



ENGINEERING STATEMENT

IN SUPPORT OF

APPLICATION FOR DISPLACEMENT OF DIGITAL TRANSLATOR AND WAIVER REQUEST

KZFC-LP

WINDSOR, CO

Background

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of television translator station KZFC-LP (BLTTL-20050223ABN, Facility ID. 67530) near Windsor, CO. The station currently operates on Ch. 36. The station is filing an instant application to displace KZFC-LP from Ch. 36 to Ch. 19 in the Special Displacement Window (Per FCC Public Notice DA-17-422 and DA 18-124).

KZFC-LP is eligible to file in the Special Displacement Window under the following criteria:

1. The current facility on Ch. 36 is predicted by the FCC TVStudy interference software to cause 4.30% interference to the post-repack full-service facility KDVR (at Denver, CO) which has been assigned Ch. 36 (LMS File #0000025684).
2. The station was licensed for operation prior to April 13, 2017

Scripps is proposing that KZFC-LP displace to the pre-auction channel for KTVD (Ch. 19) which is scheduled to transition to its post-auction channel (Ch. 31) in Phase 2 (construction deadline of April 12, 2019). Scripps respectfully requests a waiver of the contingent application rule (Part 73.3517). Displacing KZFC-LP to Ch. 19 is necessary as no other available channel could be identified for KZFC-LP which satisfies the FCC interference requirements to full-service, Class A and non-displaced LPTV/translator stations. Scripps agrees to the condition that it will not begin operating KZFC-LP on Ch. 19 prior to KTVD discontinuing its operation on Ch. 19.

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Displacement Parameters

Scripps is proposing the following parameters for the KZFC digital operation on Ch. 19:

Coordinates:	40° 38' 31.0" N (NAD83) 104° 49' 05.0" W
ERP:	2.0 kW
RCAMSL:	1703m
RCAGL:	104m
ASR#:	1045390
Antenna:	ERI ALP4L1-HSNR-19
Mask:	Full-Service

Interference

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5) with the **terrain profile increment set to a higher resolution of 0.1 km** than the default parameter (1 km). The KTVD (Ch. 19) pre-auction record (BLCDT20090218ABY) was excluded from the TVStudy analysis since KZFC-LP would not be allowed to begin operating on Ch. 19 until KTVD has ceased its pre-auction operation on Ch. 19.

The results of the study (copy attached hereto) show that potential interference is not predicted to exceed 0.49% to any full-service DTV or Class A stations or 1.99% to any low power stations as required by the Commission's Rules.

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Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report.

The location of the proposed post-incentive auction facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000545 mW/cm^2 , which is less than 5% of the MPE for public exposure (0.335333 mW/cm^2) at Ch. 19 (500-506 MHz). The contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain “in compliance” with FCC guidelines.

Scripps agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure.

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Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

A handwritten signature in black ink, appearing to read "B. Pidek", written over a horizontal line.

Benjamin L. Pidek, P.E.
May 15, 2018

Attached:
TVStudy Interference Check Report

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TVStudy TV Interference Check Report for KZFC on Ch. 19

Study created: 2018.05.15 17:40:39

Study build station data: LMS TV 2018-05-14

Proposal: KZFC-LD D19 LD CP WINDSOR, CO
File number: KZFC-C19-NRr260-2k-FM-051518
Facility ID: 188878
Station data: User record
Record ID: 1124
Country: U.S.

Build options:
Protect pre-transition records not on baseline channel

Individual records excluded:
20090218ABY KTVD D19 DT LIC DENVER, CO BLCDDT20090218ABY

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	KPXC-TV	D18	DT	CP	DENVER, CO	BLANK0000027023	61.0 km
Yes	KRMA-TV	D18	DT	LIC	DENVER, CO	BLEDT20100312ABH	113.1
No	K18FN-D	D18	LD	LIC	PEETZ, CO	BLD TT20110928AKM	136.6
No	K18JD-D	D18	LD	LIC	TORRINGTON, WY	BLD TT20110415ABJ	167.8
No	K19FH-D	D19	LD	LIC	ASPEN, CO	BLD TT20121119AGZ	233.1
No	K19DY	D19	LD	CP	CANON CITY, CO	BDFCD TT20100111AEX	248.4
No	K19DY	N19	TX	LIC	CANON CITY, CO	BL TT20001027AAF	248.4
Yes	KSBS-CD	D19	DC	CP	DENVER, CO	BLANK0000034533	107.5
No	K19KN-D	D19	LD	LIC	EADS, ETC., CO	BLANK0000001775	296.4
No	K19EG-D	D19	LD	LIC	HOLYOKE, CO	BLD TT20110613AAO	208.0
No	K19CE	N19z	TX	LIC	MONTROSE, CO	BL TT20040602ABQ	352.3
No	K19HG-D	D19	LD	LIC	REDSTONE, CO	BLD TT20091221ABC	257.2
No	K39ED-D	D19	LD	APP	ROCKY FORD, CO	BLANK0000052167	301.7
No	KWKS	D19	DT	LIC	COLBY, KS	BLEDT20070601ATA	333.1
No	K19FX-D	D19	LD	LIC	LARAMIE, WY	BLD TT20111129FFV	88.8
No	K19JG-D	D19	LD	CP	MIDWEST, WY	BNPDTL20100510ACO	349.1
No	K42HY-D	D19	LD	APP	RAWLINS, WY	BLANK0000053888	238.1
No	K19JH-D	D19	LD	CP	WHEATLAND, WY	BNPDTL20100510AEL	190.3
No	KRMT	D20	DT	CP	DENVER, CO	BLANK0000034798	120.5
No	K20KE-D	D20	LD	LIC	FORT MORGAN, CO	BLD TL20150115AAB	70.0
No	K20FS-D	D20	LD	LIC	PEETZ, CO	BLD TT20110114AAR	136.6
No	KFNB	D20	DT	LIC	CASPER, WY	BLCDDT20090225AAN	266.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D19
Mask: Full Service
Latitude: 40 38 31.00 N (NAD83)
Longitude: 104 49 5.00 W
Height AMSL: 1703.0 m
HAAT: 0.0 m

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Peak ERP: 2.00 kW
Antenna: ERI ALP-NR Ch. 19 260.0 deg
Elev Pattn: Generic

49.3 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.152 kW	88.9 m	20.0 km
45.0	0.026	133.7	15.7
90.0	0.035	175.6	19.6
135.0	0.071	197.1	24.2
180.0	0.281	184.6	30.5
225.0	1.19	161.6	36.5
270.0	1.91	121.9	36.4
315.0	0.645	58.1	23.3

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 140 m

Distance to Canadian border: 928.9 km

Distance to Mexican border: 996.4 km

Conditions at FCC monitoring station: Grand Island NE
Bearing: 84.6 degrees Distance: 538.5 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 214.3 degrees Distance: 65.7 km
ERP: 0.876 kW Field strength: 44.8 dBu, 0.2 mV/m

No land mobile station failures found

Study cell size: 1.00 km

Profile point spacing: 0.10 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

---- Below is IX received by proposal KZFC-C19-NRr260-2k-FM- ----

Proposal receives 22.45% interference from scenario 1
No IX check failures found.

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