

**ENGINEERING STATEMENT**

The engineering data contained herein have been prepared on behalf of WRGT LICENSEE, LLC, licensee of full-power digital television station WRGT-TV, Channel 36 in Dayton, 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 of WRGT-TV will be transmitted by station WKEF(TV), Channel 34 in Dayton.

Exhibit B is a map upon which the WRGT-TV and WKEF(TV) noise-limited service contours are plotted. As shown, a significant majority of the WRGT-TV service contour lies within that of WKEF(TV). Indeed, the “loss area” population that will be created as a result of the transfer of WRGT-TV’s primary ATSC 1.0 programming to WKEF(TV) is only 0.3% of the total service population of WRGT-TV. Conversely, the additional area served by WKEF(TV) that is presently not served by WRGT-TV contains 299,249 people, according to the 2020 U.S. Census data.

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 WKEF(TV) places a city-grade service contour over the entirety of the WRGT-TV city of license, Dayton, Ohio, as shown in Exhibit C. This is not

EXHIBIT A

entirely unexpected, since WKEF(TV) is licensed to the same community as WRGT-TV and shares the same transmitter site as that of WRGT-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", with a stylized flourish at the end.

KEVIN T. FISHER

November 9, 2022

**CONTOUR POPULATION : 2020 U.S. CENSUS DATABASE**  
**WRGT-TV : 3,592,580 (1,561,252 HH)**  
**WKEF(TV) (Host) : 3,881,181 (1,676,805 HH)**  
**Common Area Population : 3,581,932 (1,556,809 HH)**  
**WRGT-TV Programming Loss Area Population: 10,648 (0.3%)**  
**WRGT-TV Programming Gain Area Population: 299,249**

**SMITH AND FISHER, LLC**

**WKEF(TV) CH. 34  
N/L FCC CONTOUR**

**WRGT-TV CH. 36  
N/L FCC CONTOUR**

**WRGT-TV  
WKEF(TV)**

**EXHIBIT B**  
**FCC SERVICE CONTOUR COMPARISON**  
**PRIMARY PROGRAMMING STREAM**  
**WRGT-TV, CH. 36 ON WKEF(TV), CH. 34**  
**DAYTON, OHIO**

Scale 1:1,250,000

0 10 20 30 mi

