

**EXHIBIT SUPPORTING
UNIMAS DALLAS LLC OF IRVING TEXAS AND KUVN LICENSE
PARTNERSHIP, LP, GARLAND TEXAS. TELEVISION STATIONS
KSTR-DT AND KUVN-DT, FILE NUMBERS 0000093868 AND 0000074930
REQUEST FOR EXPIDETED PROCESSING OF ATSC 3.0 LICENSE
APPLICATION**

This exhibit supports an application by Unimas Dallas, LLC, licensee of Full Power digital television KSTR-DT ("KSTR"), for modification of its licenses from an ATSC1.0 station with an Experimental Special Temporary Authority to construct and operate an ATSC 3.0 ("3.0") "Next generation" TV "Lighthouse" station.

KSTR has been operating as an Experimental 3.0 lighthouse station since April 5, 2019 initially supporting Single Frequency Network development with other broadcast partners in the Dallas DMA.

KSTR has been broadcasting its main .1 program stream on its sister station KUVN-DT, Garland, Texas during the duration of the STA. KSTR will continue operate in ATSC 3.0, KUVN-DT will continue to broadcast KSTR's main program stream in 1.0, so that viewers will continue with the same experience they have had for the past 10 months.¹

KSTR will continue to act as a "lighthouse" carrying ATSC 3.0 simulcasts of other stations in the market. KSTR has existing host agreements with carried stations. These stations will be responsible for filing their own 3.0 licenses modifications as required.

KSTR is not proposing to make any changes to its transmitter location, antenna height, antenna pattern or effective radiated power and, therefore, the proposed 3.0 coverage contour will be the same as that of its current 1.0 contour.² Referring to the attached coverage maps, Figure 1, it shows that the coverage contour of the host simulcast 1.0 station, KUVN-DT, encompasses the current 1.0 and proposed 3.0 coverage contours of KSTR and, therefore, satisfies the requirements stated in the 47 CFR 73.6029(f)(5) and (6)(i&ii) regarding contour overlap. KSTR and KUVN-DT is also within the required relocation distance of 30 miles between the two stations. This is the same contour data used in the previously approved STA⁴

Referring to the population count comparison, Figure 1, KSTR will experience a 0.1% decrease in population with KUVN-DT serving as the simulcast host 1.0 station which satisfies the 95% coverage requirement.³ This is the same population data used to support the previously approved STA.⁴

With no changes of transmission parameters being proposed and the same interference prediction methodology applied to both 1.0 and 3.0 transmissions, no additional interference is predicted to other stations.

With there being sufficient contour overlap and acceptable predicted reduction of population coverage using KUVN-DT as the 1.0 host simulcast station, expedited

processing of this application is requested.³

KSTR has been operating as 3.0 lighthouse for 10 months. While there was no 120 days rule at the time, MVPD's were made aware of the conversion to 3.0 and no subscribers lost program service following conversion of the station to the Experimental STA nor will they lose service following the commercial conversion to ATSC 3.0.⁴

¹See paragraph (b) of 47 CFR 73.6029

² See paragraph (f)(3) of 47 CFR 73.6029

³ See paragraph (f) (5) of 47 CFR 73.6029

⁴ FCC File numbers 0000069539 04/05/2019

Figure 1



