

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KJZZ LICENSEE, LLC, licensee of full-power digital television station KJZZ-TV, Channel 19 in Salt Lake City, Utah, 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 KJZZ-TV will be transmitted by station KUCW(TV), Channel 35 in Ogden, Utah.

Exhibit B is a map upon which the KJZZ-TV and KUCW(TV) noise-limited service contours are plotted. As shown, the majority of the KJZZ-TV service contour overlaps that of KUCW(TV). Indeed, the "loss area" population that will be created as a result of the transfer of KJZZ-TV's primary ATSC 1.0 programming to KUCW(TV) is less than 0.1% of the total service population of KJZZ-TV. Conversely, the additional area served by KUCW(TV) that is presently not served by KJZZ-TV contains 100 people, according to the 2018 U.S. Census Estimate 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 KUCW(TV) places a city-grade service contour over the entirety of the KJZZ-TV city of license, Salt Lake City, Utah, as shown in Exhibit C. This is not unexpected, since KUCW(TV) operates from the same transmitter site as KJZZ-TV

EXHIBIT A

(Farnsworth Peak) and is licensed to a community in the same DMA as KJZZ-TV. 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" and a smaller "T" in the middle.

KEVIN T. FISHER

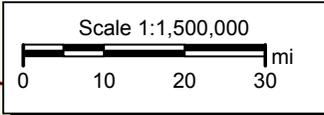
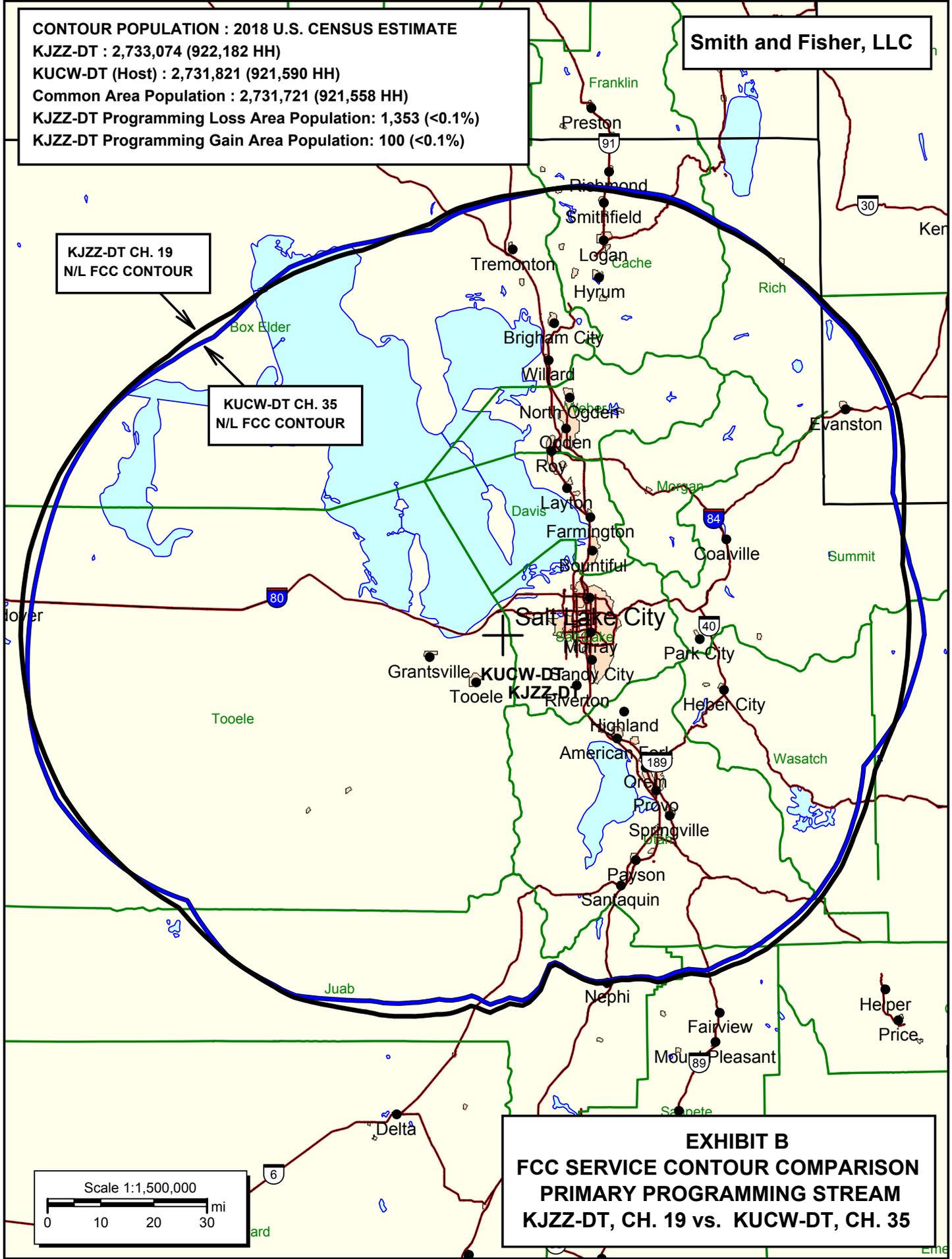
April 20, 2020

**Smith and Fisher, LLC**

**CONTOUR POPULATION : 2018 U.S. CENSUS ESTIMATE**  
KJZZ-DT : 2,733,074 (922,182 HH)  
KUCW-DT (Host) : 2,731,821 (921,590 HH)  
Common Area Population : 2,731,721 (921,558 HH)  
KJZZ-DT Programming Loss Area Population: 1,353 (<0.1%)  
KJZZ-DT Programming Gain Area Population: 100 (<0.1%)

**KJZZ-DT CH. 19  
N/L FCC CONTOUR**

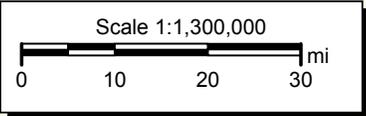
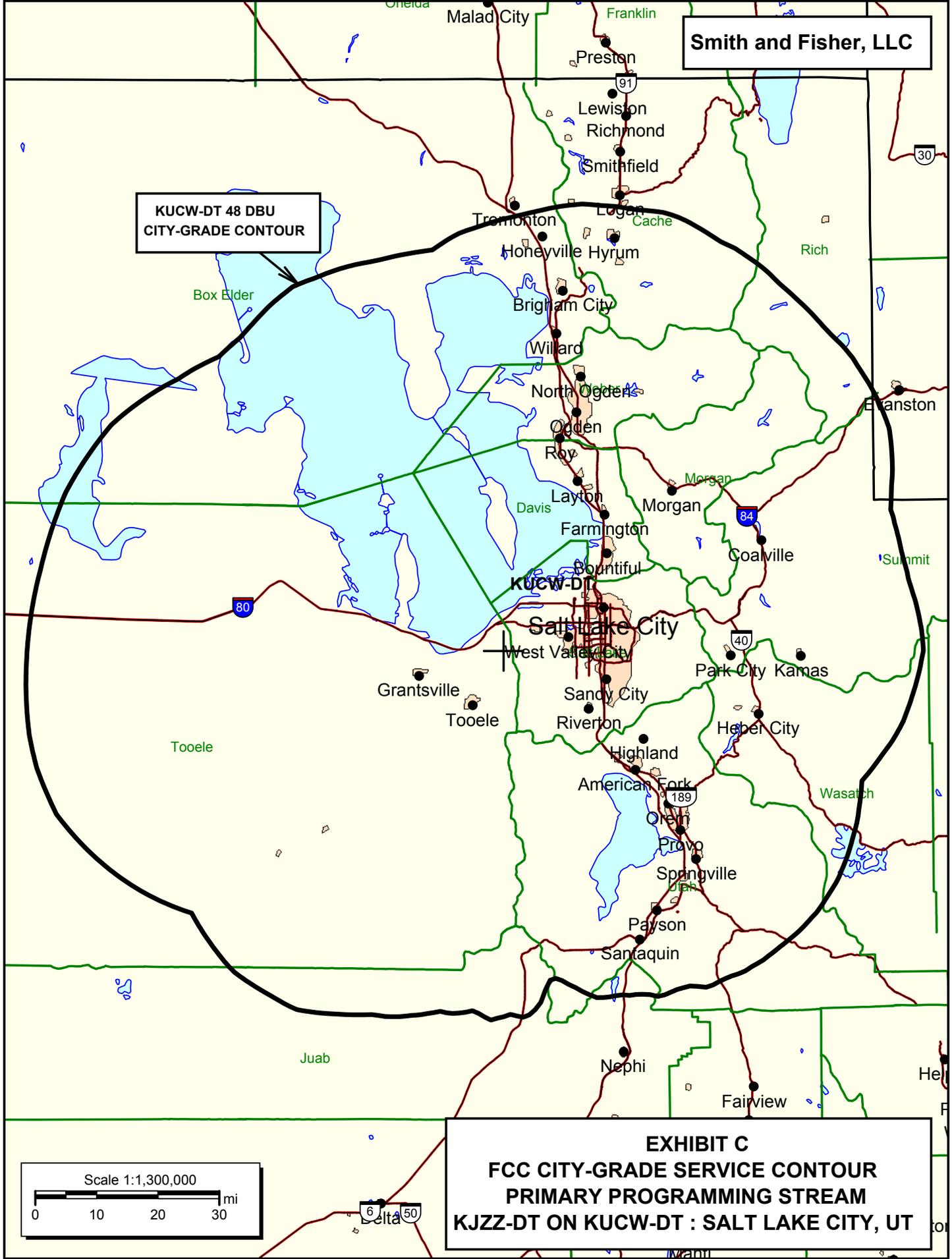
**KUCW-DT CH. 35  
N/L FCC CONTOUR**



**EXHIBIT B  
FCC SERVICE CONTOUR COMPARISON  
PRIMARY PROGRAMMING STREAM  
KJZZ-DT, CH. 19 vs. KUCW-DT, CH. 35**

**Smith and Fisher, LLC**

**KUCW-DT 48 DBU  
CITY-GRADE CONTOUR**



**EXHIBIT C  
FCC CITY-GRADE SERVICE CONTOUR  
PRIMARY PROGRAMMING STREAM  
KJZZ-DT ON KUCW-DT : SALT LAKE CITY, UT**