

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

The **KUSI-TV** (ATSC 3.0 Host / ATSC 1.0 Tenant) full-power digital television broadcast facility (File Number 0000005158) is licensed to operate on Channel 18 with an ERP of 355 kW using a directional antenna mounted on a tower with Antenna Structure Registration Number ("ASRN") 1011488 located on San Miguel Mountain, CA. The **KSWB-TV** (ATSC 1.0 Host / ATSC 3.0 Tenant) full-power digital television broadcast facility (File Number 0000068712) is licensed to operate on Channel 26 with an ERP of 350 kW using a directional antenna mounted on a tower with ASRN 1011527 located on San Miguel Mountain, CA.

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:

- KUSI-TV ATSC 1.0 Tenant at KSWB-TV ATSC 1.0 Host
- KSWB-TV ATSC 3.0 Tenant at KUSI-TV ATSC 3.0 Host

Both stations are assigned to the same DMA (San Diego, CA).

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

Station serving as the ATSC 1.0 Host:

- KSWB-TV (0000068712)

Technical Facilities of ATSC 1.0 Host Station:

- Station: KSWB-TV
- Frequency: 545 MHz (Channel 26)
- ERP: 350 kW

- Antenna: Directional
- Antenna Azimuth: 240 Degrees
- Antenna Center Height: 54.1 m AGL
- Antenna Model: TFU-29JTH/VP-R S180
- Antenna Polarization: Elliptical
- Antenna Beam Tilt: 1.0°
- Mechanical Beam Tilt: 1.0°
- Coordinates: 32° 41' 47.0" N, 116° 56' 10.0" W
- ASRN: 1011527
- DMA: San Diego, CA (Both stations)

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

KUSI ATSC 1.0 Tenant at KSWB-TV ATSC 1.0 Host

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **3,856,436 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: **3,856,424 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 100% (See Exhibits 1 - 3)**.


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 Exhibit 3, it can be seen that the KUSI-TV

ATSC 1.0 “Tenant” station will continue to completely encompass the San Diego, CA community of license with the KSWB-TV F(50,90) 48.0 dBu ATSC 1.0 Host station’s principal community contour. Also pursuant to §73.3801(c) and §73.3801(d) of FCC Rules, the KUSI-TV and KSWB-TV stations are all assigned to the same DMA (San Diego, CA).

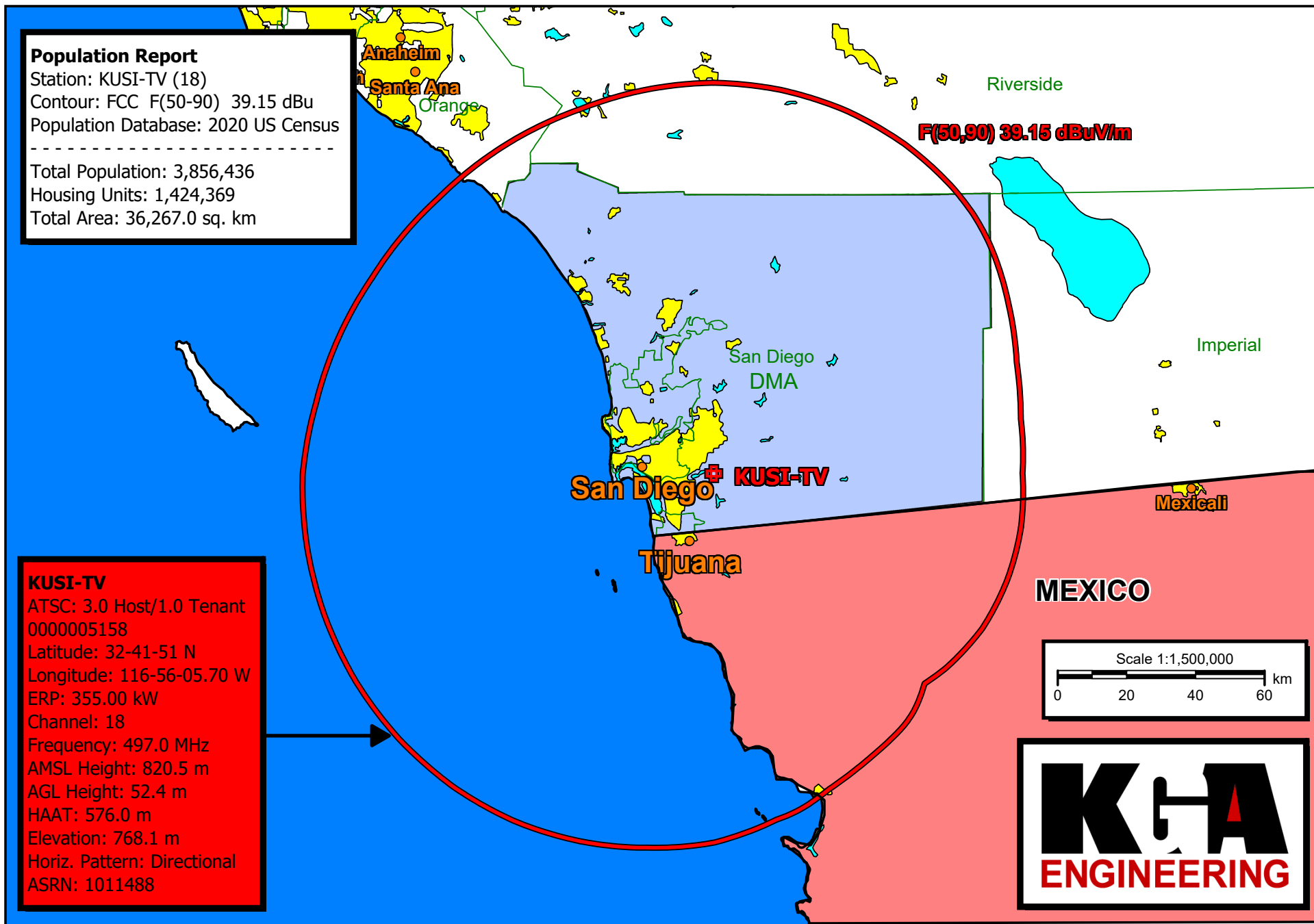
Accordingly, as demonstrated above and in enclosed Exhibits 1-3, the proposed KUSI-TV “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing frequencies with the KSWB-TV “ATSC 1.0 Host” facility (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed KSWB-TV “ATSC 3.0 Tenant” facility operating with an ATSC 3.0 signal and sharing frequencies with the KUSI-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

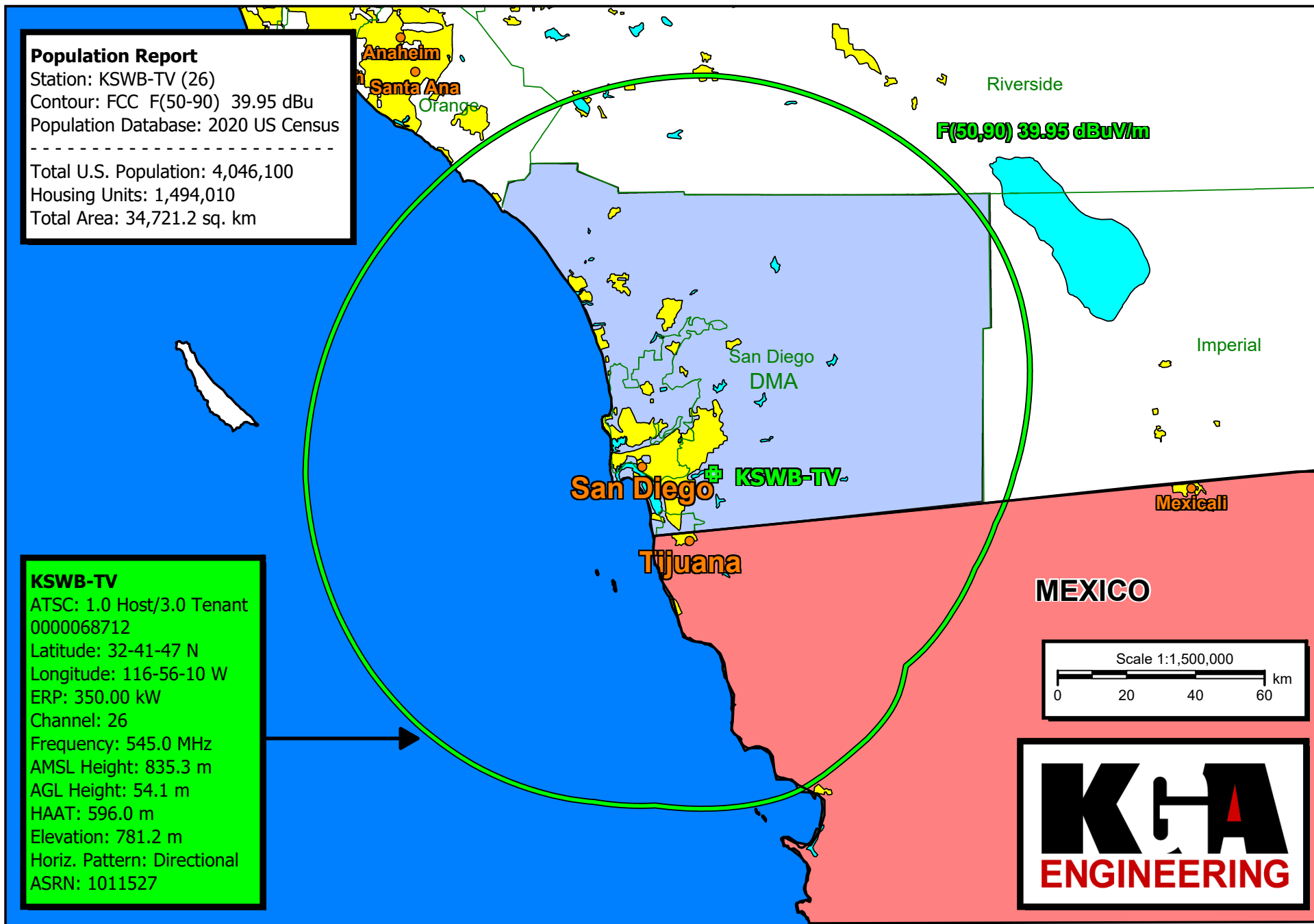
This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a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

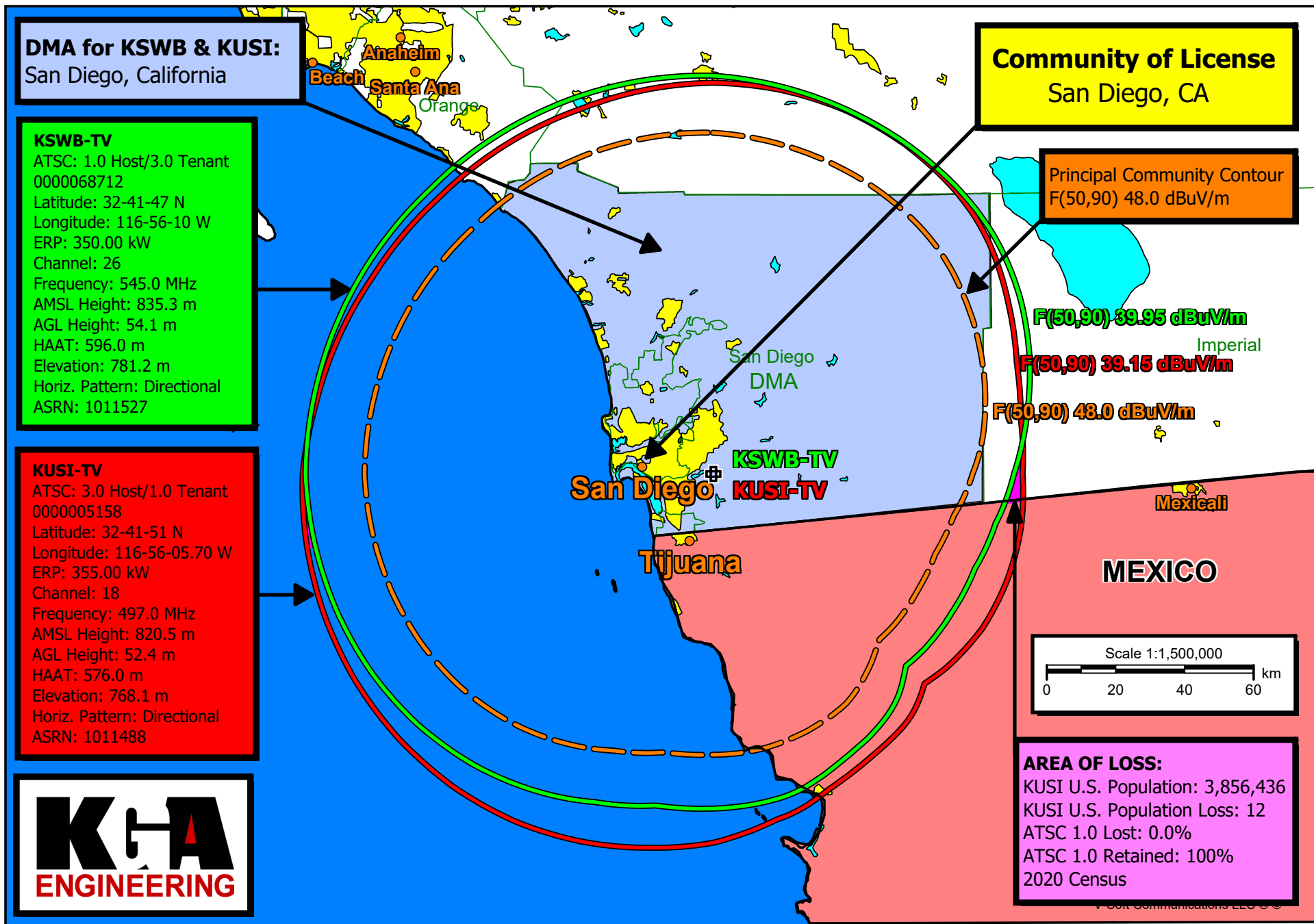
December 8, 2023



Population Within KUSI-TV Licensed Protected Noise Limited Contour



Population Within KSWB-TV Licensed Protected Noise Limited Contour



ATSC 1.0 Host: KSWB / ATSC 1.0 Tenant: KUSI (ATSC 3.0 Host)

EXHIBIT 3