

**ENGINEERING STATEMENT  
SCRIPPS BROADCASTING HOLDINGS LLC  
MODIFICATION OF LICENSE - FILE NUMBER 0000067495  
KASW, PHOENIX, AZ  
CH 27, 445 KW - DIRECTIONAL, 550.9 m HAAT  
ADDITION OF 3 DISTRIBUTED TRANSMISSION SYSTEM SITES**

This statement supports an application by Scripps Broadcasting Holdings LLC , licensee of full power digital television station KASW, to modify its license, FCC File Number 0000067495, to add three Distributed Transmission System ("DTS") sites inside the current coverage area.

Applicant proposes to operate the proposed DTS transmitters synchronously on channel 27. KASW will continue to operate its current full-power facility, as authorized, which defines the "authorized service area" as defined in the FCC Rules.<sup>1</sup> This site will be referred to as Site 1 in the exhibits attached to this statement and serves as the reference facility in terms of coverage.

The three added DTS sites will be referred to as Sites 2, 3 and 4 in the attached exhibits. All three of the proposed DTS sites are within the KASW authorized service area covered by Site 1 as shown on the map in Exhibit 1.<sup>2</sup> The predicted contours of the added DTS sites are totally within either the DTV station's Table of Distances area of 103 km (pursuant to paragraph §73.626(c)) or its authorized service area, except for a minor extension of the contour of DTS Site 4.

The map shown in Exhibit 2 shows the location of the DTS Site 4 minor contour extension in the southeast portion of the reference coverage area. The map in Exhibit 3 is a magnified view of the overlap area and shown as crosshatched. The maximum contour extension is approximately 1.9 km and with an area of 51.2 km<sup>2</sup>

Exhibit 4 is a map showing the population density in and around the DTS Site 4 contour extension area. The extracted population count inside this area is 54 people. However, these cells showing a small population count are in areas not predicted to have a receivable signal level as reported by the FCC's software, TVStudy.

Exhibit 5 is a satellite image showing an aerial view of the terrain in the extension area. The terrain is mountainous and virtually uninhabited when compared to the population density map in Exhibit 4.

For the reasons set forth above a this contour extension should be considered minimal.

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<sup>1</sup> 47 C.F.R. § 73.626(b)

<sup>2</sup> 47 C.F.R. § 73.626(f)(6)

**ENGINEERING STATEMENT  
(continued)**

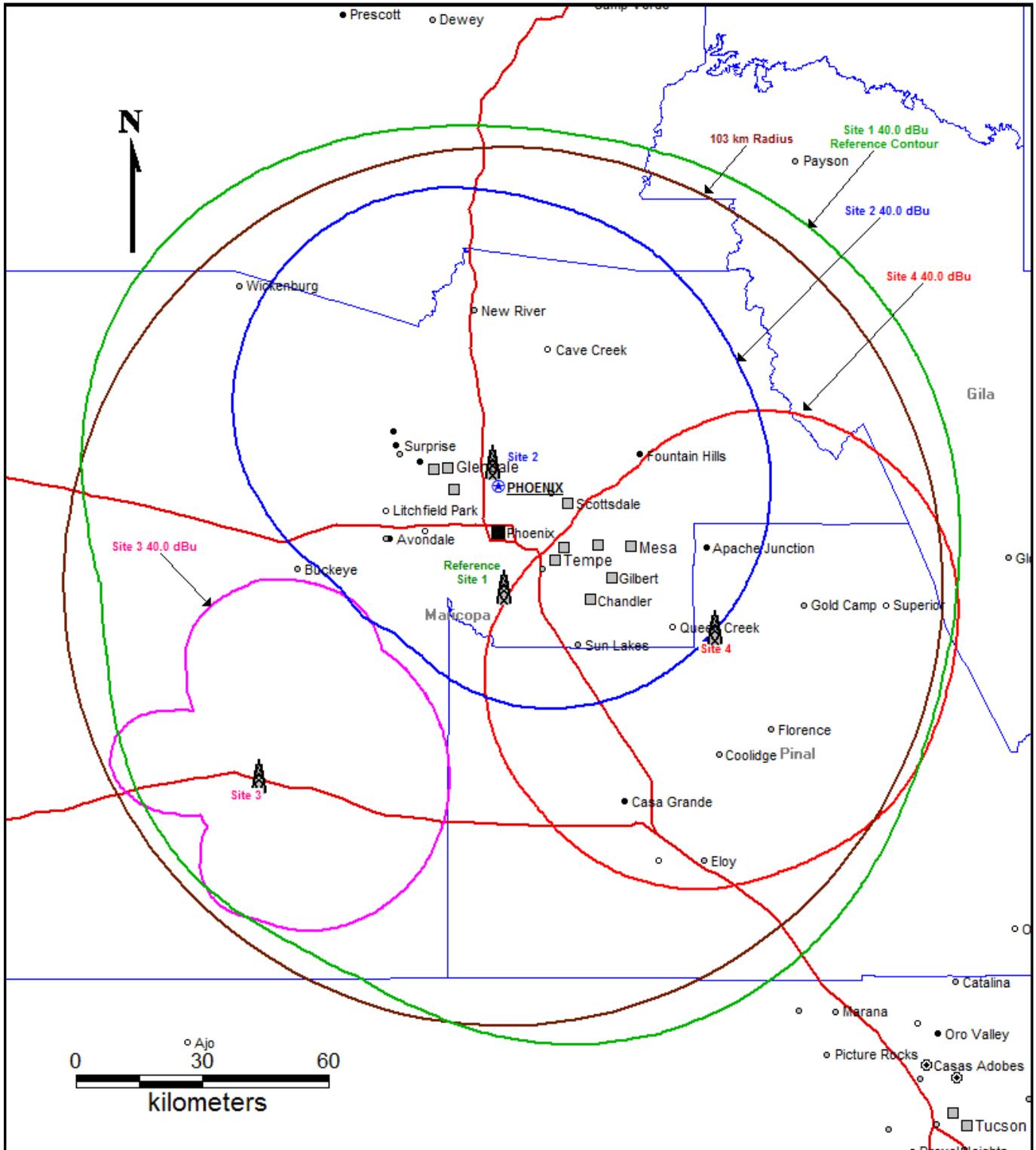
**TVSTUDY PROCESSING REQUEST**

Applicant requests that the TVStudy processing be conducted with the following setting:

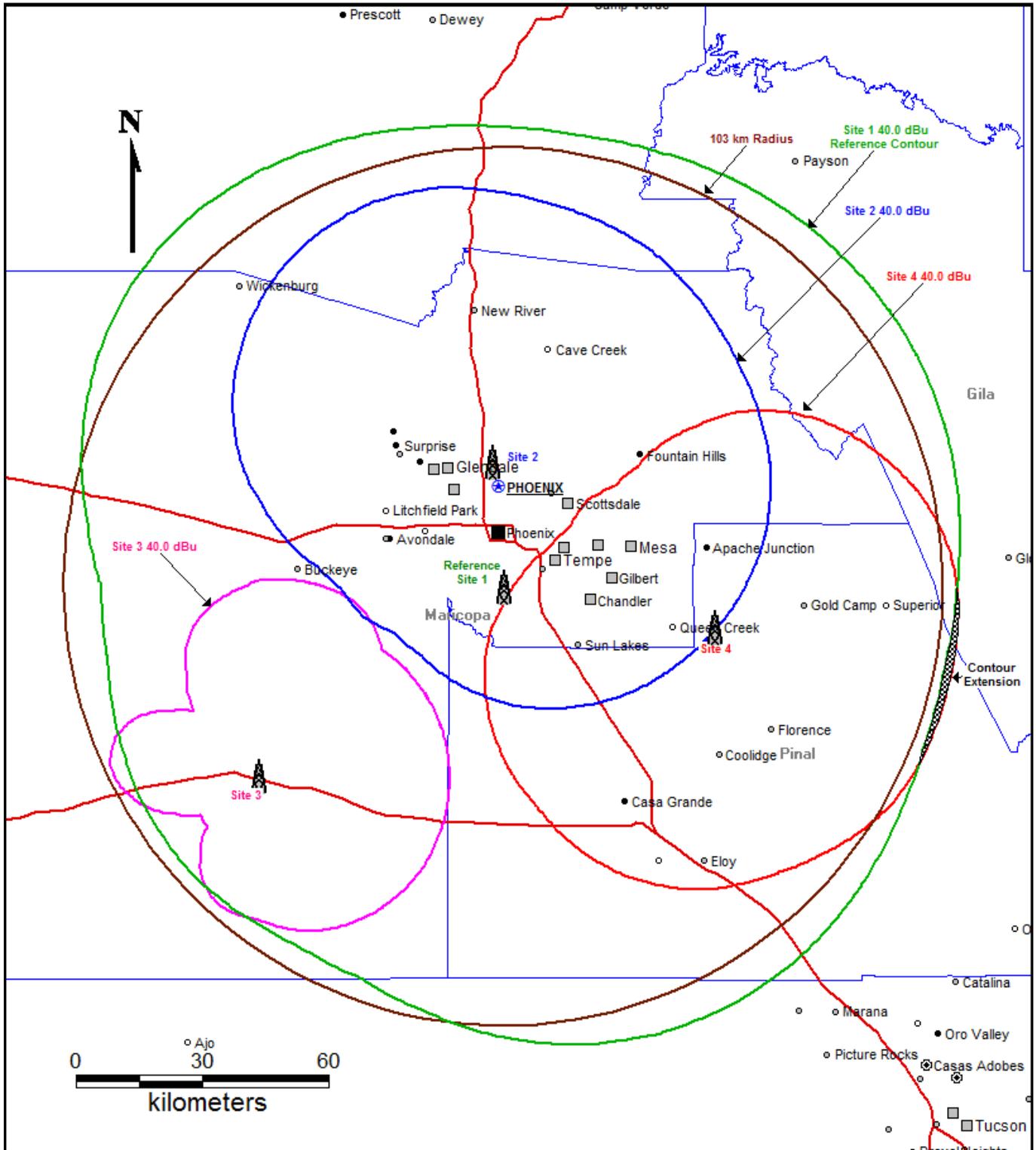
1. Study cell size: 1.00 km

Using a study cell size of 1.00 km/side, the results of the analysis showed that the proposed addition of the three proposed DTS sites is not predicted to cause interference in excess of that allowed by the rules. The analysis was performed using the methodology stated in OET-69 using the same software (TVStudy v2.2.5) utilized by the Commission and, therefore, should yield similar results.

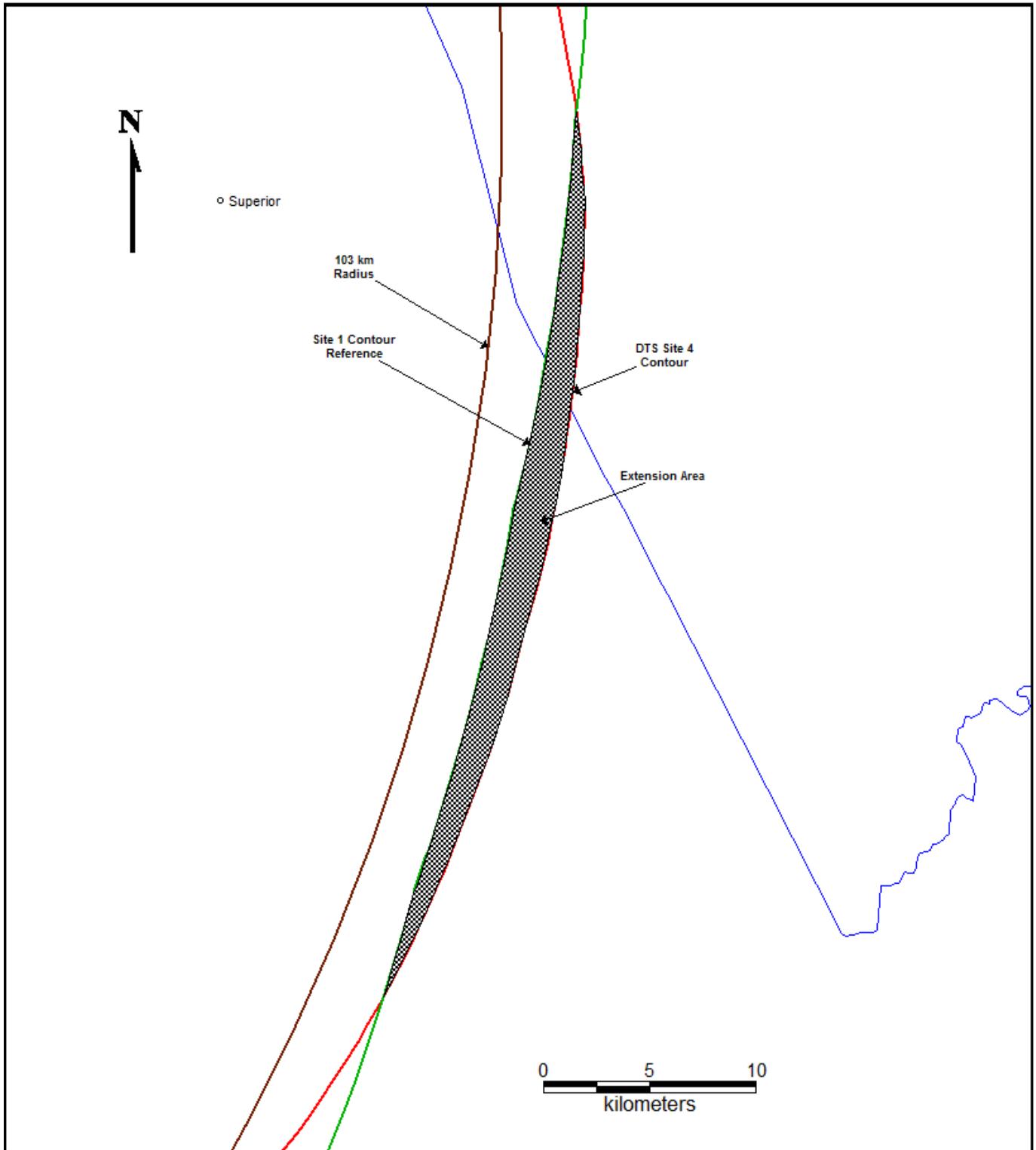
**Exhibit 1**  
**KASW, Ch. 27, Phoenix, AZ**  
**Coverage Contours of a Four Site Distributed Transmission System**  
**103 km Radius from Reference Point Shown in Brown**



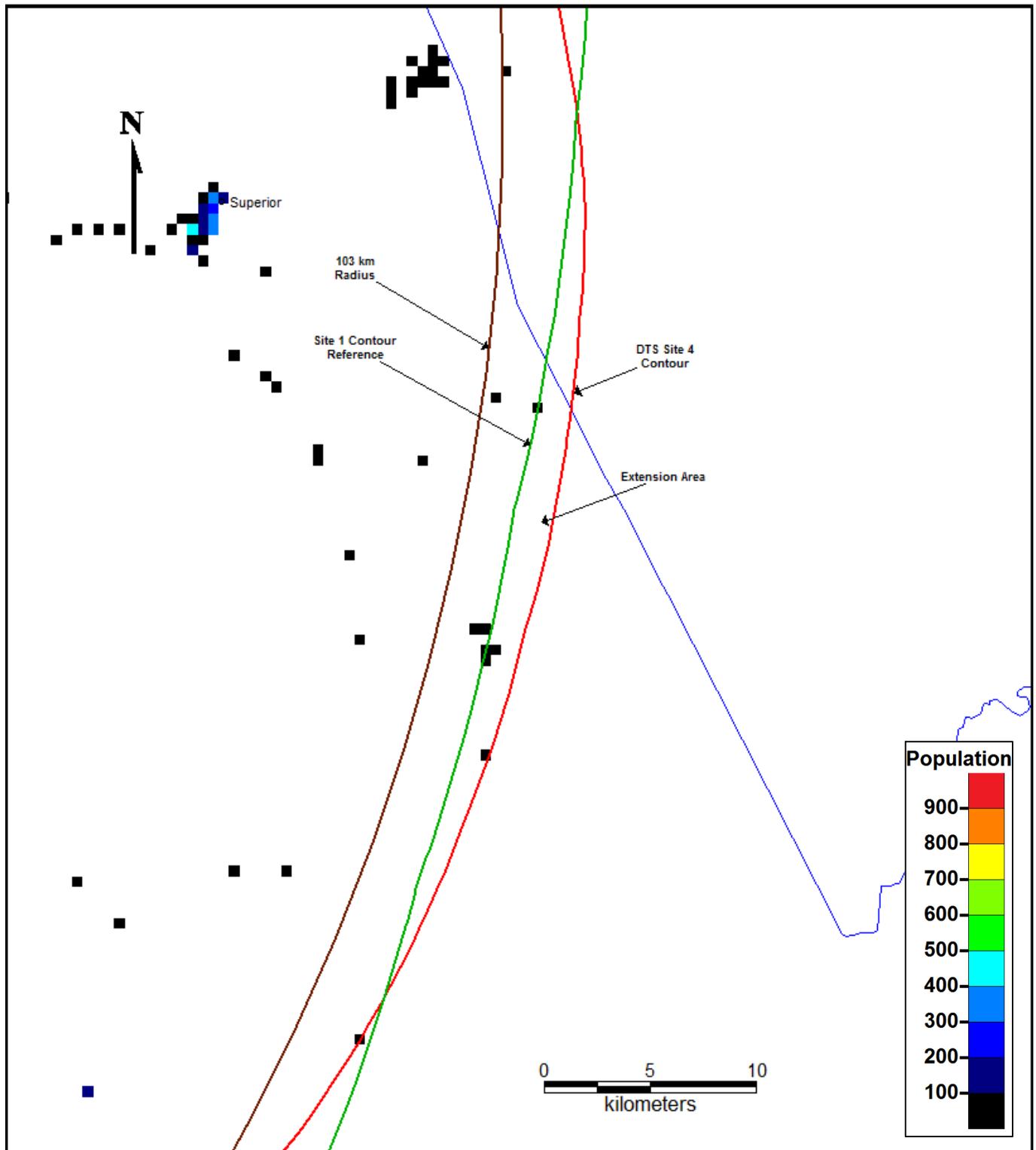
**Exhibit 2**  
**KASW, Ch. 27, Phoenix, AZ**  
**Coverage Contours of a Four Site Distributed Transmission System**  
**Minor Contour Extension of DTS Site 4 Shown as Crosshatched**



**Exhibit 3**  
**KASW, Ch. 27, Phoenix, AZ**  
**Expanded View of the Minor Contour Extension Area of DTS Site 4**



**Exhibit 4**  
**KASW, Ch. 27, Phoenix, AZ**  
**Population Density In and Around the Minor Contour Extension Area**



**Exhibit 5**  
**KASW, Ch. 27, Phoenix, AZ**  
**Satellite Image Showing Contour Extension Area and Terrain**

