

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KDSM LICENSEE, LLC, licensee of full-power digital television station KDSM-TV, Channel 16 in Des Moines, Iowa, 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 KDSM-TV will be transmitted by television station WHO-DT, Channel 13 in Des Moines, Iowa.

Exhibit B is a map upon which the KDSM-TV dipole-adjusted noise-limited service contour and the WHO-DT 36 dBu service contour are plotted. As shown, the service contour of KDSM-TV is completely enveloped by that of WHO-DT, meaning that no "loss area" will be created as a result of the transfer of KDSM-TV's primary ATSC 1.0 programming to WHO-DT. Conversely, the additional area served by WHO-DT that is presently not served by KDSM-TV contains 51,338 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 WHO-DT places a city-grade service contour over the entirety of the KDSM-TV city of license, Des Moines, Iowa, as shown in Exhibit C. This would be expected since WHO-DT is located in the same Designated Market Area (DMA) as

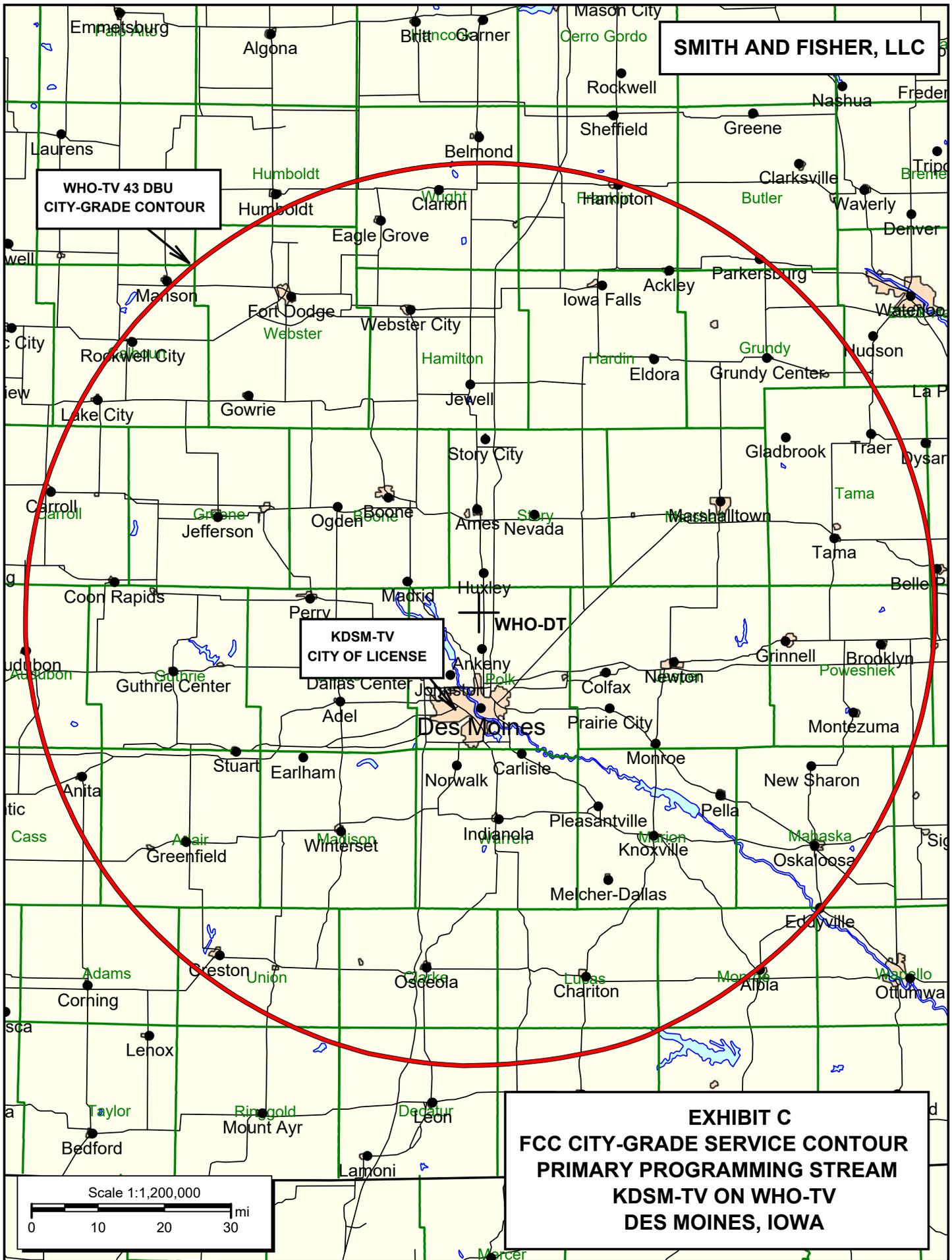
KDSM-TV and both are licensed to the same community (Des Moines). Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

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 initial "K" and a long horizontal stroke at the end.

KEVIN T. FISHER

February 23, 2023



SMITH AND FISHER, LLC

**WHO-TV 43 DBU
CITY-GRADE CONTOUR**

**KDSM-TV
CITY OF LICENSE**

WHO-DT

**EXHIBIT C
FCC CITY-GRADE SERVICE CONTOUR
PRIMARY PROGRAMMING STREAM
KDSM-TV ON WHO-TV
DES MOINES, IOWA**

