

## ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of PAPPAS TELECASTING OF CENTRAL CALIFORNIA, L.P., the proposed assignee of Station KFRE-TV, Channel 59, Sanger, California, in support of a multiple ownership submission to the Commission. As noted in the application, the majority shareholder of Pappas Telecasting of Central California, Mr. Harry J. Pappas, is also the majority shareholder of Pappas Telecasting Incorporated, the licensee of Station KMPH(TV), Channel 26, Visalia, California. Since both KFRE-TV and KMPH (the "Stations") are licensed to communities within the Fresno-Visalia Designated Market Area (DMA), FCC Rules require the submission of a multiple ownership study.

We have been asked to determine the number of television stations licensed to communities within the Fresno-Visalia DMA that have overlapping Grade B contours with the Stations. The Fresno-Visalia DMA consists of six counties: Fresno, Kings, Madera, Mariposa, Merced, and Tulare. Accordingly, we have conducted a study and find the following ten stations that are both licensed to communities within the Fresno-Visalia DMA, and have overlapping Grade B contours with the Stations.

1.	KVPT, Fresno, CA	Channel 18	Valley Public Television, Inc.
2.	KFTV, Hanford, CA	Channel 21	KFTV Limited Partnership, G.P.
3.	KTFF, Porterville, CA	Channel 61	Telefutura Fresno LLC
4.	KSEE, Fresno, CA	Channel 24	KSEE License, Inc.
5.	KFSN-TV, Fresno, CA	Channel 30	ABC, Inc.
6.	KGMC, Clovis, CA	Channel 43	Gary M. Cocola Family Trust
7.	KGPE, Fresno, CA	Channel 47	Ackerley Broadcasting-Fresno, LLC
8.	KNXT, Visalia, CA	Channel 49	Diocese of Fresno Education Corp.
9.	KNSO, Merced, CA	Channel 51	Telemundo Fresno, LLC
10.	KAIL, Fresno, CA	Channel 53	Trans-America Broadcasting Corp.

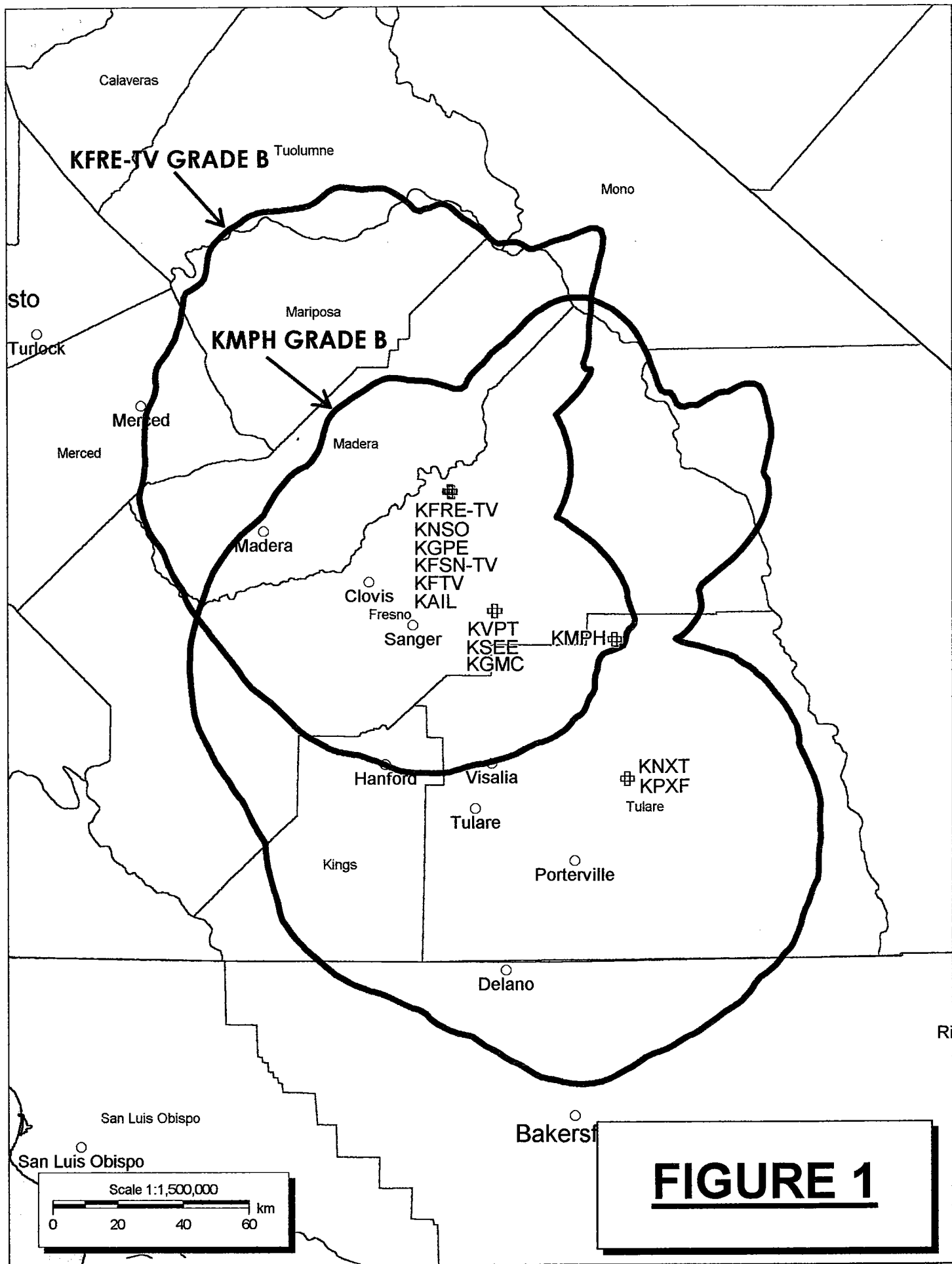
Figure 1 is a map upon which the Grade B contours of the Stations are plotted. As shown, the transmitter sites of all ten stations listed above are located within one or both of the Grade B contours of the Stations. As a result, the Grade B contours of these ten stations necessarily overlap those of the Stations, and are eligible for inclusion in this multiple ownership study.

I declare, under penalty of perjury, that the foregoing statements and attached exhibit, which was prepared by me, are true and correct to the best of my knowledge and belief.



KEVIN T. FISHER

November 3, 2003



**FIGURE 1**