

**ENGINEERING STATEMENT**

The engineering data contained herein have been prepared on behalf of KLGT LICENSEE, LLC, licensee of full-power digital television station WUCW(TV), Channel 22 in Minneapolis, Minnesota, 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 the ATSC 3.0 format, the primary ATSC 1.0 programming of WUCW(TV) will be transmitted by station KSTP-TV, which is licensed on Channel 35 in St. Paul, Minnesota.

Exhibit B is a map upon which the WUCW(TV) and KSTP-TV noise-limited service contours are plotted. As shown, the entirety of the WUCW(TV) service contour lies within that of KSTP-TV. Therefore, no "loss area" population will be created as a result of the transfer of WUCW(TV)'s primary ATSC 1.0 programming to KSTP-TV. Conversely, the additional area served by KSTP-TV that is presently not served by WUCW(TV) contains 14,323 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 KSTP-TV places a city-grade service contour over the entirety of the WUCW(TV) city of license, Minneapolis, Minnesota, as shown in Exhibit C. This is not entirely unexpected, since KSTP-TV operates from the same transmitter site as

EXHIBIT A

WUCW(TV) and is licensed to a community within the same Designated Market Area (DMA) as WUCW(TV), Minneapolis-St. Paul, Minnesota.

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

July 26, 2023

CONTOUR POPULATION : 2020 U.S. CENSUS  
WUCW(TV) : 4,216,005 (1,731,271 HH)  
KSTP-TV (Host) : 4,230,328 (1,738,487 HH)  
Common Area Population : 4,216,005 (100% of WUCW Service Pop.)  
WUCW(TV) Programming Loss Area Population: 0  
WUCW(TV) Programming Gain Area Population: 14,323

SMITH AND FISHER, LLC

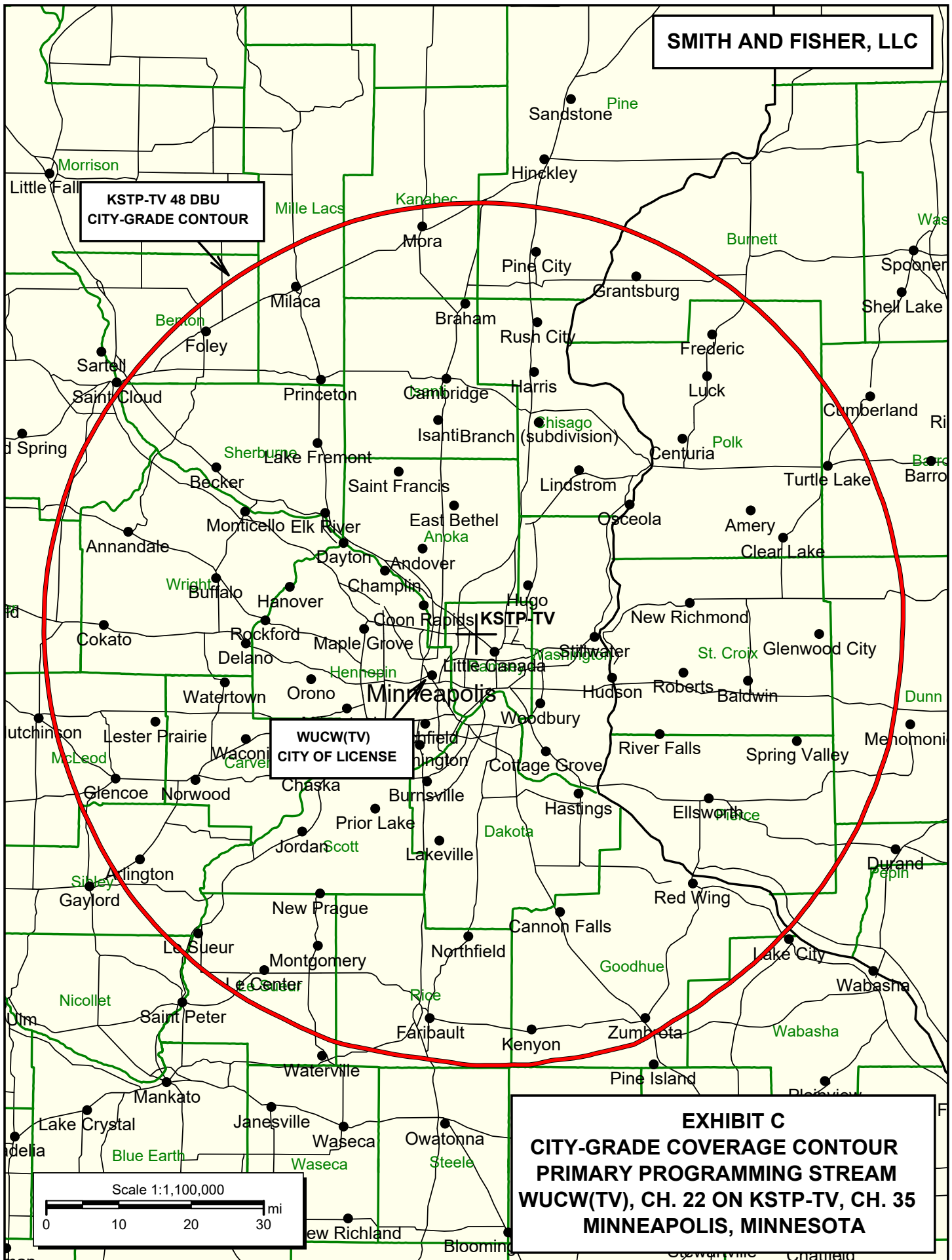
KSTP-TV CH. 35  
N/L FCC CONTOUR

WUCW(TV) CH. 22  
N/L FCC CONTOUR

**EXHIBIT B**  
**FCC SERVICE CONTOUR COMPARISON**  
**PRIMARY PROGRAMMING STREAM**  
**WUCW(TV), CH. 22 ON KSTP-TV, CH. 35**  
**MINNEAPOLIS, MINNESOTA**

Scale 1:1,250,000

0 10 20 30 mi





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N/L FCC CONTOUR

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