

COMPLIANCE WITH §73.3801 (SIMULCASTING DURING ATSC 3.0 TRANSITION)

The KWGN-DT full-power television ATSC 1.0 Tenant facility (File Number BLCDT-20091209ACA) is licensed to operate on Channel 34 with an ERP of 1,000 kW using a nondirectional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1044149 located in Golden, CO. The KDVR-DT full-power television ATSC 1.0 Host facility (File Number 0000116604) is licensed to operate on Channel 36 with an ERP of 1,000 kW using a Directional antenna mounted on a tower with ASRN 1022259 located in Golden, CO. The KMGH-DT full-power television ATSC 1.0 Host facility (File Number BLCDT-20100709AJY) is licensed to operate on Channel 7 with an ERP of 54 kW using a Directional antenna mounted on a tower with ASRN 1058328 located in Golden, CO. The KUSA-DT full-power television ATSC 1.0 Host facility (File Number BLCDT-20090417AIZ) is licensed to operate on Channel 9 with an ERP of 45 kW using a Directional antenna mounted on a tower with ASRN 1058328 located in Golden, CO.

KWGN, KDVR, KMGH and KUSA plan to partner in a simulcasting arrangement for purposes of airing KWGN-DT's ATSC 1.0 programming where KWGN is the ATSC 1.0 "Tenant" station and KDVR, KMGH and KUSA are the ATSC 1.0 "Host" stations. KWGN will serve as the ATSC 3.0 Host station. All four stations are assigned to the same DMA (Denver, CO) and the KMGH and KUSA stations are col-located.

Pursuant to section 73.3801(f)(6)(i) of FCC Rules, the following information is required for this type of application.

STATIONS SERVING AS THE HOST:

- **ATSC 1.0 Host #1**
- KDVR ([0000116604](#))
- Technical facilities of the host #1 station:
 - Frequency: 605 MHz (Channel 36)
 - ERP: 1,000 kW
 - Antenna: Directional

- Antenna Center Height: 106.0 m AGL
- Antenna Model: TFU-26DSC/VP-R C170 MT
- Antenna Polarization: Elliptical
- Antenna Electrical Beam Tilt: 1.00°
- Antenna Mechanical Beam Tilt: 0.5° at 80°
- Coordinates: 39° 43' 42.1" N, 105° 14' 15.7" W
- ASRN: 1022259
- DMA: Denver, CO (all four stations)

- **ATSC 1.0 Host #2**
- KMGH ([BLCDT-20100709AJY](#))
- Technical facilities of the host #2 station:
 - Frequency: 177 MHz (Channel 7)
 - ERP: 54 kW
 - Antenna: Directional
 - Antenna Center Height: 199.0 m AGL
 - Antenna Model: DCBR-C3-4HA/12H-2-B
 - Antenna Polarization: Circular
 - Antenna Electrical Beam Tilt: 1.00°
 - Coordinates: 39° 43' 50.6" N, 105° 13' 55.6" W
 - ASRN: 1058328
- DMA: Denver, CO (all four stations)

- **ATSC 1.0 Host #3**
- KUSA ([BLCDT-20090417AIZ](#))
- Technical facilities of the host #3 station:
 - Frequency: 189 MHz (Channel 9)
 - ERP: 45 kW
 - Antenna: Directional

- Antenna Center Height: 192.0 m AGL
- Antenna Model: DCBR-C3-4HA/12H-2-B
- Antenna Polarization: Circular
- Antenna Electrical Beam Tilt: 1.00°
- Coordinates: 39° 43' 50.6" N, 105° 13' 55.6" W
- ASRN: 1058328
- DMA: Denver, CO (all four stations)

Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the following information is also required for this type of application.

KDVR - ATSC 1.0 Host #1

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **3,715,125 persons (See Exhibit 1)**
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **21,450 Persons (See Exhibits 1, 2 & 5)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 99.4% (See Exhibits 1, 2 & 5)**

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. Referring to Exhibit 5, it can be seen that the KWGN-DT ATSC 1.0 "Tenant" station will continue to completely encompass its community of license (Denver, CO) with the KDVR-DT F(50,90) 48.0 dBu "Host" station's principal community contour. Also pursuant to §73.3801(c) of FCC Rules, the KWGN-DT "Tenant" station and the KDVR-DT "Host" station are both assigned to the same DMA (Denver, CO).

KMGH - ATSC 1.0 Host #2

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **3,715,125 persons (See Exhibit 1)**
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **21,675 Persons (See Exhibits 1, 3 & 6)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 99.4% (See Exhibits 1, 3 & 6)**

Referring to Exhibit 6, it can be seen that the KWGN-DT ATSC 1.0 “Tenant” station will continue to completely encompass its community of license (Denver, CO) with the KMGH-DT F(50,90) 43.0 dBu “Host” station’s principal community contour. Exhibit 6 also demonstrates that the KWGN-DT “Tenant” station and the KMGH-DT “Host” station are both located/assigned to the same DMA (Denver, CO).

KUSA - ATSC 1.0 Host #3

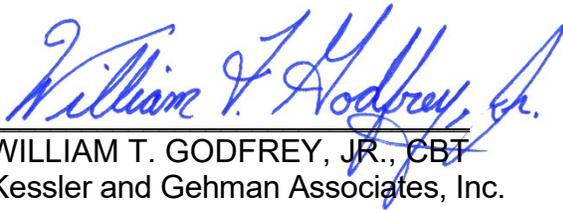
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **3,715,125 persons (See Exhibit 1)**
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **23,323 Persons (See Exhibits 1, 4 & 7)**
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 99.4% (See Exhibits 1, 4 & 7)**

Referring to Exhibit 7, it can be seen that the KWGN-DT ATSC 1.0 “Tenant” station will continue to completely encompass its community of license (Denver, CO) with the KUSA-DT F(50,90) 43.0 dBu “Host” station’s principal community contour. Exhibit 7 also demonstrates that the KWGN-DT “Tenant” station and the KUSA-DT “Host” station are both located/assigned to the same DMA (Denver, CO).

Accordingly, as demonstrated above and in enclosed Exhibits 1-7, the proposed KWGN-DT “tenant” facility’s ATSC 1.0 programming airing on the ATSC 1.0 signals of the KDVR, KMGH and KUSA “host” facilities shall full 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.

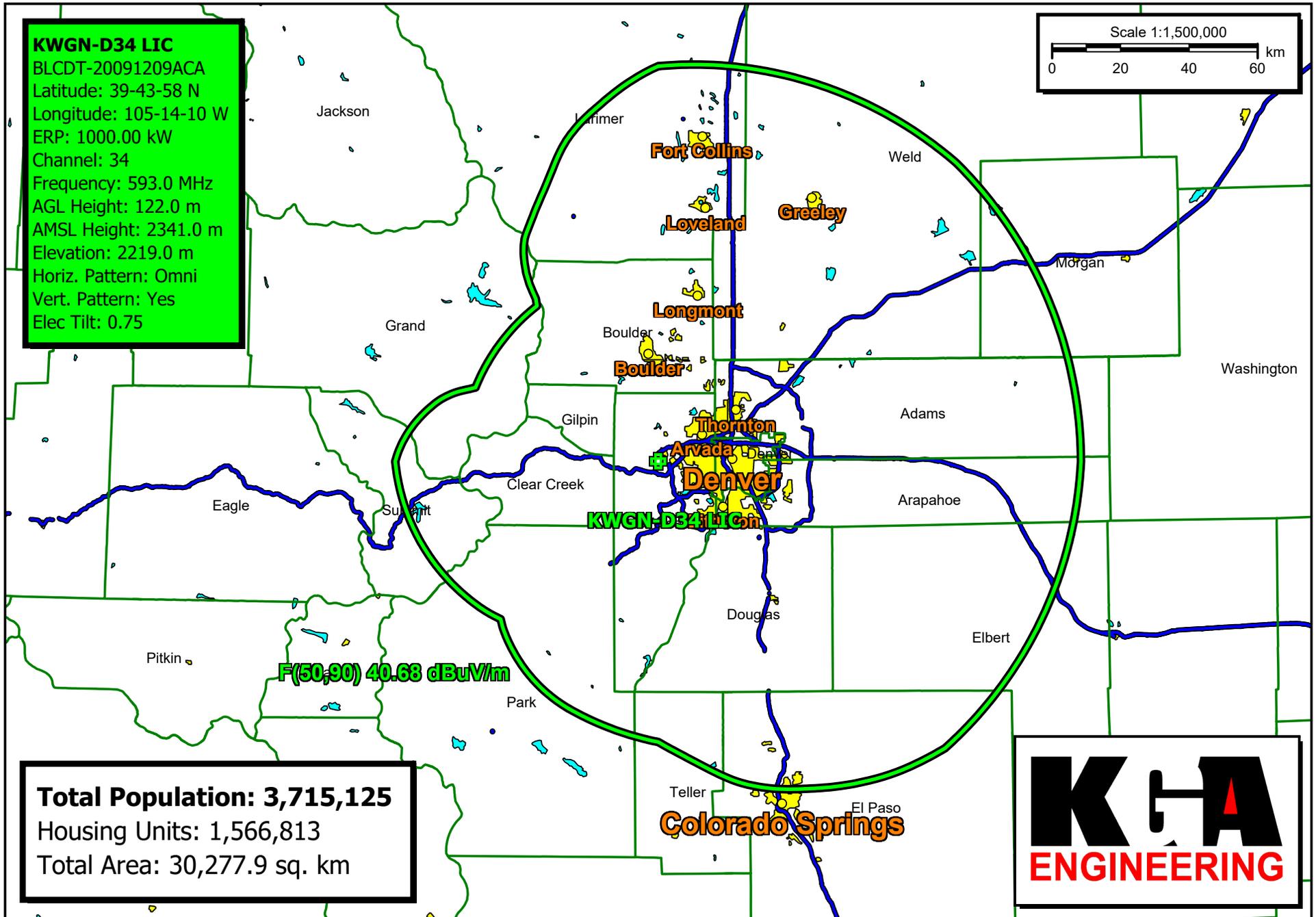
CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

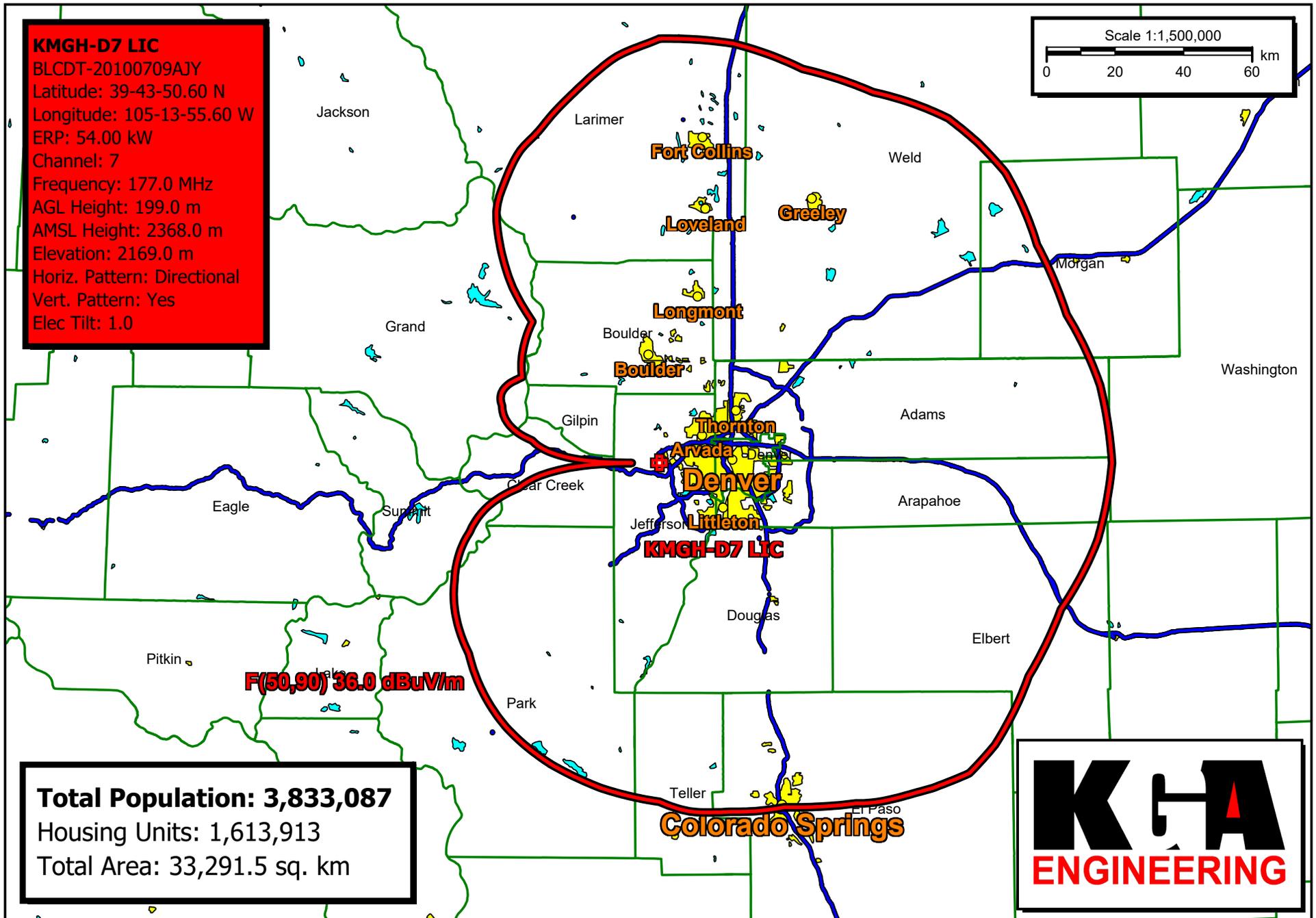
A handwritten signature in blue ink that reads "William T. Godfrey, Jr." with a horizontal line underneath.

WILLIAM T. GODFREY, JR., CBT
Kessler and Gehman Associates, Inc.
Consulting Engineers

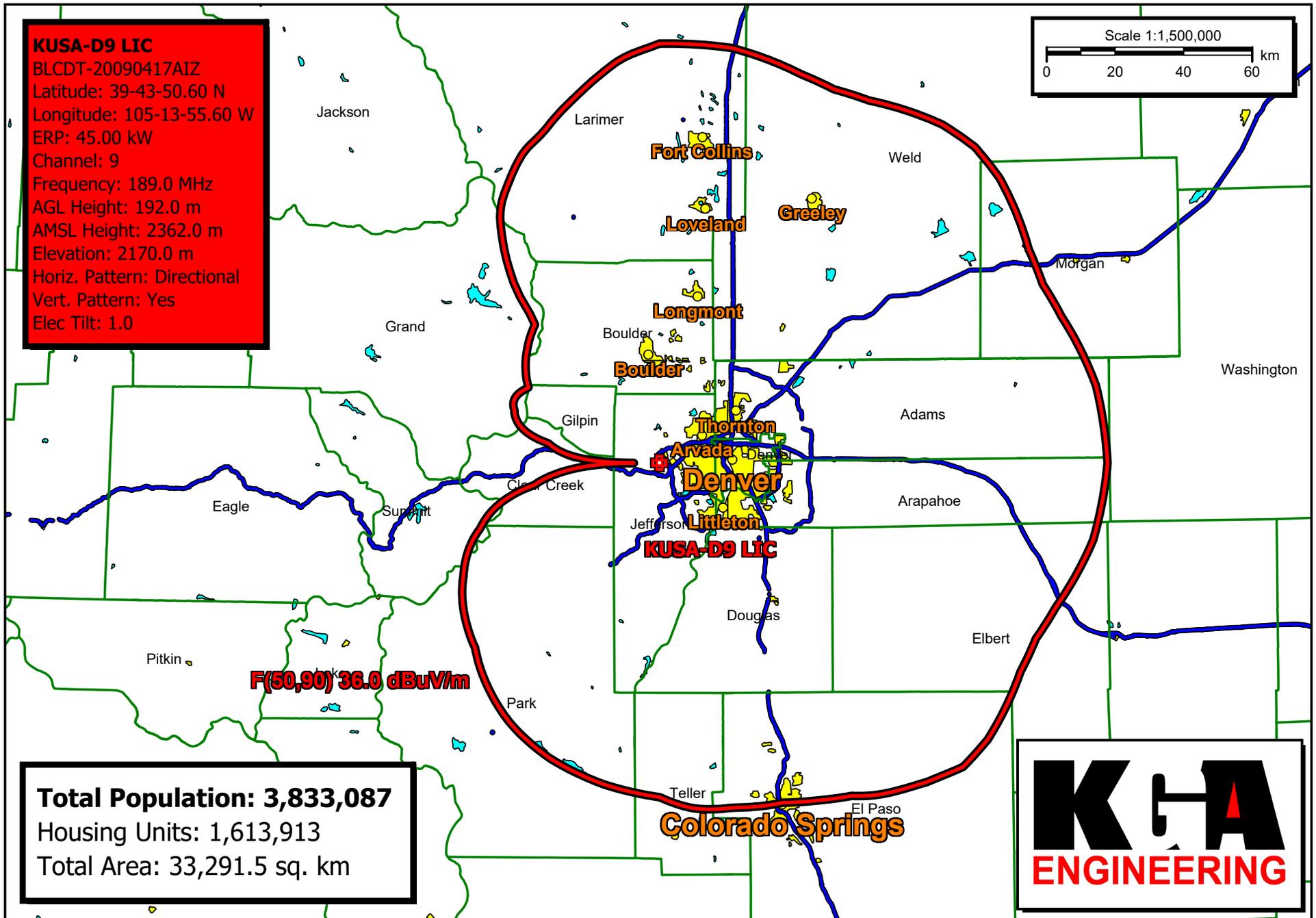
November 12, 2020



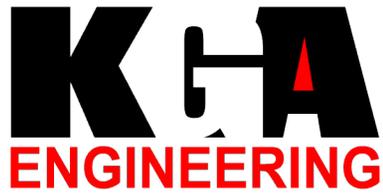
KWGN-DT Channel 34 License Population Within Protected Noise Limited Contour



KMGH-DT Channel 7 License Population Within Protected Noise Limited Contour



KUSA-DT Channel 9 License Population Within Protected Noise Limited Contour



AREA OF LOSS:
 Total Population: 21,450
 Housing Units: 21,847
 Total Area: 2,325.7 sq. km

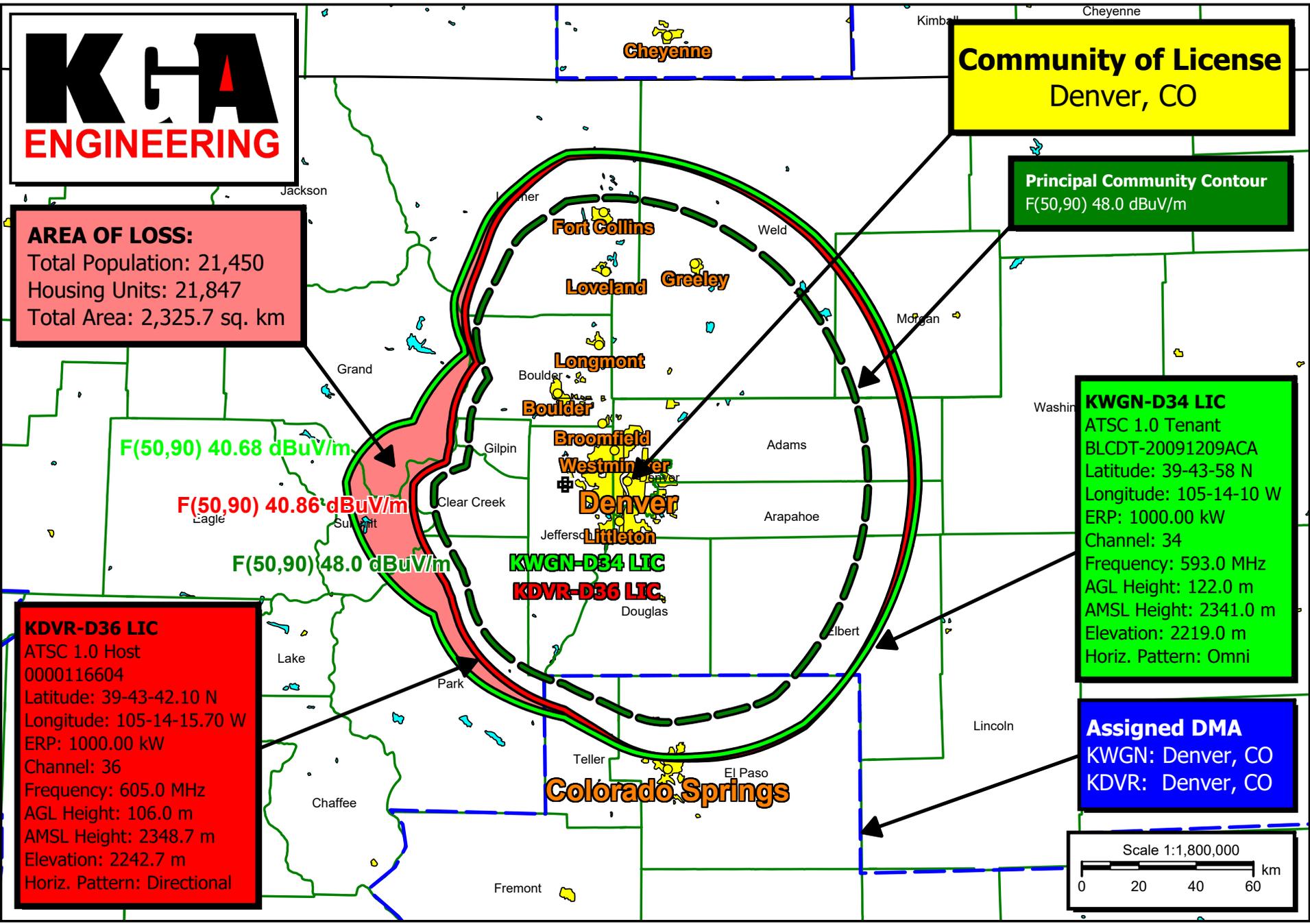
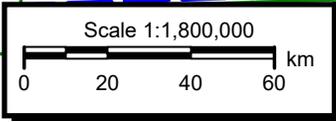
Community of License
 Denver, CO

Principal Community Contour
 F(50,90) 48.0 dBuV/m

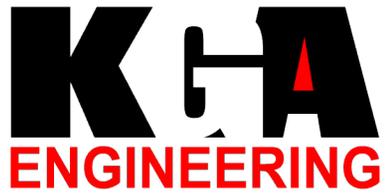
KWGN-D34 LIC
 ATSC 1.0 Tenant
 BLCDDT-20091209ACA
 Latitude: 39-43-58 N
 Longitude: 105-14-10 W
 ERP: 1000.00 kW
 Channel: 34
 Frequency: 593.0 MHz
 AGL Height: 122.0 m
 AMSL Height: 2341.0 m
 Elevation: 2219.0 m
 Horiz. Pattern: Omni

KDVR-D36 LIC
 ATSC 1.0 Host
 0000116604
 Latitude: 39-43-42.10 N
 Longitude: 105-14-15.70 W
 ERP: 1000.00 kW
 Channel: 36
 Frequency: 605.0 MHz
 AGL Height: 106.0 m
 AMSL Height: 2348.7 m
 Elevation: 2242.7 m
 Horiz. Pattern: Directional

Assigned DMA
 KWGN: Denver, CO
 KDVR: Denver, CO



KWGN-D34 Original Population Loss at KDVR-D36 ATSC 1.0 Host Site (0.6%)



AREA OF LOSS:
 Total Population: 21,675
 Housing Units: 21,555
 Total Area: 1,561.5 sq. km

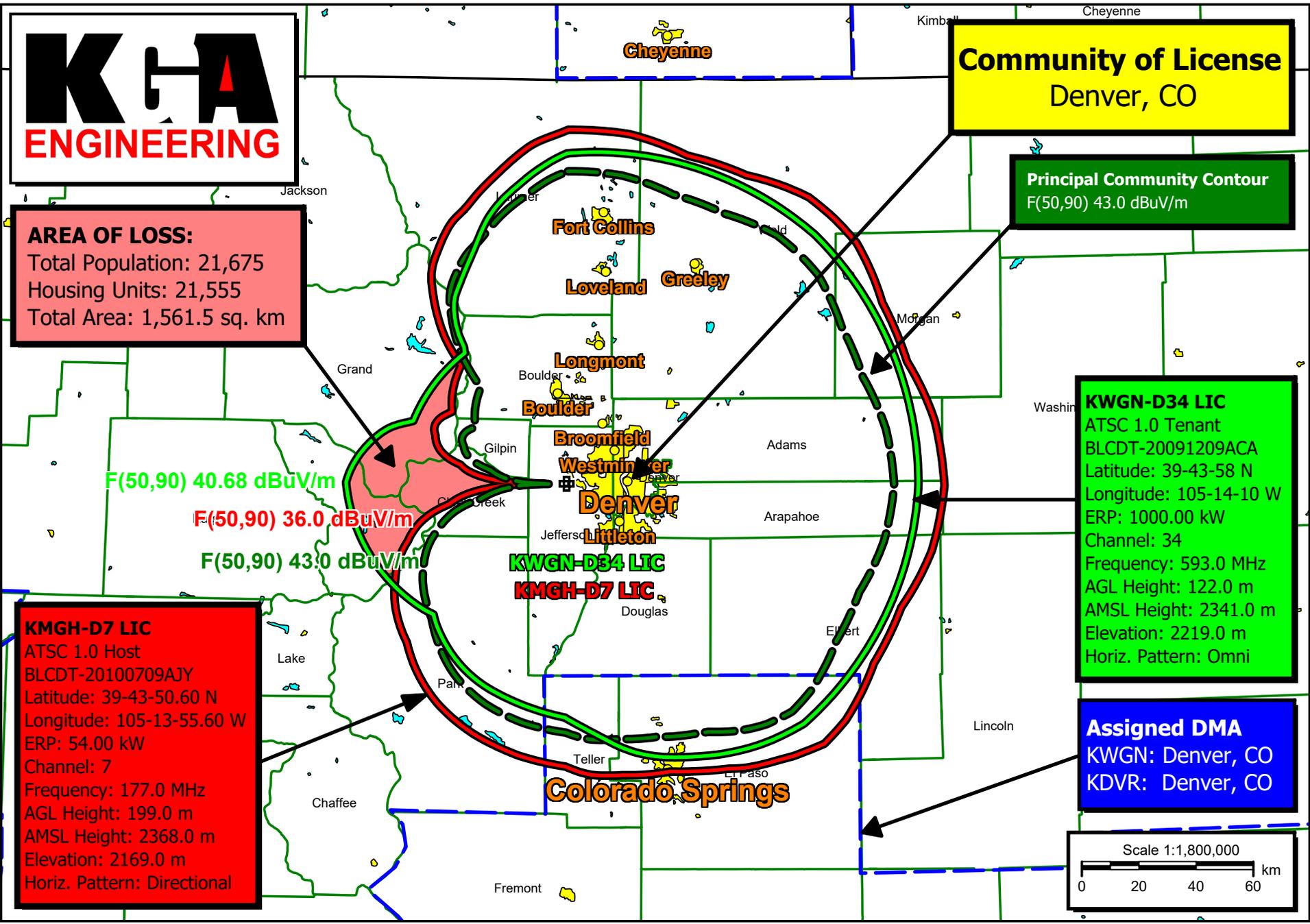
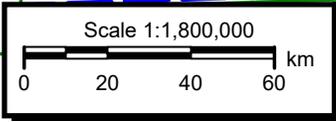
Community of License
 Denver, CO

Principal Community Contour
 F(50,90) 43.0 dBuV/m

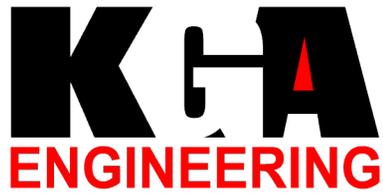
KWGN-D34 LIC
 ATSC 1.0 Tenant
 BLCDT-20091209ACA
 Latitude: 39-43-58 N
 Longitude: 105-14-10 W
 ERP: 1000.00 kW
 Channel: 34
 Frequency: 593.0 MHz
 AGL Height: 122.0 m
 AMSL Height: 2341.0 m
 Elevation: 2219.0 m
 Horiz. Pattern: Omni

KMGH-D7 LIC
 ATSC 1.0 Host
 BLCDT-20100709AJY
 Latitude: 39-43-50.60 N
 Longitude: 105-13-55.60 W
 ERP: 54.00 kW
 Channel: 7
 Frequency: 177.0 MHz
 AGL Height: 199.0 m
 AMSL Height: 2368.0 m
 Elevation: 2169.0 m
 Horiz. Pattern: Directional

Assigned DMA
 KWGN: Denver, CO
 KDVR: Denver, CO



KWGN-D34 Original Population Loss at KMGH-D7 ATSC 1.0 Host Site (0.6%)



AREA OF LOSS:
 Total Population: 23,323
 Housing Units: 22,833
 Total Area: 1,754.6 sq. km

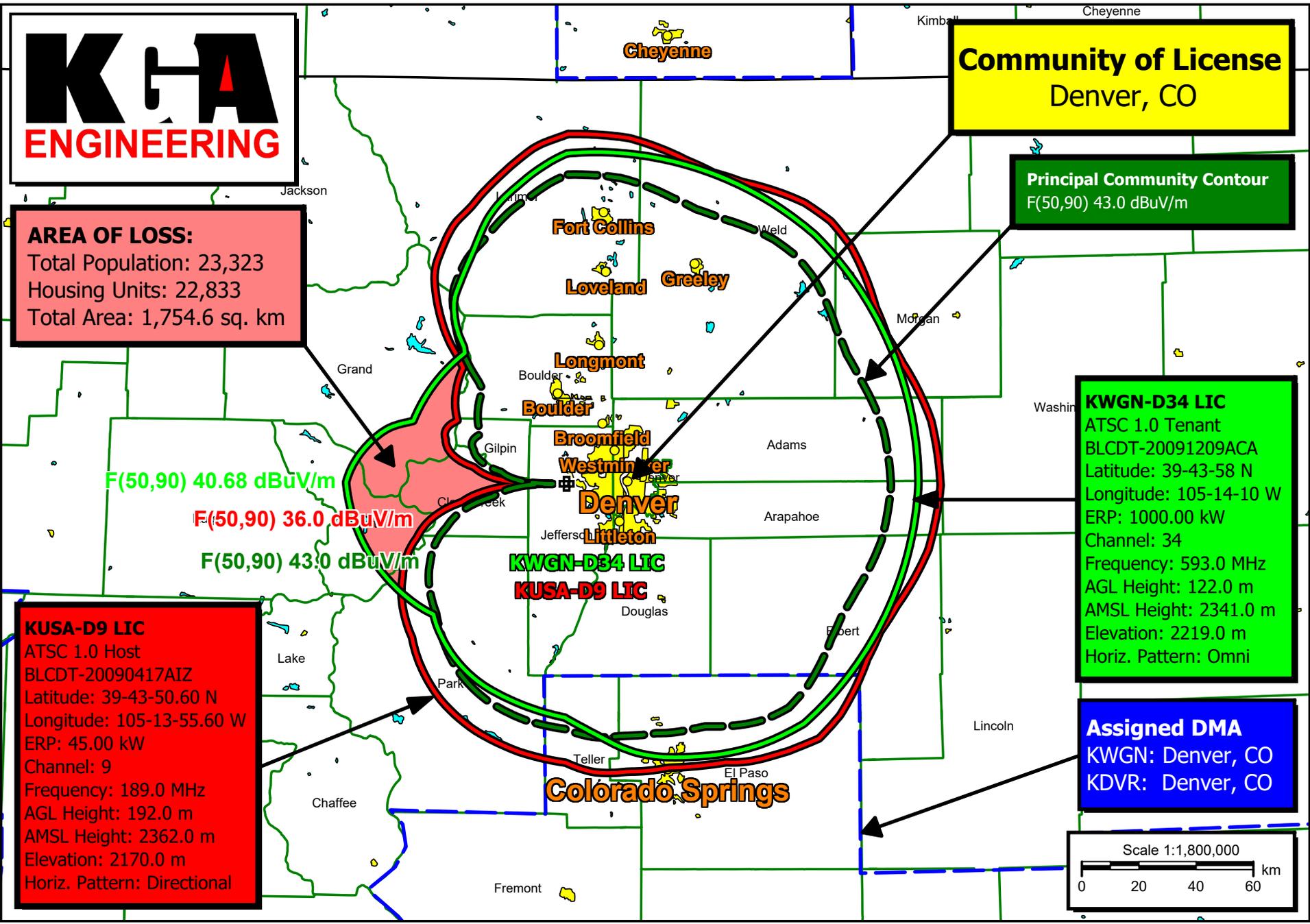
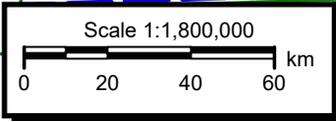
Community of License
 Denver, CO

Principal Community Contour
 F(50,90) 43.0 dBuV/m

KWGN-D34 LIC
 ATSC 1.0 Tenant
 BLCDT-20091209ACA
 Latitude: 39-43-58 N
 Longitude: 105-14-10 W
 ERP: 1000.00 kW
 Channel: 34
 Frequency: 593.0 MHz
 AGL Height: 122.0 m
 AMSL Height: 2341.0 m
 Elevation: 2219.0 m
 Horiz. Pattern: Omni

KUSA-D9 LIC
 ATSC 1.0 Host
 BLCDT-20090417AIZ
 Latitude: 39-43-50.60 N
 Longitude: 105-13-55.60 W
 ERP: 45.00 kW
 Channel: 9
 Frequency: 189.0 MHz
 AGL Height: 192.0 m
 AMSL Height: 2362.0 m
 Elevation: 2170.0 m
 Horiz. Pattern: Directional

Assigned DMA
 KWGN: Denver, CO
 KDVR: Denver, CO



KWGN-D34 Original Population Loss as KUSA-D9 ATSC 1.0 Host Site (0.6%)