

ENGINEERING EXHIBIT

Digital Low Power Television Station Application for Minor Modification of Licensed Facility

prepared for

Gray Television Licensee, LLC

KJNM-LD Fayetteville, AR

Facility ID 184462

Ch. 20 12 kW Nondirectional

Gray Television Licensee, LLC (“Gray”) is the licensee of digital Low Power Television station KJNM-LD, Channel 20, Facility ID 184462, Fayetteville AR. KJNM-LD is licensed to operate at 5 kW effective radiated power (“ERP”) with a directional antenna (file# 0000234800). *Gray* herein seeks a minor modification Construction Permit to relocate KJNM-LD and to utilize a nondirectional antenna at increased power and height.

The proposed facility will employ a new antenna to be side-mounted on the tower structure associated with FCC Antenna Structure Registration number 1004009, located 31.6 km (19.6 miles) from the licensed site. No change to the overall structure height is proposed.

The proposed antenna is a Dielectric model DLP-12B/VP having elliptical polarization. The proposed ERP is 12 kW horizontally polarized and 3.6 kW vertically polarized using a “full service” out of channel emission mask.

Figure 1 depicts the coverage contour of the proposed facility as well as that of the licensed facility, demonstrating compliance with §73.3572 for a minor change. Since the proposed 51 dB μ contour encompasses that of the licensed facility, no service loss area will be created. The population within the 51 dB μ contour increases to 137,875 persons (2010 census), which is a 262 percent increase beyond the 38,139 persons within the licensed KJNM-LD facility’s 51 dB μ contour.

Interference study per OET Bulletin 69¹ shows that the proposal complies with the FCC's interference protection requirements toward all digital television, television translator, LPTV, and Class A stations. FCC processing of this proposal is requested using a 1.0 km cell size and 0.2 km terrain profile increment. The results, summarized in Table 1, show that any new interference does not exceed the FCC's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations) to any facility.

Human Exposure to Radiofrequency Electromagnetic Field (Environmental)

The proposed facility was evaluated for human exposure to RF energy using the procedures outlined in the FCC's OET Bulletin Number 65. Based on OET-65 equation (10) and 20 percent antenna relative field in downward elevations (pattern data shows 20 percent or less relative field at angles 10 to 90 degrees below the antenna), the calculated power density attributable to the proposed facility at locations near the transmitter site at a height of two meters above ground level is $3.0 \mu\text{W}/\text{cm}^2$, which is 0.9 percent of the general population / uncontrolled maximum permissible exposure limit. This is below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from RF electromagnetic field exposure in excess of FCC guidelines. This exhibit is limited to the evaluation of exposure to RF electromagnetic field. No increase in structure height is proposed.

¹FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). This analysis employed the FCC's current "TVStudy" software with the default application processing template settings, 1 km cell size, and 0.2 km terrain increment. Comparisons of various results of this computer program (run on a Mac processor) to the FCC's implementation of TVStudy show excellent correlation.

Engineering Exhibit
Gray Television Licensee, LLC (KJNM-LD)
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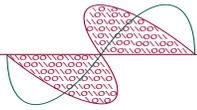


List of Attachments

Figure 1 Coverage Contour Comparison
Table 1 TVStudy Analysis of Proposal
Form 2100 Saved Version of Engineering Sections of FCC Form at Time of Upload

Chesapeake RF Consultants, LLC

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Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 1
Coverage Contour Comparison
KJNM-LD Fayetteville, AR
Facility ID 184462
Ch. 20 12 kW Nondirectional

prepared for
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January, 2024

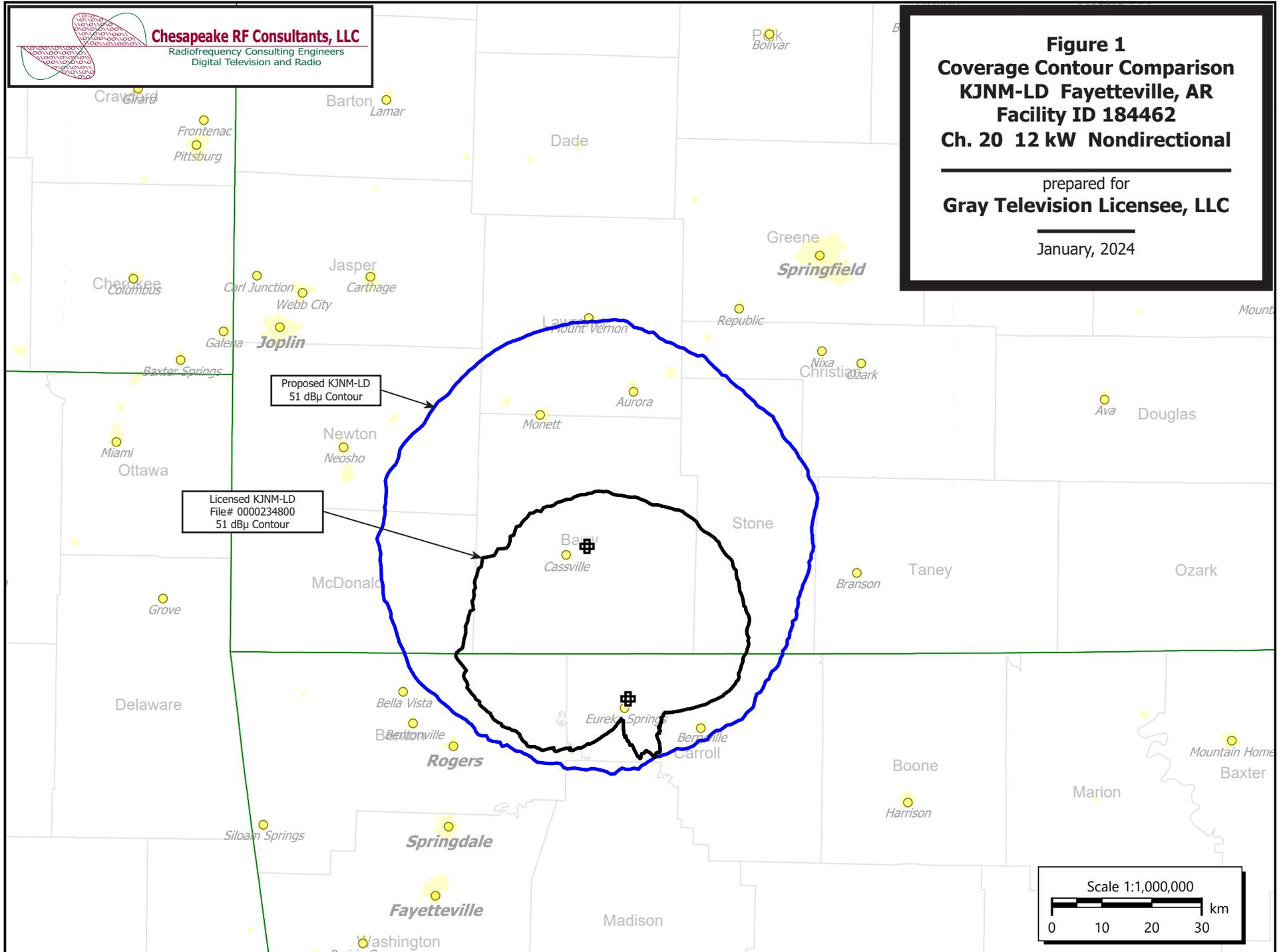


Table 1 KJNM-LD TVStudy Analysis of Proposal
 (page 1 of 4)



tvstudy v2.2.5 (4uoc83)
 Database: localhost, Study: KJNM-LD 1004009 12kW 1.0-0.2, Model: Longley-Rice
 Start: 2024.01.29 16:46:08

Study created: 2024.01.29 16:46:08

Study build station data: LMS TV 2024-01-29

Proposal: KJNM-LD D20 LD APP FAYETTEVILLE, AR
 File number: KJNM-LD 1004009 12kW
 Facility ID: 184462
 Station data: User record
 Record ID: 258
 Country: U.S.

Build options:
 Protect pre-transition records not on baseline channel

Search options:
 Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KUFS-LD	D19	LD	LIC	FORT SMITH, AR	BLANK0000220257	196.3 km
No	DK19MT-D	D19	LD	APP	SPRINGDALE, AR	BLANK0000195561	49.7
Yes	KYTV	D19	DT	LIC	SPRINGFIELD, MO	BLANK0000172336	94.8
No	K200L-D	D20	LD	LIC	FORT SMITH, AR	BLANK0000217458	146.7
No	KTEJ	D20	DT	LIC	JONESBORO, AR	BLEDT20110818AAQ	287.0
No	KLRA-CD	D20	DC	LIC	LITTLE ROCK, AR	BLANK0000004217	242.0
No	KTMJ-CD	D20	DC	LIC	TOPEKA, KS	BLANK0000122285	318.0
No	KFDR	D20	DT	LIC	JEFFERSON CITY, MO	BLCDT20110121ACA	270.6
No	KEFN-CD	D20z	DC	LIC	ST. LOUIS, MO	BLANK0000146089	385.2
No	W20DW-D	D20	LD	LIC	CLARKSDALE, MS	BLANK0000199038	374.8
No	K200H-D	D20	LD	CP	ARDMORE, OK	BLANK0000168880	399.6
Yes	KQCW-DT	D20	DT	CP	MUSKOGEE, OK	BLANK0000211781	182.0
Yes	KQCW-DT	D20	DT	LIC	MUSKOGEE, OK	BMLCDT20130823ACR	206.2
No	KBZC-LD	D20	LD	LIC	Oklahoma city, OK	BLANK0000112197	351.0
No	KHBS	D21	DT	LIC	FORT SMITH, AR	BLCDT20031121AMR	196.1
No	K21JS-D	D21	LD	LIC	HARRISON, AR	BLANK0000194711	73.3
No	KGCS-LD	D21	LD	LIC	JOPLIN, MO	BLANK0000078095	80.6
No	KRFT-LD	D21	LD	LIC	SPRINGFIELD, MO	BLANK0000156037	77.2
No	KTAJ-TV	D21	DT	LIC	ST. JOSEPH, MO	BLCDT20060703AAK	266.0

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D20
 Mask: Full Service
 Latitude: 36 41 32.10 N (NAD83)
 Longitude: 93 49 16.90 W
 Height AMSL: 542.1 m
 HAAT: 0.0 m
 Peak ERP: 12.0 kW
 Antenna: Omnidirectional
 Elev Pattn: Generic
 Elec Tilt: 1.00

49.4 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	12.0 kW	138.5 m	46.7 km
45.0	12.0	125.9	45.8
90.0	12.0	144.5	47.1
135.0	12.0	157.9	48.0
180.0	12.0	135.2	46.5
225.0	12.0	105.0	44.1
270.0	12.0	97.1	43.2
315.0	12.0	96.3	43.1

Database HAAT does not agree with computed HAAT

Table 1 KJNM-LD TVStudy Analysis of Proposal
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Database HAAT: 0 m Computed HAAT: 125 m

Distance to Canadian border: 1087.9 km

Distance to Mexican border: 1042.5 km

Conditions at FCC monitoring station: Grand Island NE
Bearing: 321.1 degrees Distance: 616.5 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 294.5 degrees Distance: 1062.8 km

No land mobile station failures found

Study cell size: 1.00 km
Profile point spacing: 0.20 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

Interference to BLANK0000172336 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	KYTV	D19	DT	LIC	SPRINGFIELD, MO	BLANK0000172336				
Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	94.8 km			
	KFSM-TV	D18	DT	CP	FORT SMITH, AR	BLANK0000216674	184.6			
	WGEM-TV	D19	DT	CP	QUINCY, IL	BLANK0000235415	341.1			
	WPSD-TV	D19	DT	LIC	PADUCAH, KY	BLANK0000116960	350.6			
	KFDR	D20	DT	LIC	JEFFERSON CITY, MO	BLCDT20110121ACA	185.8			
	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
	49985.5	1,095,450	49192.6	1,084,027	48861.4	1,077,769	48726.9	1,073,595	0.28	0.39
Undesired			Total IX	Unique IX, before	Unique IX, after					
KJNM-LD D20 LD APP		135.5	4,174	134.5	4,174					
KFSM-TV D18 DT CP		8.1	95	8.1	95					
WGEM-TV D19 DT CP		112.0	2,685	83.7	2,424					
WPSD-TV D19 DT LIC		198.1	3,309	181.9	3,107					
KFDR D20 DT LIC		41.3	430	29.2	371					

Interference to BLANK0000172336 LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	KYTV	D19	DT	LIC	SPRINGFIELD, MO	BLANK0000172336				
Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	94.8 km			
	KFSM-TV	D18	DT	LIC	FORT SMITH, AR	BLCDT20060530AIM	184.6			
	WGEM-TV	D19	DT	CP	QUINCY, IL	BLANK0000235415	341.1			
	WPSD-TV	D19	DT	LIC	PADUCAH, KY	BLANK0000116960	350.6			
	KFDR	D20	DT	LIC	JEFFERSON CITY, MO	BLCDT20110121ACA	185.8			
	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
	49985.5	1,095,450	49192.6	1,084,027	48862.4	1,077,796	48727.9	1,073,622	0.28	0.39
Undesired			Total IX	Unique IX, before	Unique IX, after					
KJNM-LD D20 LD APP		135.5	4,174	134.5	4,174					
KFSM-TV D18 DT LIC		7.0	68	7.0	68					
WGEM-TV D19 DT CP		112.0	2,685	83.7	2,424					
WPSD-TV D19 DT LIC		198.1	3,309	181.9	3,107					
KFDR D20 DT LIC		41.3	430	29.2	371					

Interference to BLANK0000211781 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KQCW-DT	D20	DT	CP	MUSKOGEE, OK	BLANK0000211781	

Table 1 KJNM-LD TVStudy Analysis of Proposal
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Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	182.0 km		
	KAUT-TV	D19	DT	LIC	OKLAHOMA CITY, OK	BLANK0000121785	171.0		
	KHBS	D21	DT	LIC	FORT SMITH, AR	BLCDDT20031121AMR	138.8		
	Service area	Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
	40145.4	1,393,181	39008.0	1,375,495	38189.8	1,363,610	38034.2	1,360,609	0.41 0.22
Undesired			Total IX		Unique IX, before		Unique IX, after		
KJNM-LD	D20	LD	APP	161.6	3,022		155.6	3,001	
KAUT-TV	D19	DT	LIC	163.5	2,500		163.5	2,500	
KHBS	D21	DT	LIC	654.7	9,385		648.7	9,364	

Interference to BLANK0000211781 CP scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	KQCW-DT	D20	DT	CP	MUSKOGEE, OK	BLANK0000211781			
Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	182.0 km		
	KAUT-TV	D19	DT	CP	OKLAHOMA CITY, OK	BLANK0000127590	171.0		
	KHBS	D21	DT	LIC	FORT SMITH, AR	BLCDDT20031121AMR	138.8		
	Service area	Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
	40145.4	1,393,181	39008.0	1,375,495	38166.7	1,363,432	38011.1	1,360,431	0.41 0.22
Undesired			Total IX		Unique IX, before		Unique IX, after		
KJNM-LD	D20	LD	APP	161.6	3,022		155.6	3,001	
KAUT-TV	D19	DT	CP	186.6	2,678		186.6	2,678	
KHBS	D21	DT	LIC	654.7	9,385		648.7	9,364	

Interference to BMLCDDT20130823ACR LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	KQCW-DT	D20	DT	LIC	MUSKOGEE, OK	BMLCDDT20130823ACR			
Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	206.2 km		
	KAUT-TV	D19	DT	LIC	OKLAHOMA CITY, OK	BLANK0000121785	153.5		
	KHBS	D21	DT	LIC	FORT SMITH, AR	BLCDDT20031121AMR	127.0		
	Service area	Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
	23612.7	1,127,752	23108.2	1,123,658	22745.8	1,119,257	22741.8	1,119,197	0.02 0.01
Undesired			Total IX		Unique IX, before		Unique IX, after		
KJNM-LD	D20	LD	APP	5.0	66		4.0	60	
KAUT-TV	D19	DT	LIC	32.9	183		32.9	183	
KHBS	D21	DT	LIC	329.5	4,218		328.5	4,212	

Interference to BMLCDDT20130823ACR LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	KQCW-DT	D20	DT	LIC	MUSKOGEE, OK	BMLCDDT20130823ACR			
Undesireds:	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	206.2 km		
	KAUT-TV	D19	DT	CP	OKLAHOMA CITY, OK	BLANK0000127590	153.5		
	KHBS	D21	DT	LIC	FORT SMITH, AR	BLCDDT20031121AMR	127.0		
	Service area	Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
	23612.7	1,127,752	23108.2	1,123,658	22743.8	1,119,252	22739.8	1,119,192	0.02 0.01
Undesired			Total IX		Unique IX, before		Unique IX, after		
KJNM-LD	D20	LD	APP	5.0	66		4.0	60	
KAUT-TV	D19	DT	CP	34.9	188		34.9	188	
KHBS	D21	DT	LIC	329.5	4,218		328.5	4,212	

Interference to proposal scenario 1
5.78% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	

Table 1 KJNM-LD TVStudy Analysis of Proposal
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Undesireds:	KYTV	D19	DT	LIC	SPRINGFIELD, MO	BLANK0000172336	94.8 km
	KTEJ	D20	DT	LIC	JONESBORO, AR	BLEDT20110818AAQ	287.0
	KFDR	D20	DT	LIC	JEFFERSON CITY, MO	BLCDT20110121ACA	270.6
	KQCW-DT	D20	DT	CP	MUSKOGEE, OK	BLANK0000211781	182.0

	Service area		Terrain-limited		IX-free		Percent IX
6514.1	156,300	6259.8	149,333	5978.3	140,707	4.50	5.78

Undesired				Total IX		Unique IX	Prcnt Unique IX		
KYTV	D19	DT	LIC	145.0	3,205	85.1	2,202	1.36	1.47
KTEJ	D20	DT	LIC	1.0	71	1.0	71	0.02	0.05
KFDR	D20	DT	LIC	7.0	161	1.0	21	0.02	0.01
KQCW-DT	D20	DT	CP	193.4	6,332	133.4	5,329	2.13	3.57

 Interference to proposal scenario 2
 4.25% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KJNM-LD	D20	LD	APP	FAYETTEVILLE, AR	KJNM-LD 1004009 12kW	

Undesireds:	KYTV	D19	DT	LIC	SPRINGFIELD, MO	BLANK0000172336	94.8 km
	KTEJ	D20	DT	LIC	JONESBORO, AR	BLEDT20110818AAQ	287.0
	KFDR	D20	DT	LIC	JEFFERSON CITY, MO	BLCDT20110121ACA	270.6
	KQCW-DT	D20	DT	LIC	MUSKOGEE, OK	BMLCDT20130823ACR	206.2

	Service area		Terrain-limited		IX-free		Percent IX
6514.1	156,300	6259.8	149,333	6060.5	142,988	3.18	4.25

Undesired				Total IX		Unique IX	Prcnt Unique IX		
KYTV	D19	DT	LIC	145.0	3,205	126.1	2,820	2.01	1.89
KTEJ	D20	DT	LIC	1.0	71	1.0	71	0.02	0.05
KFDR	D20	DT	LIC	7.0	161	1.0	21	0.02	0.01
KQCW-DT	D20	DT	LIC	69.2	3,401	51.3	3,048	0.82	2.04

**Channel and
Facility
Information**

Section	Question	Response
Facility ID	184462	
State	Arkansas	
City	FAYETTEVILLE	
LPD Channel	20	

**Antenna Location
Data**

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1004009
Coordinates (NAD83)	Latitude	36° 41' 32.1" N+
	Longitude	093° 49' 16.9" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	96.9 meters
	Support Structure Height	91.4 meters
	Ground Elevation (AMSL)	456.5 meters
Antenna Data	Height of Radiation Center Above Ground Level	85.6 meters
	Height of Radiation Center Above Mean Sea Level	542.1 meters
	Effective Radiated Power	12 kW

**Antenna
Technical Data**

Section	Question	Response
Antenna Type	Antenna Type	Non-Directional
	Do you have an Antenna ID?	
	Antenna ID	
Antenna Manufacturer and Model	Manufacturer:	Dielectric
	Model	DLP-12B/VP
	Rotation	
	Electrical Beam Tilt	1.0
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Elliptical
Elevation Radiation Pattern	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	No
	Uploaded file for elevation antenna (or radiation) pattern data	
	Out-of-Channel Emission Mask:	Full Service