

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KFRE LICENSEE, LLC, licensee of full-power television station KFRE-TV, Channel 36 in Sanger, California, in support of its request for Special Temporary Authority to operate the station with the ATSC 3.0 transmission standard and transfer its secondary ATSC 1.0 programming streams to the following stations: KNSO(TV), Channel 27 in Clovis, California; KMPH-TV, Channel 28 in Visalia, California; and, KSEE(TV), Channel 20 in Fresno, California. It is important to note that the primary programming stream of KFRE-TV will be transmitted by KGPE(TV), Channel 34 in Fresno, California, and the engineering support for that proposal is contained in the KFRE-TV Application for Modification of License to convert to ATSC 3.0 operation.

Exhibit B is a map upon which the KNSO(TV) and KFRE-TV noise-limited service contours are plotted. As shown, nearly the entire KFRE-TV service contour is contained within that of KNSO(TV). Indeed, there is no "loss area" population that will be created as a result of the transfer of KFRE-TV's secondary ATSC 1.0 programming to KNSO(TV). In addition, the gain area served by KNSO(TV) that is presently not served by KFRE-TV contains 134,695 people), according to the 2020 U.S. Census database.

It is also important to note that KNSO(TV) places a 48 dBu city-grade service contour over the entirety of the KFRE-TV city of license, Sanger, California, as shown in the attached Exhibit C. This is not entirely unexpected, since KNSO(TV) is licensed to a community within the same Designated Market Area (DMA) as KFRE-TV, Fresno-Visalia, California, and operates from a transmitter site adjacent to that of KFRE-TV. Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

EXHIBIT A

Exhibit D is a map upon which the KFRE-TV and KMPH-TV noise-limited service contours are plotted. As shown, a majority of the KFRE-TV service contour overlaps that of KMPH-TV. Indeed, the “loss area” population that will be created as a result of the transfer of KFRE-TV’s secondary ATSC 1.0 programming to KMPH-TV is small, amounting to only 13.6% of the total service population of KFRE-TV, according to the 2020 U.S. Census. In addition, a significant amount of gain area, containing 285,525 people, will be created by a move of the ATSC 1.0 secondary streams to station KMPH-TV.

KMPH-TV also places a 48 dBu city-grade service contour over the entirety of the KFRE-TV city of license, Sanger, California, as shown in Exhibit E. Like KNSO(TV), KMPH-TV is licensed to a community within the same Designated Market Area (DMA) as KFRE-TV. Thus, the instant proposal meets the requirements of Section 73.3801(c) of the Commission’s Rules.

Exhibit F is a map upon which the KFRE-TV and KSEE(TV) noise-limited service contours are plotted. As shown, a significant majority of the KFRE-TV service contour overlaps that of KSEE(TV). Indeed, the “loss area” population that will be created as a result of the transfer of KFRE-TV’s secondary ATSC 1.0 programming to KSEE(TV) is extremely small, amounting to only 0.3% of the total service population of KFRE-TV, according to the 2020 U.S. Census. In addition, a significant amount of gain area, containing 75,358 people, will be created by a move of the ATSC 1.0 secondary streams to station KSEE(TV).

KSEE(TV) also places a 48 dBu city-grade service contour over the entirety of the KFRE-TV city of license, Sanger, California, as shown in Exhibit G. This is not entirely unexpected, since KSEE(TV) is licensed to a community within the same Designated Market Area (DMA) as KFRE-TV, Fresno-Visalia, California, and operates from a transmitter site

adjacent to that of KFRE-TV. Thus, the instant proposal 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 13, 2022

CONTOUR POPULATION : 2020 U.S. CENSUS
 KFRE-TV : 1,854,637 (623,034 HH)
 KNSO(TV) (Host) : 1,989,332 (663,574 HH)
 Common Area Population : 1,854,637 (100% of KFRE-TV Service Pop.)
 KFRE-TV Programming Loss Area Population: 0
 KFRE-TV Programming Gain Area Population: 134,695

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KNSO(TV) CH. 27
N/L FCC CONTOUR

KFRE-TV CH. 36
N/L FCC CONTOUR

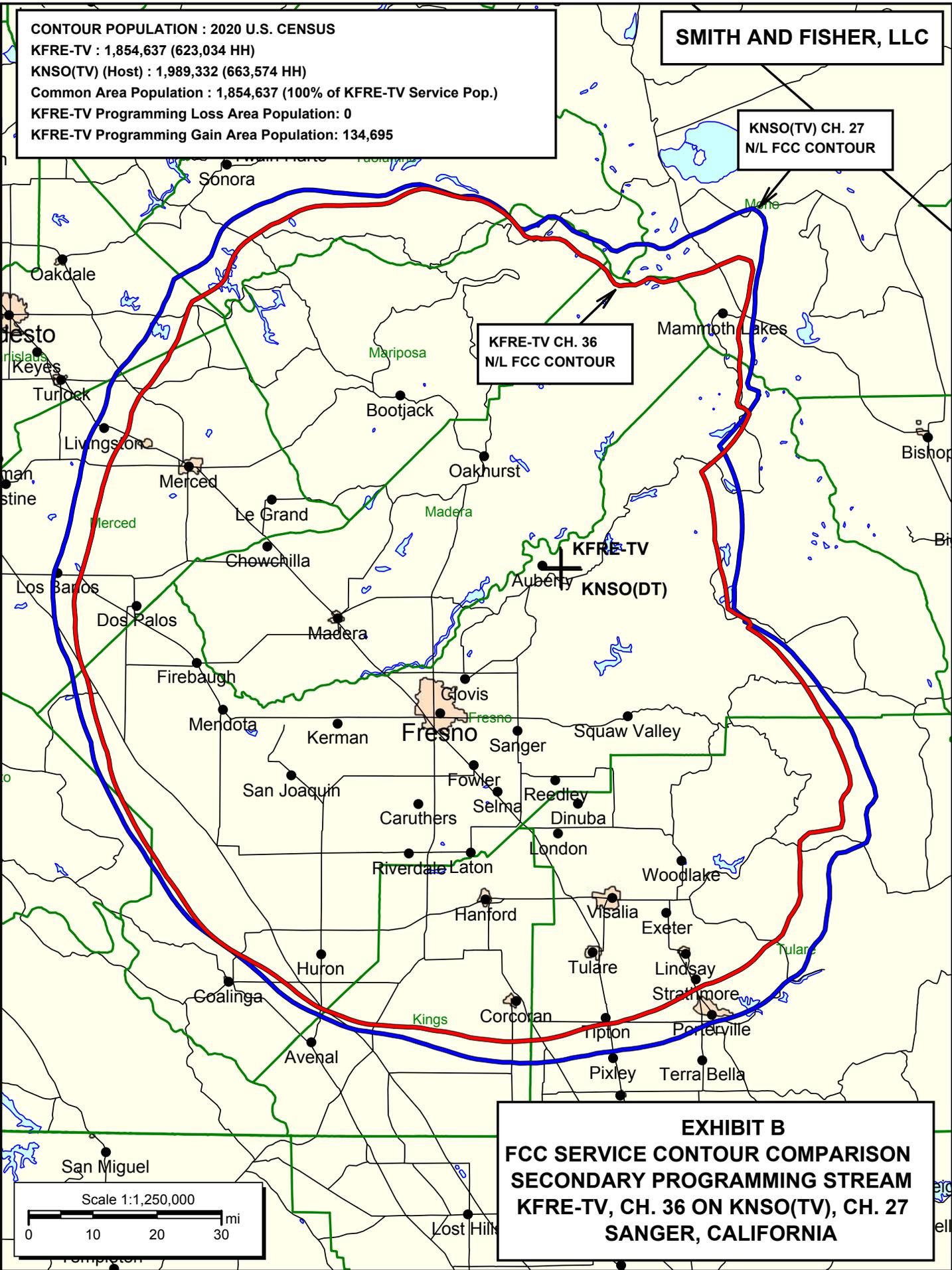
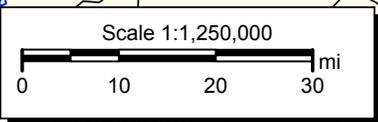


EXHIBIT B
FCC SERVICE CONTOUR COMPARISON
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KNSO(TV), CH. 27
SANGER, CALIFORNIA

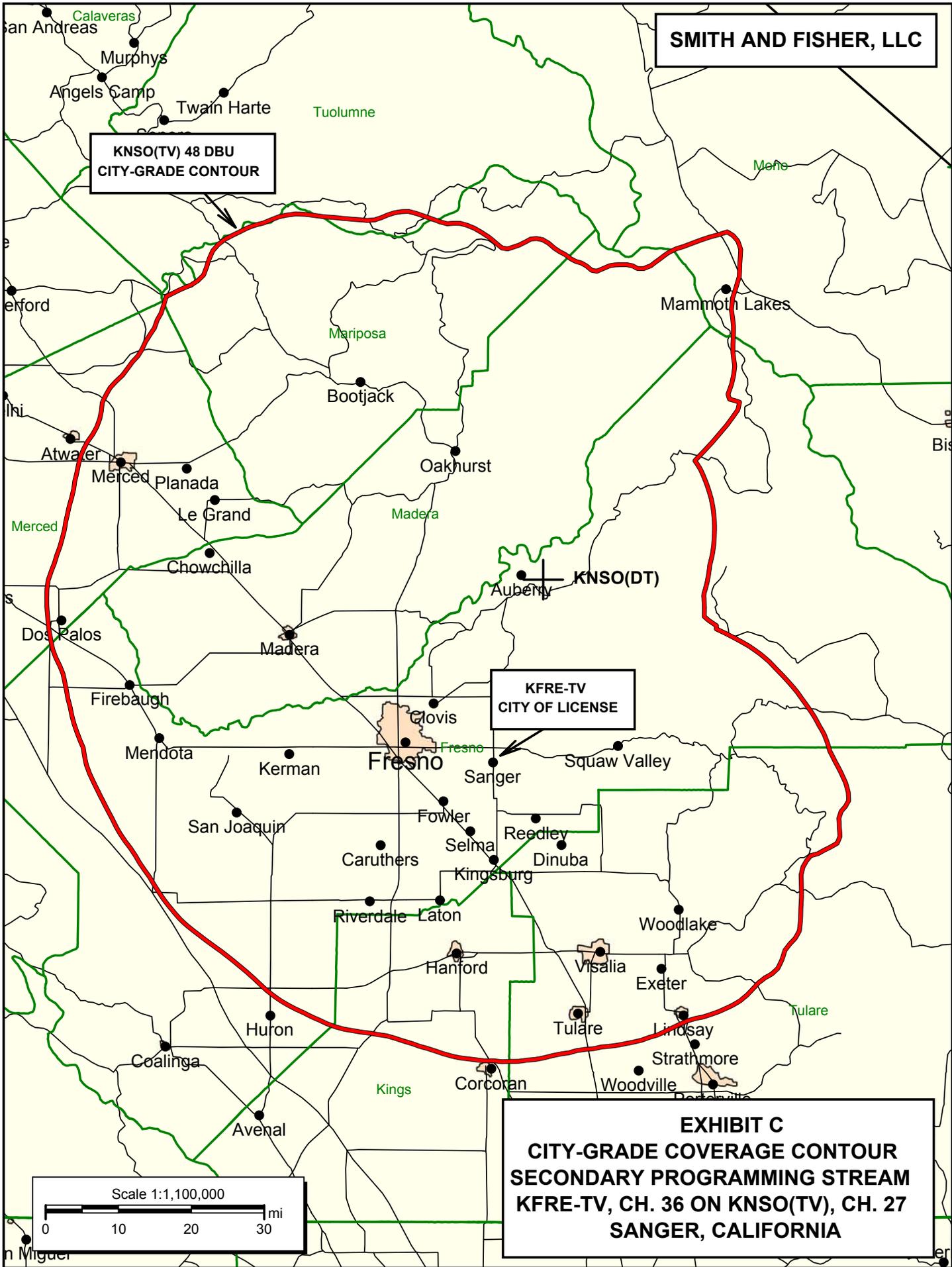
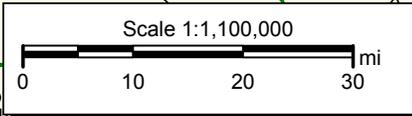


SMITH AND FISHER, LLC

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

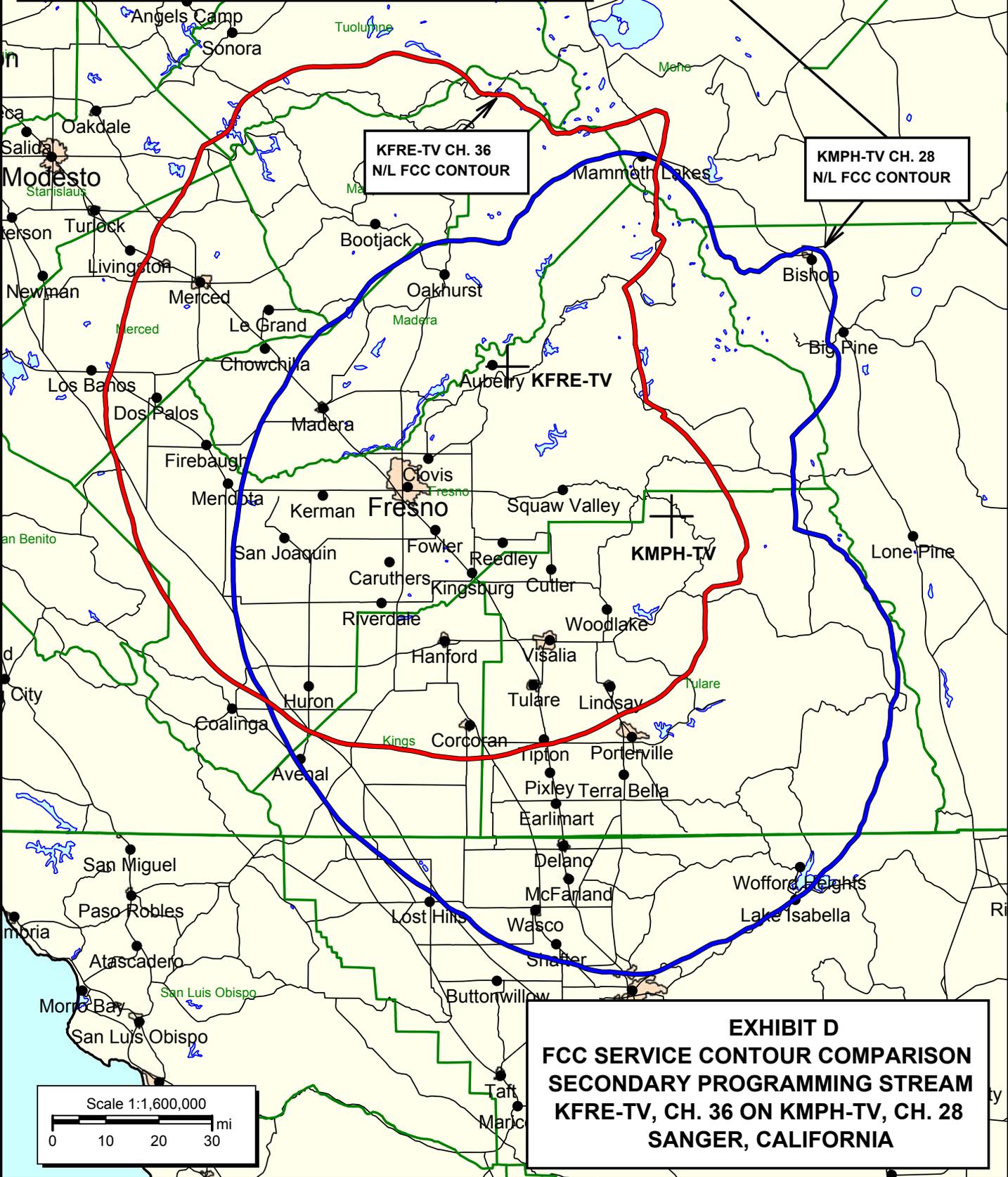
**KFRE-TV
CITY OF LICENSE**

**EXHIBIT C
CITY-GRADE COVERAGE CONTOUR
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KNSO(TV), CH. 27
SANGER, CALIFORNIA**



CONTOUR POPULATION : 2020 U.S. CENSUS
 KFRE-TV : 1,854,637 (623,034 HH)
 KMPH-TV (Host) : 1,888,281 (624,410 HH)
 Common Area Population : 1,602,756 (86.4% of KFRE-TV Service Pop.)
 KFRE-TV Programming Loss Area Population: 251,881 (13.6%)
 KFRE-TV Programming Gain Area Population: 285,525

SMITH AND FISHER, LLC



KFRE-TV CH. 36
N/L FCC CONTOUR

KMPH-TV CH. 28
N/L FCC CONTOUR

EXHIBIT D
FCC SERVICE CONTOUR COMPARISON
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KMPH-TV, CH. 28
SANGER, CALIFORNIA



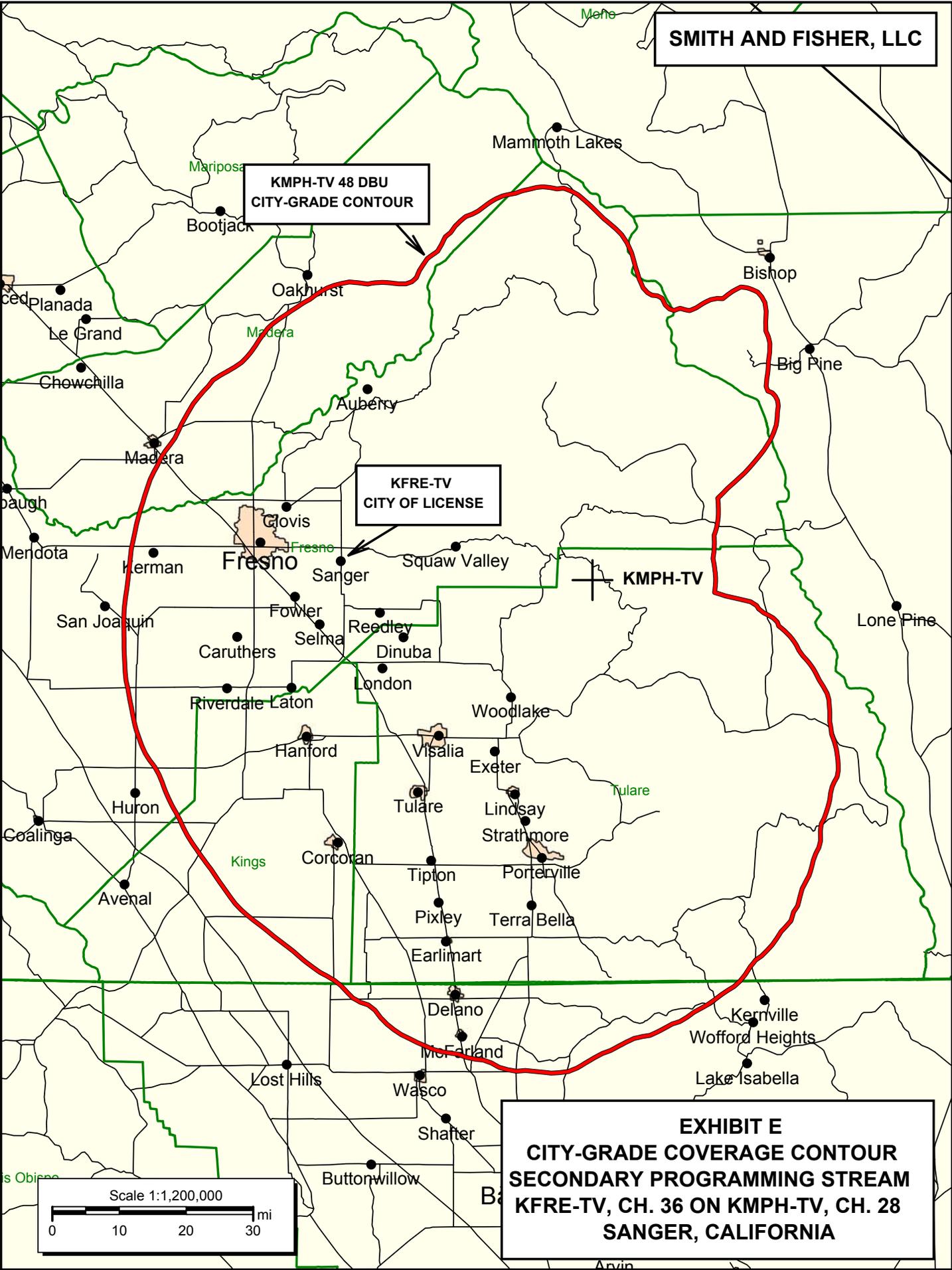
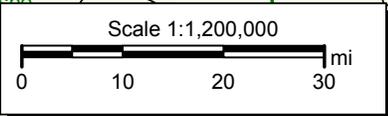
SMITH AND FISHER, LLC

**KMPH-TV 48 DBU
CITY-GRADE CONTOUR**

**KFRE-TV
CITY OF LICENSE**

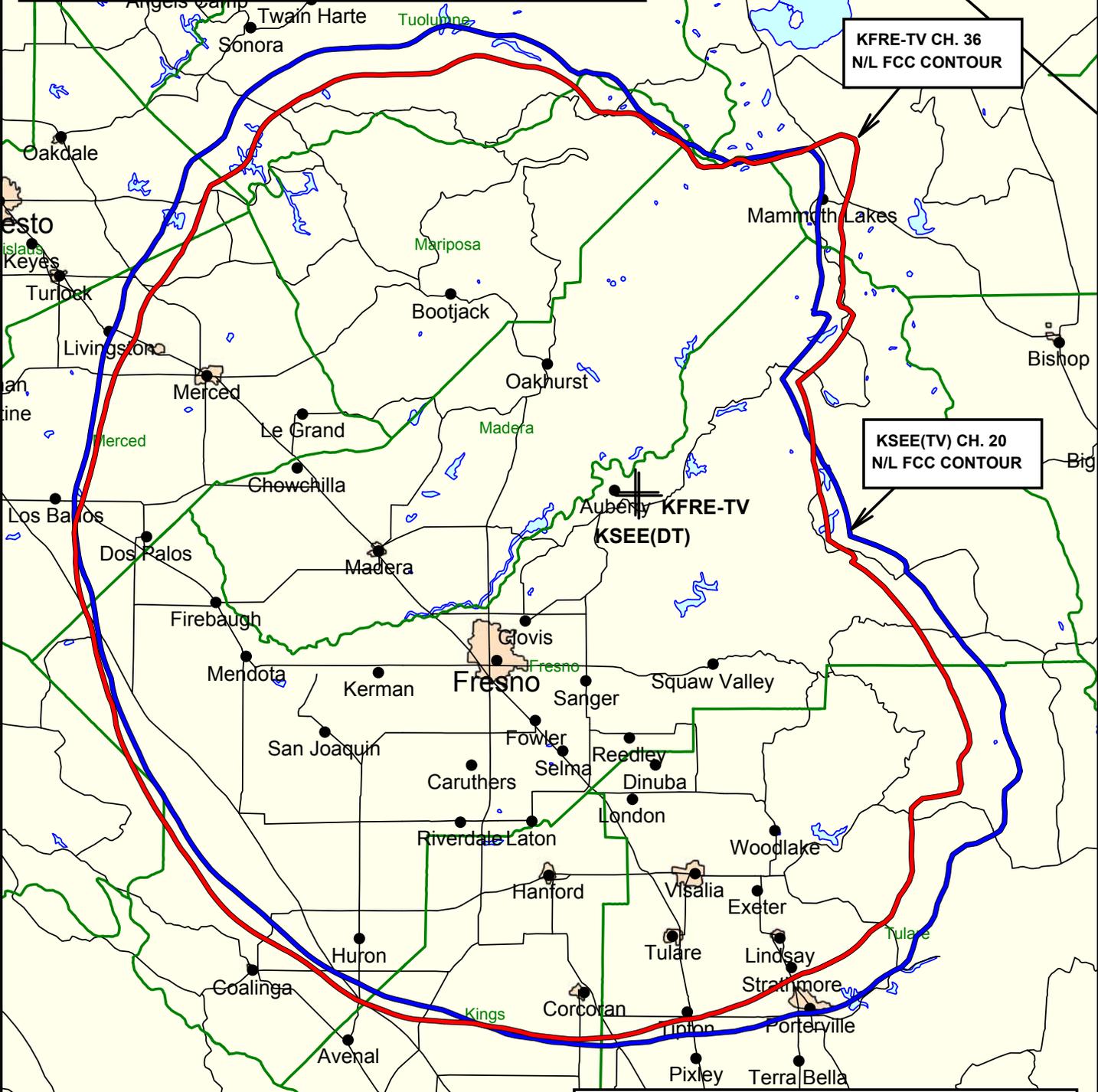
KMPH-TV

**EXHIBIT E
CITY-GRADE COVERAGE CONTOUR
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KMPH-TV, CH. 28
SANGER, CALIFORNIA**



CONTOUR POPULATION : 2020 U.S. CENSUS
 KFRE-TV : 1,854,637 (623,034 HH)
 KSEE(TV) (Host) : 1,924,913 (640,863 HH)
 Common Area Population : 1,849,555 (99.7% of KFRE-TV Service Pop.)
 KFRE-TV Programming Loss Area Population: 5,082 (0.3%)
 KFRE-TV Programming Gain Area Population: 75,358

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

**KSEE(TV) CH. 20
N/L FCC CONTOUR**

**KFRE-TV
KSEE(DT)**

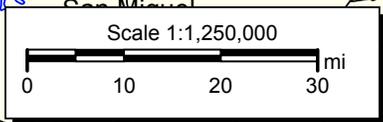


EXHIBIT F
FCC SERVICE CONTOUR COMPARISON
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KSEE(TV), CH. 20
SANGER, CALIFORNIA

SMITH AND FISHER, LLC

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

**KFRE-TV
CITY OF LICENSE**

**EXHIBIT G
CITY-GRADE COVERAGE CONTOUR
SECONDARY PROGRAMMING STREAM
KFRE-TV, CH. 36 ON KSEE(TV), CH. 20
SANGER, CALIFORNIA**

