

Exhibit 1
NATURE OF THE PROPOSAL
prepared for
KONG-TV, Inc.
KONG(TV) Everett, Washington
Facility ID 35396
Ch. 31 679 kW 220 m

KONG-TV, Inc. (“*Gannett*”) licensee of digital television station KONG, Everett, WA, seeks herein to modify the station license to correct the antenna height. A commensurate reduction in effective radiated power (“ERP”) is specified to assure that the noise-limited service contour will not extend beyond that of the licensed facility in any direction.

Nature of the Proposal

During a recent facilities audit, *Gannett* discovered a discrepancy between the “as built” antenna height and the information shown on the KONG license (See BLCDDT-20060627ADG). The actual antenna center height above ground, above sea level, and above average terrain is approximately two meters greater than shown on the station license.

To show an increase in antenna height without increasing the distance to the KONG noise-limited contour pursuant to the present filing freeze¹, a reduction in effective radiated power (“ERP”) to 679 kW is necessary. As shown in the attached **Table 1**, distances to the noise-limited service contour following this correction will not extend beyond the noise-limited service contour of the licensed facility.

In preparing the attached table, pertinent station data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and directional antenna pattern. The requisite contour distances were determined using digitized, 30 arc-second terrain data to calculate HAAT values along radials spaced at 45 degree increments. An implementation of the Commission's TVFMFS computer program that simulates the TV distance curves along with interpolated HAAT and directional antenna pattern values, was used to calculate noise-limited contour locations. Pursuant to discussions with FCC staff, contour these distances were rounded to the nearest 0.1 kilometer.

¹ See FCC DA 13-618 Public Notice *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*. (April 5, 2013)

Exhibit 12 - Statement A
NATURE OF THE PROPOSAL
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The FCC's new Licensing and Management System (LMS) permits the applicant to change the values for transmitter output power, transmission line loss, antenna input power, and antenna gain ("input values"). However, the ERP form field values (both kW and dBk) are not automatically updated following changes in the input values. Because the ERP fields are "read only," the form prohibits values to be manually altered. Further, when there are apparent discrepancies between the calculated and displayed ERP values, LMS displays error messages preventing the application from being filed.

During an informal discussion on this topic with the FCC's staff, it was recommended to provide the correct Operating Constants in this attachment. Certification Statements regarding the truth and accuracy of Operating Constants refer to the data provided below and not elsewhere in this Application.

Transmitter Output Power (TPO): 19.1 kW; 12.81 dBk
Line and Other Losses (LL): 0.84 dB
Antenna Input Power (AIP): 15.74 kW; 11.97 dBk
Antenna Gain (AG): 43.15; 16.35 dBk
Effective Radiated Power (ERP): 679 kW; 28.32 dBk

Table 1
Distance to Contour Comparison
prepared for
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Bearing (degrees)	Distance to Contour (km)		
	<u>Licensed</u>	<u>Proposed</u>	<u>Difference</u>
0	74.6	74.6	0.0
10	76.2	76.2	0.0
20	77.8	77.8	0.0
30	79.4	79.4	0.0
40	81.0	81.0	0.0
50	81.6	81.5	-0.1
60	81.1	81.1	0.0
70	80.6	80.6	0.0
80	80.2	80.1	-0.1
90	79.7	79.7	0.0
100	79.9	79.9	0.0
110	80.1	80.1	0.0
120	80.3	80.2	-0.1
130	80.5	80.4	-0.1
140	80.6	80.6	0.0
150	80.8	80.8	0.0
160	81.0	81.0	0.0
170	81.2	81.2	0.0
180	81.4	81.4	0.0
190	81.6	81.6	0.0
200	81.8	81.8	0.0
210	82.1	82.1	0.0
220	82.3	82.3	0.0
230	81.4	81.4	0.0
240	79.4	79.4	0.0
250	77.5	77.5	0.0
260	75.5	75.5	0.0
270	73.5	73.5	0.0
280	73.7	73.7	0.0
290	73.9	73.9	0.0
300	74.1	74.1	0.0
310	74.3	74.3	0.0
320	74.4	74.4	0.0
330	74.5	74.5	0.0
340	74.5	74.5	0.0
350	74.5	74.5	0.0