

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of DEERFIELD MEDIA (SAN ANTONIO) LICENSEE, LLC, licensee of full-power digital television station KMYS(TV), Channel 32 in Kerrville, Texas, in support of its Application for Modification of License to operate the station with the ATSC 3.0 transmission standard. It is proposed that during the time that the facility will be transmitting in ATSC 3.0, the primary ATSC 1.0 programming of KMYS(TV) will be transmitted by station KCWX(TV), Channel 5 in Fredericksburg, Texas.

Exhibit B is a map upon which the KMYS(TV) and KCWX(TV) noise-limited service contours are plotted. As shown, the majority of the KMYS(TV) service contour overlaps that of KCWX(TV). Indeed, the "loss area" population that will be created as a result of the transfer of KMYS(TV)'s primary ATSC 1.0 programming to KCWX(TV) is only 2.0% of the total service population of KMYS(TV). Conversely, the additional area served by KCWX(TV) that is presently not served by KMYS(TV) contains 2,501,665 people, according to the 2020 U.S. Census data.

Therefore, this proposal meets Section 73.3801(f)(6)(ii) of the FCC Rules, which requires that the new ATSC 1.0 host station cover at least 95% of the service population of the station that elects to operate under the new ATSC 3.0 format. As a result, expedited processing of this proposal is respectfully requested and believed to be justified.

It is also important to note that KCWX(TV) places a city-grade service contour over the entirety of the KMYS(TV) city of license, Kerrville, Texas, as shown in Exhibit C. This is not unexpected, since both stations are licensed to communities within the same Designated

Market Area (San Antonio). Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K" and "F".

KEVIN T. FISHER

May 17, 2022

**CONTOUR POPULATION : 2020 U.S. CENSUS**  
 KMYS(TV) : 2,694,103 (1,081,288 HH)  
 KCWX(TV) (Host) : 5,141,692 (2,102,787 HH)  
 Common Area Population : 2,640,027 (98.0% of KMYS Service Pop.)  
 KMYS(TV) Programming Loss Area Population: 54,076 (2.0%)  
 KMYS(TV) Programming Gain Area Population: 2,501,665

**SMITH AND FISHER, LLC**

**KCWX(TV) CH. 5  
 28 DBU FCC CONTOUR**

**KMYS(TV) CH. 32  
 N/L FCC CONTOUR**

**EXHIBIT B  
 FCC SERVICE CONTOUR COMPARISON  
 PRIMARY PROGRAMMING STREAM  
 KMYS(TV), CH. 32 ON KCWX(TV), CH. 5  
 KERRVILLE, TEXAS**



