

Statement of Justification for Minor Modification – KRCB(TV)

Rural California Broadcasting Corp. (“RCBC”), licensee of noncommercial educational television station KRCB(TV), Cotati, California (Fac. ID No. 57945) submits the following justification for the minor modification of its repack construction permit (LMS File No. 59424) requested herein. As set forth herein, grant of the application would serve the public interest by allowing KRCB to bring improved over-the-air service to viewers that otherwise might struggle to receive the station’s low-VHF signal while allowing the noncommercial station to save more than half a million dollars in potential costs. RCBC notes that the FCC recently lifted its freeze on filing and processing of minor modification applications that would increase a full power television station’s noise-limited contour or a Class A station’s protected contour in one or more directions beyond the station’s authorized facilities in instances where, for example, antenna manufacturers are unable to exactly match a station’s authorized antenna pattern.¹ In order to be able to construct its repacked facility, KRCB had to relocate its transmission facility to Mt. Sutro. For the reasons set forth below RCBC believes that this application falls within the Commission’s intent in lifting the freeze, as antenna manufacturers were unable to create a pattern that matched the station’s authorized contour from Sonoma Mountain without creating a “hole” in the southern part of the station’s service area. To the extent the Commission determines that the instant application does not fall within the scope of this Public Notice, RCBC respectfully requests a waiver of the freeze for the reasons set forth herein.

Background

KRCB is being repacked from Channel 23 to Channel 5, pursuant to a winning incentive auction bid. In the incentive auction, RCBC had the option to move from UHF to low band VHF or to surrender the KRCB license, with either option resulting in the same auction payout. RCBC believes strongly in its noncommercial educational television mission and it chose to continue operations of KRCB, but understood that operation on a low VHF channel was not an attractive prospect going forward for reasons of difficulty of reception and the inability to fully take advantage of ATSC 3.0 capabilities.

KRCB’s original repack construction permit (LMS File No. 26214) requested repack facilities at its existing transmitter site in Sonoma County, and the station later requested maximized facilities at that site (LMS File No. 34469). In September 2018, KRCB filed a minor modification application requesting facilities on Mt. Sutro in San Francisco (LMS File No. 59424). As explained in detail in that application, there was no existing tower near the station’s existing transmitter site that would have been capable of accommodating the station’s new Channel 5 antenna. Thus, KRCB requested, and the Commission granted, a construction permit specifying facilities on Mt. Sutro.

Because of the Commission’s freeze on minor modification applications that would extend a station’s noise-limited service contour beyond authorized facilities, KRCB’s September 2018 proposal was highly directionalized to the north in order to ensure coverage to KRCB’s city of license and to avoid extending the station’s contour outside of the maximized CP contour.² The resulting construction permit specified

¹ *Media Bureau Lifts the Freeze on the Filing of Minor Modification Applications That Expand the Contour of Full Power and Class A Television Stations for Certain Repacked Stations, Effective Immediately*, Public Notice, DA 19-684 (MB rel. Jul. 22, 2019).

² *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station*

an antenna and facilities that complied with the parameters of the freeze but that also would result in a loss in the FCC protected service area in the region shown as “service area shortfall” in the attached map, particularly given the propagation characteristics of KRCB’s new low-VHF channel.

KRCB’s existing construction permit specifies use of a horizontally-polarized, 4-bay 2-around panel antenna. KRCB chose this antenna for its repack project because it could be modified, reconfigured and rehung as a circularly-polarized 4-bay 3-around antenna. With that modification / reconfiguration, which is reflected in the instant application, KRCB would be able to provide significantly enhanced over-the-air service to its viewers from its currently authorized CP site.

Justification for Modification

RCBC is committed to providing public television service and community engagement throughout its service area in the San Francisco DMA.

Grant of the instant application would result in dramatically improved over-the-air service to San Francisco and the other areas, particularly to the south of Mt. Sutro. As the Commission is aware, low-band VHF channels are not well-suited for DTV reception, particularly in urban areas where man-made noise levels are significant. As a result, higher power levels are often necessary to ensure that urban viewers are able to consistently receive a usable signal. KRCB’s currently approved post-repack facilities contains a substantial null area that is likely to impair the ability of viewers in and around San Francisco to receive KRCB’s signal, particularly with an indoor antenna. The modification of facilities requested herein would reduce the severity of this impediment to reception of KRCB. Grant of the instant application also would eliminate the loss in FCC protected service area noted above by restoring service to a large portion of the South Bay area that would have fallen within KRCB noise-limited service contour under its original Sonoma Mountain repack construction permit, had RCBC been in a position to construct it, but that would not be served by KRCB’s initial/current Mt. Sutro permit. A map reflecting this area is attached hereto.

Moreover, grant of the instant application now would provide a significant cost savings, additional resources that RCBC will put toward its educational mission. Specifically, if RCBC constructed the facilities reflected in its current construction permit before receiving authorization to modify the facilities as requested herein, it would need to contract with a tower crew to remove the currently authorized 4-bay 2-around antenna, reconfigure the mounts, and install the modified 4-bay 3-around antenna. Between the costs for the tower crew and new mount steel, RCBC estimates a total additional expense of more than \$550,000. These costs could be avoided if RCBC is permitted to install the modified facilities in the first instance.

Finally, grant of RCBC’s application will not disadvantage any other party. Since the Commission announced the minor modification filing freeze, both repacked³ and non-repacked⁴ stations have had

Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate, Public Notice, 28 FCC Rcd 4364 (MB 2013).

³ *Incentive Auction Task Force and Media Bureau Announce Procedures for the Post-Incentive Auction Broadcast Transition*, Public Notice, 32 FCC Rcd 858 at paras. 27-37 (MB & IATF 2017).

⁴ *Freeze on the Filing of Modification Applications to Be Lifted Temporarily to Permit Filing of Applications to Expand the Contours of Full Power and Class A Television Stations That Are Not Part of the Post-Incentive Auction Repack Process*, Public Notice, 32 FCC Rcd 7643 (MB 2017).

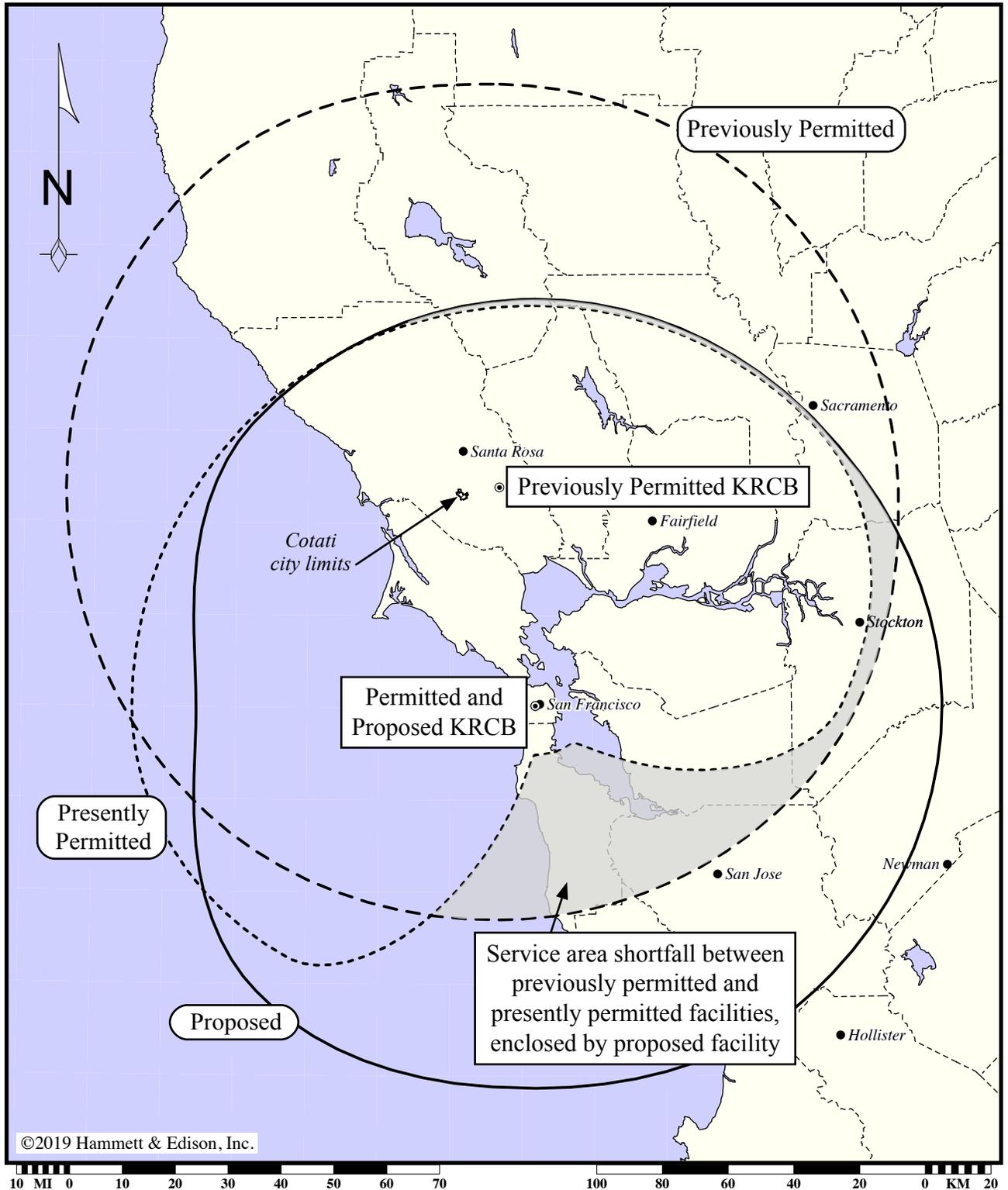
the opportunity to file maximization applications. KRCB, however, has not had an opportunity to file for expanded facilities from its Mt. Sutro site. Because the vast majority other stations with a desire to maximize facilities already have had the opportunity to request them, no other party is likely to be disadvantaged by processing and grant of this application.

Conclusion

For the foregoing reasons, RCBC urges that the public interest would be served by the grant of its application to modify the KRCB facilities as proposed.

TV Station KRCB • Post-Transition Channel 5 • Cotati, California

Previously Permitted Facility vs. Presently Permitted Facility vs. Proposed Facility FCC F(50,90) 28 dBu Threshold Contours



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Albers equal area map projection. City and county limits shown taken from U.S. Census Bureau TIGER/Line 2010 data.

