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**TECHNICAL SUMMARY OF KDOC-TV'S MINOR CHANGE
APPLICATION TO ACCOMMODATE ITS CHANGE FROM UHF
CHANNEL 32 TO VHF CHANNEL 12**

This exhibit summarizes major technical aspects and design considerations for KDOC-TV's proposed new antenna facilities to support its operations on newly assigned VHF channel 12.

The basic operating parameters of the antenna are as follows:

Latitude: 34-13-55 N
Longitude: 118-04-21 W
ERP: 52.00 kW
Channel: 12
Frequency: 207.0 MHz
AMSL Height: 2015.0 m
Antenna: DIE-THV5A12 C170 210.0 deg

A map showing the resulting coverage contour is attached.

The antenna facilities have been designed to address a number of challenges faced by KDOC-TV in connection with its change of channels from UHF channel 32 to VHF channel 12, and other changes necessitated by the Commission's incentive auction. These challenges include the following:

First, as the Commission recognized might be the case, it was not possible for KDOC-TV to obtain an antenna that replicates the coverage contour reflected in the Channel Reassignment PN. The antenna pattern set out in the Commission's channel assignment letter, which apparently was based upon the existing channel 32 antenna pattern, is not possible to reproduce at VHF frequencies. The KDOC-TV proposed antenna pattern is achievable and does not interfere with any full service or Class A television authorization, as reflected in the attached TV interference analysis report. With the proposed power level of 52 kW, the contours of the proposed facility and the channel assignment letter facility track closely at the azimuth of 270 degrees which has a field value of 1.0 for both antenna patterns.

Second, KDOC-TV's existing tower lease arrangement is based upon a shared television facility arrangement among several UHF stations. Because other stations that were part of that sharing arrangement were sold at auction, the landlord is redeveloping the tower for shared FM use, leading to KDOC-TV's relocation. Responding to this challenge, KDOC-TV successfully reached an agreement to allow it to move to another tower in the area, at higher elevation, as reflected in the accompanying minor change application.

Third, the change in bands from UHF to VHF will result in lower signal levels and be more difficult to provide service in well-known coverage nulls in this market.. KDOC-TV has attempted to minimize these nulls by adjusting its power to the proposed value. Similarly, given the topography and the thermal and RF noise in the densely populated Los Angeles area, the proposed power level will maintain an adequate quality of service for the public. The proposed ERP value results in a contour that slightly exceeds the contour that is associated with the Commission's channel assignment letter, but is consistent with the Commission's rules for band-changing stations in that there is no new interference to other full service or Class A broadcast stations.¹

Overall, the antenna facilities that have been selected have been designed to allow KDOC-TV to preserve its existing service on its newly assigned channel while staying within the parameters permitted by the Commission for minor change applications required to be submitted at this stage of the broadcast station transition process.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory L. Batte".

President

¹ See 47 C.F.R. §73.3700 (b)(3). In addition, the geographic coverage area of the station would remain below that of the largest station within the market.

PROPOSED KDOC INITIAL CP FACILITY

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KDOC-TV-A Proposed

Antenna & Location Mod
Latitude: 34-13-55 N
Longitude: 118-04-21 W
ERP: 52.00 kW
Channel: 12
Frequency: 207.0 MHz
AMSL Height: 2015.0 m
Elevation: 1645.0 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 1.5

