

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KFRE LICENSEE, LLC, licensee of full-power digital television station KFRE-TV, Channel 36 in Sanger, California, 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 KFRE-TV will be transmitted by station KGPE(TV), Channel 34 in Fresno, California.

Exhibit B is a map upon which the KFRE-TV and KGPE(TV) noise-limited service contours are plotted. As shown, a significant majority of the KFRE-TV service contour lies within that of KGPE(TV). Indeed, the "loss area" population that will be created as a result of the transfer of KFRE-TV's primary ATSC 1.0 programming to KGPE(TV) is only 2.8% of the total service population of KFRE-TV. Conversely, the additional area served by KGPE(TV) that is presently not served by KFRE-TV contains 1,585 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 KGPE(TV) places a city-grade service contour over the entirety of the KFRE-TV city of license, Sanger, California, as shown in Exhibit C. This is not entirely unexpected, since KGPE(TV) is licensed to a community within the same

Designated Market Area (DMA) as KFRE-TV (Fresno-Visalia, California) and has a transmitter site located near that of KFRE-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.

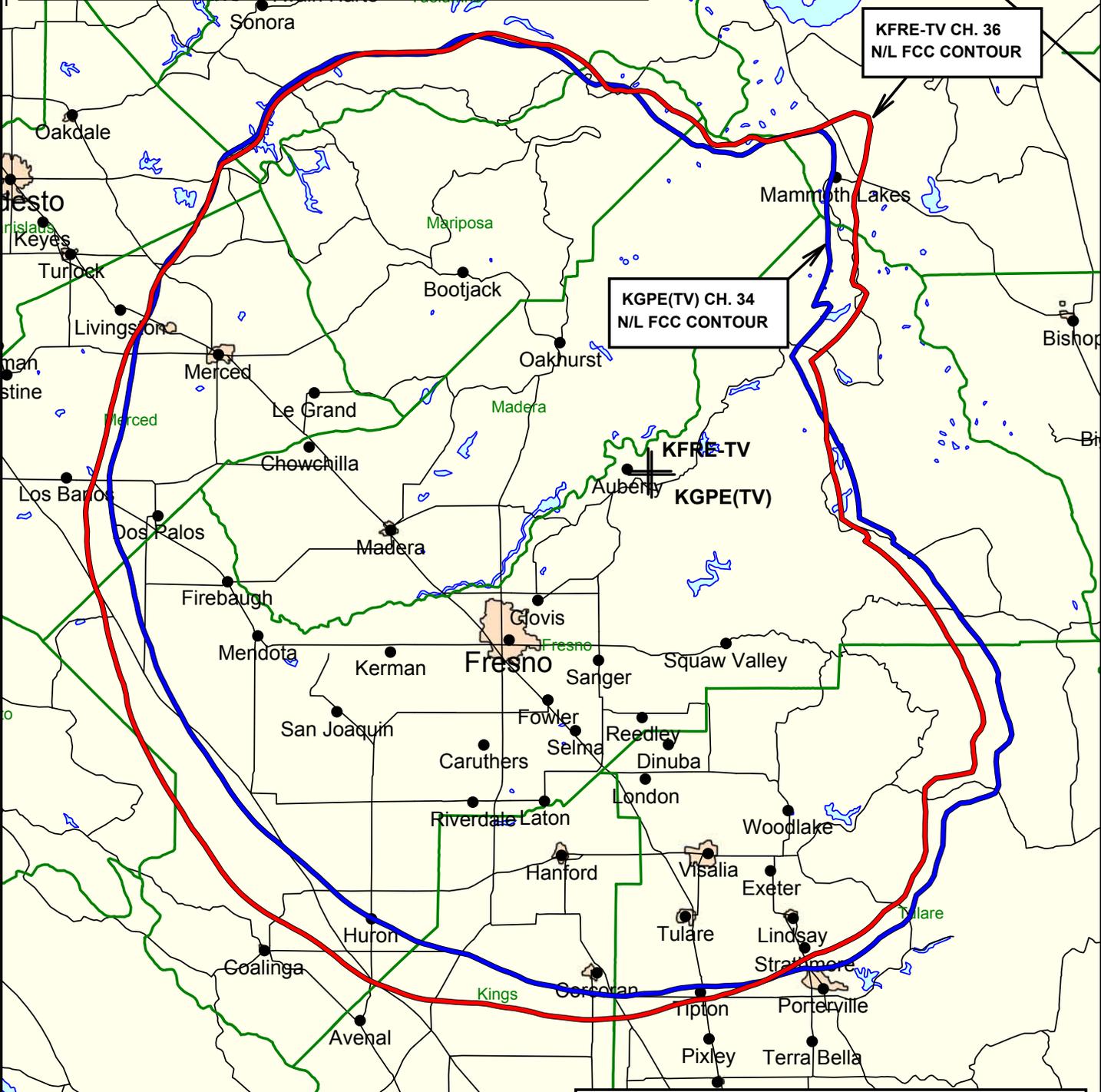
A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K" and "F" and a smaller "T".

KEVIN T. FISHER

May 13, 2022

CONTOUR POPULATION : 2020 U.S. CENSUS
 KFRE-TV : 1,854,637 (623,034 HH)
 KGPE(TV) (Host) : 1,838,186 (615,980 HH)
 Common Area Population : 1,836,601 (97.2% of KFRE-TV Service Pop.)
 KFRE-TV Programming Loss Area Population: 18,036 (2.8%)
 KFRE-TV Programming Gain Area Population: 1,585

SMITH AND FISHER, LLC

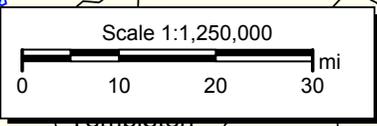


**KFRE-TV CH. 36
N/L FCC CONTOUR**

**KGPE(TV) CH. 34
N/L FCC CONTOUR**

**KFRE-TV
KGPE(TV)**

EXHIBIT B
FCC SERVICE CONTOUR COMPARISON
PRIMARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KGPE(TV), CH. 34
SANGER, CALIFORNIA



SMITH AND FISHER, LLC

**KGPE(TV) 48 DBU
CITY-GRADE CONTOUR**

**KFRE-TV
CITY OF LICENSE**

**EXHIBIT C
CITY-GRADE COVERAGE CONTOUR
PRIMARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KGPE(TV), CH. 34
SANGER, CALIFORNIA**

