

TECHNICAL SUMMARY
APPLICATION FOR CONSTRUCTION PERMIT
TELEVISION STATION KVSN-DT
PUEBLO, COLORADO
CHANNEL 27 232 KW (MAX-DA) 695 M HAAT

1. The instant application was prepared on behalf of Entravision Holdings, LLC ('Entravision') in support of a first priority window application for KVSN-DT at Pueblo, Colorado to move from its reassigned channel 25 to channel 27.¹ The purpose is to accommodate the reassignment of KCEC from channel 14 to Channel 28 at Denver, Colorado.² Entravision also proposes the re-assignment of station KOAA-TV, Pueblo, CO, from Channel 28 to Channel 25 as part of the KCEC move to channel 28.

2. Through the FCC's Incentive Auction repacking procedure, KVSN-DT was reassigned to Channel 25 and currently has a construction permit (LMS File No. 0000028375) to operate on channel 25 with a directional antenna (DA) maximum ERP of 222 kW and an HAAT of 695 meters. It is proposed to move KVSN-DT to channel 27 and operate with replication facilities from its current location, namely, with a DA maximum ERP of 232 kW and an HAAT of 695 meters. The proposed KVSN-DT operation will meet all interference protection requirements. The results of the *TVStudy* analysis are attached. It is noted that a cell size of 1.0 km with a terrain increment of 0.1 km was employed in the analysis and that the KOAA-TV channel 28 CP (LMS File No. 0000028588) and channel 28 baseline allotment (DTVBL59014) were excluded from the *TVStudy* analysis. It is also noted that KVSN-DT will accept the predicted interference from KCEC's proposed channel 28 operation through an interference consent agreement.

3. The proposed KVSN-DT facility noise-limited service contour does not exceed the Channel 25 baseline service contour in any direction in compliance with the FCC's requirements. See Predicted Coverage Contours exhibit (Figure 1).

¹ In an FCC letter decision dated September 20, 2017 regarding the KCEC(TV) channel 28 application (LMS File No. 00000299130, the FCC waived the termination date of the first priority window for stations involved in multiparty agreements for a period of time to permit completion of any necessary agreements with other stations and the filing of amended and/or additional applications by Entravision and such other stations.

² KCEC has filed an application for channel 28, LMS File No. 0000029913.

4. The proposed KCEC 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.

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

6. RFR Compliance: A RF hazard statement is attached demonstrating that the proposed operation complies with the FCC's limits on human exposure to RF energy.