 Host

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **9,292,327 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: **38,739 Persons (See Exhibits 8-9)**
- 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 99.6% (See Exhibits 1, 8 & 9)**


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, 7 and 9, it can be seen that the KRON-TV ATSC 1.0 "Tenant" station will continue to completely encompass the San Francisco, CA community of license with the KTVU F(50,90) 48.0 dBu "ATSC 1.0 Host #1" station's principal community contour, the KNTV F(50,90) 43.0 dBu "ATSC 1.0 Host #2" station's principal community contour, the KBCW F(50,90) 48.0 dBu "ATSC 1.0 Host #3" station's principal community contour and the KGO-TV F(50,90) 43.0 dBu "ATSC 1.0 Host #4" station's principal community contour. Also pursuant to §73.3801(c) and §73.3801(d)

of FCC Rules, the KRON-TV, KTVU, KNTV, KBCW and KGO-TV stations are all assigned to the same DMA (San Francisco - Oak - San Jose, CA).

Accordingly, as demonstrated above and in enclosed Exhibits 1-9, the proposed KRON-TV “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing frequencies with the KTVU, KNTV, KBCW and KGO-TV “ATSC 1.0 Host” facilities (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed KTVU, KNTV, KBCW and KGO-TV “ATSC 3.0 Tenant” facilities operating with an ATSC 3.0 signal and sharing frequencies with the KRON-TV “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.

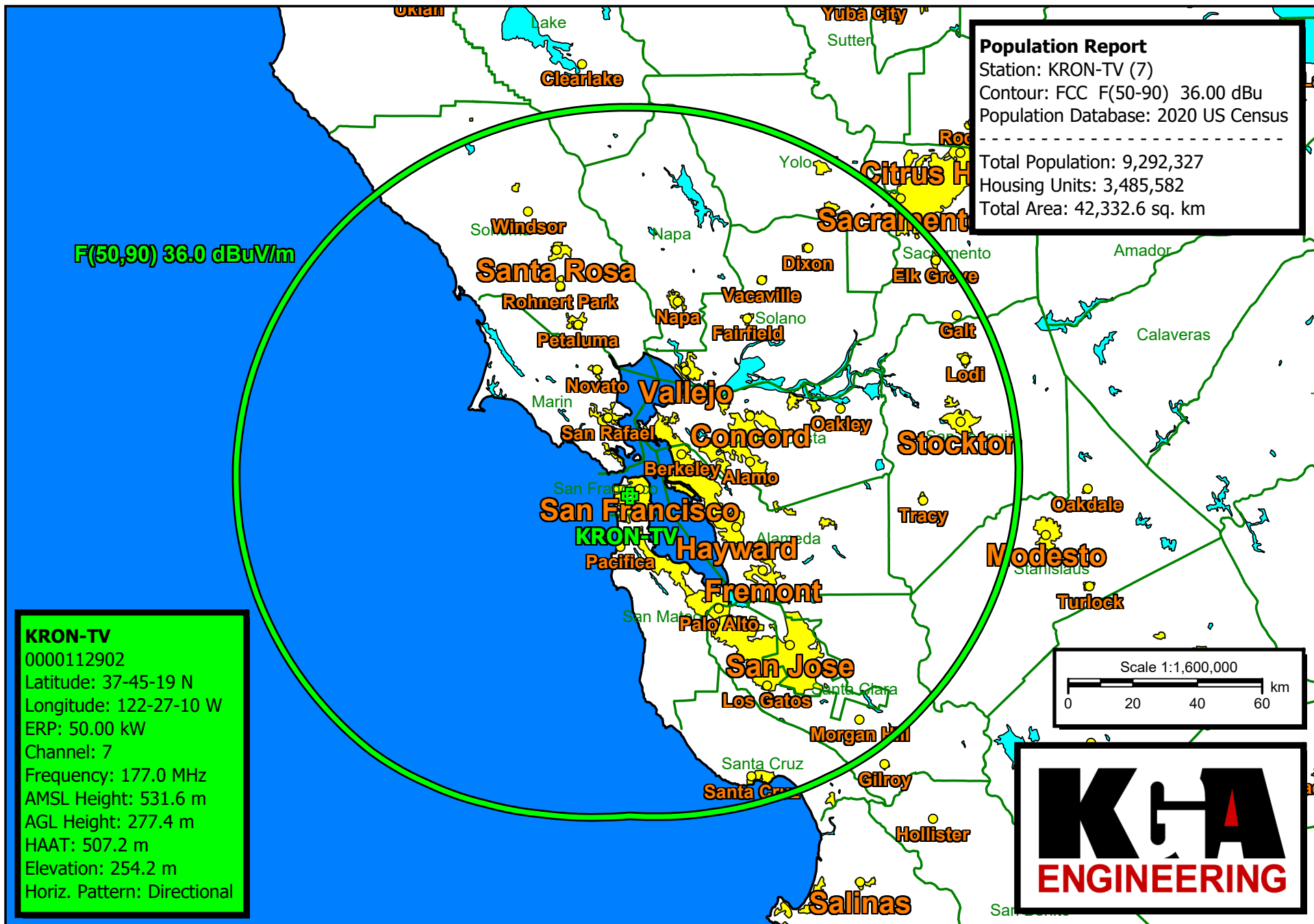
CERTIFICATION

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.

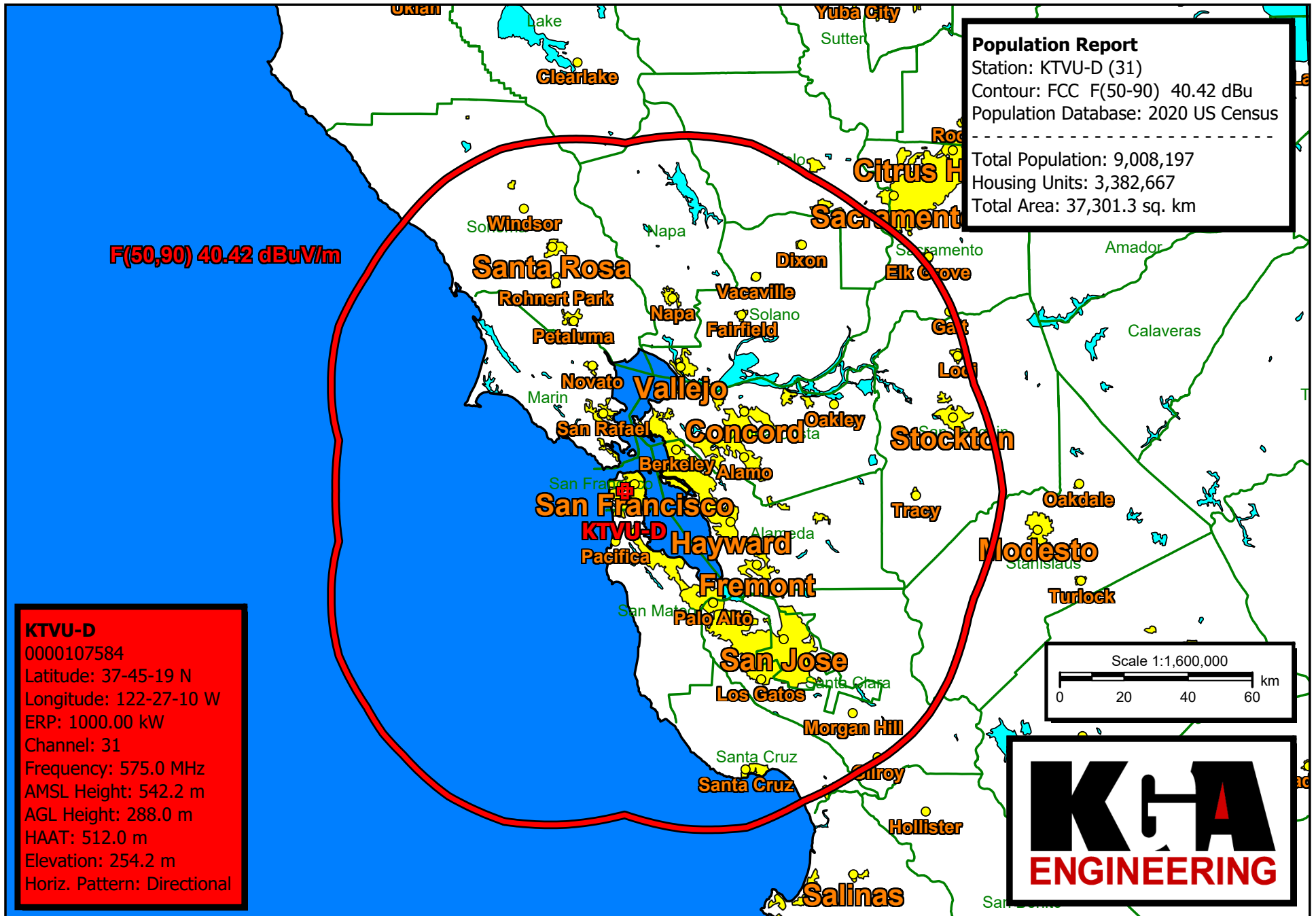

WILLIAM T. GODFREY, JR., CBT

Kessler and Gehman Associates, Inc.
Consulting Engineers

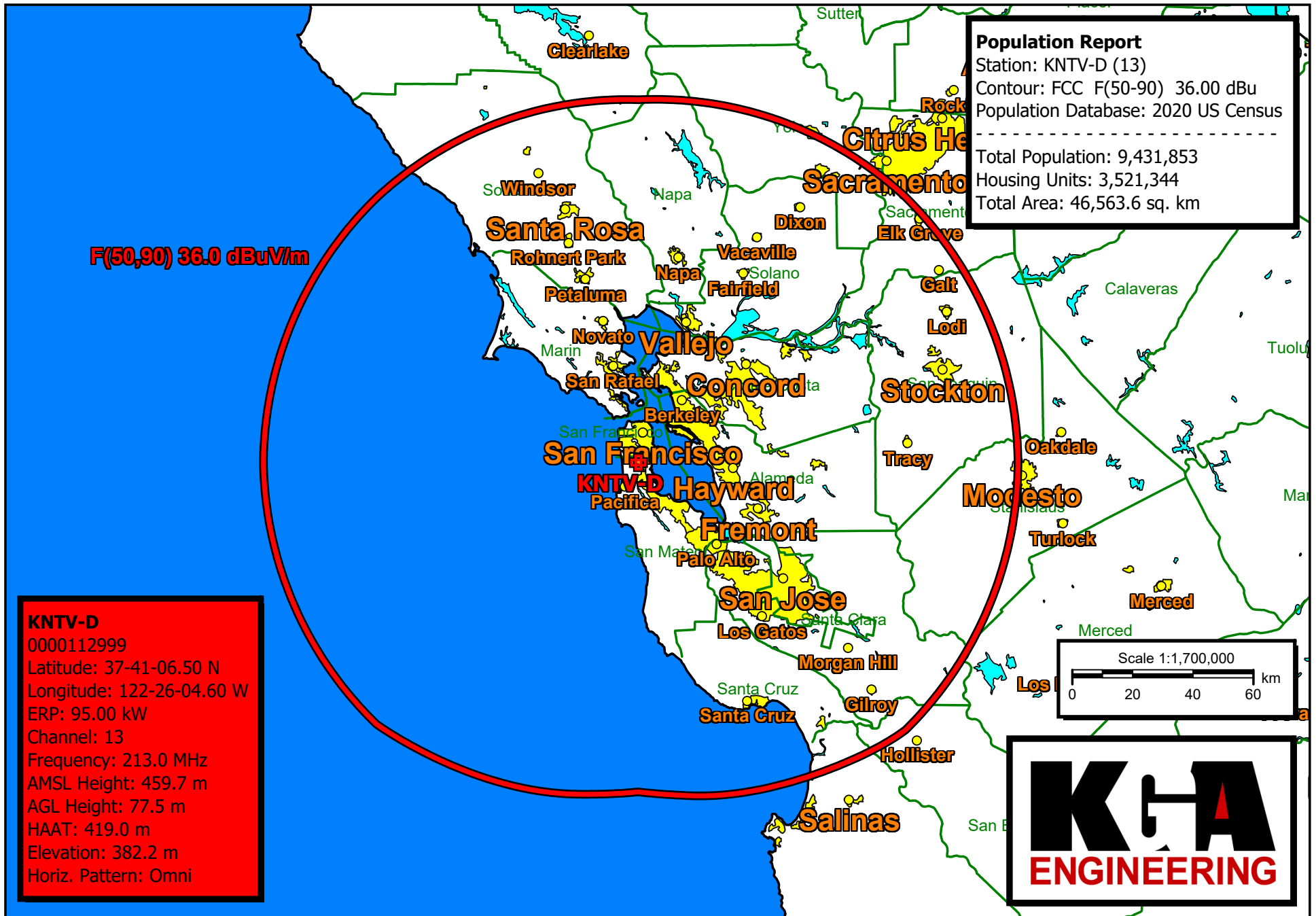
March 7, 2023



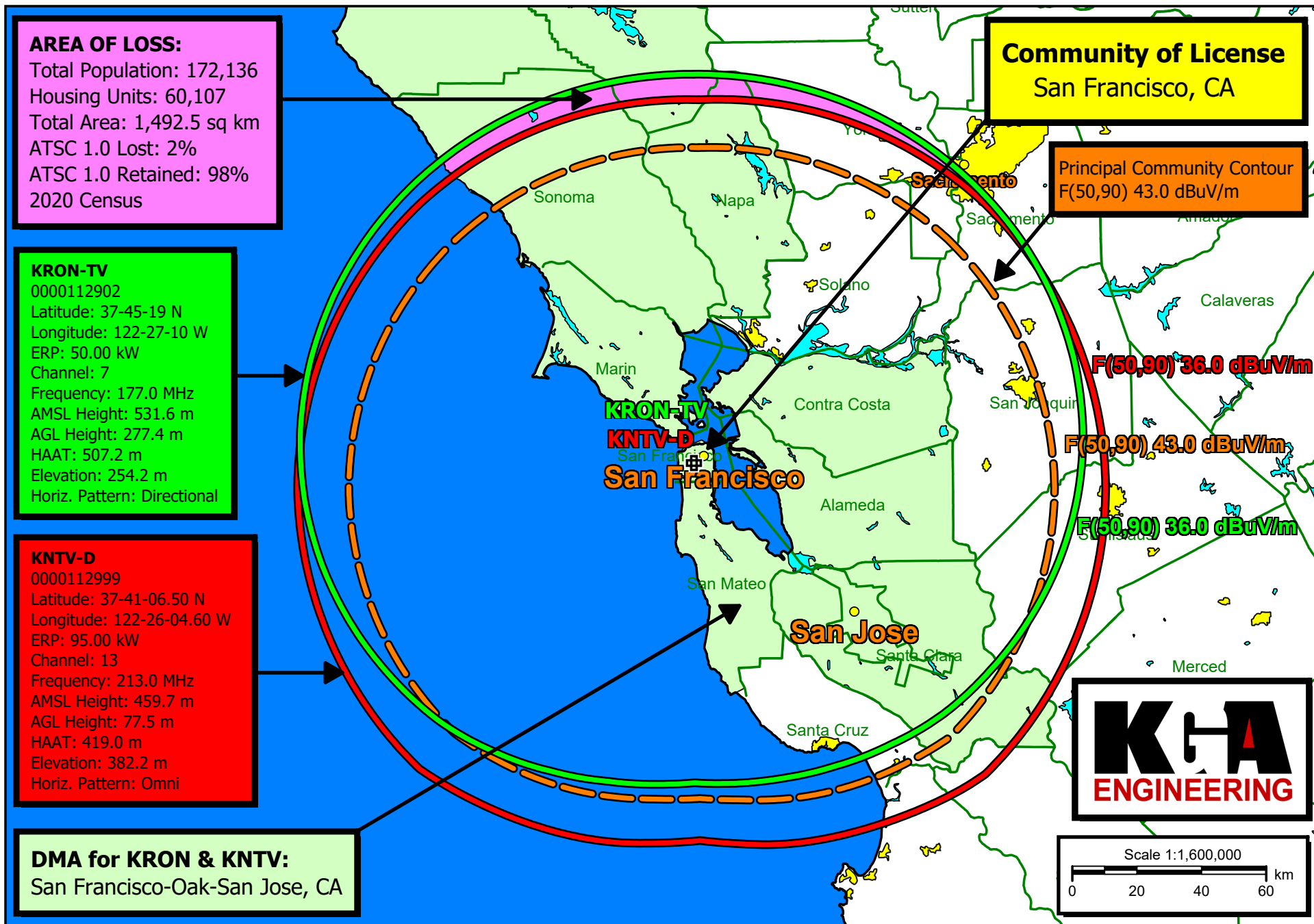
Population Within KRON-TV Licensed Protected Noise Limited Service Contour



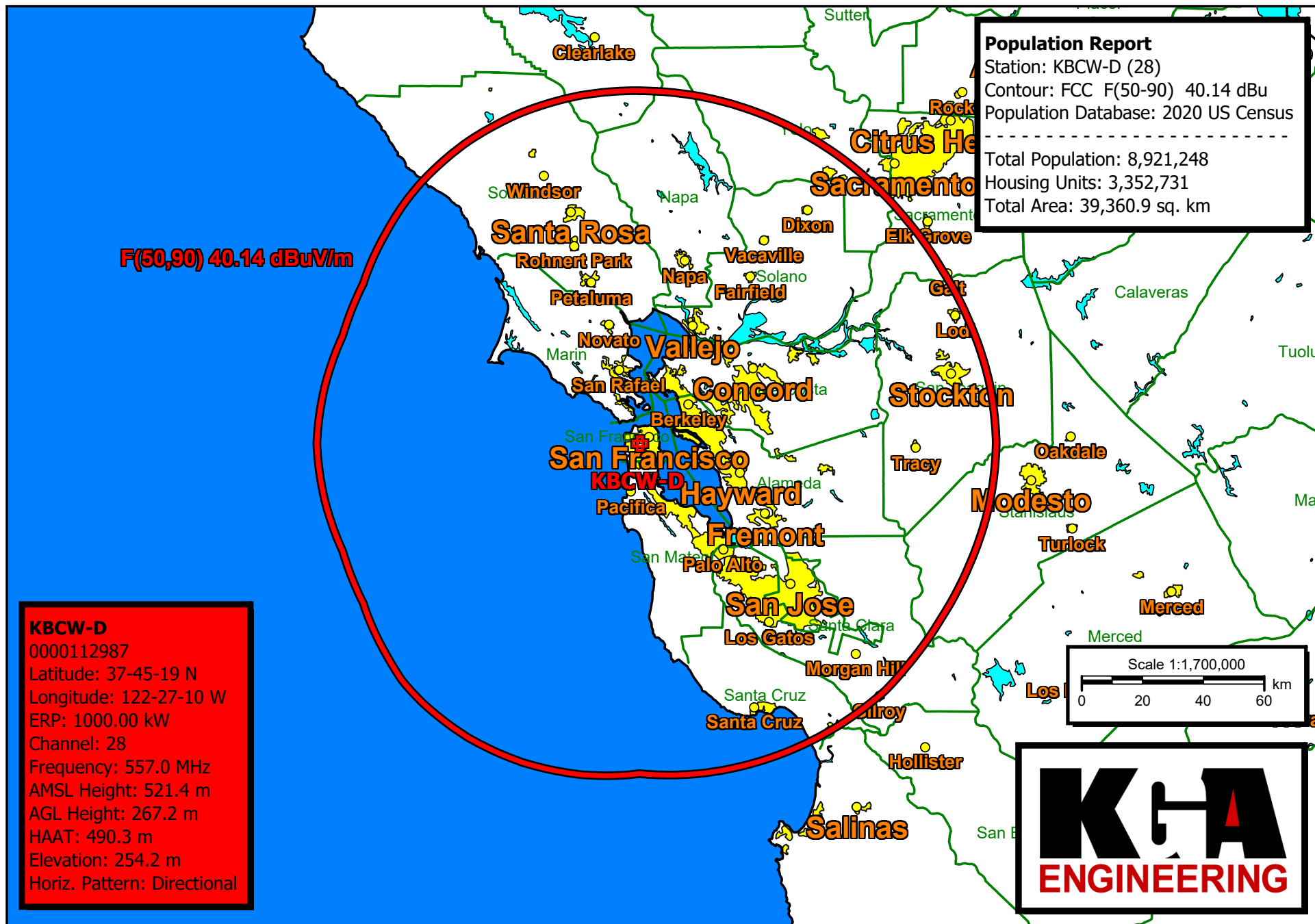
Population Within KTVU Licensed Protected Noise Limited Service Contour



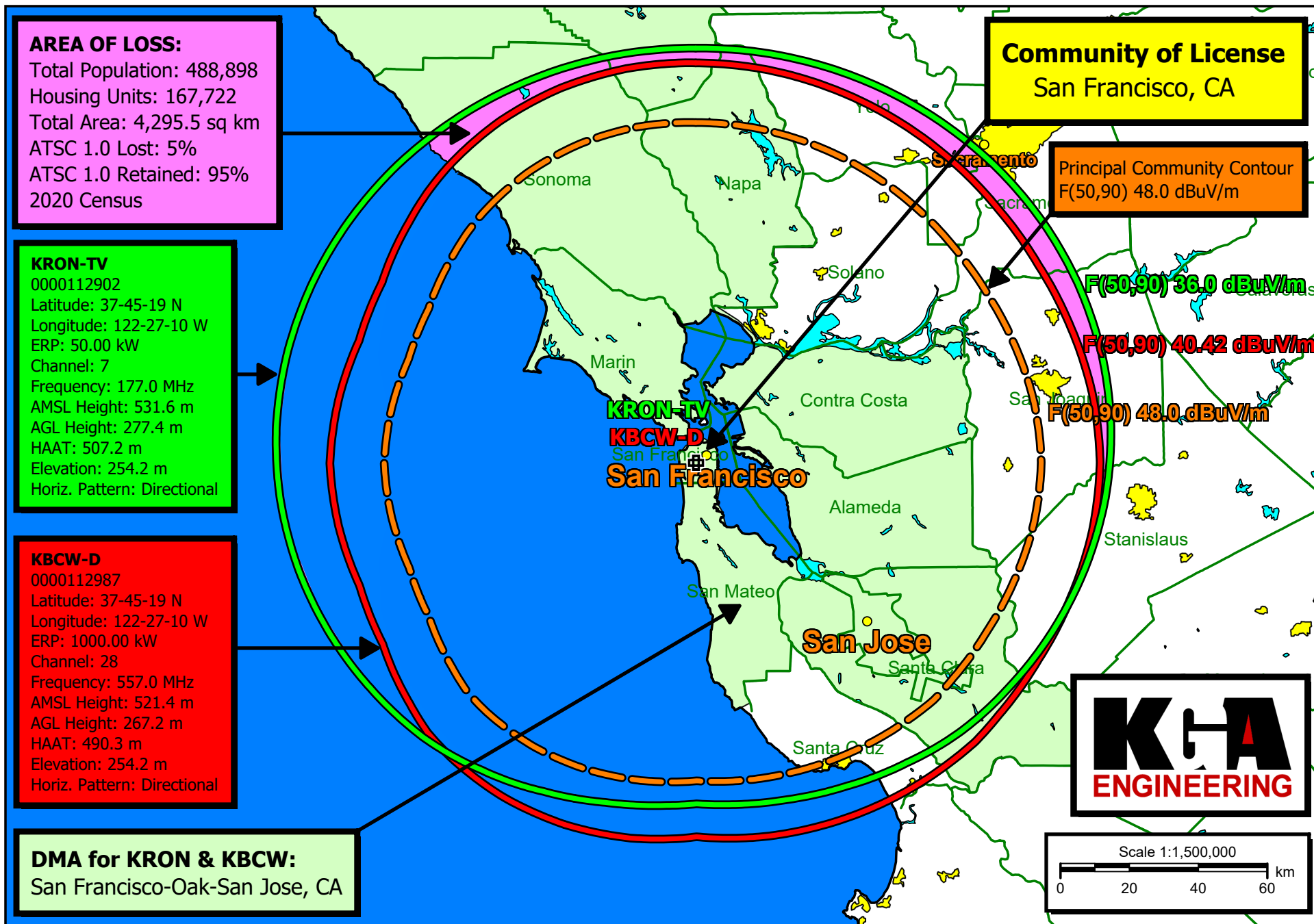
Population Within KNTV Licensed Protected Noise Limited Service Contour



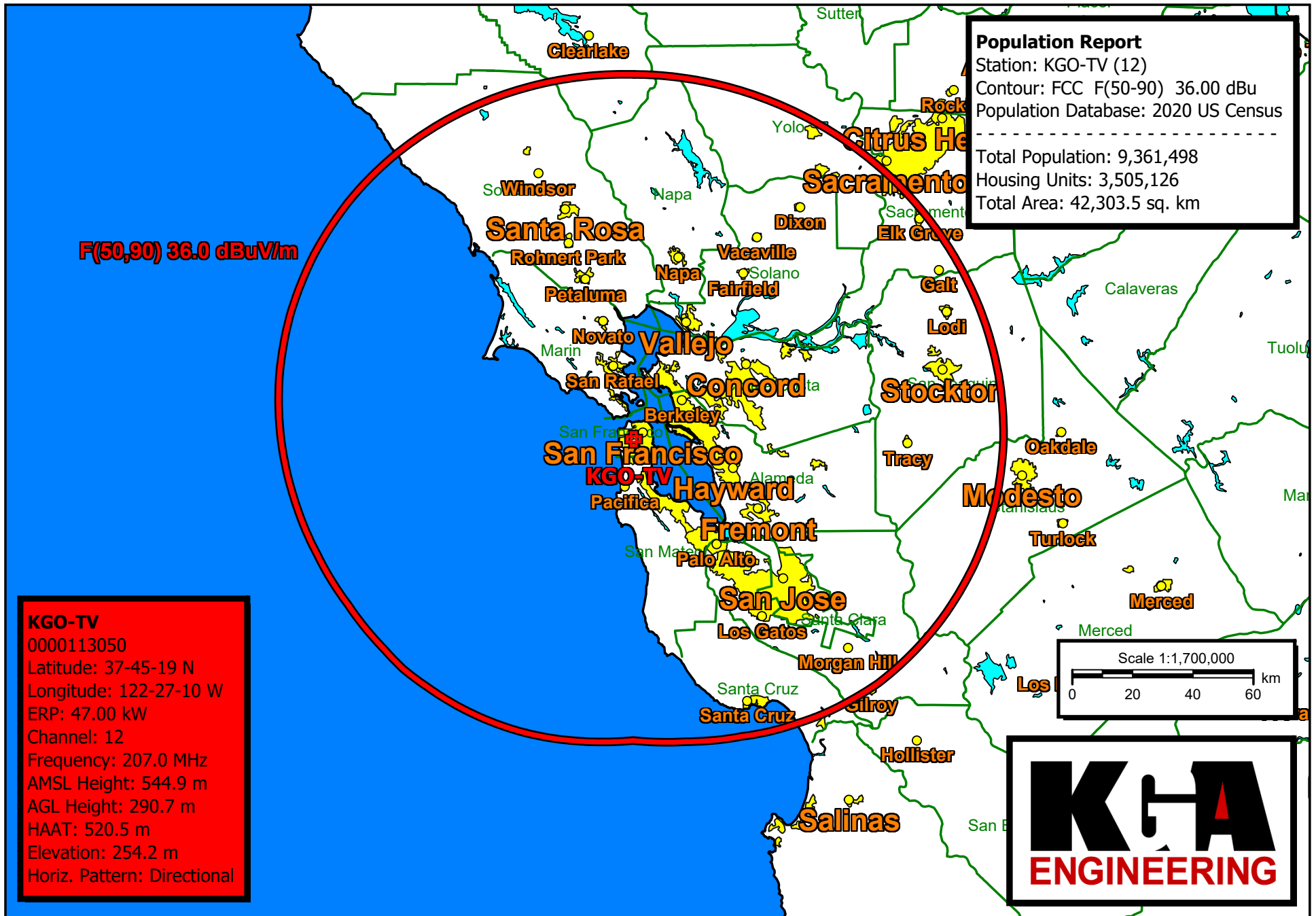
ATSC 1.0 Host: KNTV / ATSC 1.0 Tenant: KRON-TV (ATSC 3.0 Host)



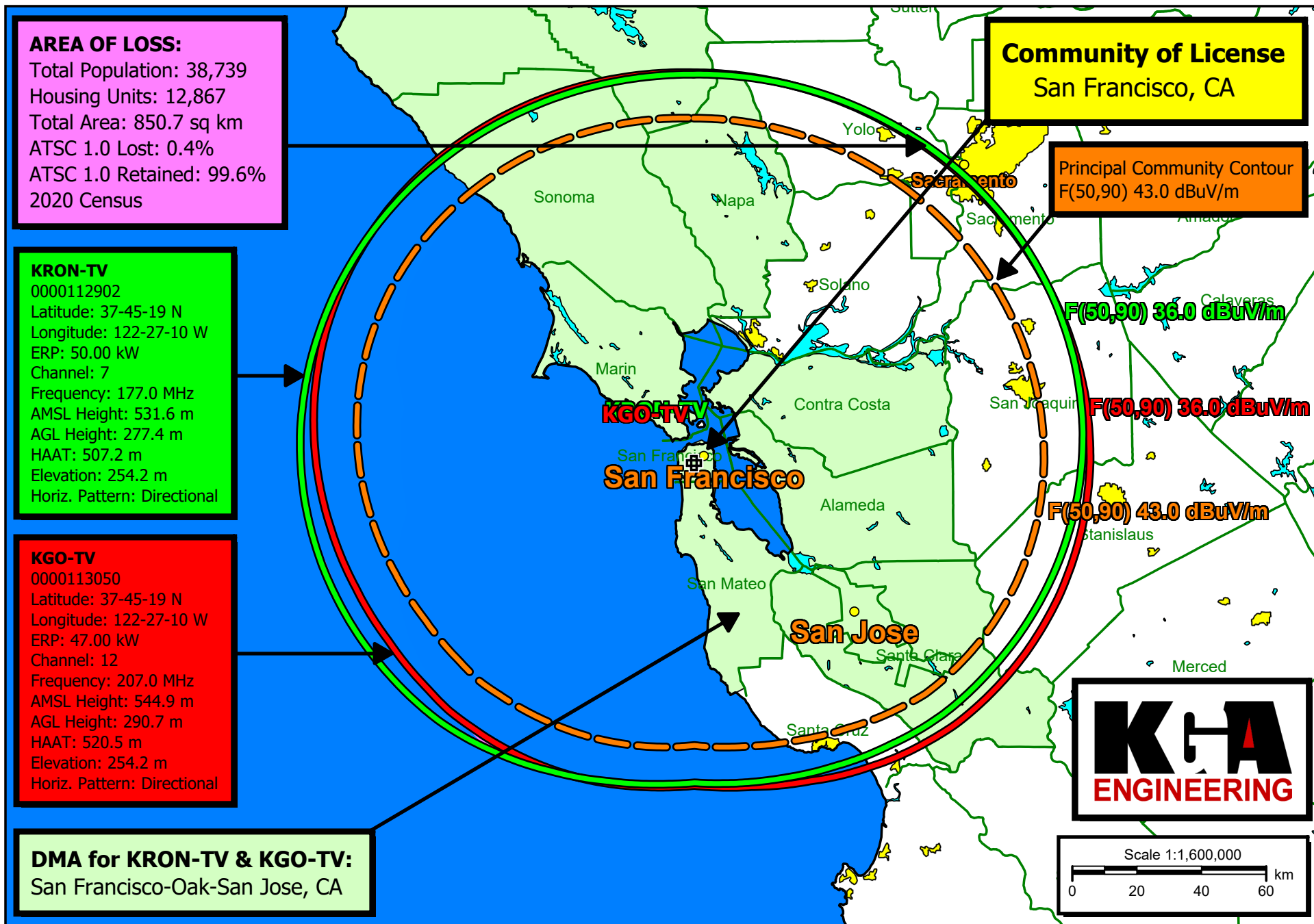
Population Within KBCW Licensed Protected Noise Limited Service Contour



ATSC 1.0 Host: KBCW / ATSC 1.0 Tenant: KRON-TV (ATSC 3.0 Host)



Population Within KGO-TV Licensed Protected Noise Limited Service Contour



ATSC 1.0 Host: KGO-TV / ATSC 1.0 Tenant: KRON-TV (ATSC 3.0 Host)