KUFS Channel 7 Ft. Smith, AR Digital Engineering STA Request Extraordinary Circumstance

KTV Media, LLC is asking for an STA to relocate our low power repeater station, KUFS-LP, from its current location on Cavanal Mountain to a tower site on Beverly Mountain. This location is approximately 36 miles from the current transmitter site so we are asking for an exception from the current FCC policy limiting LPTV moves to 30 miles or less.

The reason for the move is three-fold. First, the current site is somewhat remote and we are unable to obtain reliable internet for monitoring our transmitter or providing a backup signal source. Secondly, this is a rural site on a mountain top where we have major power surges causing us to frequently go off the air. Finally, we have a significant problem picking up and maintaining our primary signal. The current site sits on a high mountain and receives a lot of interference from distant signals. The combination of these issues, create a very unreliable signal.

By relocating to the Beverly site, we give up a lot of height, but we would be moving to a reliable site that covers our City of License – Fort Smith, Arkansas as well as our current site does. This is a unique situation in that we already have a tower lease at the new site, and the owner of the new site is the owner of the current site. This would allow for a smooth transition to the new site with a minimum of costs and no disruption of service to our current viewers.

So, we are requesting an STA based on the following reasons:

- 1. We are actually reducing our coverage area while improving the reliability of our signal to a significant majority of our current viewers;
- 2. We are replicating our coverage of our City of License, just coming from the opposite side of town; and
- 3. Our STA noise limited contour will be entirely within our current Construction Permit's noise limited contour. We are attaching a Contour map to demonstrate this.

We believe we need this STA to better serve the public interest and reach the viewers within our current contour in the same DMA and same City.

Although this request is for an STA, I am hopeful you will approve a subsequent application for a construction permit.