Exhibit In Support Of
Amendment To Application For Digital Construction Permit

KRCR-TV, Redding, CA

This application amends a pending application for construction permit[1] in order to specify the use of a directional antenna. KRCR-TV, Redding, CA ("the Station") seeks to replace its currently-authorized nondirectional antenna in order to improve service to the public. Grant of this application would be in the public interest because it would enable the Station to provide ABC Network service to sizeable "white" and "gray" areas. It also would improve the reliability of the Station's service, because malfunctions of the currently-authorized, 32-year-old antenna have resulted in periodic, brief transmission problems. Finally, grant of this application would enable the Station to improve service to certain viewers who lost service from KRCR-TV following the digital transition.

As noted above, antenna malfunctions have resulted in periodic transmission problems. The transmitter site is located on a mountaintop and prone to heavy snow and ice accumulations. (A picture showing winter conditions at the transmitter site is attached hereto.) Uneven ice buildup is causing standing wave reflections and high reflected power on the antenna, resulting in a degraded signal. Moreover, if the reflections reach a critical value, the transmitter will shut down as a self-protection measure, and the Station is then required to operate the transmitter in reduced power mode until the icing conditions stabilize or the ice naturally sloughs off. Transmissions have ceased completely for periods ranging from several seconds to two minutes, and reduced power operations have lasted for up to 12 hours. These problems pose a serious challenge to the Station's ability to serve its viewers because winter conditions can make the transmitter site very difficult to access as late as July or early August, with severe conditions resuming again as early as September.

The proposed modification would enhance localism. As the attached Engineering Exhibit illustrates, the service gains resulting from the proposal would be concentrated in the Chico-Redding Designated Market Area ("DMA"), the Station's home market. Any service losses resulting from the proposal would occur outside the Station's market.[2] Further, as described in the Engineering Exhibit:

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[1] *See* FCC File No. BPCDT-20100408ABO. The pending application seeks authorization to operate permanently using the nondirectional facilities currently authorized with Special Temporary Authority ("STA") in FCC File No. BEDSTA-20100111AES.

[2] The Commission discounts service losses to viewers outside a station's DMA. For example, it has granted a station authorization to relocate its transmitter in a case where the gains from the proposal would be in the station's DMA while the losses would chiefly occur outside of the DMA. *See* FCC File No. BPCDT-20090521ADA. *See also Public Notice: DTV Channel Election: First Round Conflict Decision Extension and Guidelines for Interference Conflict Analysis*; 20 FCC Rcd. 13415, at 3 (2005) (citing as a factor in interference agreement acceptability "where the interference occurs (*e.g.*, whether it is outside the affected station's (continued…)

- The out-of-market viewers in the predicted contour loss area will continue to be well served. As noted in the Engineering Exhibit at 4-5 and Figure 6, the vast majority of the population in the contour loss area – 92.4 percent – is served by five or more DTV stations.

- The proposal would improve service in the gain areas substantially, with 23 percent of the proposal's service gains being provided to viewers in white or gray areas. Indeed, 97.2 percent of the gain population currently is served by only three or fewer services. *See* Engineering Exhibit at 4-5.

- Due to terrain blocking, the vast majority of viewers in the predicted ABC Network contour loss areas do not actually receive the Station's signal, with the result that, ultimately, only 231 persons would lose ABC Network service. *See* Engineering Exhibit at 5 and Figure 8. Moreover, the ABC Network service loss population is not located within the Station's DMA.

- By contrast, the proposed facility would enable the Station to provide first ABC Network service to a substantial population: 29,791 persons, the majority of whom are located within the Station's DMA. *See* Engineering Exhibit at 5-6 and Figure 7.

Grant of this application also would improve service to certain of KRCR's viewers who lost service following the digital transition. While the operations pursuant to the STA described in footnote 1 have substantially resolved these reception problems, the directional antenna (and the fact that the antenna has circular polarization) would enable the Station to increase power and signal penetration in the populated areas that experienced the most significant service losses following the digital transition. Thus, the facilities sought herein should facilitate the Station's continued efforts to enhance its service and aid any viewers who may have lost service, while obviating the need for the FCC to act on the Station's pending request for waiver of maximum power/height limits set forth in Section 73.622(f)(7).[3] Moreover, the Station believes that the circular polarization of the new antenna will improve the Station's ability to provide a robust mobile DTV signal to viewers.

Grant of this application would serve the public interest. It would enable the Station to expand local digital television service substantially, providing robust service to many white and gray areas and other areas that are not well-served. It would provide a first ABC Network service to a significant population, and enhance service to viewing areas that experienced service losses following KRCR's digital transition. Given the number of alternative

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DMA)"); *Letter from Barbara A. Kreisman, Chief, Video Division, Media Bureau, to Michael E. Carosella, Qualcomm Inc.*, 22 FCC Rcd. 3831, at 4 (Feb. 23, 2007) (approving mobile service activation where "almost all of [the predicated interference] area is outside the [station's home] DMA; in fact, only 0.22% of the population within the DMA is predicted to receive interference.").

[3] *See* FCC File No. BPCDT-20100408ABO.

services in the loss area and the existence of terrain-shielding from the Station's signal, the proposal would not result in any significant service losses to viewers in the predicted contour loss area. In light of these benefits and the problems noted above with respect to the current antenna's reliability, the Station respectfully requests prompt action on this request.