

Engineering Statement

Minor Modification of KPXR Cedar Rapids, IA Channel 22

This Engineering Statement has been prepared on behalf of ION Media License Company LLC, licensee of television station KPXR and permittee of Construction Permit File Number 0000026998 Facility ID #21156 at Cedar Rapids, IA. The statement was prepared in support of a Minor Amendment to the outstanding Construction Permit for the FCC's "Maximization Window" filing as herein proposed.

The instant application proposes to increase KPXR's ERP to 1000 kW, utilize a non-directional antenna pattern at the height above average terrain (HAAT) of 451 m.

The proposed facility is compliant with the 'largest station in the market' provision of Section 73.622(f)(5) of the FCC Rules. It is proposed operate on Channel 22 with a maximum non-directional ERP of 1000 kW and an antenna height above average terrain (HAAT) of 451 meters. These facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Cedar Rapids market is KCRG-DT, Cedar Rapids, IA, Channel 9, which is licensed to provide noise-limited 36 dBu, f(50,90) service to an area of 51,939 square kilometers. The proposed KPXR-DT operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 40,940 square kilometers. Therefore, the proposed KPXR-DT facility is compliant with the largest station provision of the FCC Rules.

It is noted that the proposed facility is predicted to cause new interference to other broadcasters, including KCWI Des Moines and KGCW Burlington, IA. However, licensee intends to negotiate and sign an interference agreement with those affected parties and submit such documentation upon execution.