

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of DEERFIELD MEDIA (CINCINNATI) LICENSEE, LLC, licensee of full-power digital television stationWSTR-TV, Channel 18 in Cincinnati, Ohio, 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 ofWSTR-TV will be transmitted by stationWLWT(TV), Channel 20 in Cincinnati.

Exhibit B is a map upon which theWSTR-TV andWLWT(TV) noise-limited service contours are plotted. As shown, the majority of theWSTR-TV service contour overlaps that ofWLWT(TV). Indeed, the "loss area" population that will be created as a result of the transfer ofWSTR-TV's primary ATSC 1.0 programming toWLWT(TV) is only 0.4% of the total service population ofWSTR-TV, according to the 2018 U.S. Census Estimate data. And, a significant amount of gain area (comprising 90,639 people) will be created by the move of theWSTR-TV ATSC 1.0 primary programming toWLWT(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 thatWLWT(TV) places a city-grade service contour over the entirety of theWSTR-TV city of license, Cincinnati, Ohio, as shown in Exhibit C. This is not unexpected, sinceWLWT(TV) operates from a transmitter site in fairly close proximity to that of

WSTR-TV and is licensed to the same community as WSTR-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 initial "K" and a long horizontal stroke at the end.

KEVIN T. FISHER

August 18, 2021

**SMITH AND FISHER, LLC**

**CONTOUR POPULATION : 2018 U.S. CENSUS ESTIMATE**  
WSTR-TV : 3,373,959 (1,479,914 HH)  
WLWT(TV) (Host) : 3,450,633 (1,513,362 HH)  
Common Area Population : 3,359,994 (99.6% of WSTR-TV Contour Population)  
WSTR-TV Programming Loss Area Population: 13,965 (0.4%)  
WSTR-TV Programming Gain Area Population: 90,639

**WSTR-TV CH. 18  
N/L FCC CONTOUR**

**WLWT(TV) CH. 20  
N/L FCC CONTOUR**

**EXHIBIT B  
FCC SERVICE CONTOUR COMPARISON  
PRIMARY PROGRAMMING STREAM  
WSTR-TV, CH. 18 ON WLWT(TV), CH. 20  
CINCINNATI, OHIO**



