

**ENGINEERING TECHNICAL STATEMENT**  
**COMPLIANCE WITH §73.6029 OF FCC RULES**  
***SIMULCASTING DURING ATSC 3.0 TRANSITION***

The KZUP-CD (ATSC 1.0 Tenant / ATSC 3.0 Host) Class A digital television broadcast facility (File Number BLDTA-20100308ABT) is licensed to operate on Channel 20 with an ERP of 10 kW using a directional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1022810 located in West Baton Rouge, LA. The WBRL-CD (ATSC 1.0 Host #1) Class A television facility (File Number BLDTA-20100908AAP) is licensed to operate on Channel 21 with an ERP of 10 kW using a directional antenna co-located with KZUP-CD on the same tower (ASRN 1022810).

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:

- KZUP-CD ATSC 1.0 Tenant at WBRL-CD ATSC 1.0 Host
- WBRL-CD ATSC 3.0 Tenant at KZUP-CD ATSC 3.0 Host

Both stations are assigned to the same DMA (Baton Rouge, LA).

Pursuant to §73.6029(f)(6) of FCC Rules, the following information is required for these types of applications.

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

- ATSC1.0 Host: WBRL-CD (BLDTA-20100908AAP)

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

- Station: WBRL-CD
- Frequency: 515 MHz (Channel 21)
- ERP: 10 kW
- Antenna: Directional

- Antenna Center Height: 213.4 m AGL
- Antenna Model: ALP-32L3-HSNR-21
- Antenna Polarization: Horizontal
- Antenna Beam Tilt: 0.75°
- Coordinates: 30° 19' 34.6" N, 91° 16' 36.1" W
- ASRN: 1022810
- DMA: Baton Rouge, LA

**KZUP-CD ATSC 1.0 Tenant at WBRL-CD ATSC 1.0 Host**

- Predicted population within the protected contour served by the station's original ATSC 1.0 signal: **753,838 persons based on U.S. Census 2020 data (See Exhibit 1).**
- Predicted population within the protected 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: **753,537 Persons (See Exhibit 2).**
- 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 99.96% (See Exhibits 1 - 3).**

Pursuant to §73.6029(c) of FCC Rules, Class A broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service (and that convert their existing facilities to ATSC 3.0), the station must satisfy the following requirements:

- 1) Maintain overlap between the protected contour (§ 73.6010(c)) of its existing signal and its ATSC 1.0 simulcast signal.
- 2) May not relocate its ATSC 1.0 simulcast signal more than 30 miles from the reference coordinates of the relocating station's existing antenna location.

- 3) Must select a host station assigned to the same DMA as the originating station (i.e., the station whose programming is being transmitted on the host station).

Referring to Exhibit 3, it can be seen that the KZUP-CD ATSC 1.0 “Tenant” station is collocated with the ATSC 1.0 “Host” station which satisfies the contour overlap requirement in #1 listed above and 30 mile limit requirement in #2 above. Exhibit 3 also demonstrates that KZUP-CD and WBRL-CD stations are both assigned to the same DMA (Baton Rouge, LA).

Accordingly, as demonstrated above and in enclosed Exhibits 1-3, the proposed KZUP-CD “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing frequencies with the WBRL-CD “ATSC 1.0 Host” facility (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed WBRL-CD “ATSC 3.0 Tenant” facility operating with an ATSC 3.0 signal and sharing frequencies with the KZUP-CD “ATSC 3.0 Host” facility (Coverage requirements for ATSC 3.0 signals) fully satisfy the FCC rules pursuant to §73.6029 and **should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.**

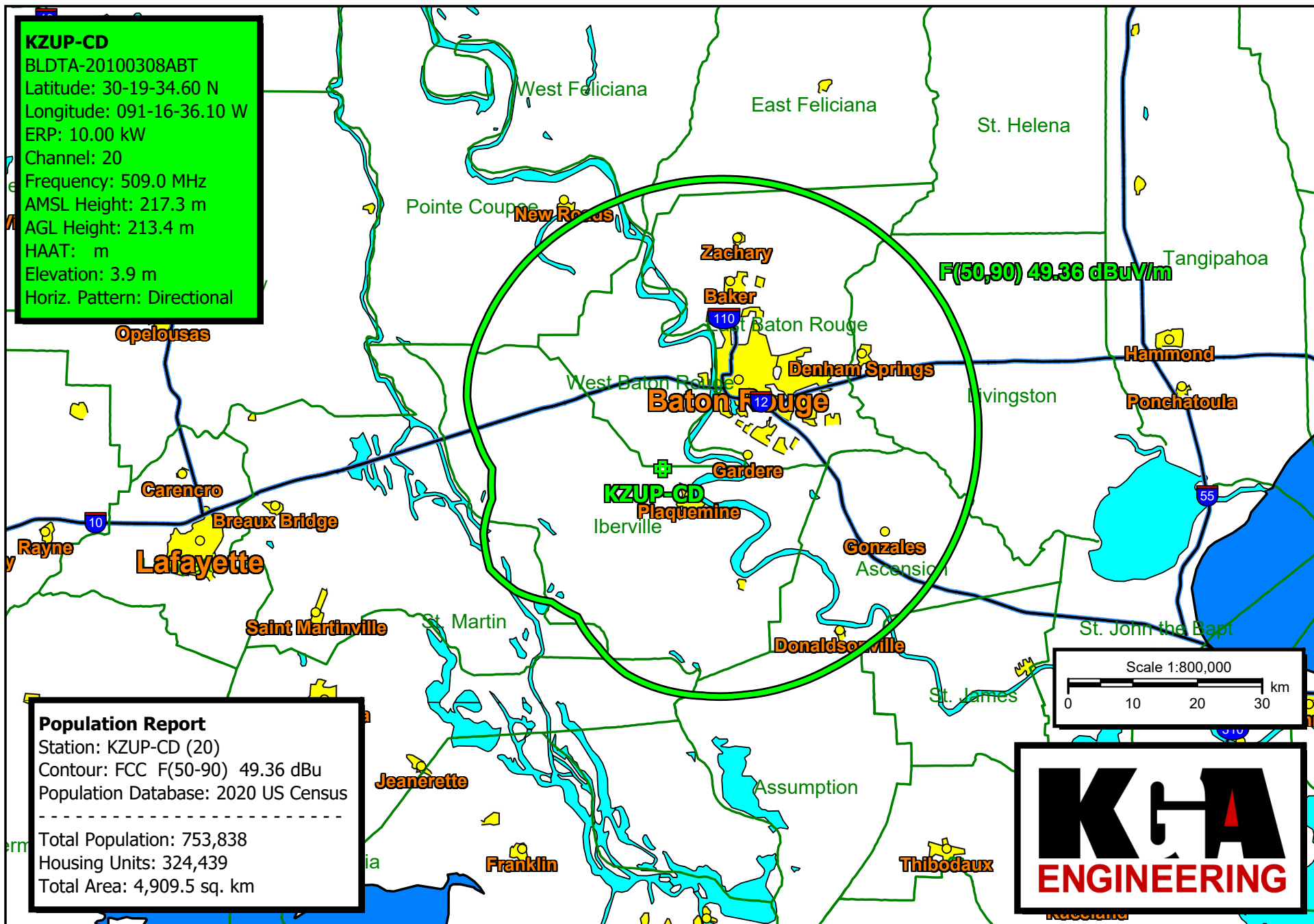
### **CERTIFICATION**

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.

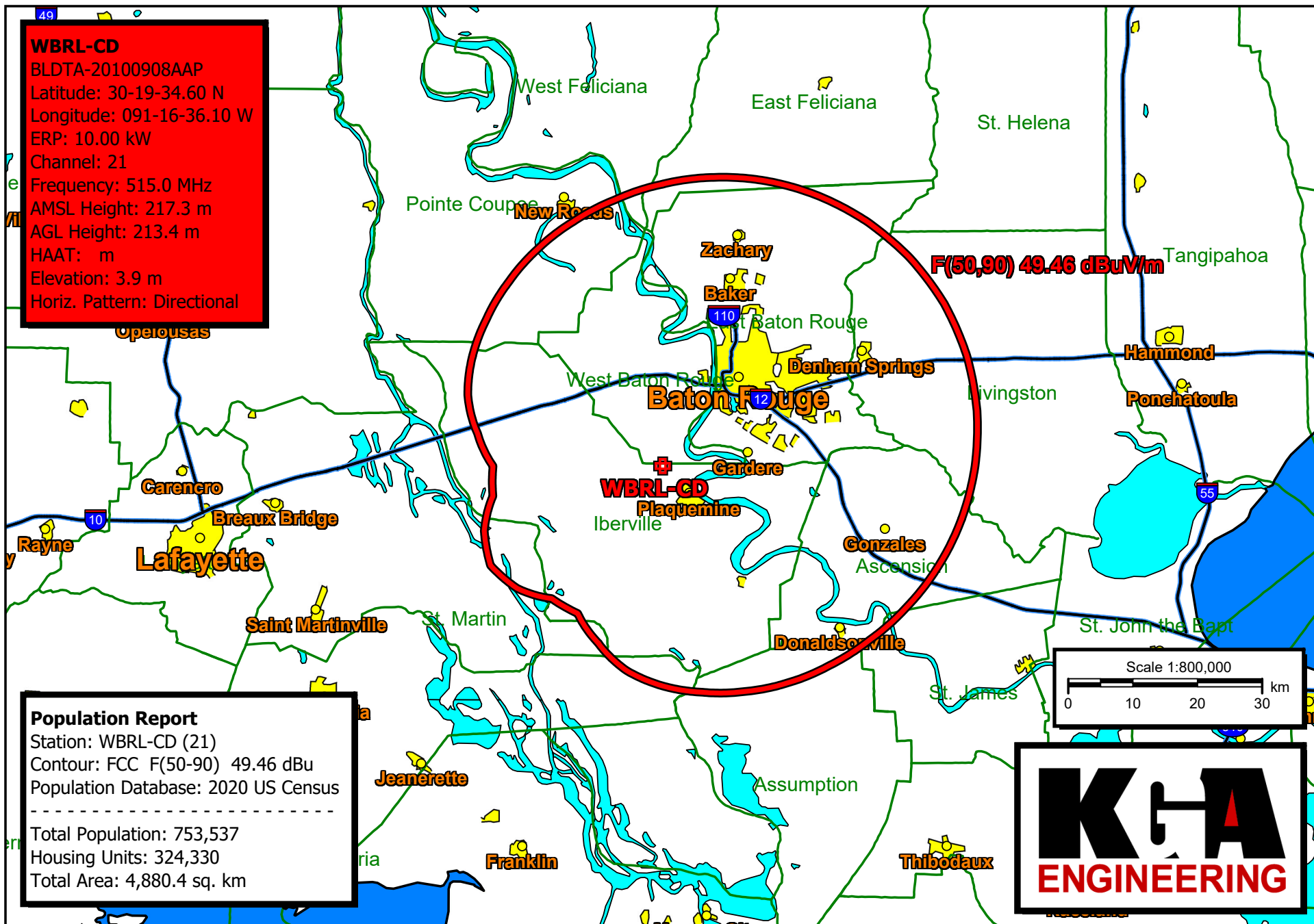


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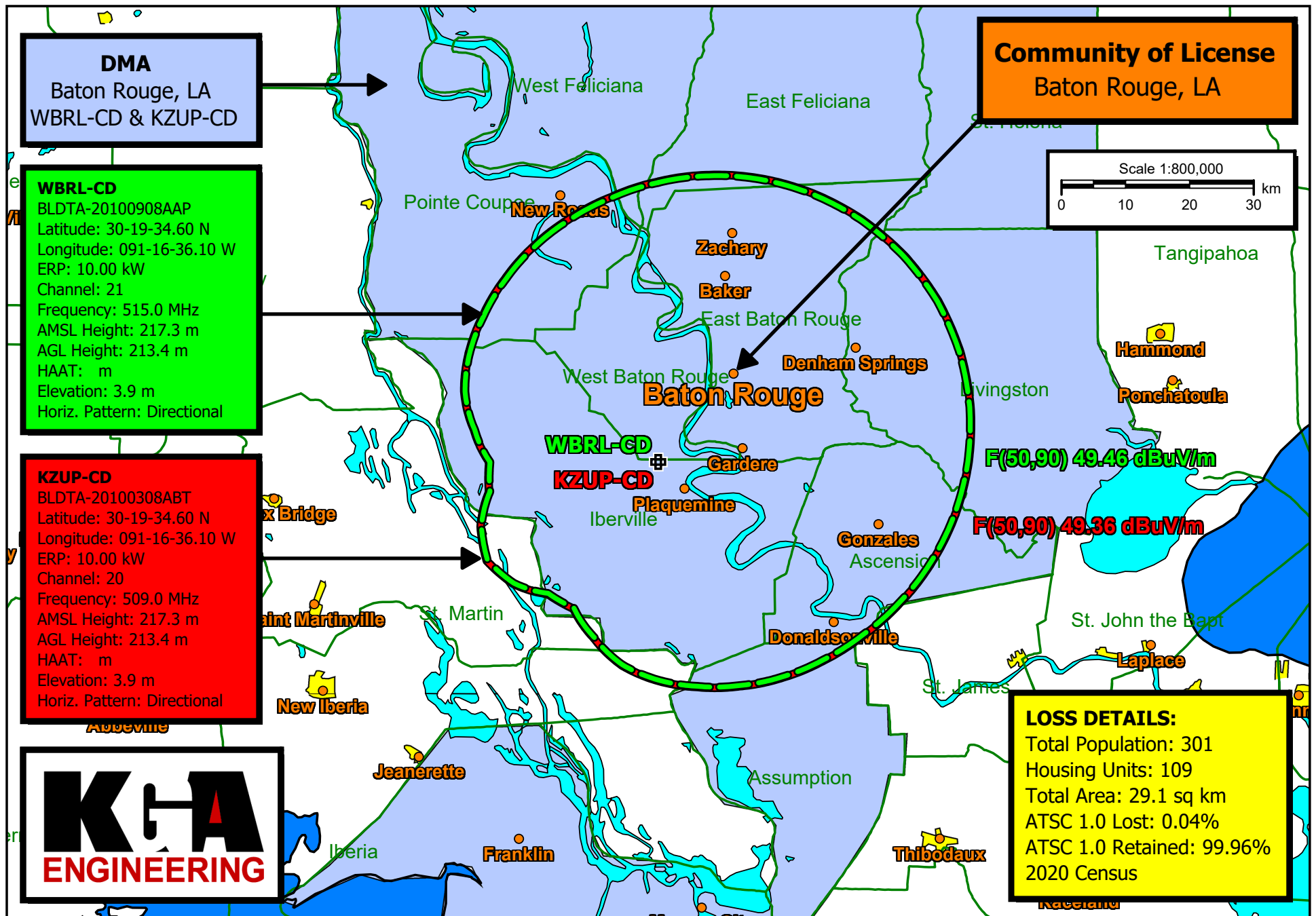
November 9, 2023



**Population Within KZUP-CD Licensed Protected Noise Limited Service Contour**



**Population Within WBRL-CD Licensed Protected Noise Limited Service Contour**



**ATSC 1.0 Host: WBRL-CD / ATSC 1.0 Tenant: KZUP-CD (ATSC 3.0 Host)**

**EXHIBIT 3**