

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KUPN LICENSEE, LLC, licensee of full-power digital television station KVCW(TV), Channel 29 in Las Vegas, Nevada, 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 KVCW(TV) will be transmitted by station KTNV-TV, Channel 13 in Las Vegas, Nevada.

Exhibit B is a map upon which the KVCW(TV) and KTNV-TV noise-limited service contours are plotted. As shown, the service contour of KVCW(TV) is completely enveloped by that of KTNV-TV, meaning that no "loss area" will be created as a result of the transfer of KVCW(TV)'s primary ATSC 1.0 programming to KTNV-TV. Indeed, the additional area served by KTNV-TV that is presently not served by KVCW(TV) contains 141,511 people, according to the 2018 U.S. Census Estimate 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 KTNV-TV places a city-grade service contour over the entirety of the KVCW(TV) city of license, Las Vegas, Nevada, as shown in Exhibit C. In addition, KTNV-TV is located in the same Designated Market Area (DMA) as KVCW(TV). Both

are assigned to the Las Vegas, Nevada, DMA. 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" in the middle.

KEVIN T. FISHER

April 24, 2020

Smith and Fisher, LLC

CONTOUR POPULATION (2018 U.S. CENSUS ESTIMATE)
KVCW(TV) : 2,247,542 (919,216 HH)
KTNV-TV (HOST) : 2,389,035 (994,526 HH)
KVCW(TV) LOSS AREA POPULATION : 0
KVCW(TV) GAIN AREA POPULATION : 141,493 (6.3%)

KTNV-TV CH. 13
N/L FCC CONTOUR

KVCW(TV) CH. 29
N/L FCC CONTOUR

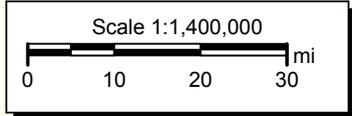
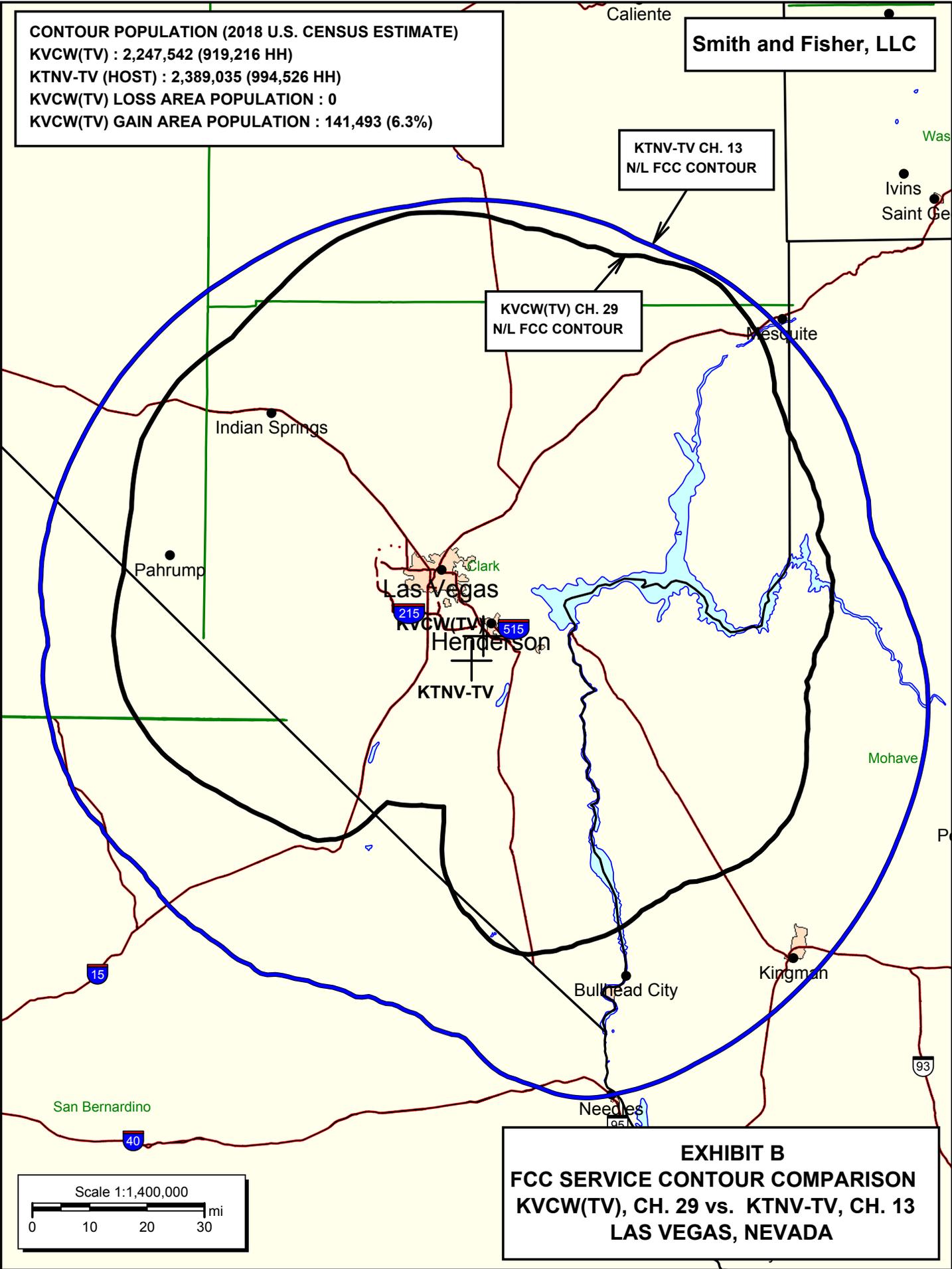


EXHIBIT B
FCC SERVICE CONTOUR COMPARISON
KVCW(TV), CH. 29 vs. KTNV-TV, CH. 13
LAS VEGAS, NEVADA

Smith and Fisher, LLC

KTNV-TV CH. 13
CITY-GRADE CONTOUR

Ivins
Saint

Mesquite

Indian Springs

Pahrump

Clark
Las Vegas
East Las Vegas
Henderson
KTNV-TV

Mohave

15

Bullhead City

Kingman

San Bernardino

40

Needles

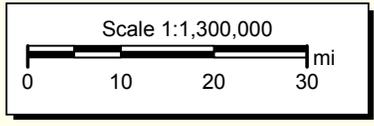


EXHIBIT C
CITY-GRADE COVERAGE
KTNV-TV
CH. 13 - LAS VEGAS, NEVADA

