



## **ENGINEERING STATEMENT**

**IN SUPPORT OF**

**APPLICATION FOR DISPLACEMENT OF DIGITAL TRANSLATOR**

**KSAW-LD**

**TWIN FALLS, ID**

### **Background**

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of digital television translator station KSAW-LD (File#BLDTL-20140325AEJ, Facility ID. 59256) near Twin Falls, ID. The station currently operates on Ch. 15. The station is filing an instant application to displace KSAW-LD from Ch. 15 to Ch. 28 in the Special Displacement Window (Per FCC Public Notice DA-17-422 and DA 18-124).

KSAW-LD was licensed for operation prior to April 13, 2017. Its current facility on Ch. 15 is predicted by the FCC TVStudy interference software to cause 0.69% interference to the maximized KPIF Ch. 15 facility (at Pocatello, ID) proposed in KPIF's latest application, LMS File #0000035740. KPIF is currently operating under Special Temporary Authority (LMS File#0000033622) with all the parameters specified in the maximization application--antenna pattern, RCAMSL, coordinates, etc.--except the ERP which is at 25 kW instead of 288 kW. In its STA request, KPIF indicated that it is ready to operate at the ERP specified in its maximization application (288 kW), but it was not able to modify its currently licensed parameters due to the "freeze" on non-repacked facilities (prior to the temporary lifting on the freeze for maximization applications at the end of 2017).

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It is therefore expected that as soon as the KPIF maximization application is granted, it will begin operating at the higher power, and KSAW-LD will become displaced. Scripps urges that KPIF's pending maximization construction permit, filed in connection with the Commission's "repacking process" as implemented by the Bureau, triggers KSAW-LD's eligibility to participate in the Special Displacement Window. Should the Bureau conclude that KSAW-LD's application is not within the category of stations expressly authorized to participate in this window, Scripps is requesting waiver to permit its participation as being in the public interest and in furtherance of the policy of reserving LPTV service expressed in the Commission's Incentive Auction Report & Order. See KSAW-LD's attached Waiver Request.

### **Displacement Parameters**

Scripps is proposing the following parameters for the KSAW-LD operation on Ch. 28:

Coordinates:	42° 43' 45.9" N (NAD83) 114° 24' 56.5" W
ERP:	15.0 kW
RCAMSL:	1341.5m
RCAGL:	33.5m
Antenna:	Jampro JUHD-5/3 (15)
Mask:	Simple

### **Interference**

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5). The results of the study (copy attached hereto) show that

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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.

### **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 0.011364 mW/cm<sup>2</sup>, which is less than 5% of the MPE for public exposure (0.371333 mW/cm<sup>2</sup>) at Ch. 28 (554-560 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 "Ben Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.  
May 30, 2018

Attached:  
TVStudy Interference Check Report

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## TVStudy TV Interference Check Report for KSAW-LD on Ch. 28

Study created: 2018.05.30 18:08:45

Study build station data: LMS TV 2018-05-30

Proposal: KSAW-LD D28 LD LIC TWIN FALLS, ID  
 File number: KSAW-C28-15kW-Jam-r190-SM  
 Facility ID: 59256  
 Station data: User record  
 Record ID: 1232  
 Country: U.S.

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

Search options:  
 Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	KBAX-LD	D27	LD	LIC	TWIN FALLS, ID	BLDTL20120207AOC	0.1 km
Yes	KYUU-LD	D28	LD	LIC	BOISE, ID	BLDTL20120906ABB	177.7
No	K28NK-D	D28	LD	LIC	HOLBROOK, ID	BLDTT20140416ABE	159.5
No	K28LE-D	D28	LD	LIC	IDAHO FALLS, ID	BLDTL20140225ABP	224.2
No	K28NB-D	D28	LD	CP	GLEN, MT	BNPDTL20100609AIP	338.6
No	K28LH-D	D28	LD	LIC	BEOVAWE, NV	BLDTT20111230AAR	300.9
No	K48EB-D	D28	LD	APP	MCDERMITT, NV	BLANK0000054090	276.8
No	K28NA-D	D28	LD	CP	ROCKY POINT, NV	BNPDTL20100512AIA	179.1
No	K28MY-D	D28	LD	CP	WINNEMUCCA, NV	BNPDTL20100512AHI	338.6
No	K27IZ-D	D28	LD	APP	COALVILLE, UT	BLANK0000053073	320.5
No	K23JR-D	D28	LD	APP	HENEFER, ETC., UT	BLANK0000053045	314.2
No	K28JK-D	D28	LD	LIC	HUNTSVILLE, LIBERTY, UT	BLDTT20081215AAE	264.4
No	K51GA-D	D28	LD	APP	LOGAN, UT	BLANK0000054008	242.7
No	K28JL-D	D28	LD	LIC	MORGAN, ETC., UT	BLDTT20090624AAP	293.3
No	K13QJ	D28	LD	APP	RANDOLPH, UT	BLANK0000052884	297.6
No	KSTU	D28	DT	LIC	SALT LAKE CITY, UT	BLCDT20120305ABX	294.4
No	K28JS-D	D28	LD	LIC	SAMAK, UT	BLDTT20090624ABM	350.6
No	K28JR-D	D28	LD	LIC	WANSHIP, UT	BLDTT20090624ADM	329.0
No	K29KY-D	D29	LD	CP	BLACKFOOT, ID	BNPDTL20100609AHK	176.1
No	KIWB-LP	D29	LD	APP	BOISE, ID	BLANK0000053771	179.0
Yes	K29GV-D	D29	LD	LIC	HAGERMAN, ID	BLDTL20100113ADE	42.7
No	K29KG-D	D29	LD	CP	IDAHO FALLS, ID	BMJADTL20100524ABH	224.3

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D28  
 Mask: Simple  
 Latitude: 42 43 45.90 N (NAD83)  
 Longitude: 114 24 56.50 W  
 Height AMSL: 1341.5 m  
 HAAT: 0.0 m

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Peak ERP: 15.0 kW  
 Antenna: JAM-JUHD-5/3(15) 190.0 deg  
 Elev Pattn: Generic

50.1 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.547 kW	138.7 m	30.0 km
45.0	1.47	134.7	34.8
90.0	12.2	124.0	44.9
135.0	12.7	159.4	47.5
180.0	10.7	199.7	49.0
225.0	11.0	219.4	50.3
270.0	10.4	208.4	49.4
315.0	4.79	173.2	43.4

Database HAAT does not agree with computed HAAT  
 Database HAAT: 0 m Computed HAAT: 170 m

Distance to Canadian border: 697.1 km

Distance to Mexican border: 1113.0 km

Conditions at FCC monitoring station: Livermore CA  
 Bearing: 230.7 degrees Distance: 834.4 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
 Bearing: 107.5 degrees Distance: 814.8 km

Study cell size: 1.00 km  
 Profile point spacing: 1.00 km

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

**No IX check failures found.**

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