

TECHNICAL SUMMARY
APPLICATION FOR CONSTRUCTION PERMIT
IN FIRST PRIORITY FILING WINDOW
TELEVISION STATION KPPX-TV
TOLLESON, ARIZONA
CHANNEL 31 645 KW (H), 161 KW (V) 556 M HAAT

1. The instant application is prepared under the provisions of the 'First Priority Filing Window' for the reassigned facilities of KPPX-TV, Tolleson, AZ. KPPX-TV was identified as an eligible station according to the criteria outlined in the FCC's *Public Notice* announcing the First Priority Filing Window* due to the fact that it is unable to construct its given reassignment facility on Channel 14.

2. Through the FCC's Incentive Auction repacking procedure, KPPX-TV was reassigned to Channel 14. However, due to the close proximity of multiple adjacent-channel land mobile facilities, it was determined that the facility cannot be constructed due to the inability to protect the land mobile facilities from interference. The FCC granted a waiver of the July 12, 2017 filing deadline to KPPX-TV due to the circumstances.

3. The KPPX-TV Channel 14 baseline facility was based on the KPPX-TV Channel 51 facility, which was in operation until approximately October, 2016 when KPPX-TV was rebuilt on Channel 31, as it now operates.† The KPPX-TV Channel 14 baseline facility was given for operation with an equivalent replication facility of the original Channel 51 facility, with an effective radiated power of 463 kW (non-directional) with an antenna height above average terrain of 536 m.

4. Pursuant to the First Priority Window *Public Notice*, KPPX-TV is eligible to request an alternate channel option. Therefore, Channel 31 is proposed for KPPX-TV as a compliant substitute for Channel 14 at Tolleson, AZ.

* See *Public Notice*, 'Incentive Auction Task Force And Media Bureau Announce The Opening Of The First Priority Filing Window For Eligible Full Power And Class A Television Stations From August 9 Through September 8, 2017,' DA 17-724, Released: July 31, 2017.

† Through an agreement with T-Mobile to activate 700 MHz wireless spectrum in the Phoenix market, the KPPX-TV facility was migrated from Channel 51 to Channel 31 in October, 2016.

5. A replication facility for KPPX-TV on Channel 31 was developed using the latest version of the FCC's *TVStudy* software. The results of this analysis are attached as an exhibit.

6. An analysis for the facility proposed for KPPX-TV on Channel 31 was also analyzed using the FCC's *TVStudy* software. The results of this analysis are also attached as an exhibit. The facility proposed for KPPX-TV on Channel 31 differs in antenna height and effective radiated power from the equivalent baseline facility. This is due to an increase in the KPPX-TV antenna height on the tower antenna stack and a corresponding reduction in effective radiated power to produce an equivalent facility on Channel 31.

7. The proposed KPPX-TV facility on Channel 31 meets the FCC's interference protection criteria with respect to all pertinent allotments and assignments. See analysis results for proposed facility.

8. The proposed KPPX-TV facility noise-limited service contour does not exceed the Channel 31 baseline service contour by more than 1% in any direction in compliance with the FCC's requirements. See Predicted Coverage Contours exhibit (Figure 1).

9. The proposed KPPX-TV facility does not decrease the noise-limited interference-free service population by more than 5% in compliance with the FCC's requirements. See the attached *TVStudy* interference analysis results.

10. The instant proposal is compliant with the city coverage requirements of Tolleson, AZ. This is illustrated in the Predicted Coverage Contours exhibit (Figure 1).

11. The proposal meets the requirements of Table 6, the *Pre-Incentive Auction US Post-Transition DTV Allotment Plan*, from the agreement between the United States and Mexico dated 15 July 2015. Specifically, Table 6 provides for an effective radiated power of 1000 kW for the KPPX-TV facility on any of UHF channels 14 through 36 that could be assigned as part of the Incentive Auction re-pack process.