

**Technical Statement for Construction Permit Minor Modification:  
Station KAZT-CD, Facility ID 72618  
Channel 36  
Phoenix, CA  
8/24/2020**

This Technical Statement provides technical data and information associated with our minor modification request for Station KAZT-CD operating on digital channel 36 in communities of the Phoenix (Prescott) Arizona DMA. In particular, KAZT-CD addresses interference due to recent cochannel station modifications during the latest 2012 repack and how granting this minor modification is in the public interest by reducing interference to KAZT-CD.

While KAZT-CD understands the commissions, reasons outlined in Docket 12-268 Notice of Proposed Rulemaking 27 FCC Rcd 12357 (2012) (“NPRM”), this 2012 NPRM provides opportunities for Class A Minor modifications consideration on a case by case basis. In light of July 13<sup>th</sup> 2020 successful completion of Docket 12-268 KAZT-CD is requesting consideration of our minor modification request. Granting KAZT-CD waiver request would not cause any frustration and would avoid frustrating the central goal of “repurpos[ing] the maximum amount of UHF band spectrum for flexible licensed and unlicensed use,” we believe it is now necessary to limit the filing and processing of modification applications that would expand broadcast television stations’ use of spectrum.

Granting this minor modification is in the public interest. The proposed minor modification will allow KAZT-CD, a woman owned and locally owned station to provide Phoenix Arizona viewers with reduced interference to a growing free, over-the-air market, where historically our viewer calls reporting difficulties viewing the station due to increased interference levels.

KAZT-CD demonstrates how a waiver request is in the public interest. Allowing KAZT-CD minor modification to our antenna pattern will increase Effective Radiated Power into already densely populated areas currently serviced by KAZT-CD and reducing interference from repack changes (Ch. 36 KUVB-CD File#- 0000026094) and LPTV minor modifications (K36AE, File#0000114373). KAZT-CD has received several viewer complaints from the fringe of the coverage area to the south (figure 3) and from within Phoenix areas (figure 2), as documented in the attached figure 1 map. We believe that this interference is due to KUVB-CD and K36AE. Changing from a directional antenna to an omnidirectional antenna will help alleviate the interference to the south, and KAZT-CD is working with K36AE to resolve the interference in Phoenix.

KAZT-CD minor modification waiver request wouldn’t net any significant population gains within the new noise limited service contour as demonstrated in figure 4. Figure 4 demonstrates the shaded area where the noise limited contour increases over the current licensed noise limited service contour. This Study also provides data indicated the noise limited service contour population increased area only accounts for 3.4% in population increase illustrating this minor modification gains will enhance our OTA digital viewing experience by reducing interference in our service area. The majority of the increased area south to west is the Sonoran Desert National Monument and should not see any future interference or population gains.

A TV Study interference analyses of KAZT-CD proposed minor modification shows that it would not cause impermissible interference to any other full-service of Class A station; the predicted interference to co-channel KUVB-CD is 0.02%, well below the allowable de minimis of 0.5%.

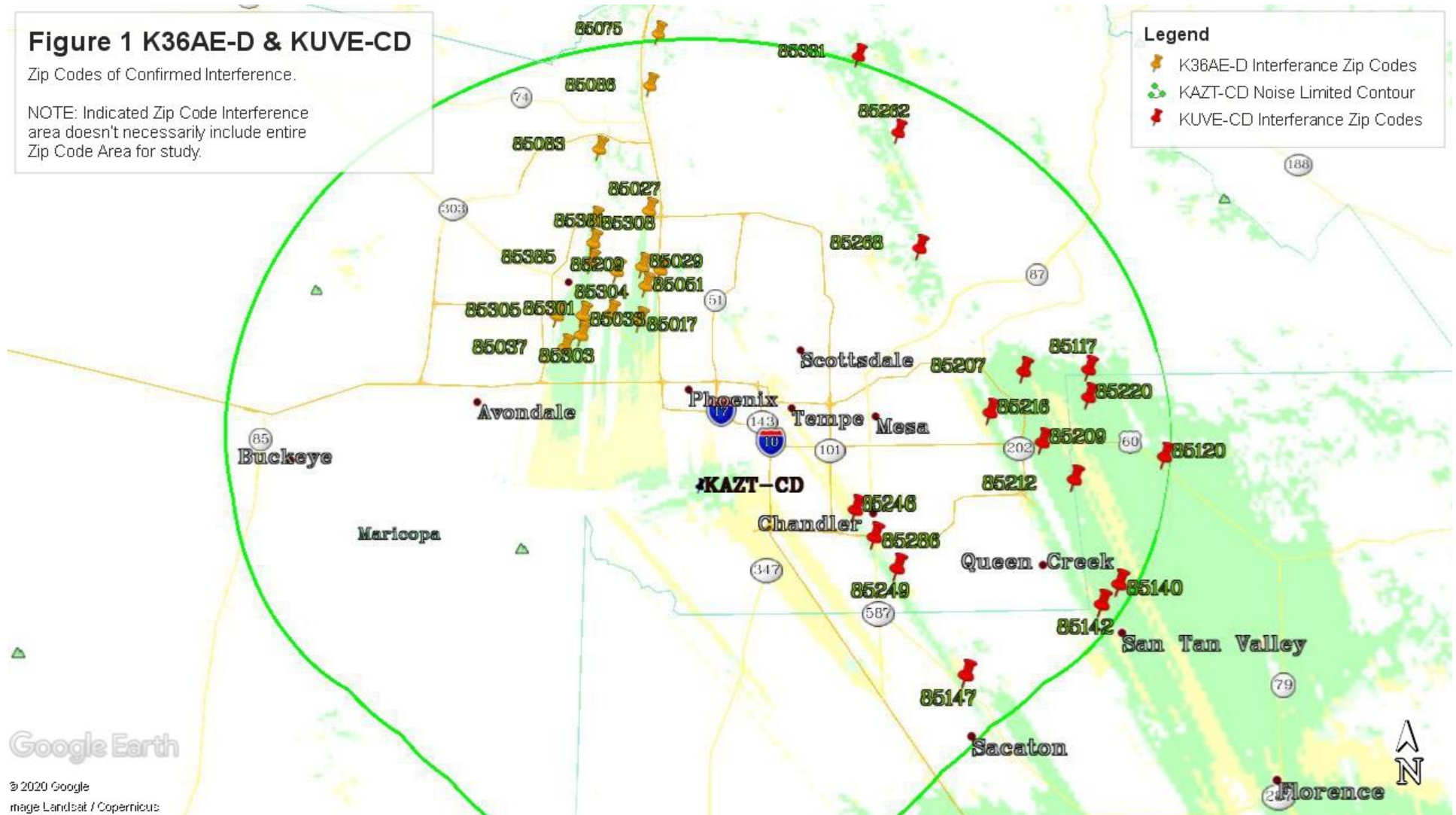
## Figure 1 K36AE-D & KUVE-CD

Zip Codes of Confirmed Interference.

NOTE: Indicated Zip Code Interference area doesn't necessarily include entire Zip Code Area for study.

### Legend

- K36AE-D Interference Zip Codes
- KAZT-CD Noise Limited Contour
- KUVE-CD Interference Zip Codes






## Figure 2 K36AE-D MAP

Zip Codes of Confirmed Interference.

NOTE: Indicated Zip Code Interference area doesn't necessarily include entire Zip Code Area for study.

### Legend

-  K36AE-D Interference Zip Codes
-  KAZT-CD Noise Limited Contour
-  KUVB-CD Interference Zip Codes





