

AMEND BPCDT-20080321ACM
J.F. BROADCASTING, LLC
KWSD-DT TELEVISION STATION
CH 36 - 602-608 MHZ - 400.0 KW (DA)
SIOUX FALLS, SOUTH DAKOTA
April 2008

TECHNICAL STATEMENT

This Technical statement and attached exhibits were prepared on behalf of J.F. Broadcasting, LLC ("JFB"), licensee of KWSD-DT, Channel 51, Sioux Falls, South Dakota and analog station KWSD, Channel 36+, Sioux Falls, South Dakota. In the Seventh Further Notice of Proposed Rule Making, MB Docket #87-268, released October 20, 2006, the updated Digital Table of Allotments indicated that KWSD-DT is to operate on digital Channel 36 with a nominal effective radiated power of 152.0 kilowatts and height above average terrain of 209.0 meters at the site specified in KWSD-DT's present license.

JFB has submitted an application requesting a construction permit for digital operation on Channel 36 utilizing the existing Channel 36 analog antenna system already installed on the tower (BPCDT-20080321ACM). In the process of reviewing the KWSD-DT request, JFB's consultant received an inquiry from the Commission's staff regarding the amount of population served by the proposed KWSD-DT facility in comparison to the population served by the Channel 36 DT allocated facility.¹ In order to bring the population served by the proposed KWSD-DT facility to a level greater than 95%, JFB herein amends its pending application to

1) In BPCDT-20080321ACM, it was noted that the proposed KWSD-DT facility provided service to 95% of the population total, as indicated, within the allotted facility. The preliminary calculations by the staff indicated that the proposed KWSD-DT facility only provided service to 94.5%.

increase the proposed effective radiated power to 400.0 kilowatts. Aside from this increase in power, there are no other proposed changes. Since KWSD-DT will utilize the existing KWSD analog directional antenna system, data relating to the directional antenna system is attached hereto as Exhibit A.

It is noted that KWSD-DT is presently operating on Channel 51, its pre-transition digital facility. JFB and/or its predecessors requested that KWSD-DT be allowed to use its analog Channel 36 for post-transition digital operation. Channel 36 was allotted for digital use for KWSD-DT. The Channel 36 digital allocation for KWSD-DT provided for greater facilities than the operating KWSD-DT facilities on Channel 51, but is closer to replicating the UHF analog facilities. In order to use the existing Channel 36 antenna system, the height of the proposed KWSD-DT facility will increase. However, since the existing Channel 36 antenna is directional, it is proposed that the herein requested DT facility operate with a power level of 400.0 kilowatts (directional).

While this will cause a slight extension of the 41 dBu (50/90) contour in some directions, in comparison to the Appendix B digital allotment, the coverage to the southeast is slightly reduced. The areas of extension do not exceed 5.0 miles in any direction. It is noted that no interference to any other DTV facility listed in Appendix B will result. The extension area and loss area to the southeast of the 41 dBu contour is indicated on Exhibit . As there will be an extension of the noise limited contour of the proposed KWSD-DT, an outgoing DTV interference study showing that the proposed facility will meet the Commission's interference requirements to

other Appendix B DTV facilities is attached as Exhibit C.² As indicated in the Report and Order, MB Docket #07-91, Third Periodic Review of the Commission's Rules and Policy Affecting the Conversion to Digital Television, a 5.0 mile extension is allowed to accommodate the use of existing antenna systems for the implementation of DT operation.

At the proposed power level and height, the population within the proposed KWSD-DT 400.0 kilowatt facility is not reduced by more than 5% of the total population within the allocated Channel 36 DT contour. The proposed KWSD-DT digital facility meets the checklist guidelines for post-transition expedited processing of its application for digital Channel 36, with the exception of the 5.0 mile extension of the noise limited contour and facilities, which are slightly greater than the Appendix B allocation for Channel 36, as indicated above. The KWSD-DT will operate on a digital channel established in §73.622 of the rules. The proposed KWSD-DT Channel 36 DTV facility will remain at its authorized site and will utilize an existing antenna installed there. The tower on which the antenna is installed has been assigned Antenna Structure Registration Number 1206712. The proposed KWSD-DT digital facility will provide the required coverage over the community of license, as indicated in Exhibit D. The proposed KWSD-DT facility will not exceed the radio frequency exposure limits, as indicated in Exhibit E.

It is noted that the existing/proposed KWSD-DT facility is located within 3.2 kilometers of directional AM station KXRB, 1000 kHz, Sioux Falls, South Dakota. As JFB intends to use the existing installed KWSD analog antenna and associated transmission line, there will be no

2) The outgoing interference analysis was made using V-Soft's Probe 3 software, which implements the OET Bulletin #69 Longley-Rice propagation model. Aside from using terrain sampled in 0.1 kilometer increments, the remaining variables of the OET model were used. The Probe 3 model has been found to closely replicate the data produced from the Commission's analysis of DTV interference model.

tower construction. Therefore, KXRB will not be impacted by this proposed facility. JFB, therefore, requests that the herein requested permit have no pre- or post-construction field strength measurement requirements regarding KXRB. All remaining exhibits used to prepare this application have been provided to JFB and are available for submission to the Commission upon request.³

3) The undersigned has evaluated only the radio frequency radiation exposure limits of this proposal. All other environmental issues have been or will be reviewed by the applicant. Further, all data regarding broadcast facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database that may be adverse to the requests contained herein.