

**Technical Statement in Support of ATSC 3 Host and ATSC 1 Guest
License Modification for WUPL, Facility ID 13938
Slidell, Louisiana**

Executive Summary

Belo TV, Inc. is the licensee of WUPL¹ and hereby proposes transitioning the WUPL ATSC 1.0 signal to the facilities of host stations as described in §73.3801(f)(2)(i) and converting the existing WUPL facility to transmit an ATSC 3.0 signal pursuant to §73.3801(f)(2)(iii) via the §73.3801(f)(3) streamlined process with §73.3801(f)(5) expedited processing.

Compliance with Coverage Requirements

Pursuant to §73.3801(f)(6)(i)(A), WUPL will broadcast as an ATSC 3.0 host and will operate its primary MyNetwork ATSC 1.0 signal as a guest on WNOL-TV². WUPL has 4 simulcast channels and has made the following simulcast arrangements:

- ThisTV as an ATSC 1.0 guest on WVUE-DT³,
- TrueReal as an ATSC 1.0 guest on WDSU-TV⁴, and
- Quest and Heroes & Icons as an ATSC 1.0 guest on WGNO⁵

Pursuant to §73.3801(f)(6)(i)(B), the technical parameters of the ATSC 1.0 host stations are a matter of record with the Commission and FCC File numbers are referenced in the footnotes below.

Compliance with Expedited processing Requirements

¹ Facility ID 13938 with technical facilities specified in FCC File No.: 0000112386

² Facility ID 54280 with technical facilities specified in FCC File No.: BLCDT-20121019AAR

³ Facility ID 4149 with technical facilities specified in FCC File No.: BLCDT-20110502AEC

⁴ Facility ID 71357 with technical facilities specified in FCC File No.: 0000098906

⁵ Facility ID 72119 with technical facilities specified in FCC File No.: BLCDT-20121019AAK

Appendices A, B, C, and D demonstrate the WUPL coverage area with respect to the ATSC 1.0 host stations' coverage areas. The exhibits were produced by running the licensed facilities in TVStudy V2.2.5 to generate geographical files and contours using the "general-purpose study" option. The output was subsequently mapped in Arcmap v10.7. The metadata from coverpts.shp contains 2010 population census figures along with the TVStudy result codes which determine signal coverage status for each cell studied. The coverage data was filtered to remove all points that is not considered terrain limited service⁶. The ATSC 1.0 host station's noise limited coverage area was augmented to match the WUPL noise limited contour such that a complete cell by cell comparison can be made between host facilities within the WUPL noise limited contour which lie beyond the host stations contours. The resulting coverage areas are layered with the host stations blue cells overlapping and thus masking the WUPL red cells such that if a blue cell is missing a red cell shows through visually indicating lost coverage area for WUPL. Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the analysis above and in the attached exhibit demonstrates that:

- Predicted terrain limited population within the WUPL ATSC 1.0 licensed noise limited contour is 1,719,990 people.
- Predicted terrain limited population within the WUPL ATSC 1.0 licensed noise limited contour that will lose over-the-air access to the host stations ATSC 1.0 service due to the simulcasting arrangement is 0 people for all the 4 host stations studied.
- The result of the ATSC 1.0 simulcast arrangement is that 100% of the WUPL ATSC 1.0 population will continue to have over-the-air access to each of WUPL's program streams in ATSC 1.0 format via the applicable host stations. Pursuant to

⁶ Result Codes 1 and 11 are kept and all other result codes are filtered out.

§73.3801(f)(5), The proposed arrangement thus meets the 95% retention required for expedited processing.

Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Pursuant to §73.3801(c), Appendices A, B, C, and D demonstrate that the host stations will completely subsume WUPL's community of license of Slidell, LA with a 48.0 dBμV/m principal community contour and all five stations belong to the New Orleans, LA DMA. As demonstrated, the proposed host stations fully satisfy the FCC rules specified in §73.3801 and the application should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

CERTIFICATION

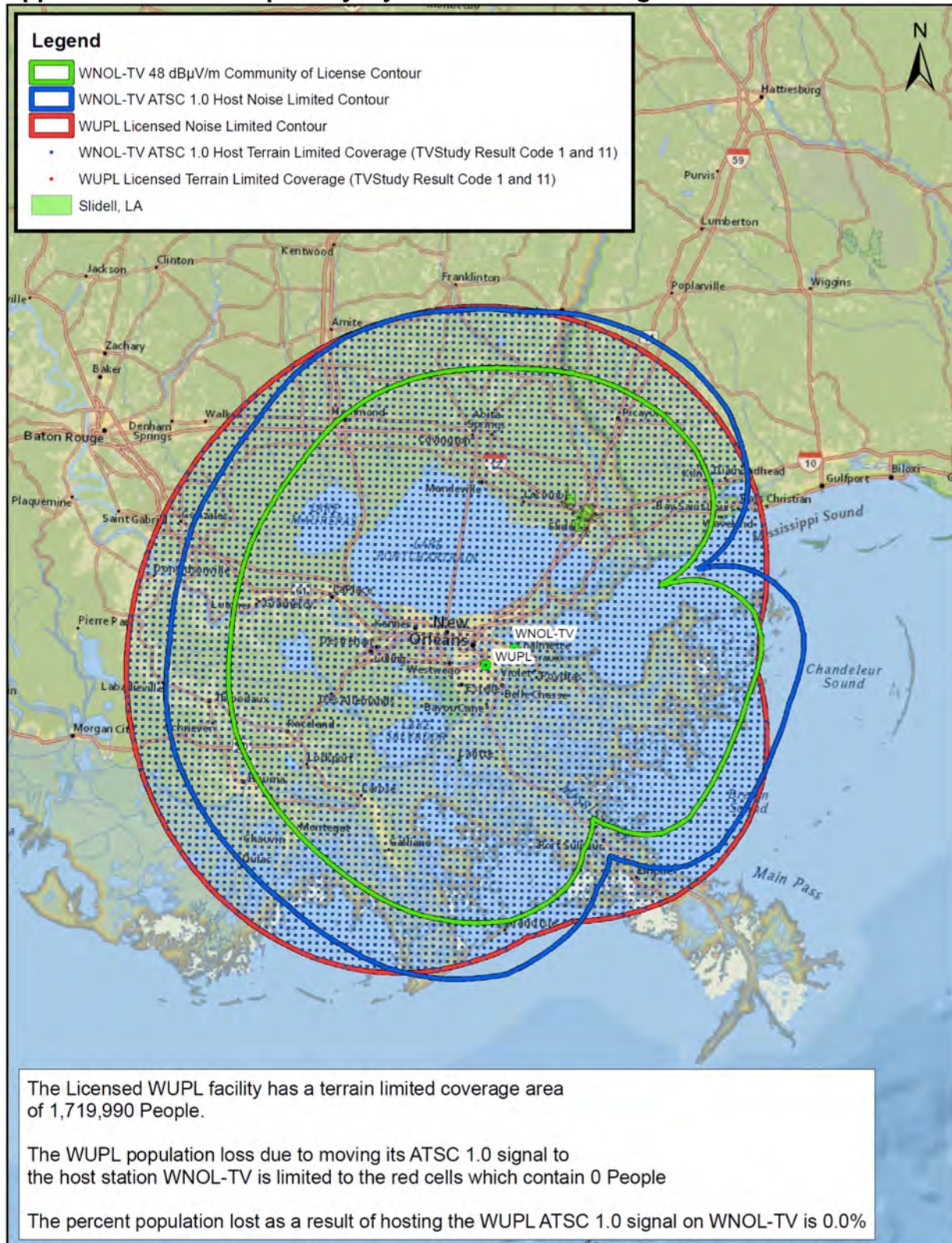
The foregoing statement and the report regarding the engineering work are true and correct to the best of my knowledge. Executed September 26, 2021

Kessler and Gehman Associates, Inc.



Ryan Wilhour
Consulting Engineer

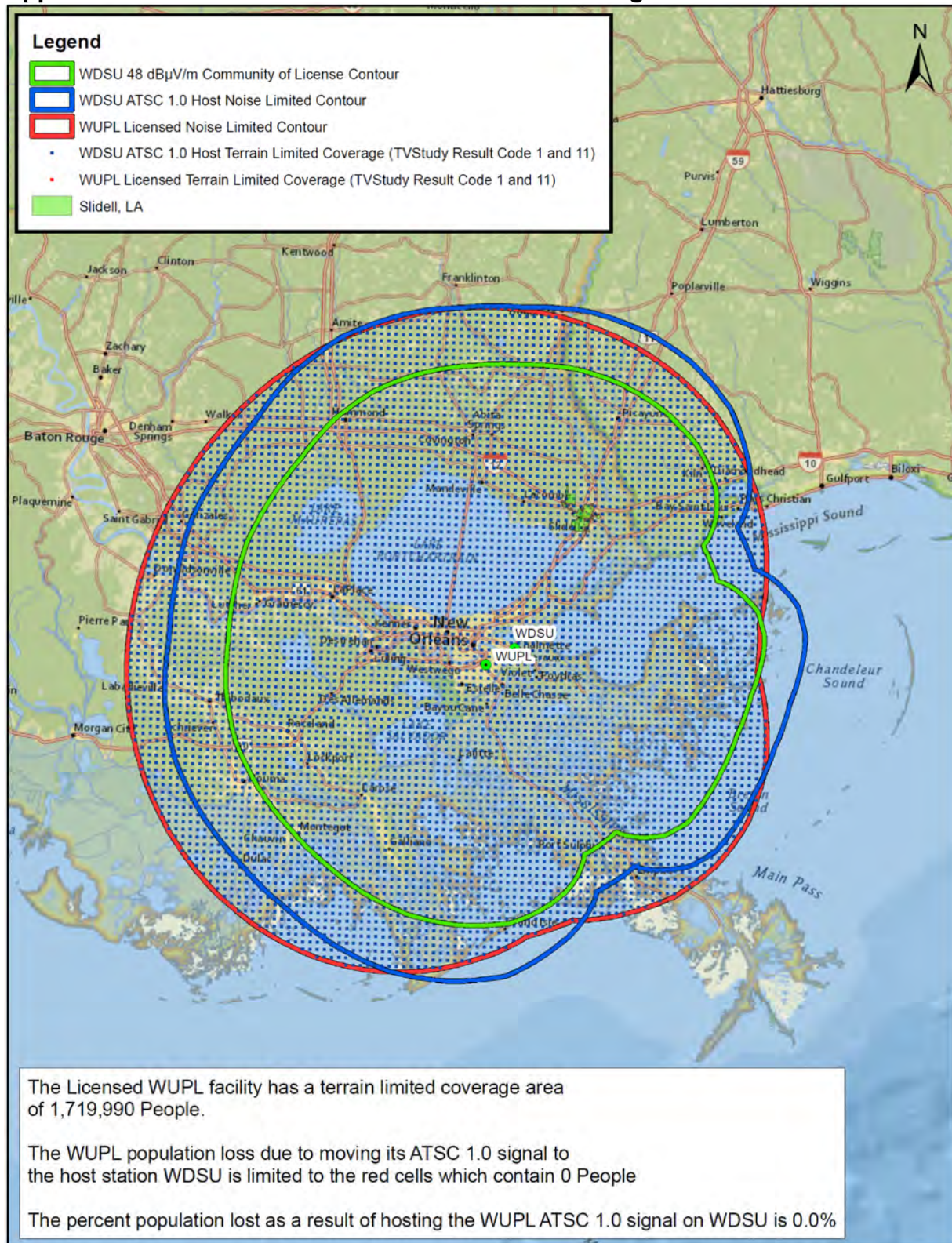
Appendix A – WUPL’s primary MyNetwork ATSC 1.0 Signal hosted on WNOL-TV



Appendix B – WUPL's Multicast ThisTV ATSC 1.0 Signal hosted on WVUE-DT



Appendix C – WUPL’s Multicast TrueReal ATSC 1.0 Signal hosted on WDSU-TV



Appendix D – WUPL’s Multicast Quest and Heroes & Icons ATSC 1.0 Signal hosted on WGNO-TV

