

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KFOX LICENSEE, LLC, licensee of full-power digital television station KFOX-TV, Channel 15 in El Paso, Texas, in support of its Application for Modification of License to operate the station with the ATSC 3.0 transmission standard. It is proposed that during the time that the facility will be transmitting in ATSC 3.0, the primary ATSC 1.0 programming of KFOX-TV will be transmitted by station KTSM-TV, Channel 16 in El Paso.

Exhibit B is a map upon which the KFOX-TV and KTSM-TV noise-limited service contours are plotted. As shown, a significant majority of the KFOX-TV service contour lies within that of KTSM-TV. Indeed, based on the 2020 U.S. Census database, the “loss area” population within the United States that will be created as a result of the transfer of KFOX-TV’s primary ATSC 1.0 programming to KTSM-TV is only 2.3% of the total service population of KFOX-TV.

Therefore, this proposal meets Section 73.3801(f)(6)(ii) of the FCC Rules which requires that the new ATSC 1.0 host station cover at least 95% of the service population of the station that elects to operate under the new ATSC 3.0 format. As a result, expedited processing of this proposal is respectfully requested and believed to be justified.

It is also important to note that KTSM-TV places a city-grade service contour over the entirety of the KFOX-TV city of license, El Paso, Texas, as shown in Exhibit C. This is not entirely unexpected, since KTSM-TV is licensed to the same community within the same Designated Market Area (DMA), El Paso, Texas – Las Cruces, New Mexico, as KFOX-TV and

has a transmitter site that is nearly co-located with that of KFOX-TV. Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K" and "F" and a smaller "T".

KEVIN T. FISHER

November 13, 2023

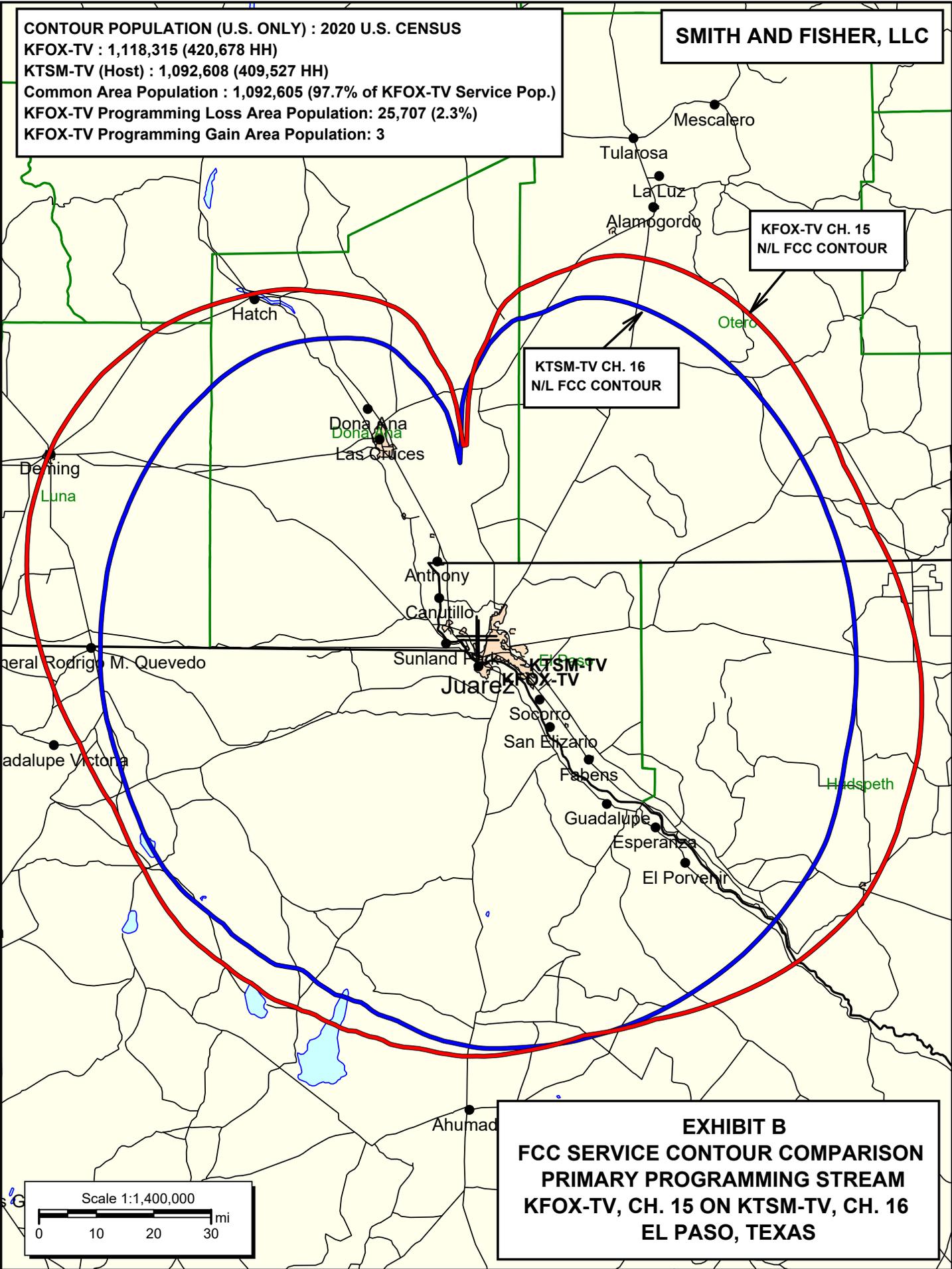
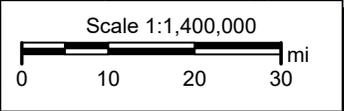
CONTOUR POPULATION (U.S. ONLY) : 2020 U.S. CENSUS
KFOX-TV : 1,118,315 (420,678 HH)
KTSM-TV (Host) : 1,092,608 (409,527 HH)
Common Area Population : 1,092,605 (97.7% of KFOX-TV Service Pop.)
KFOX-TV Programming Loss Area Population: 25,707 (2.3%)
KFOX-TV Programming Gain Area Population: 3

SMITH AND FISHER, LLC

**KFOX-TV CH. 15
N/L FCC CONTOUR**

**KTSM-TV CH. 16
N/L FCC CONTOUR**

**EXHIBIT B
FCC SERVICE CONTOUR COMPARISON
PRIMARY PROGRAMMING STREAM
KFOX-TV, CH. 15 ON KTSM-TV, CH. 16
EL PASO, TEXAS**



SMITH AND FISHER, LLC

**KTSM-TV 48 DBU
CITY-GRADE CONTOUR**

Otero

Dona Ana
Dona Ana
Las Cruces
Mesilla

Anthony

Canutillo

KTSM-TV

**KFOX-TV
CITY OF LICENSE**

eco

Sunland Park

Juarez

El Paso

Socorro

San Elizario

Fabens

Guadalupe

Esperanza

El Porvenir

Ahumada

**EXHIBIT C
CITY-GRADE COVERAGE CONTOUR
PRIMARY PROGRAMMING STREAM
KFOX-TV, CH. 15 ON KTSM-TV, CH. 16
EL PASO, TEXAS**

