ENGINEERING STATEMENT

I, W. Jeffrey Reynolds, do hereby declare and state:

1. I am a consulting engineer with du Treil, Lundin & Rackley, Inc., a broadcast engineering firm specializing in frequency allocation, signal coverage optimization of broadcast stations, and propagation and coverage studies. Our firm has more than sixty years' experience in the broadcast radio frequency field.

2. I have worked as a broadcast consultant for more than thirty years, and have consulted on numerous multiple ownership and cross-ownership studies over that time, including satellite exemptions to the televisions multiple ownership rule.

3. I personally supervised the preparation of the exhibits included with this Engineering Statement. The predicted coverage contours for each operation were calculated in accordance with the provisions of Section 73.625 of the FCC Rules. The average terrain elevations from 3 to 16 kilometers along 72 radials evenly spaced at 5 degree intervals, were obtained from the National Geophysical Data Center's (NGDC) 3-second terrain database. The terrain elevations were then used in combination with the effective radiated power for determining the distances to coverage contours.

4. The information displayed herein is accurate, and was prepared using generally accepted engineering standards and principles.

5. Figure 1 is a map showing the FCC predicted digital 41 dBu, noise-limited service contours ("NLSC") for KMTR, (Eugene), KTCW (Roseburg) and KMCB (Coos Bay).* As shown, there is mutual NLCS overlap between all three stations. However, as shown in terrain profiles of Figures 2, 3 and 4, there is rugged terrain (Cascade and Coast Mountain Ranges) between the three stations and the area of predicted NLSC overlap, which precludes actual NLSC overlap of the three stations. Thus, field strength calculations were made for each station in the direction of the predicted NLSC overlap, based on the Longley-Rice Method (otherwise known as Tech Note 101).† The predicted field strengths of KMTR(TV) and KTCW(TV) were calculated along several radials toward the area of predicted overlap as a more precise alternative to the standard FCC method. The following parameters were employed, along with each station's licensed technical facilities, in the Longley-Rice calculations for each station:

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* The NLSC is the equivalent of the analog Grade B service contour.

† It is noted that Section 73.684(f) of the FCC Rules, permits supplemental showings using alternative prediction methods where the terrain in the general vicinity of the area of concern departs widely from the average terrain of the 3 to 16 kilometer sector used in the standard prediction method. As noted, such widely varying terrain exists between the pertinent antenna sites and the NLSC overlap areas.

Location Variability:	50%
Time Availability:	90%
Situation Availability:	50%
Polarization:	Horizontal
Conductivity:	0.005 S/m
Dielectric Constant:	15.0
Climate Zone:	Continental Temp.
Receive Antenna Height AGL:	9.1 m
Clutter Factor:	0 dB

Specifically, terrain profiles and field strength calculations were made every 10 degrees of azimuth from 165° thru 255° from the KMTR transmitter site toward the overlap areas (see Figure 2) and likewise, terrain profiles and field strength calculations were made every 10 degrees of azimuth from 230° thru 80° true from the KTCW transmitter site (see Figure 3) toward the overlap areas and from 0° thru 160° true from the KMCB transmitter site toward the overlap areas (see Figure 4). Results of the calculations show that based on the Longley-Rice Methodology the distance to the NLSC contours for each station are significantly reduced, and thus there is no predicted NLCS overlap between the three stations. Figure 5 is a map (with terrain relief) depicting the NLSC contours for KMTR, KTCW KMCB based on both the FCC's methodology and also based on the Longley-Rice methodology towards the areas of concern. Finally, it is noted that the FCC previously approved a waiver of the satellite exception to the duopoly prohibition based on use of the Longley-Rice Methodology for the analog operations of KMTR and KTCW.[‡]

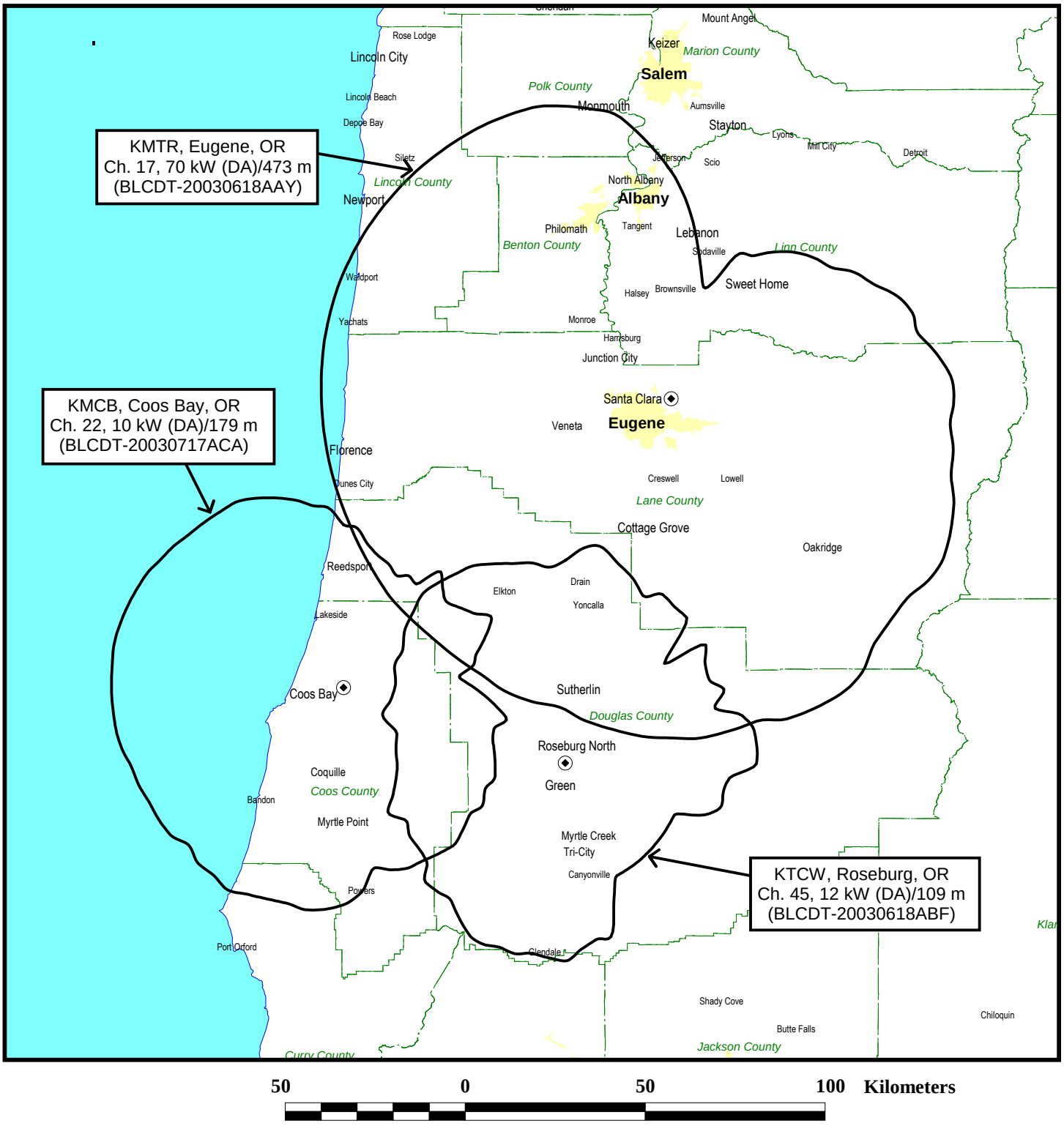
6. If there are any questions regarding this technical statement please contact the office of the undersigned.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

February 5, 2013

[‡] See assignment of license application, FCC File No. BALCT-20070504AFS.



FCC PREDICTED NLSC COVERAGE

KMTR/KTCW/KMCB

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

KMTR, Ch 17, Eugene, OR - 165 Degrees True

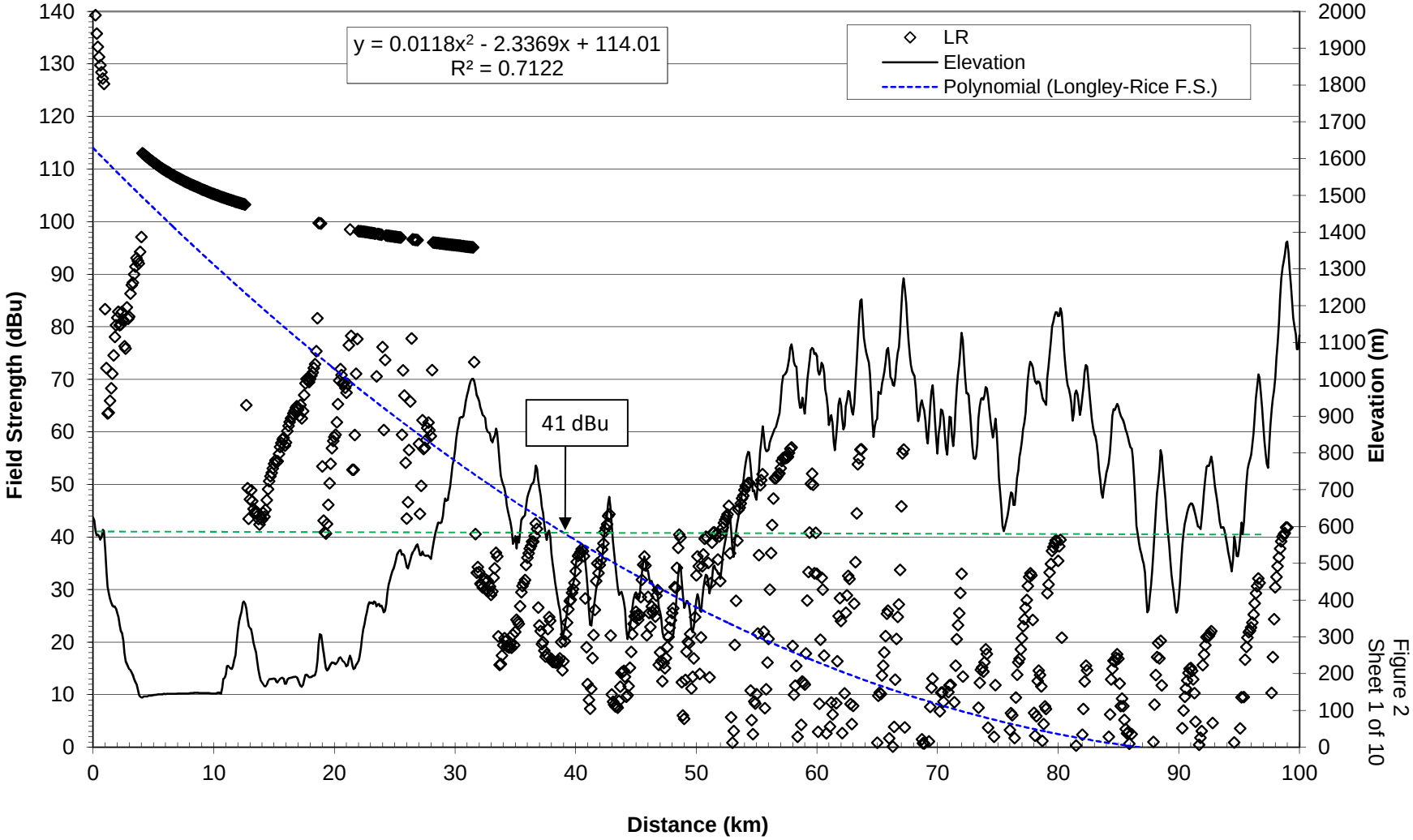


Figure 2
Sheet 1 of 10

KMTR, Ch 17, Eugene, OR - 175 Degrees True

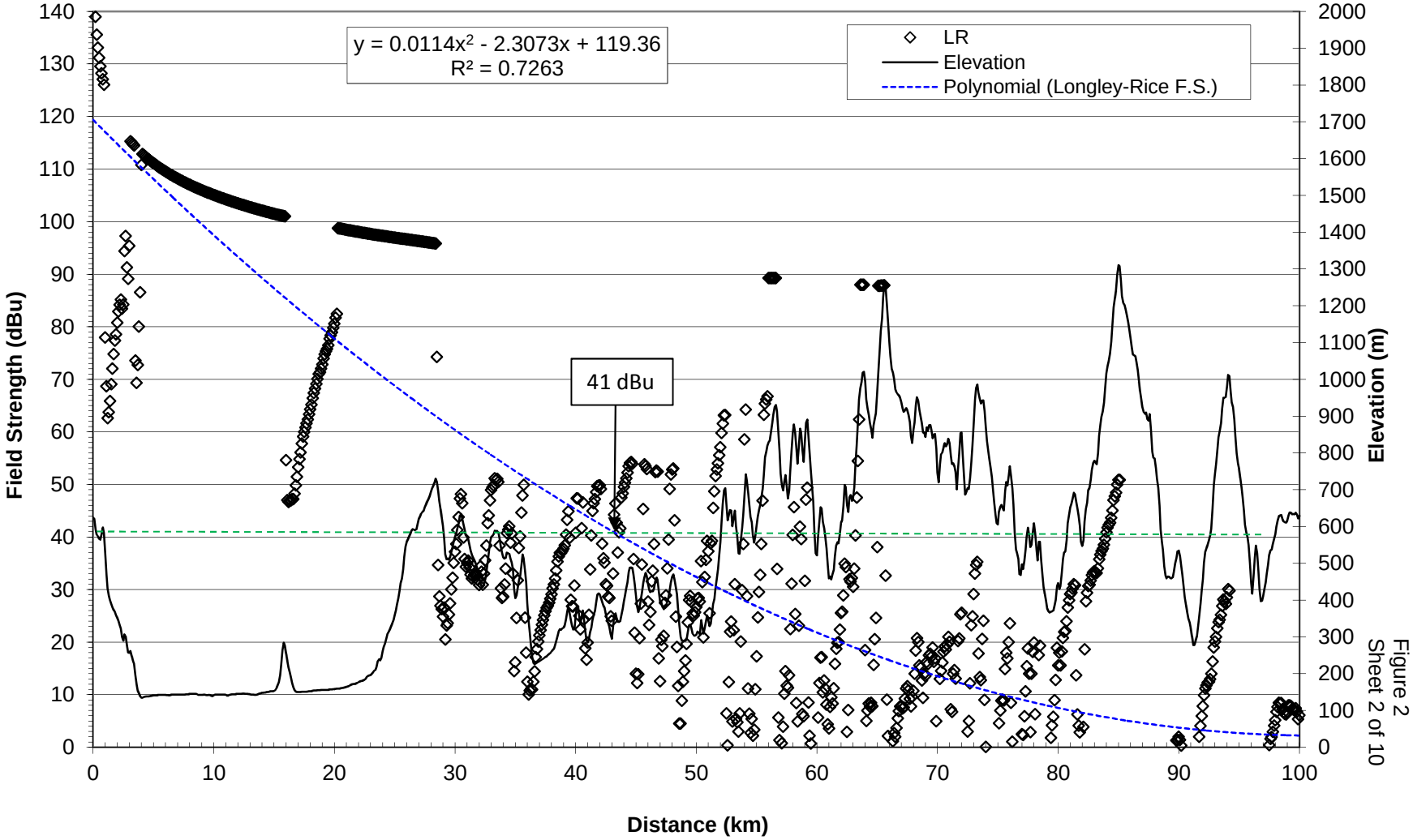


Figure 2
Sheet 2 of 10

KMTR, Ch 17, Eugene, OR - 185 Degrees True

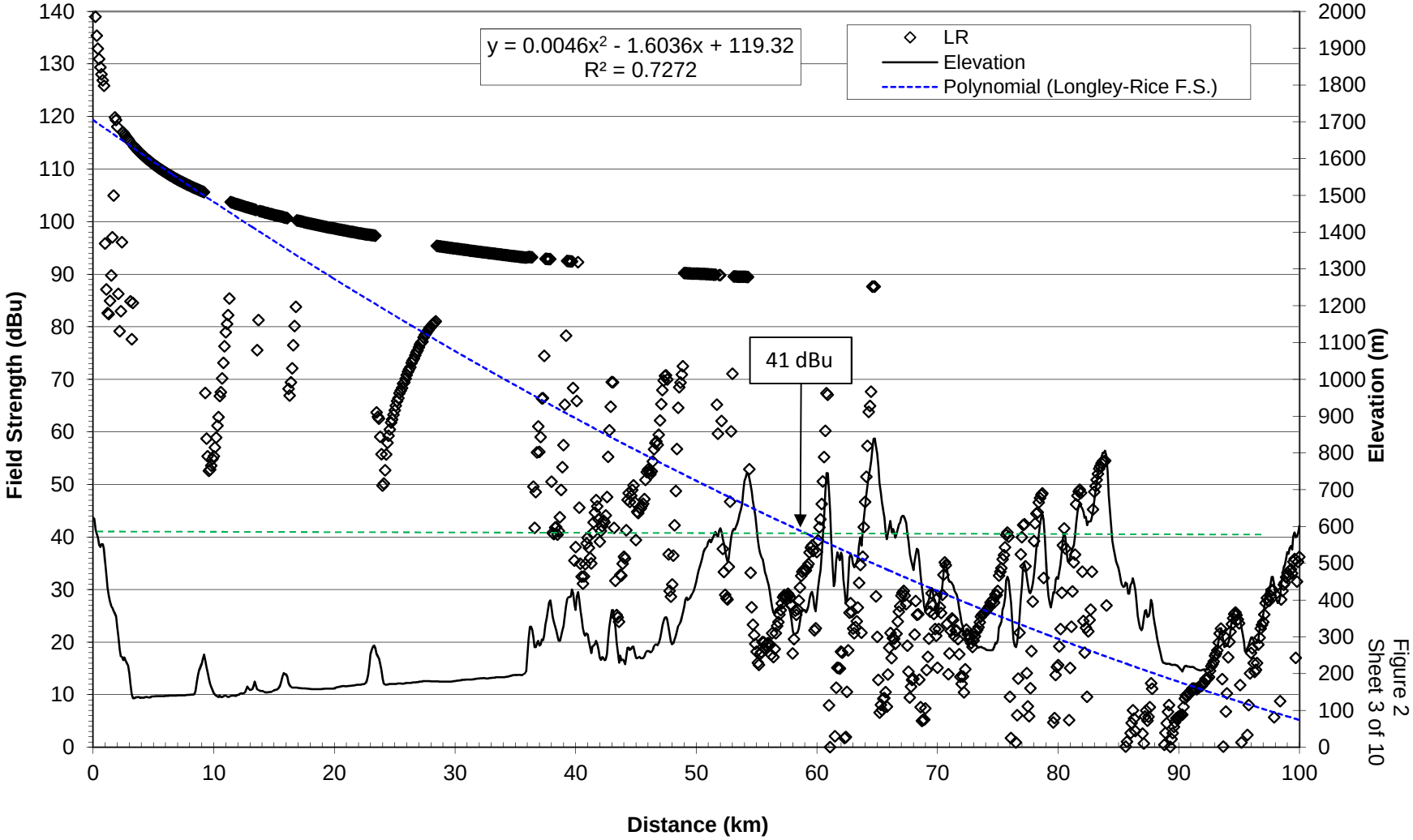


Figure 2
Sheet 3 of 10

KMTR, Ch 17, Eugene, OR - 195 Degrees True

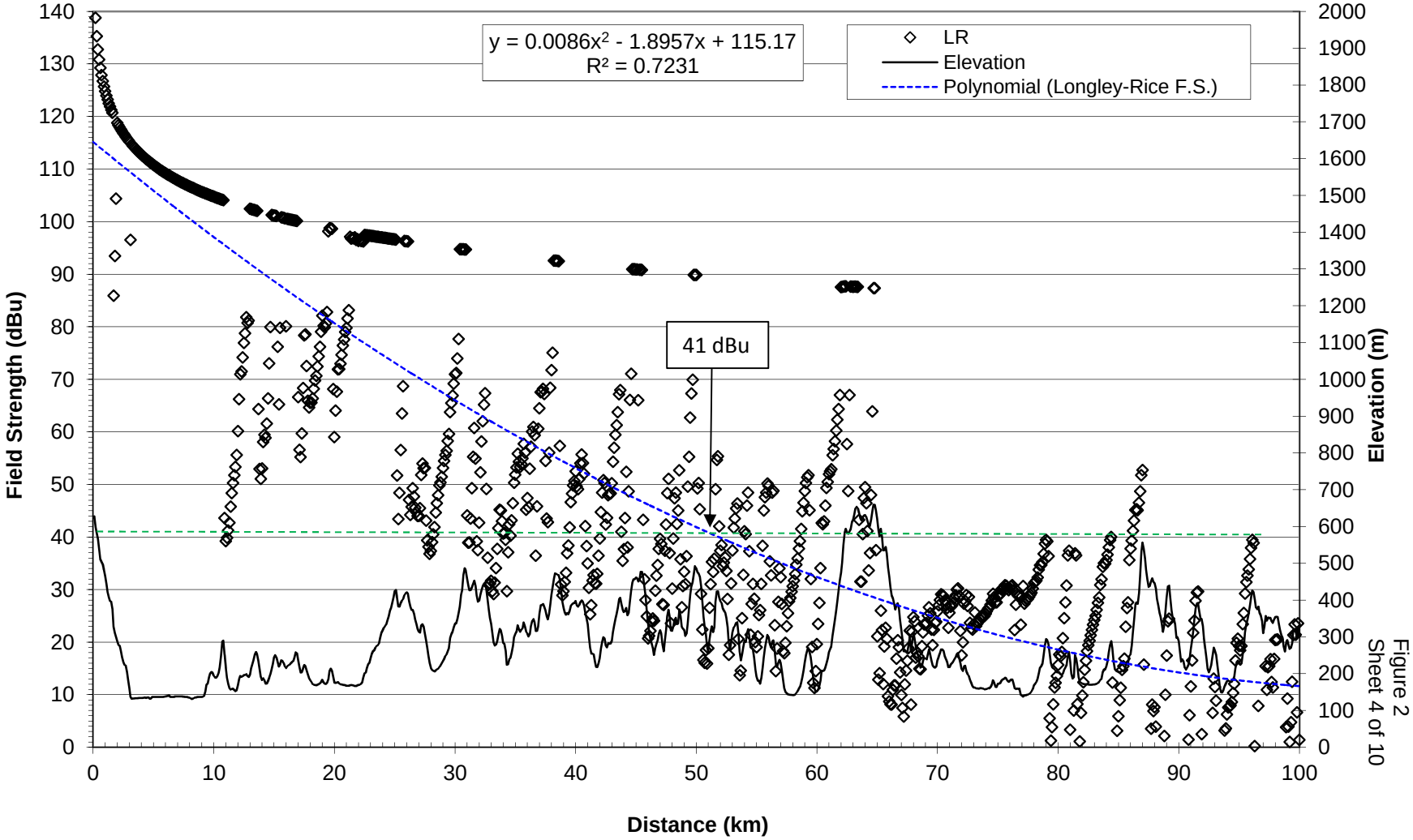


Figure 2
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KMTR, Ch 17, Eugene, OR - 205 Degrees True

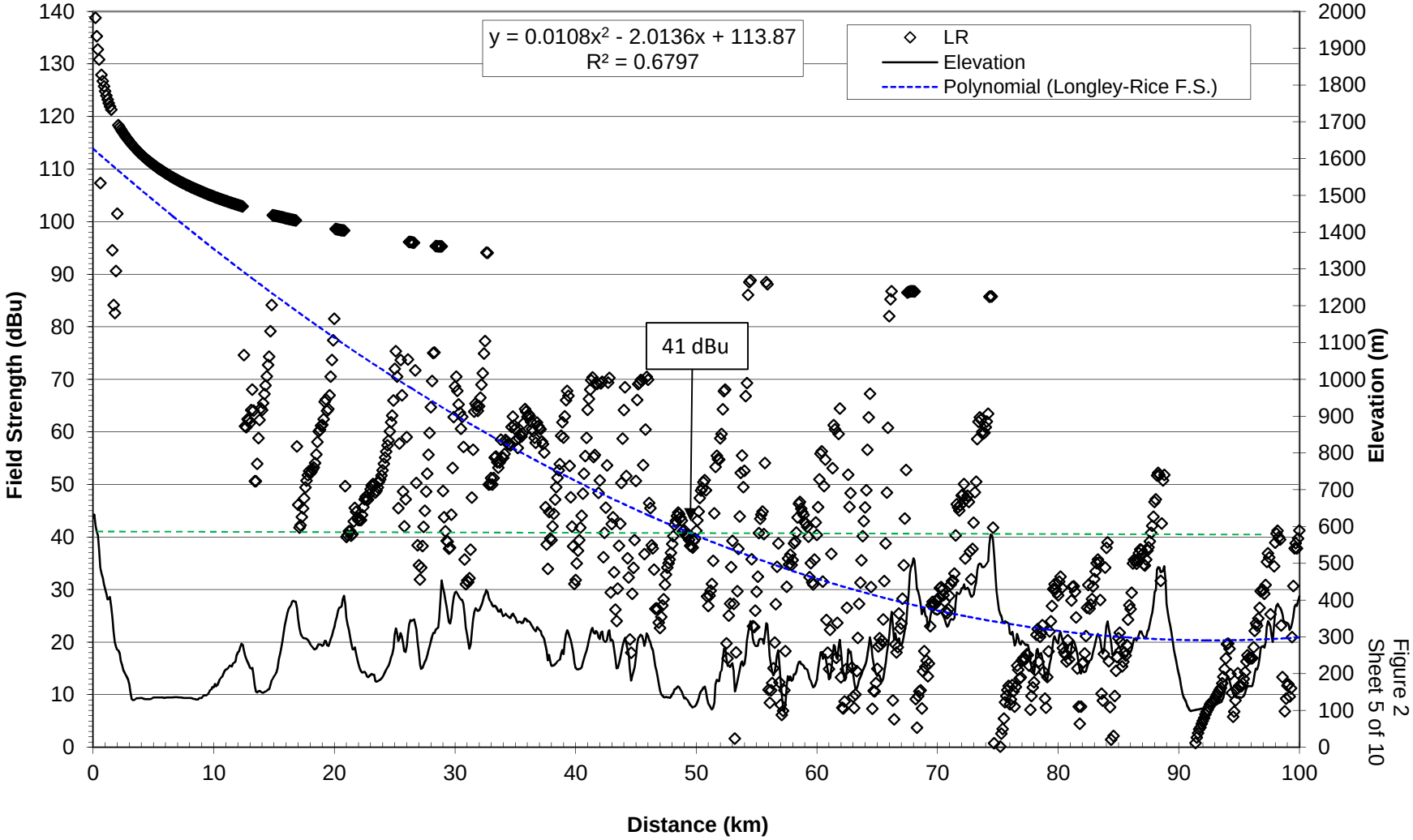

Figure 2
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KMTR, Ch 17, Eugene, OR - 215 Degrees True

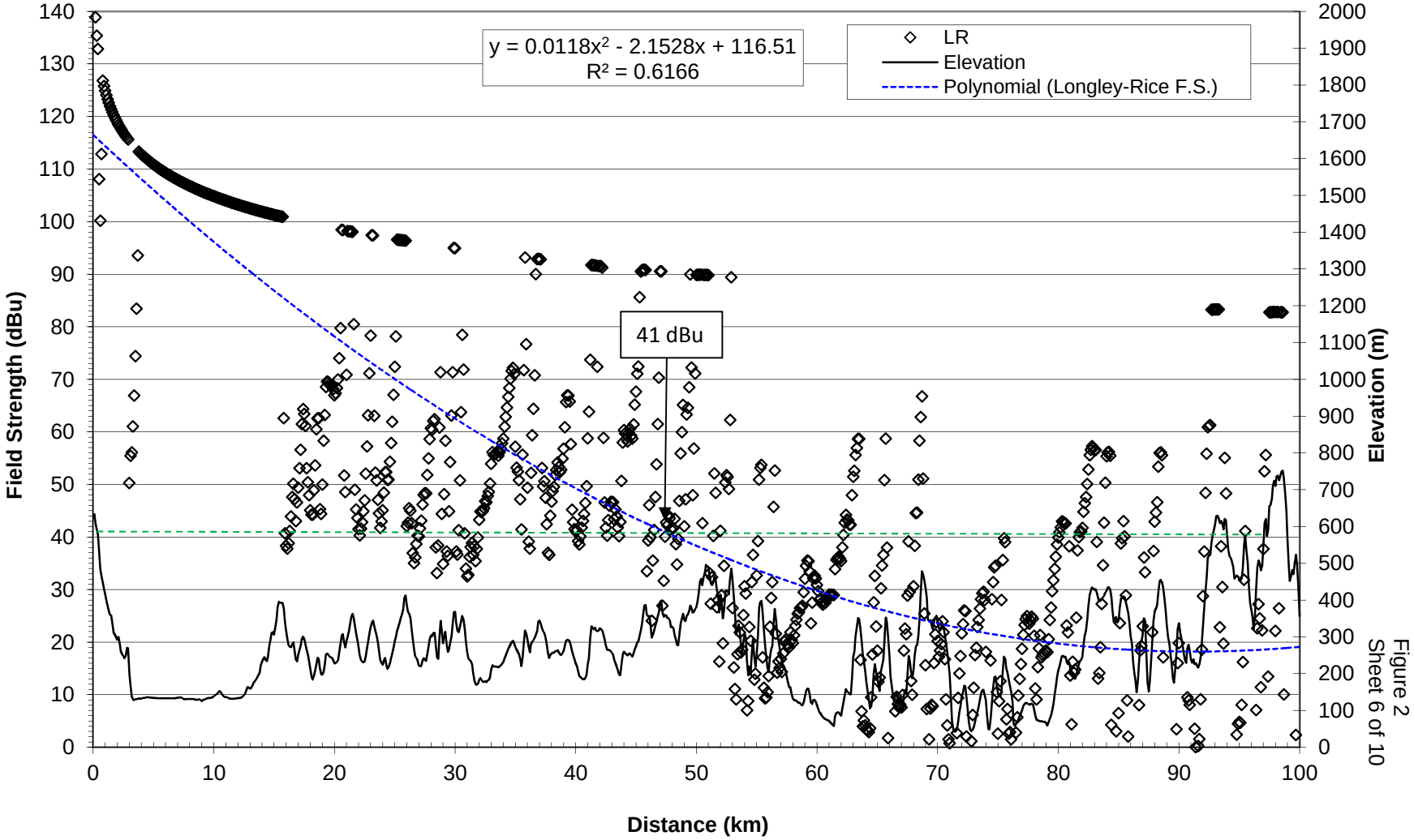

Figure 2
Sheet 6 of 10

KMTR, Ch 17, Eugene, OR - 225 Degrees True

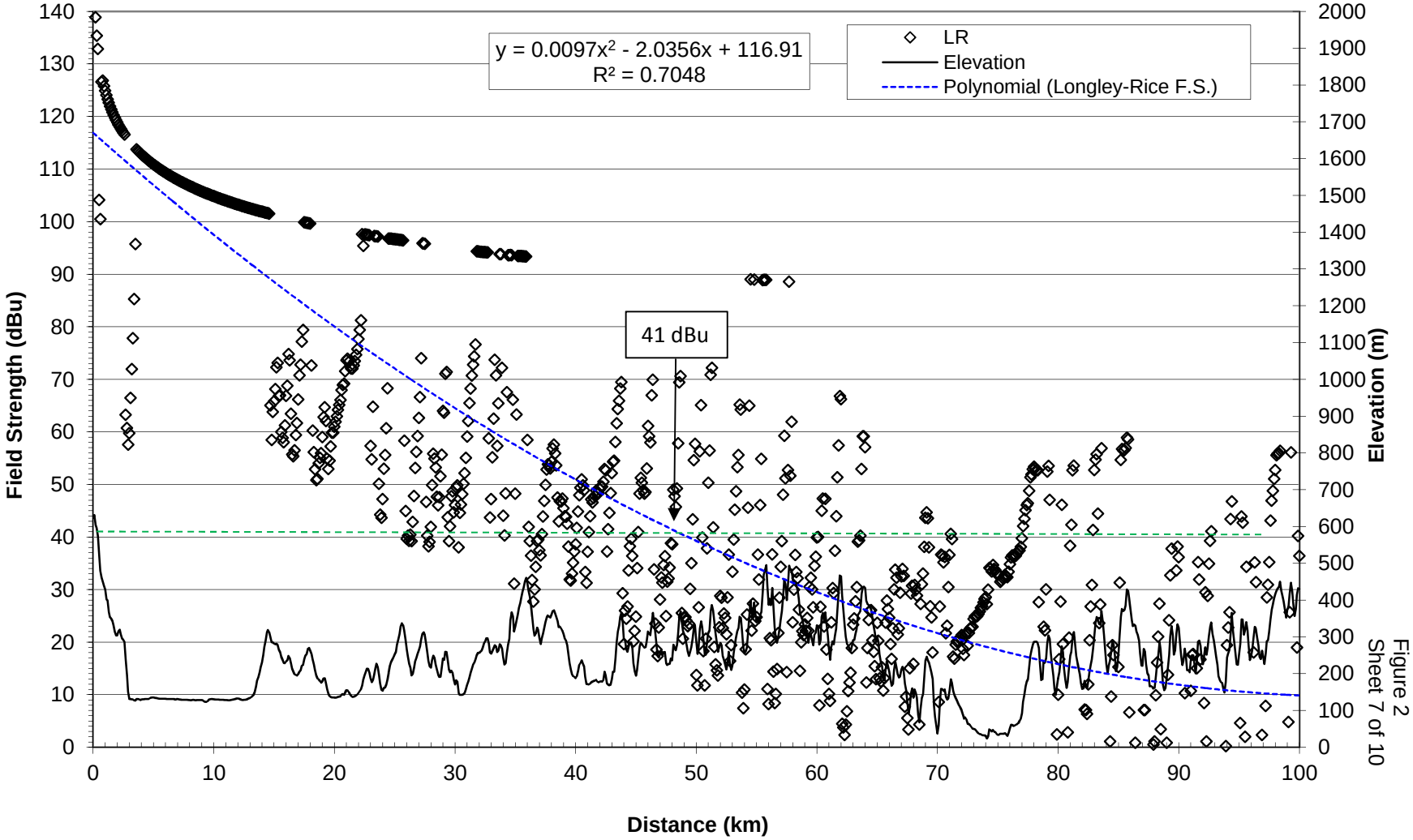

Figure 2
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KMTR, Ch 17, Eugene, OR - 235 Degrees True

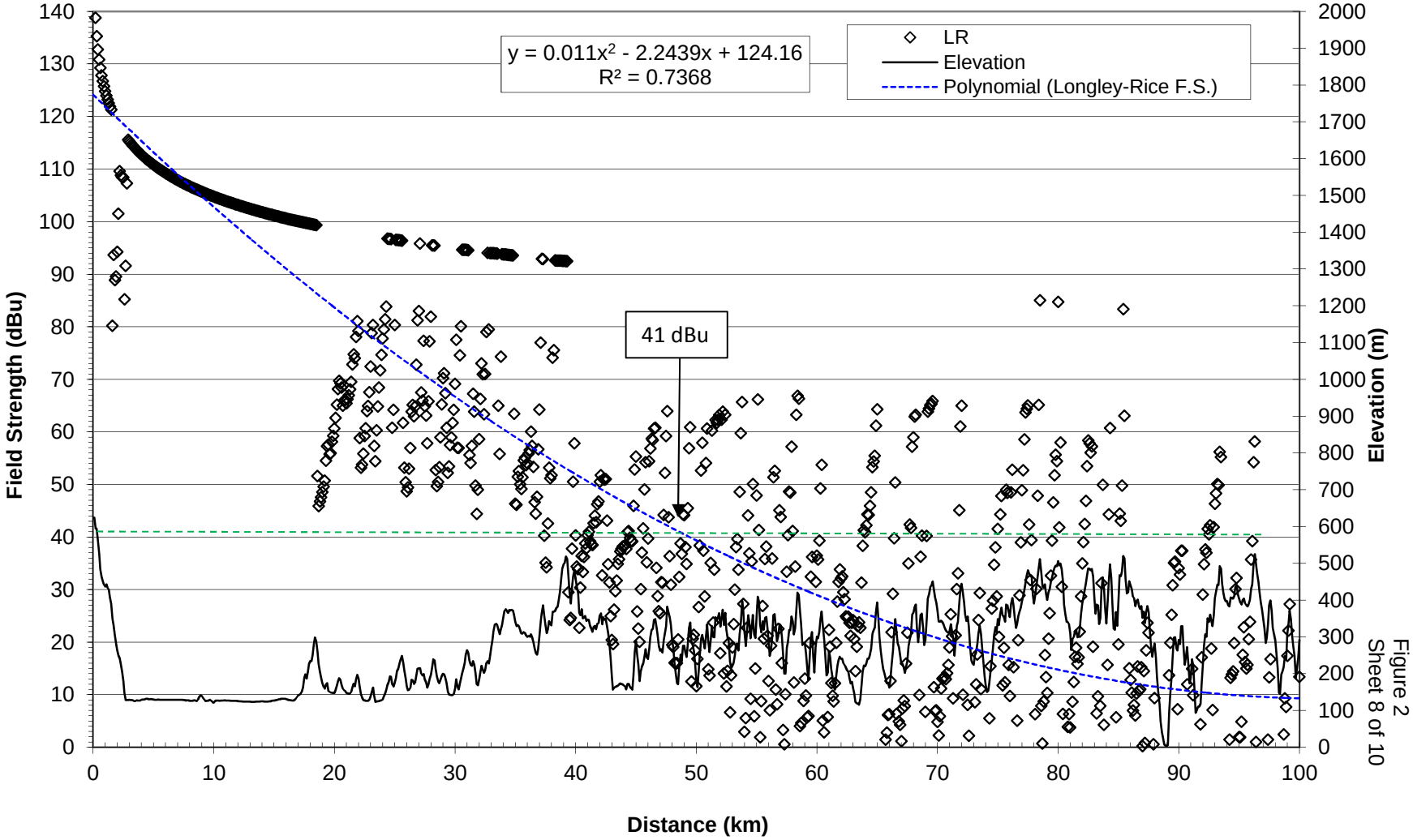

Figure 2
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KMTR, Ch 17, Eugene, OR - 245 Degrees True

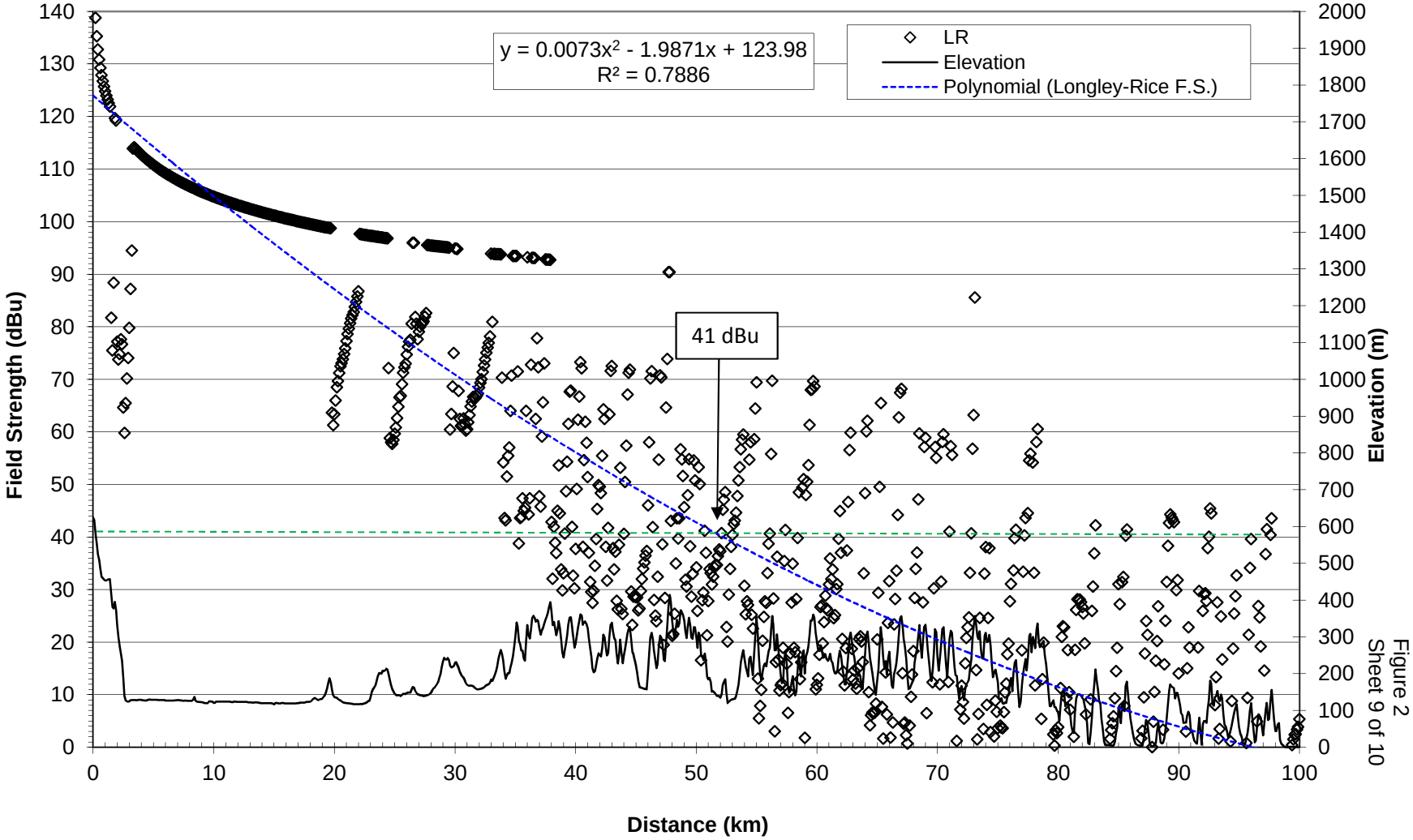

Figure 2
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KMTR, Ch 17, Eugene, OR - 255 Degrees True

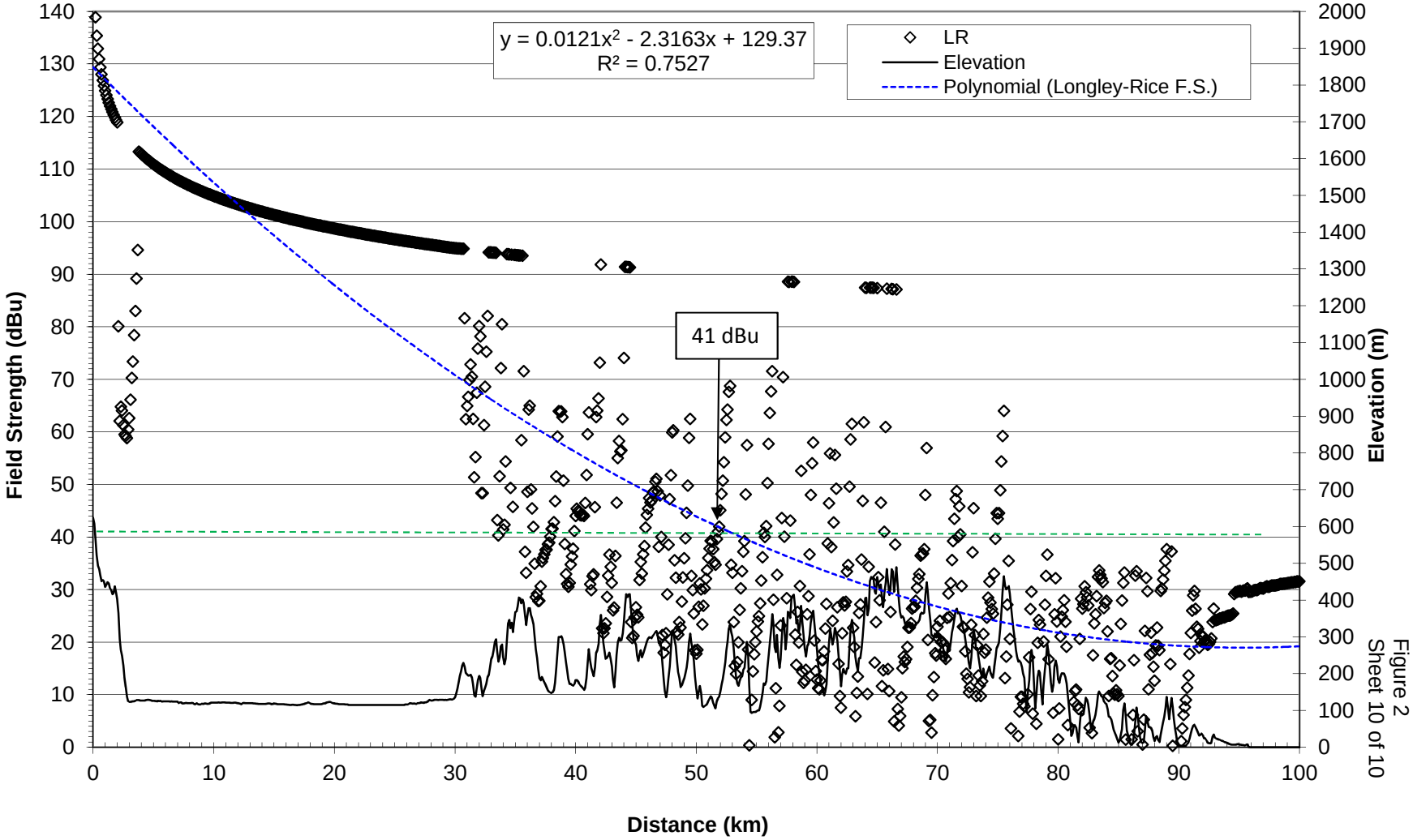

Figure 2
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KTCW, Ch 45, Roseburg, OR - 0 Degrees True

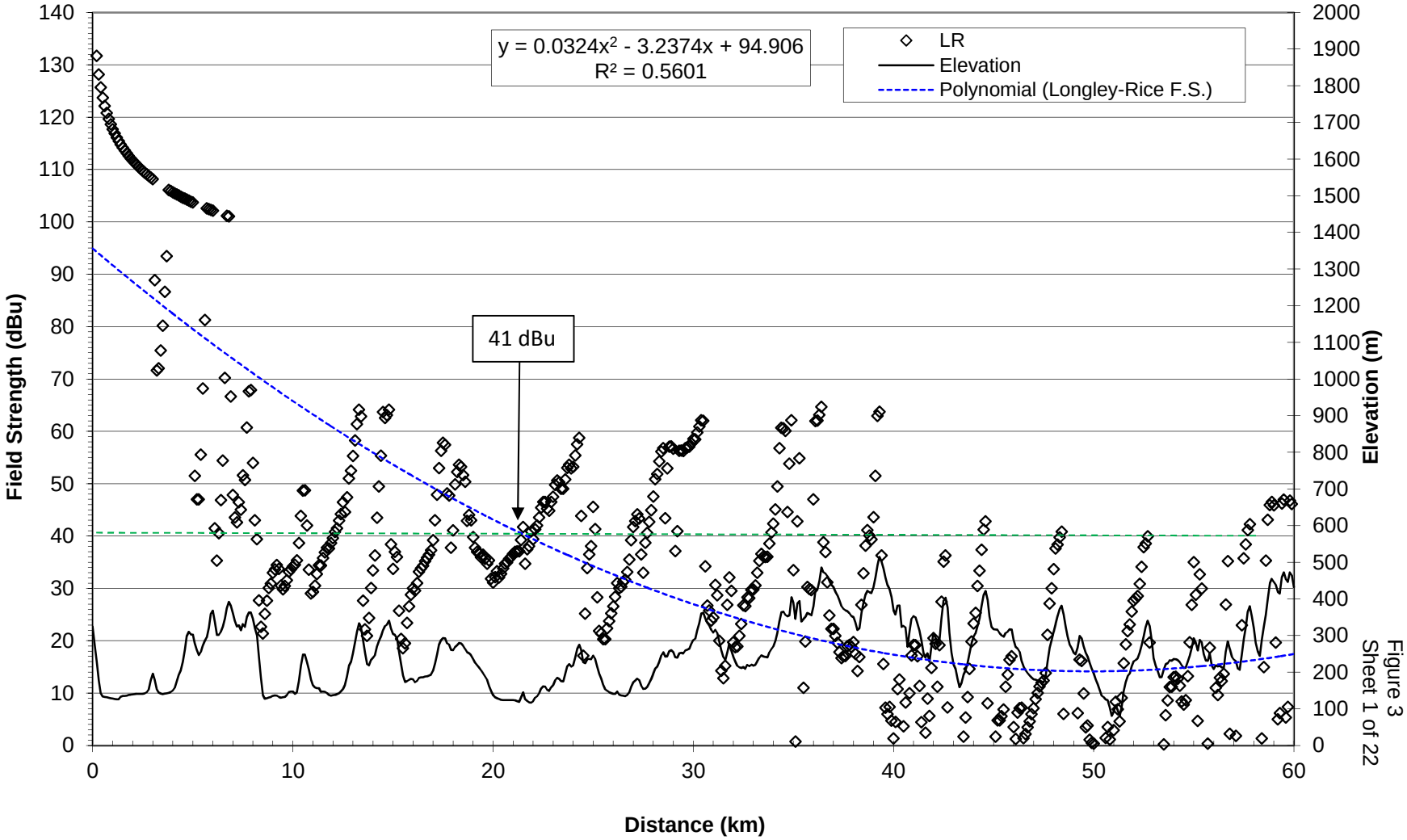

Figure 3
Sheet 1 of 22

KTCW, Ch 45, Roseburg, OR - 10 Degrees True

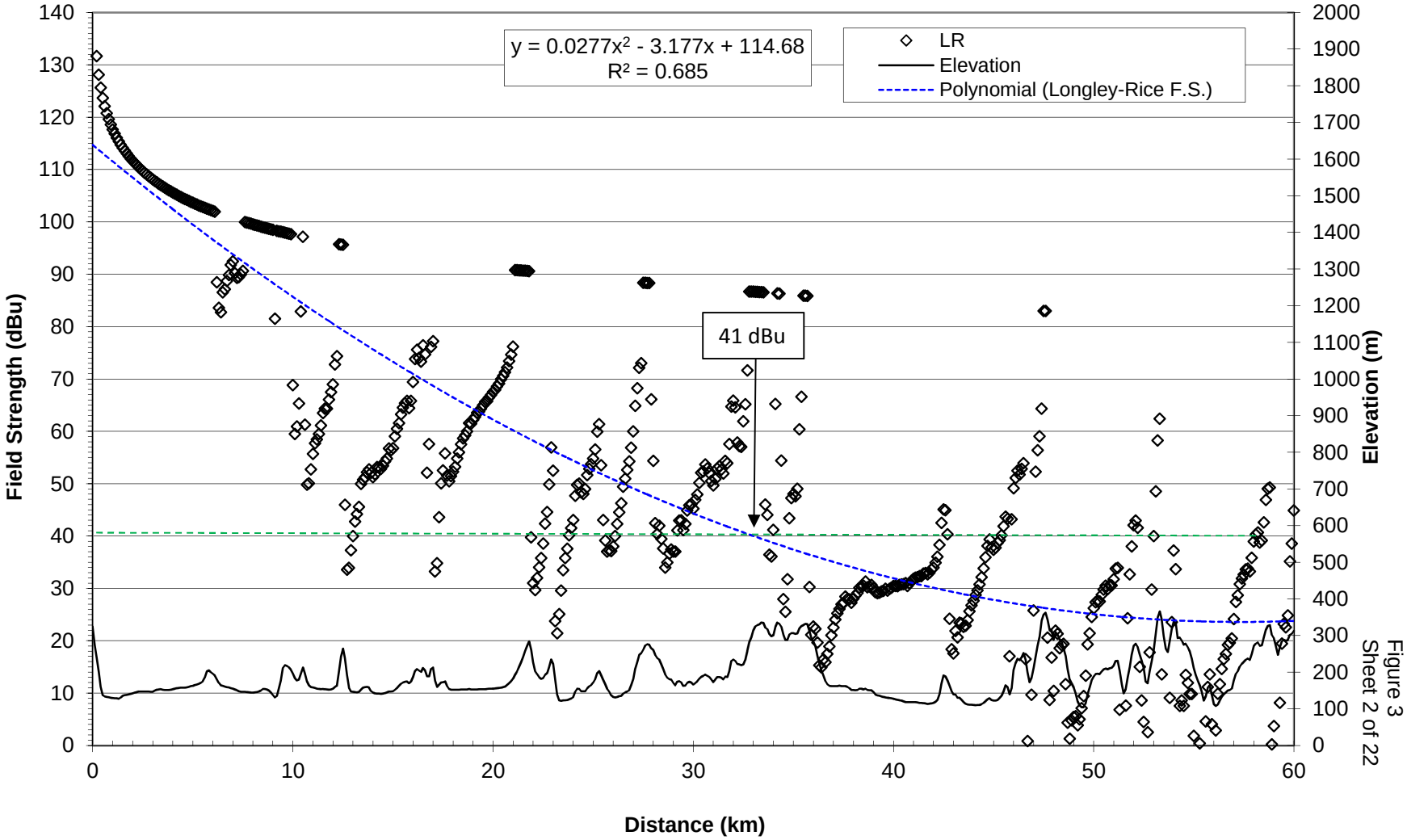

Figure 3
Sheet 2 of 22

KTCW, Ch 45, Roseburg, OR - 20 Degrees True

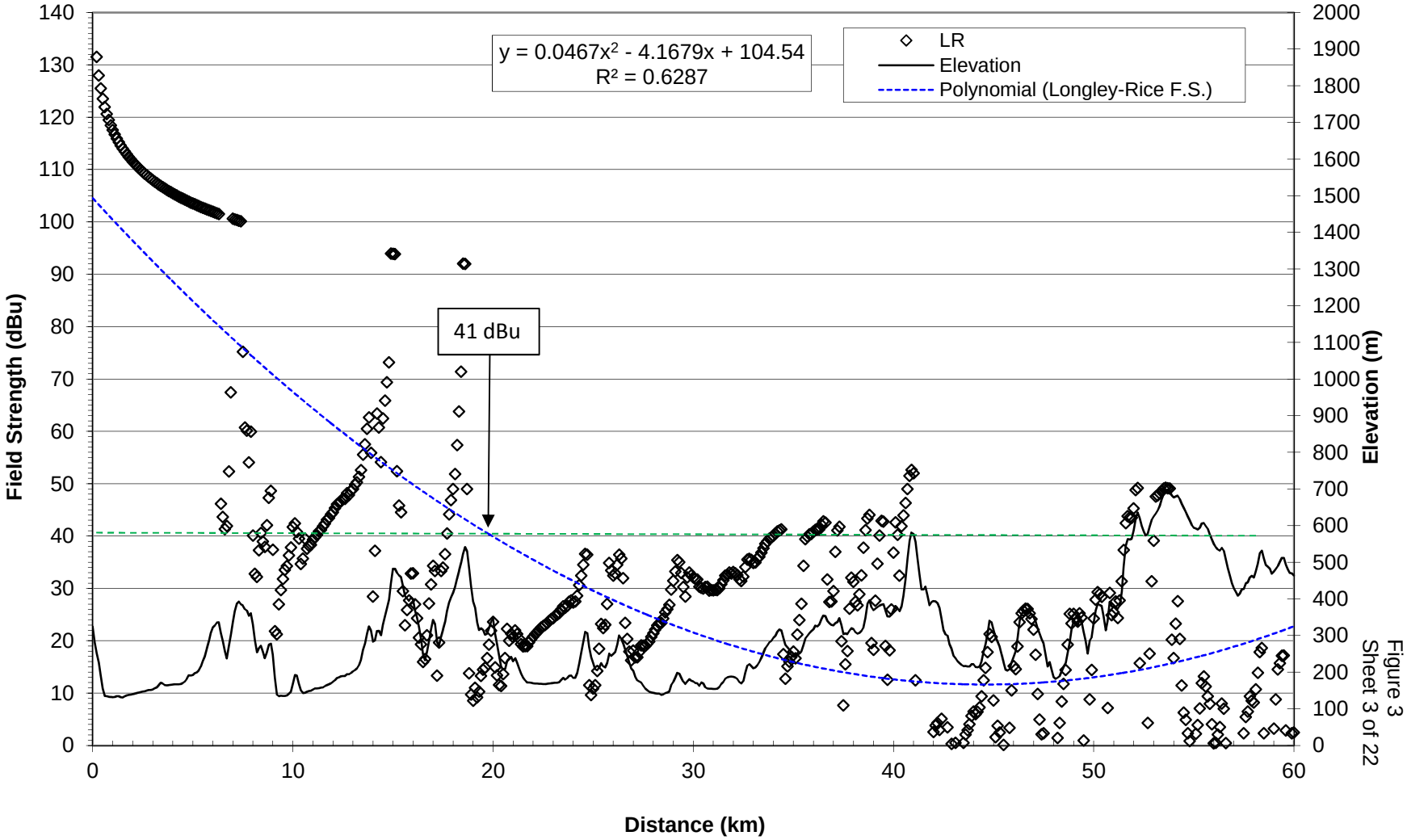

Figure 3
Sheet 3 of 22

KTCW, Ch 45, Roseburg, OR - 30 Degrees True

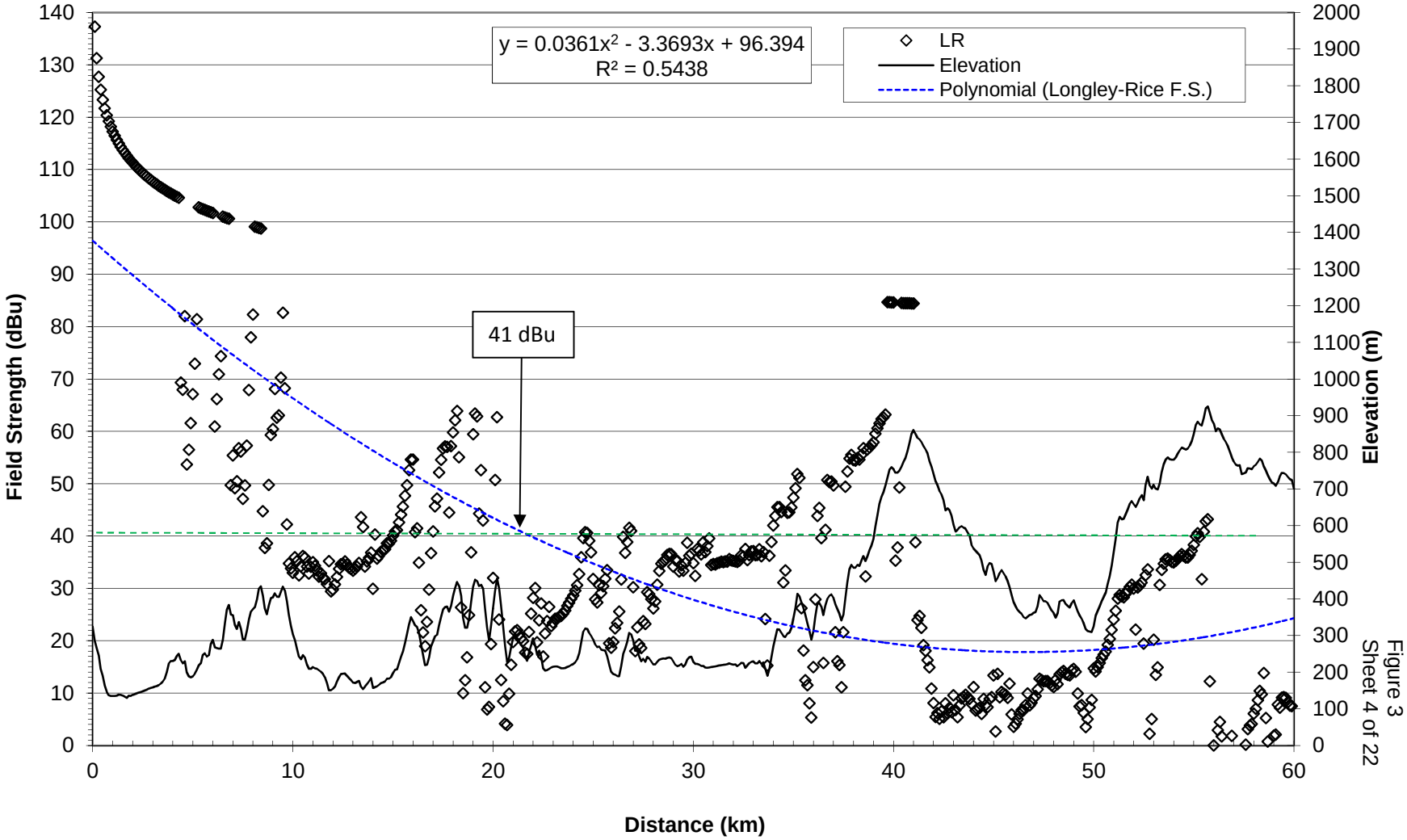

Figure 3
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KTCW, Ch 45, Roseburg, OR - 40 Degrees True

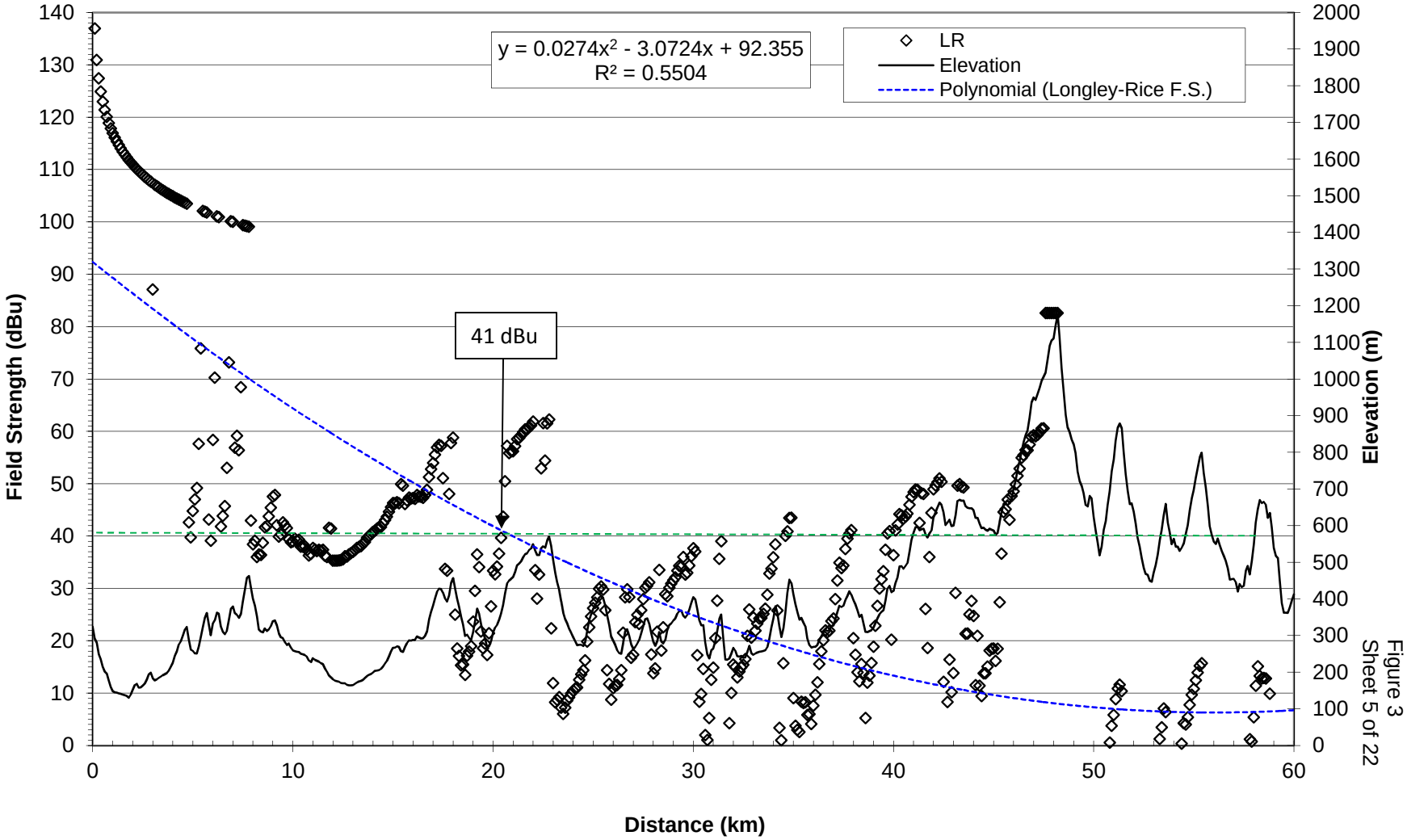

Figure 3
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KTCW, Ch 45, Roseburg, OR - 50 Degrees True

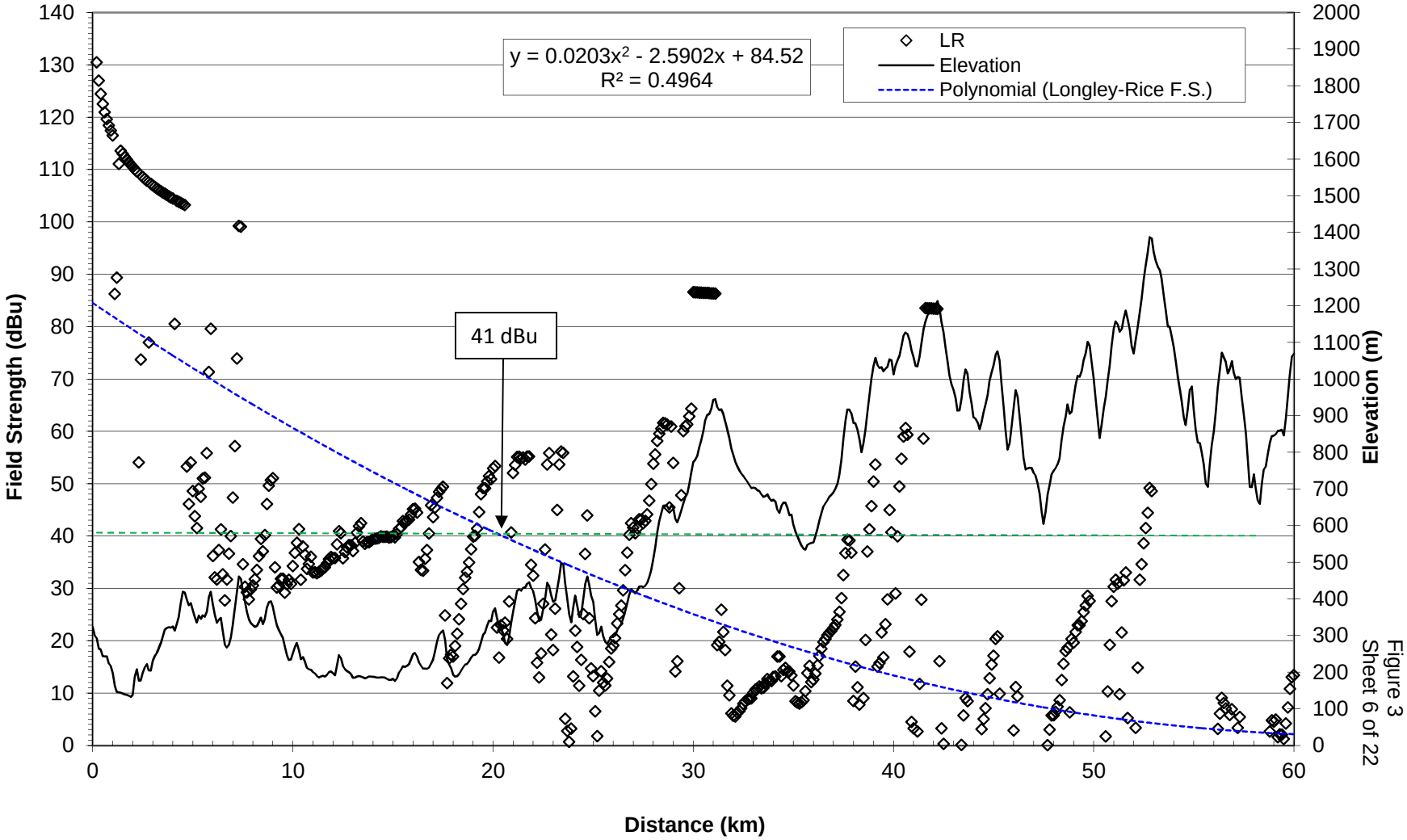

Figure 3
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KTCW, Ch 45, Roseburg, OR - 60 Degrees True

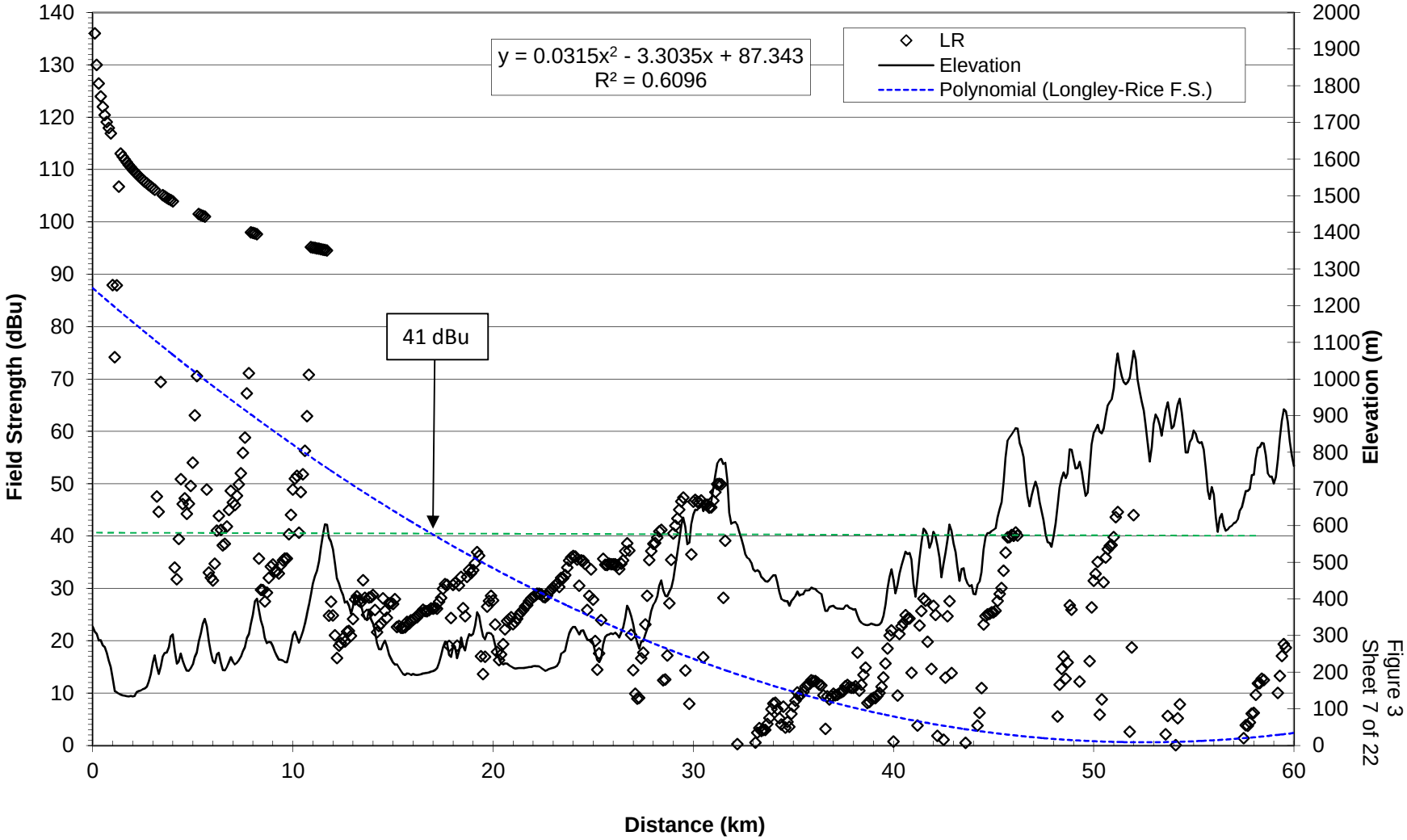

Figure 3
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KTCW, Ch 45, Roseburg, OR - 70 Degrees True

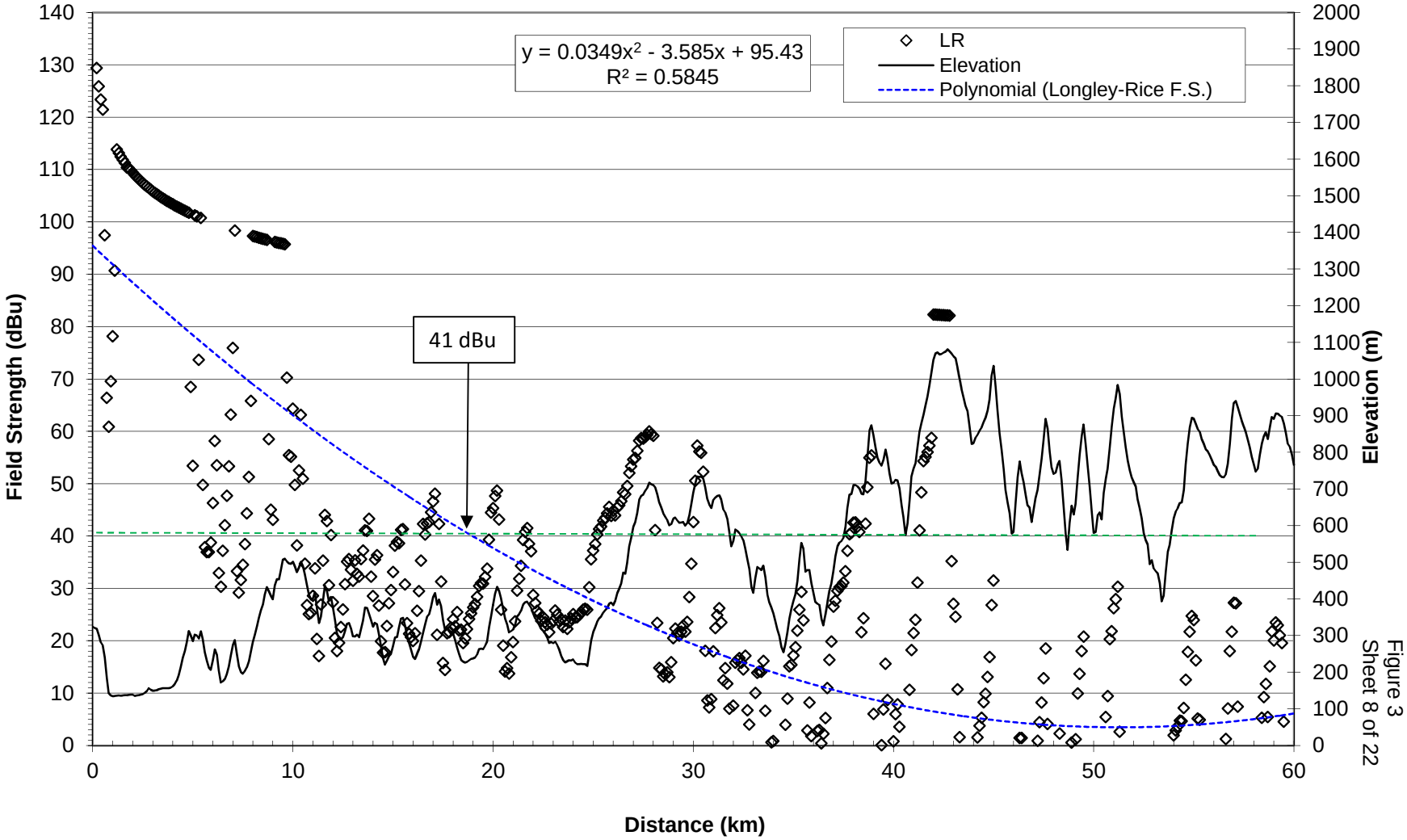

Figure 3
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KTCW, Ch 45, Roseburg, OR - 80 Degrees True

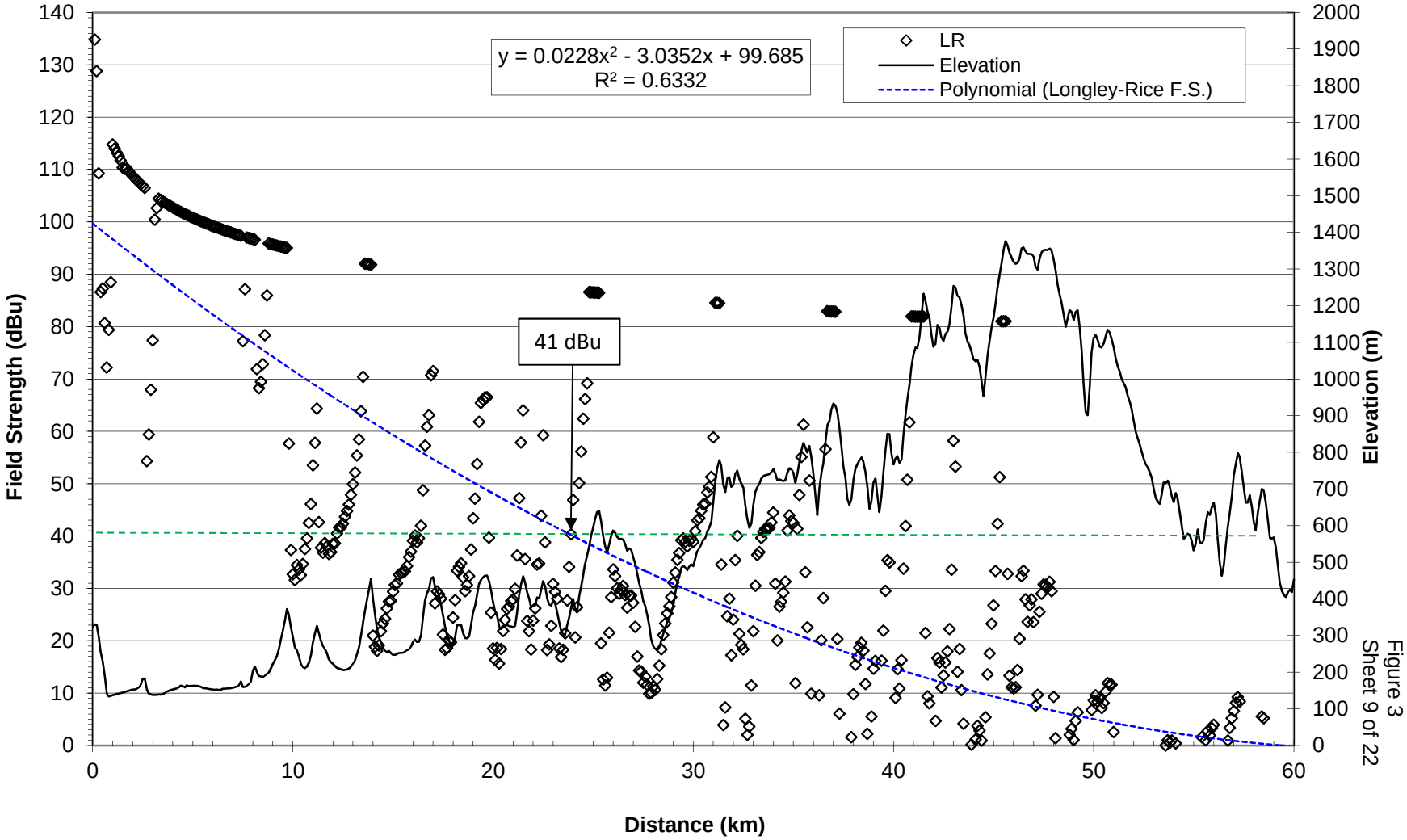

Figure 3
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KTCW, Ch 45, Roseburg, OR - 230 Degrees True

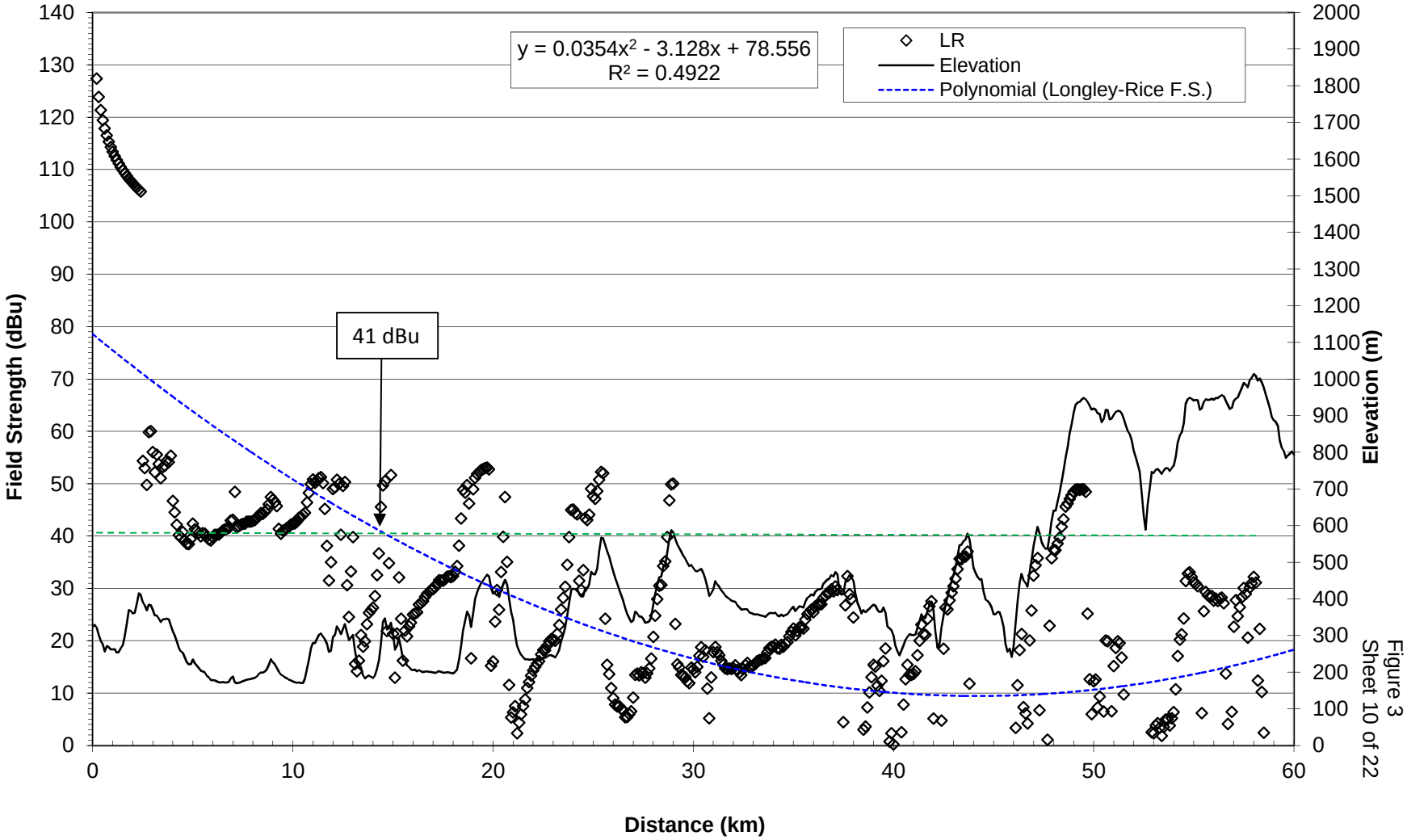

Figure 3
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KTCW, Ch 45, Roseburg, OR - 240 Degrees True

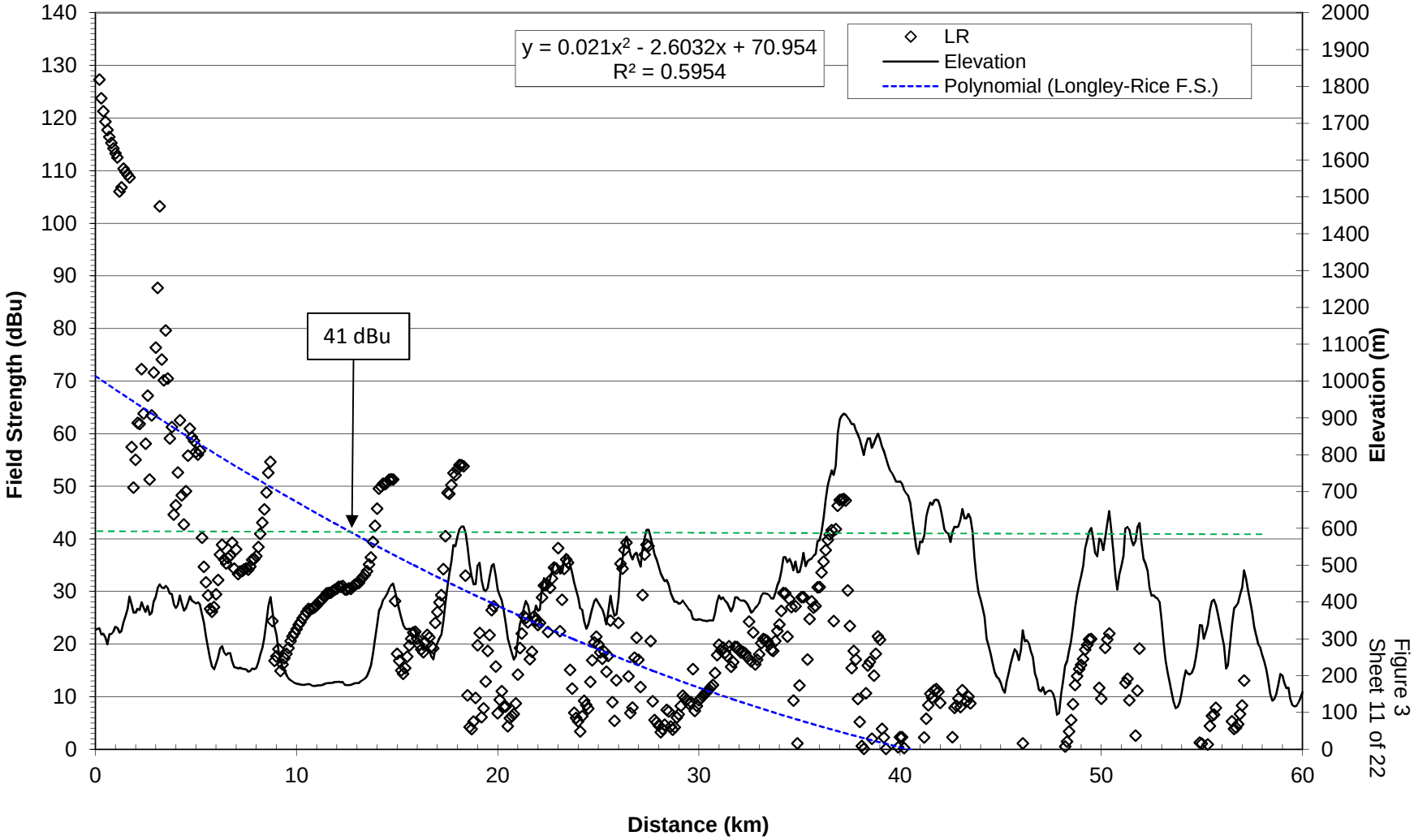

Figure 3
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KTCW, Ch 45, Roseburg, OR - 250 Degrees True

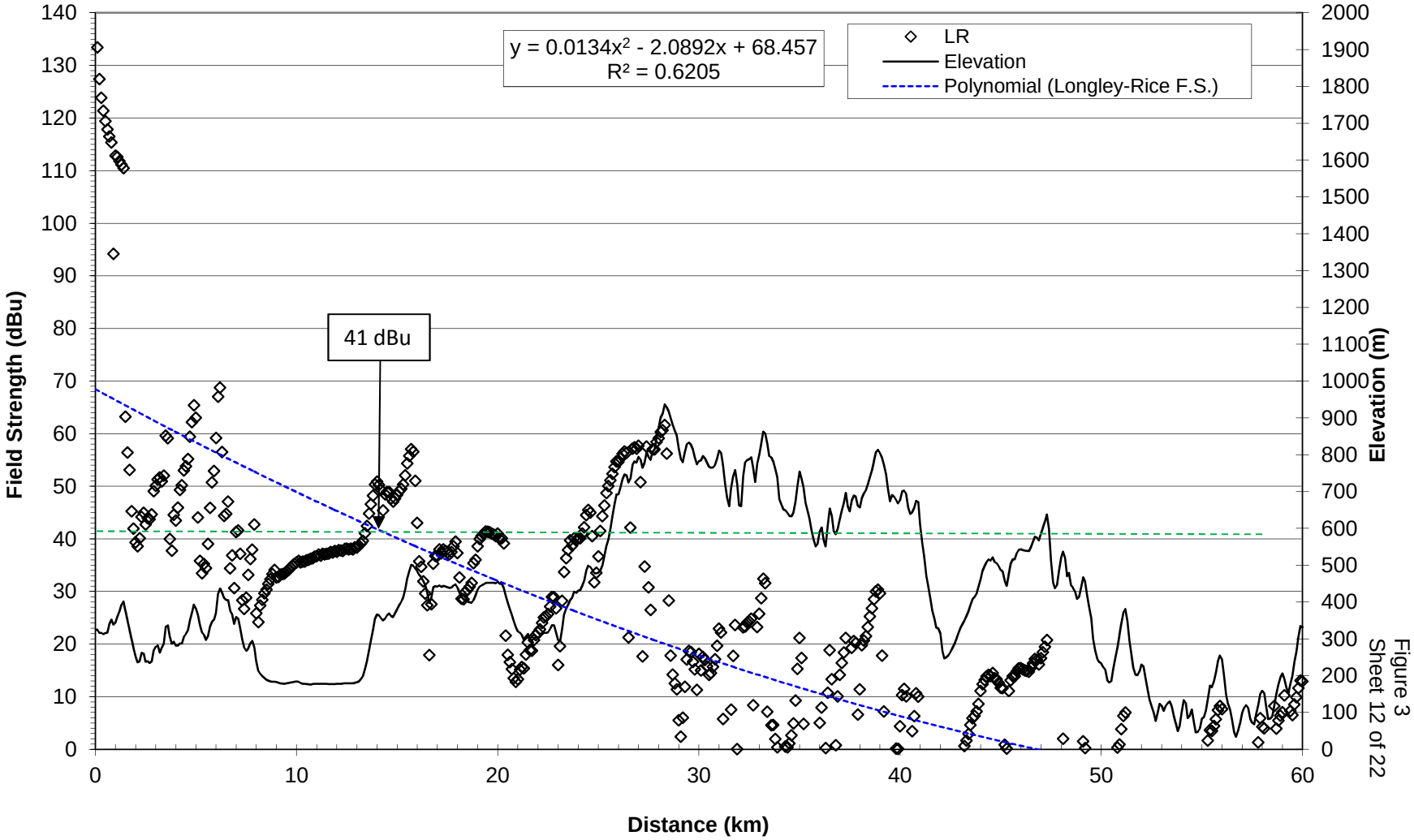

Figure 3
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KTCW, Ch 45, Roseburg, OR - 260 Degrees True

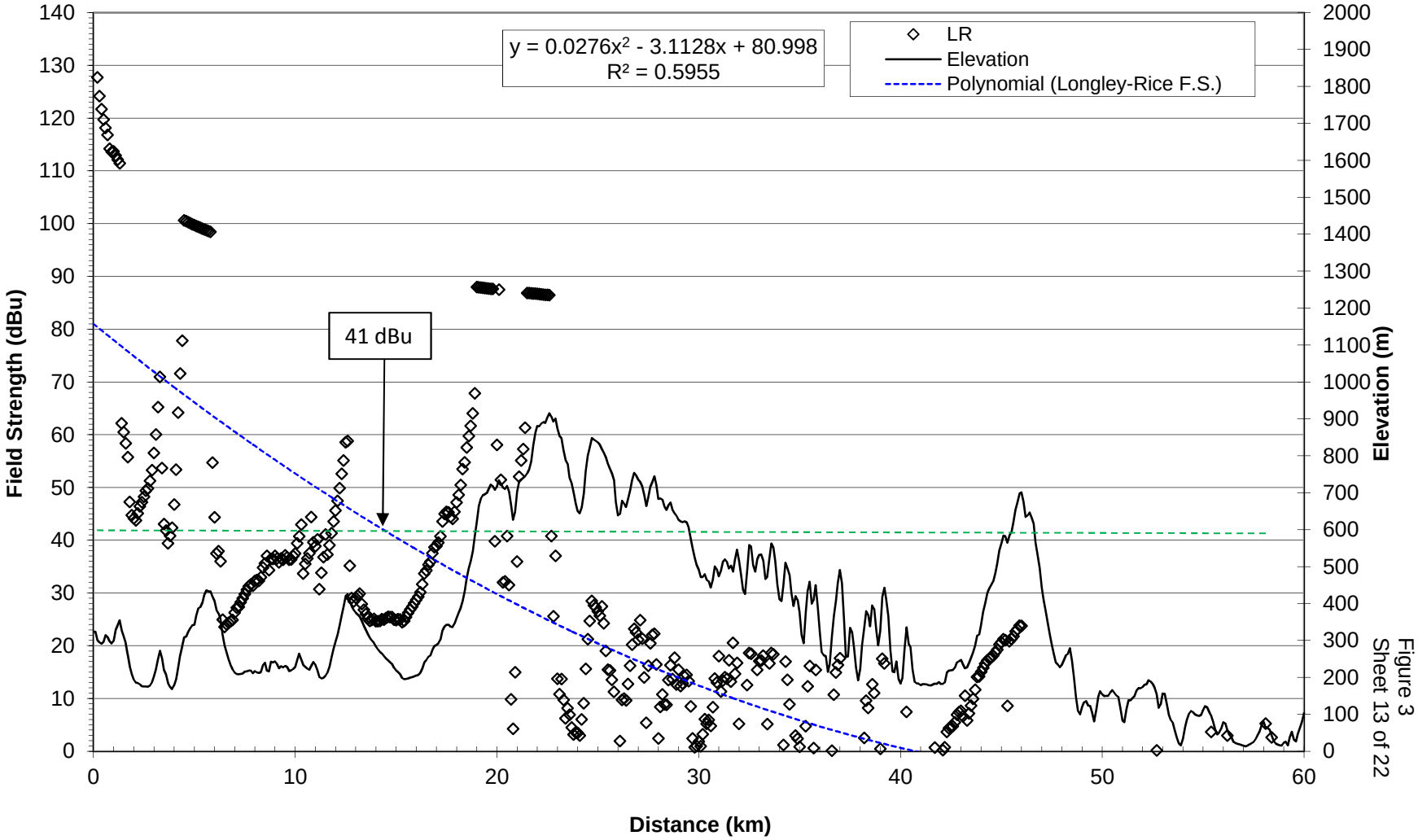

Figure 3
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KTCW, Ch 45, Roseburg, OR - 270 Degrees True

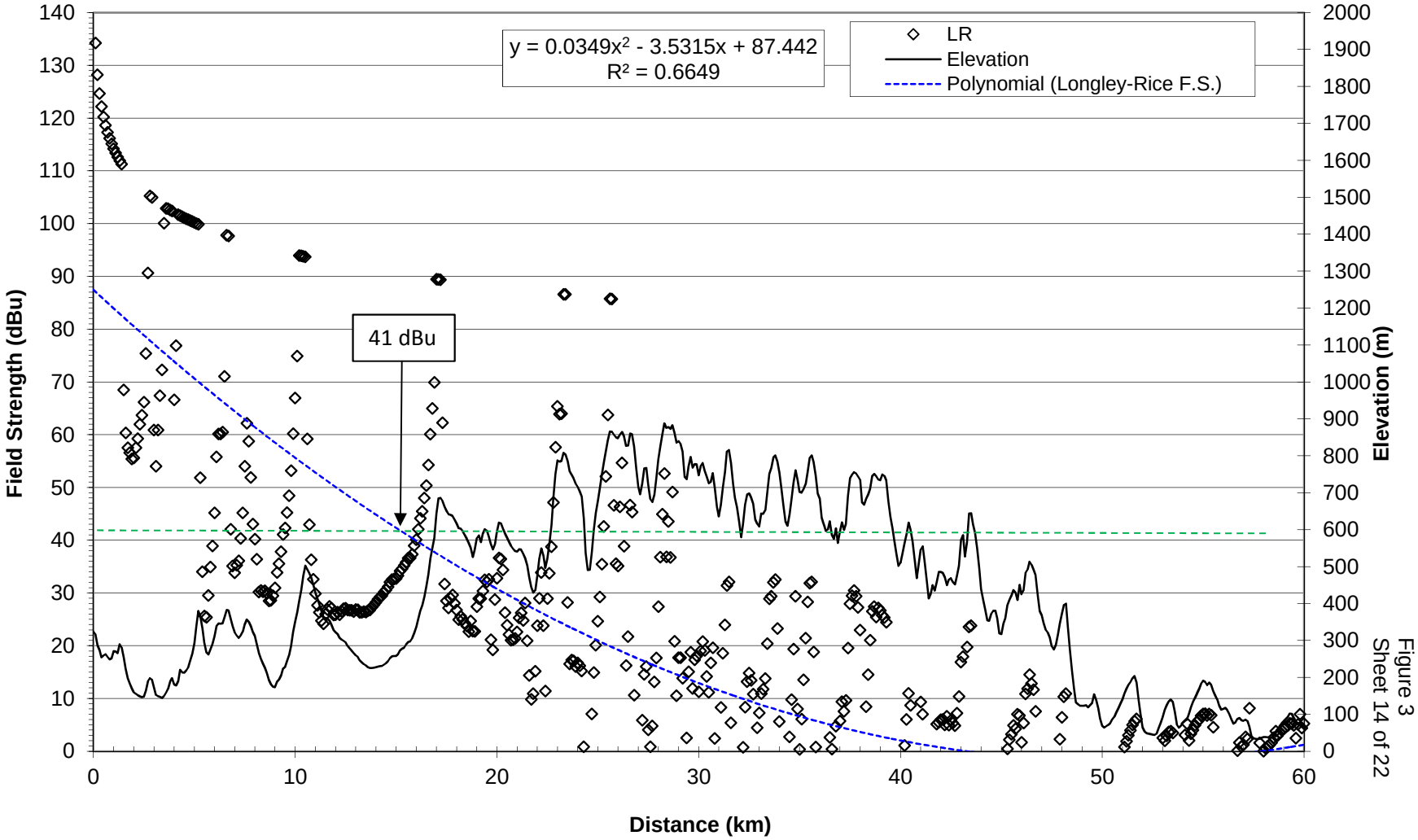

Figure 3
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KTCW, Ch 45, Roseburg, OR - 280 Degrees True

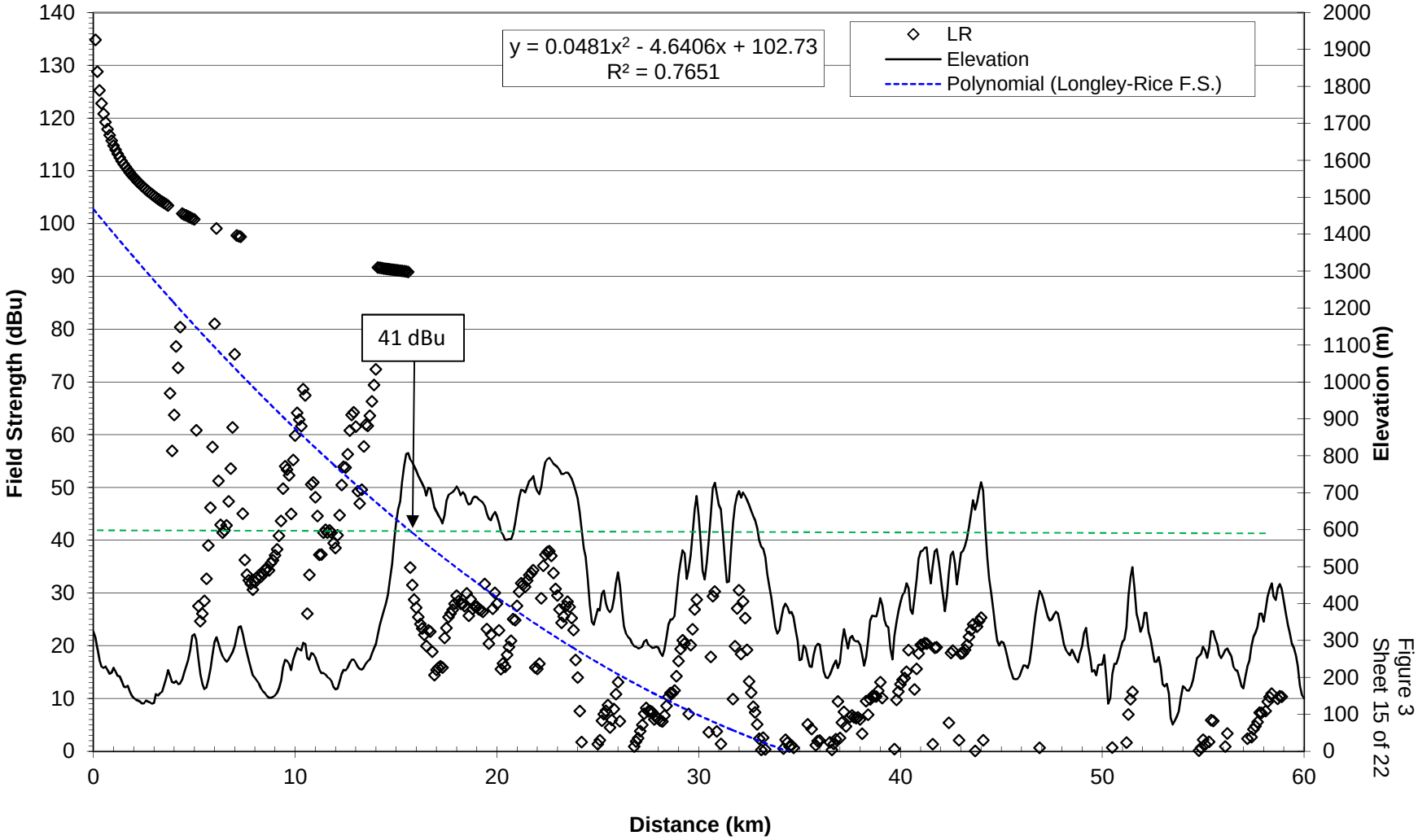

Figure 3
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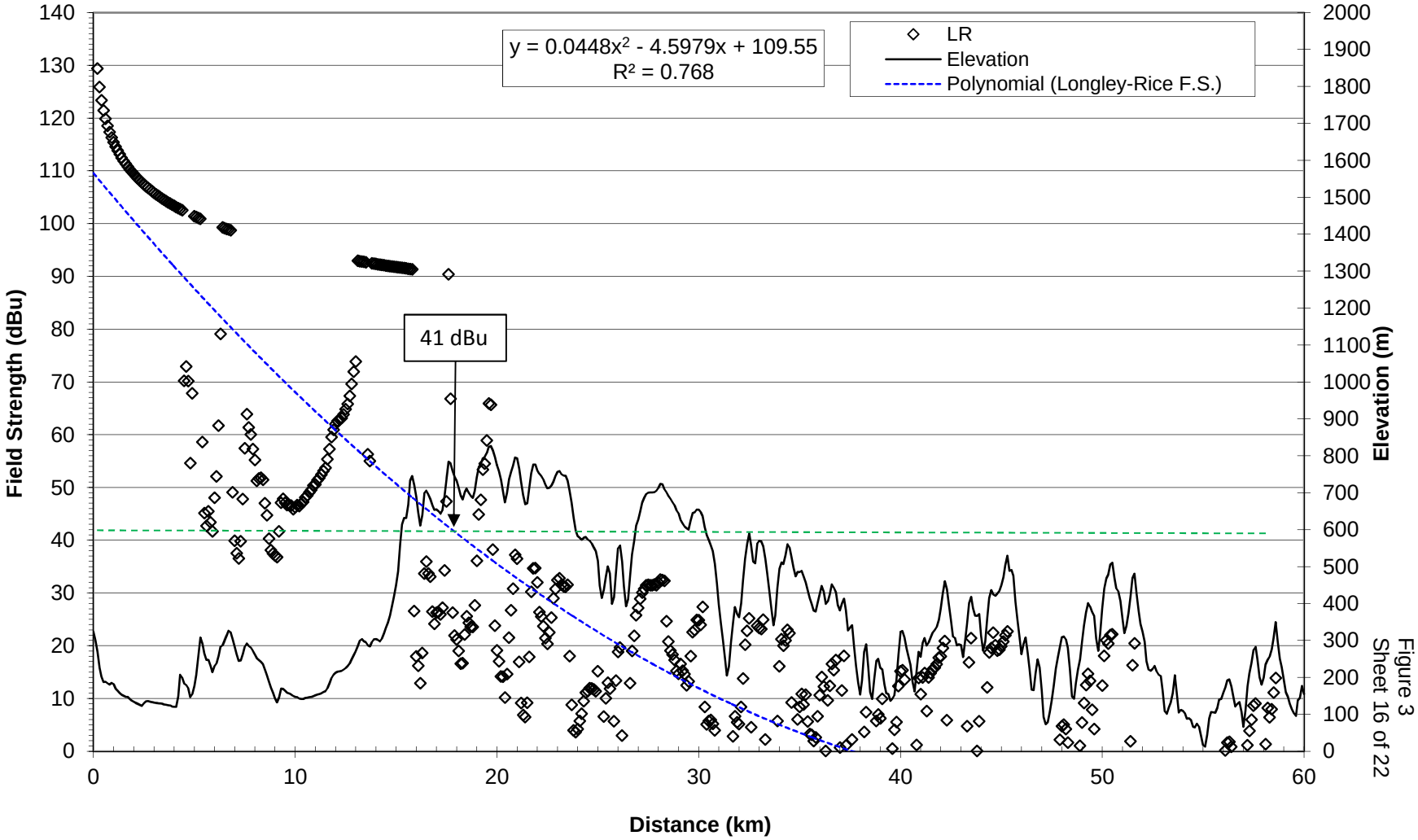
KTCW, Ch 45, Roseburg, OR - 290 Degrees True



KTCW, Ch 45, Roseburg, OR - 300 Degrees True

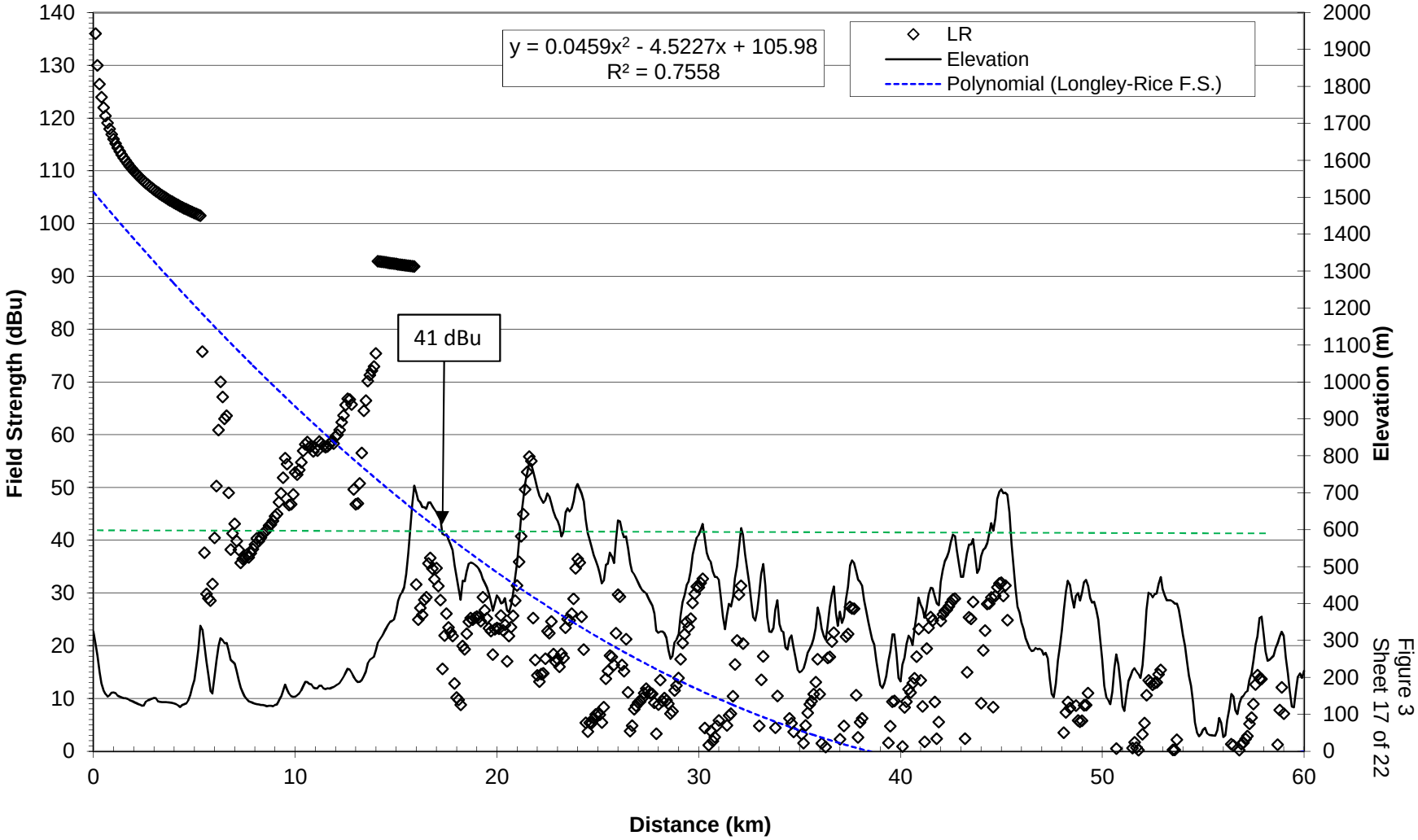


Figure 3
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KTCW, Ch 45, Roseburg, OR - 310 Degrees True

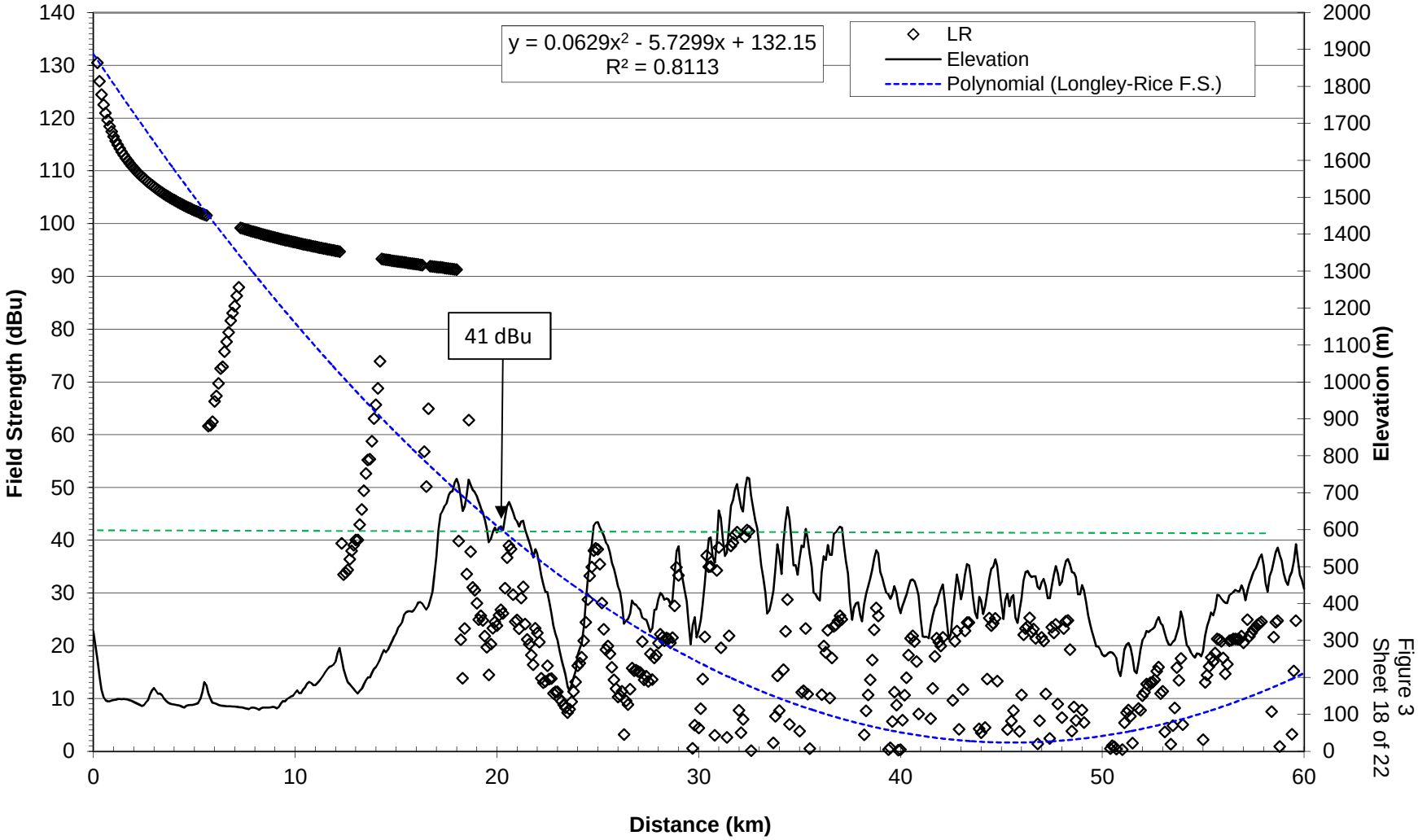

Figure 3
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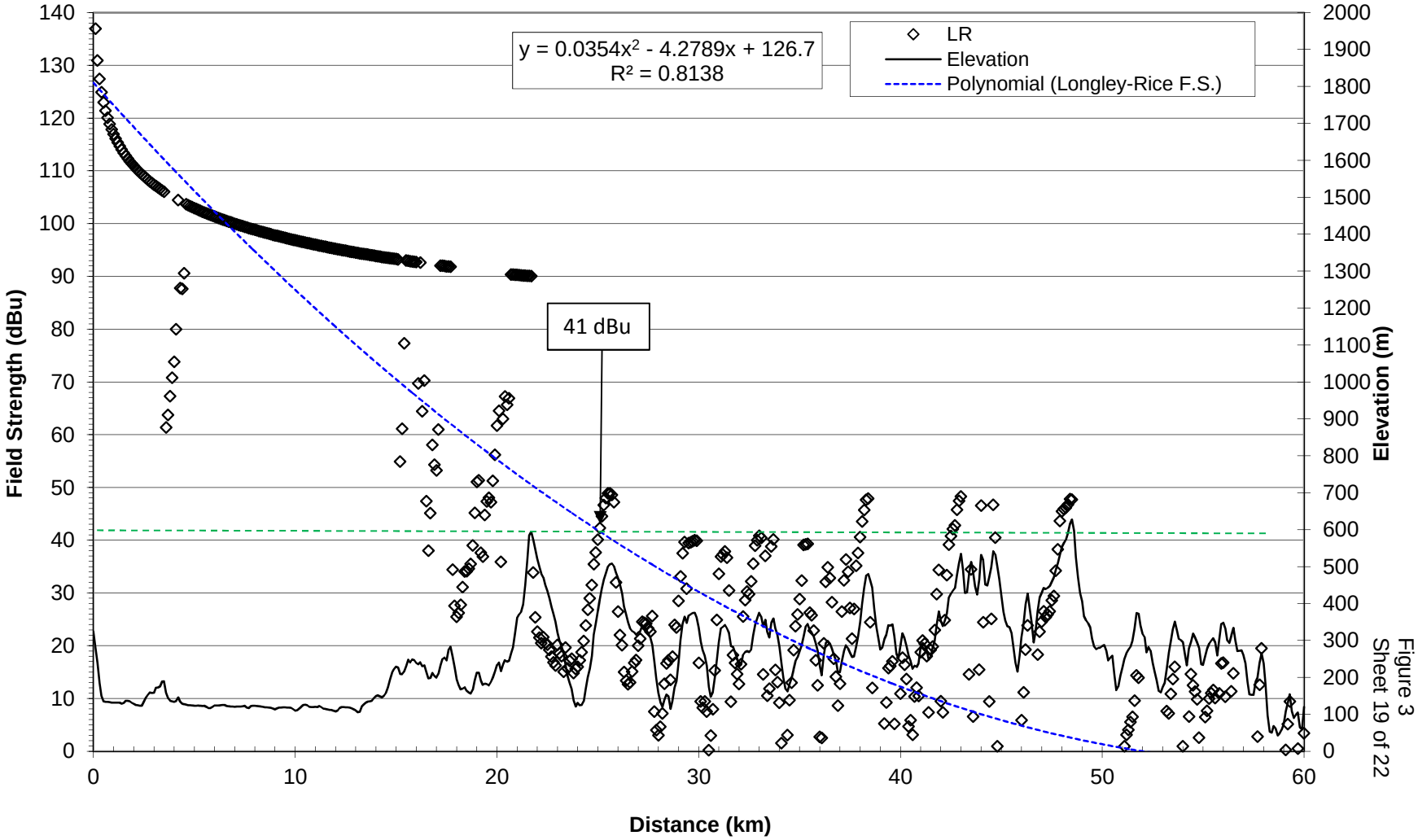
KTCW, Ch 45, Roseburg, OR - 320 Degrees True



KTCW, Ch 45, Roseburg, OR - 330 Degrees True

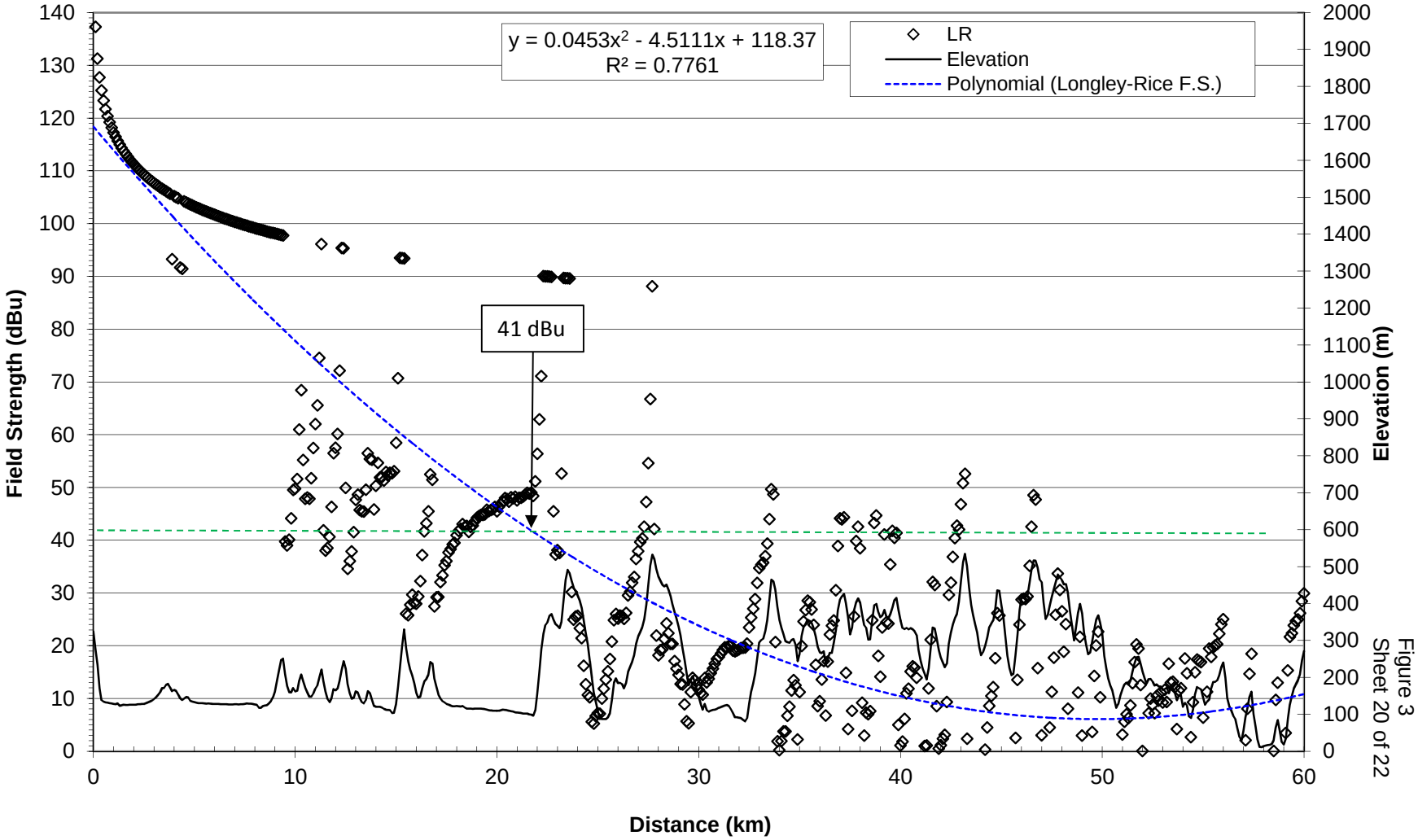


Figure 3
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KTCW, Ch 45, Roseburg, OR - 340 Degrees True

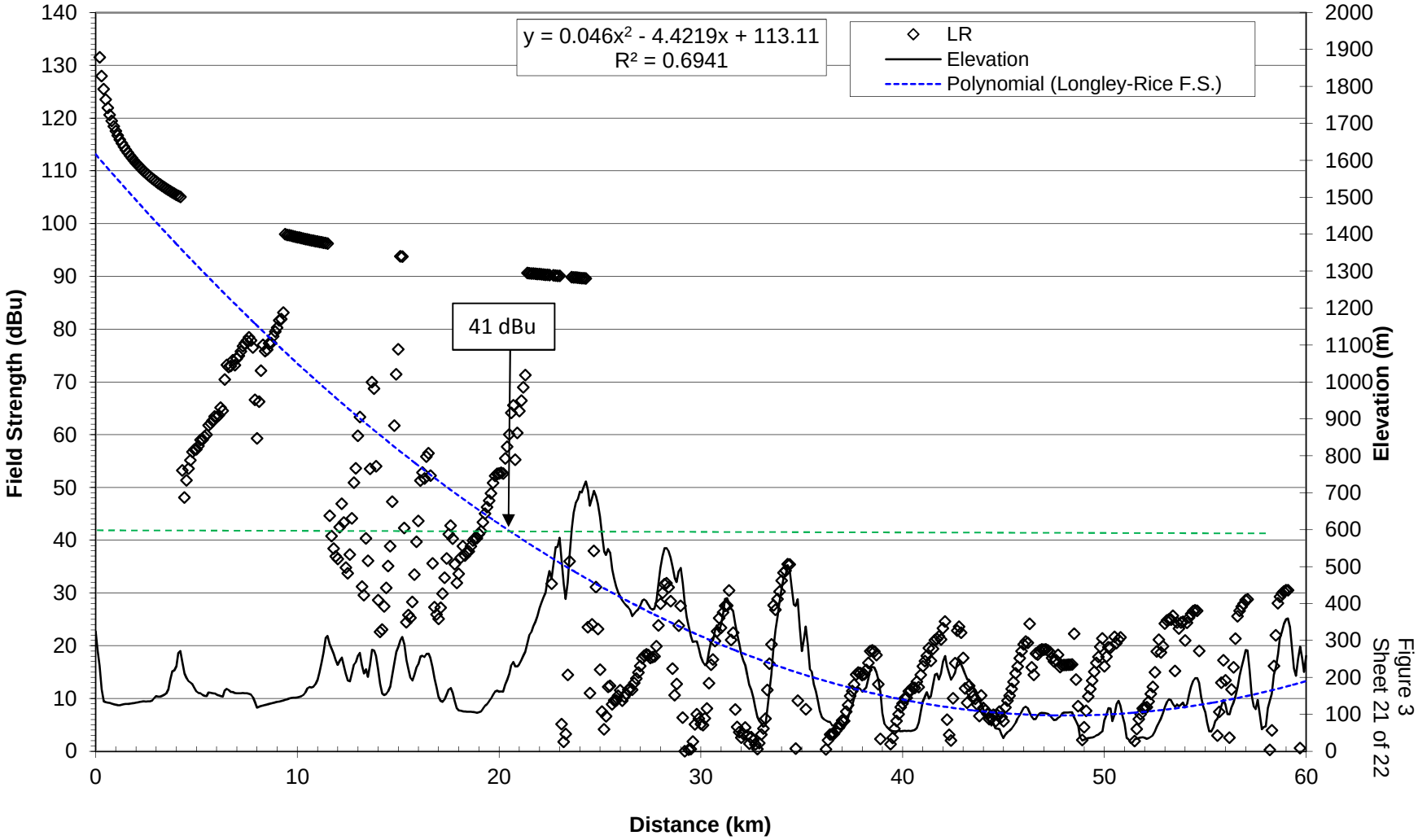

Figure 3
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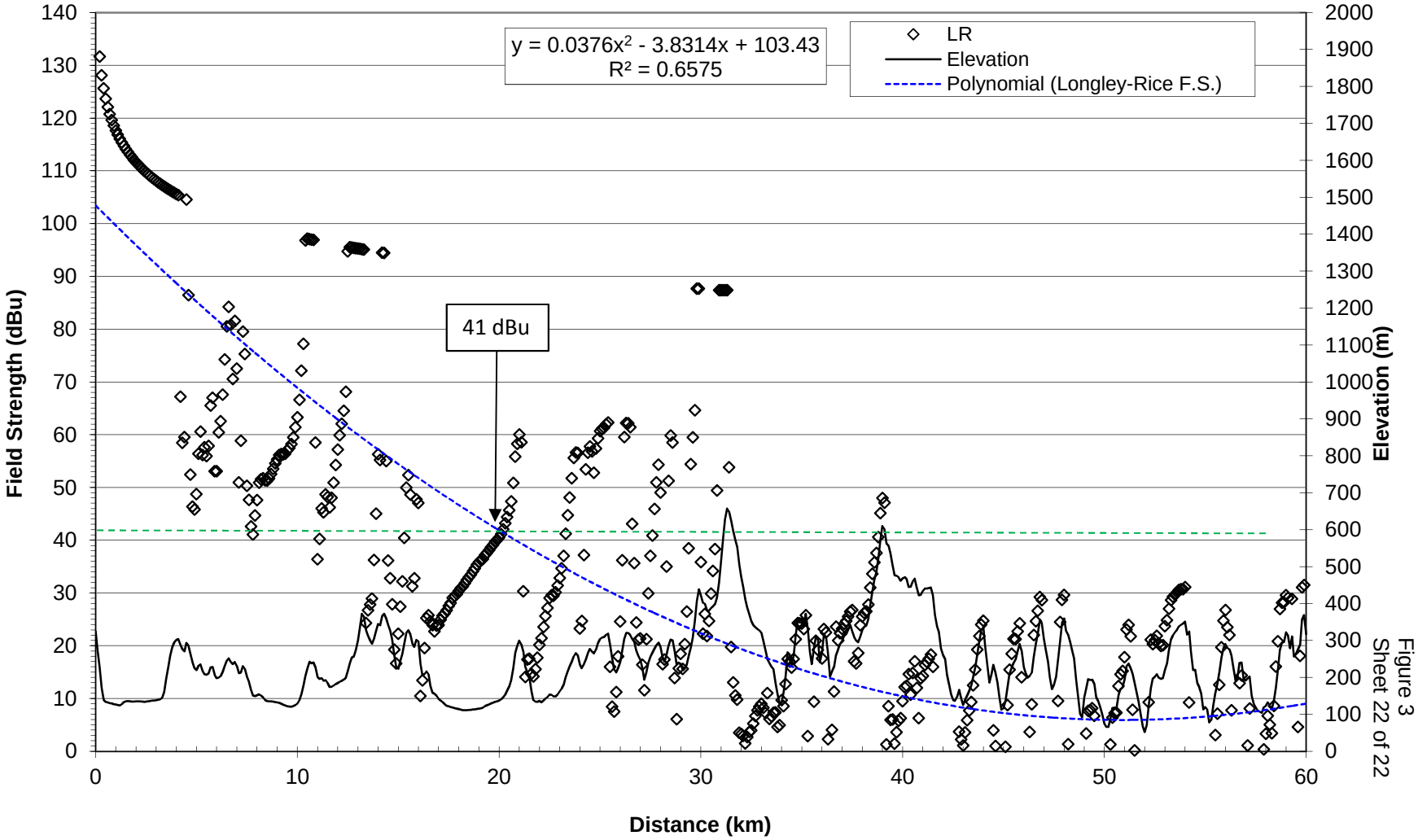
KTCW, Ch 45, Roseburg, OR - 350 Degrees True



KMCB, Ch 22, Coos Bay, OR - 0 Degrees True

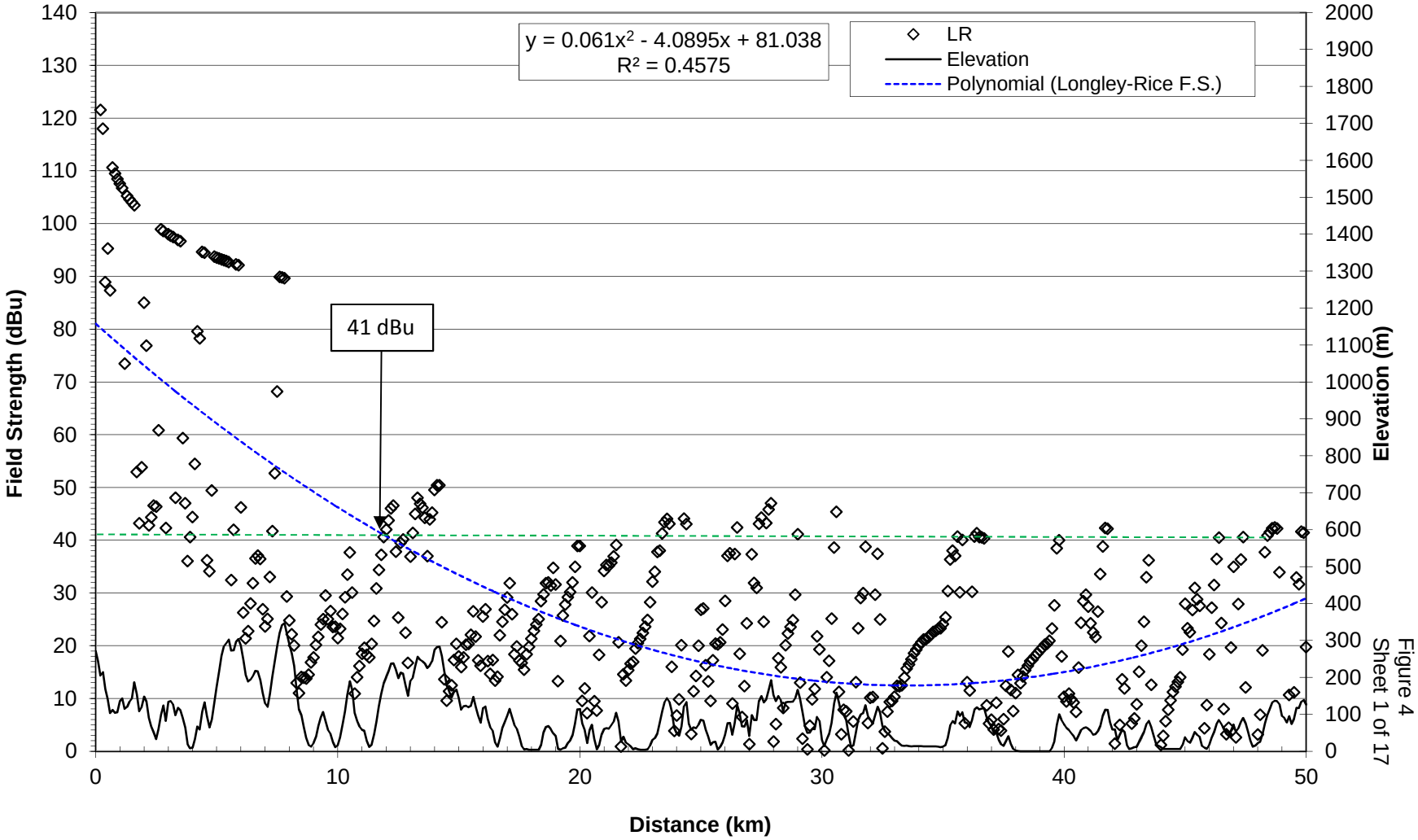


Figure 4
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KMCB, Ch 22, Coos Bay, OR - 10 Degrees True

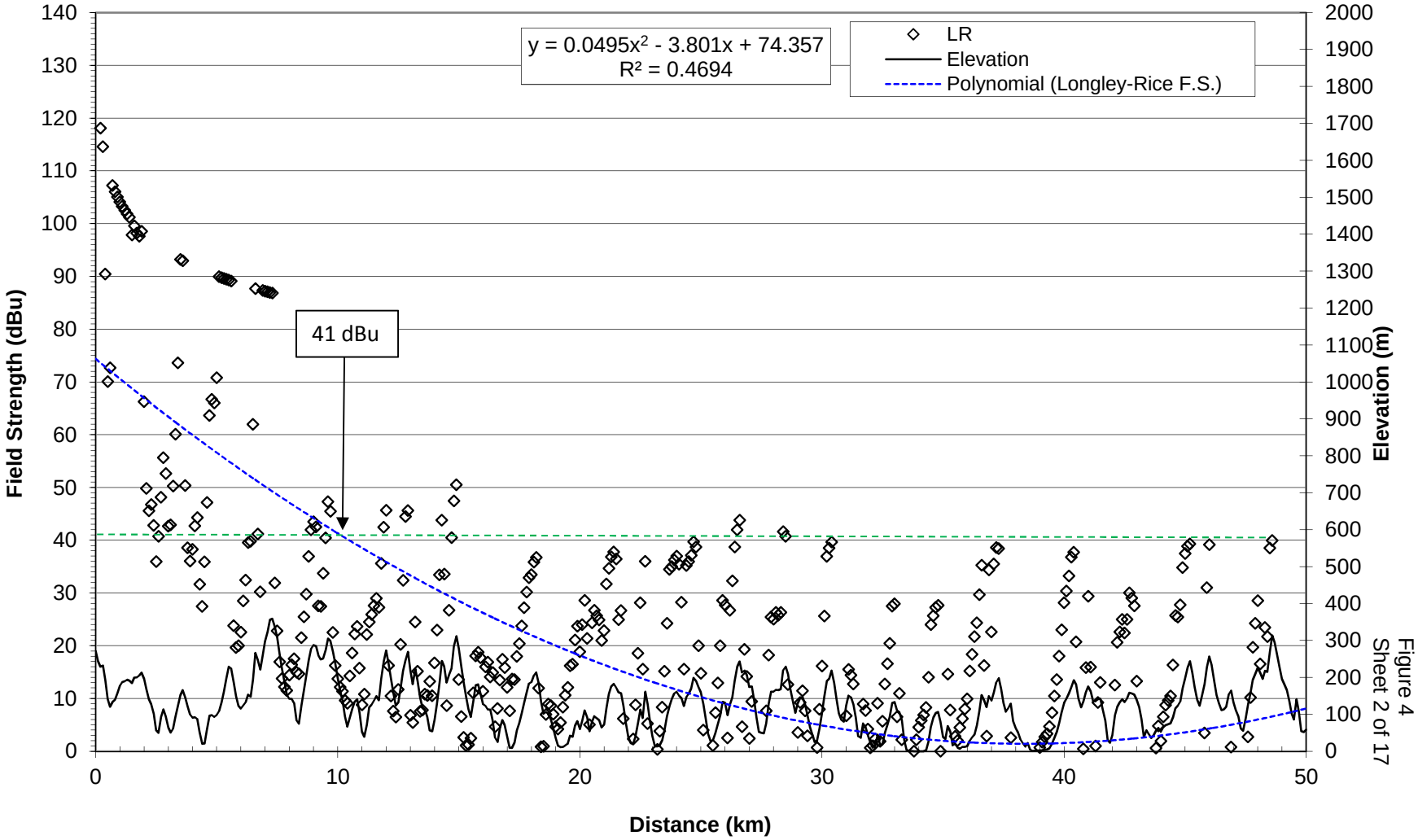

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 20 Degrees True

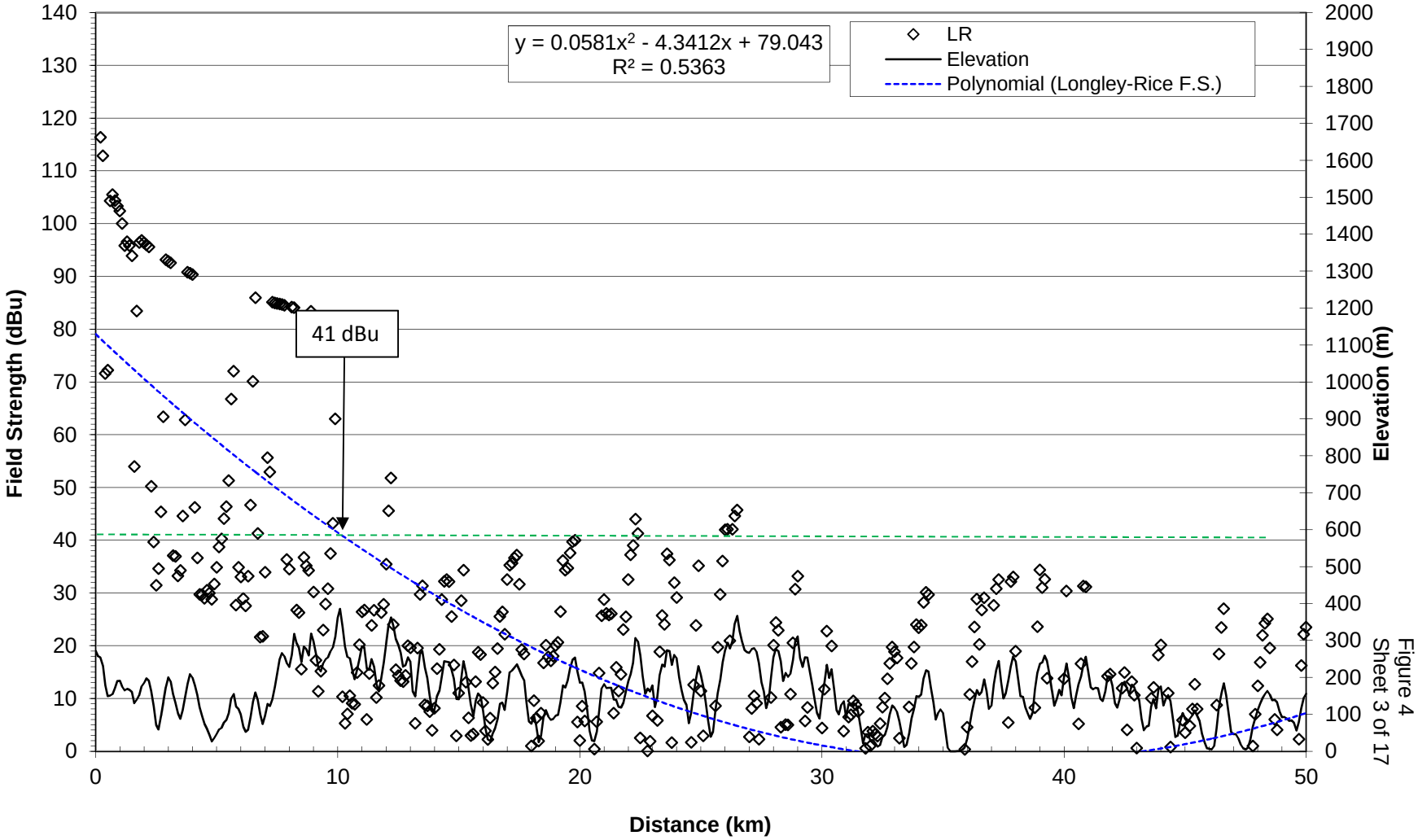

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 30 Degrees True

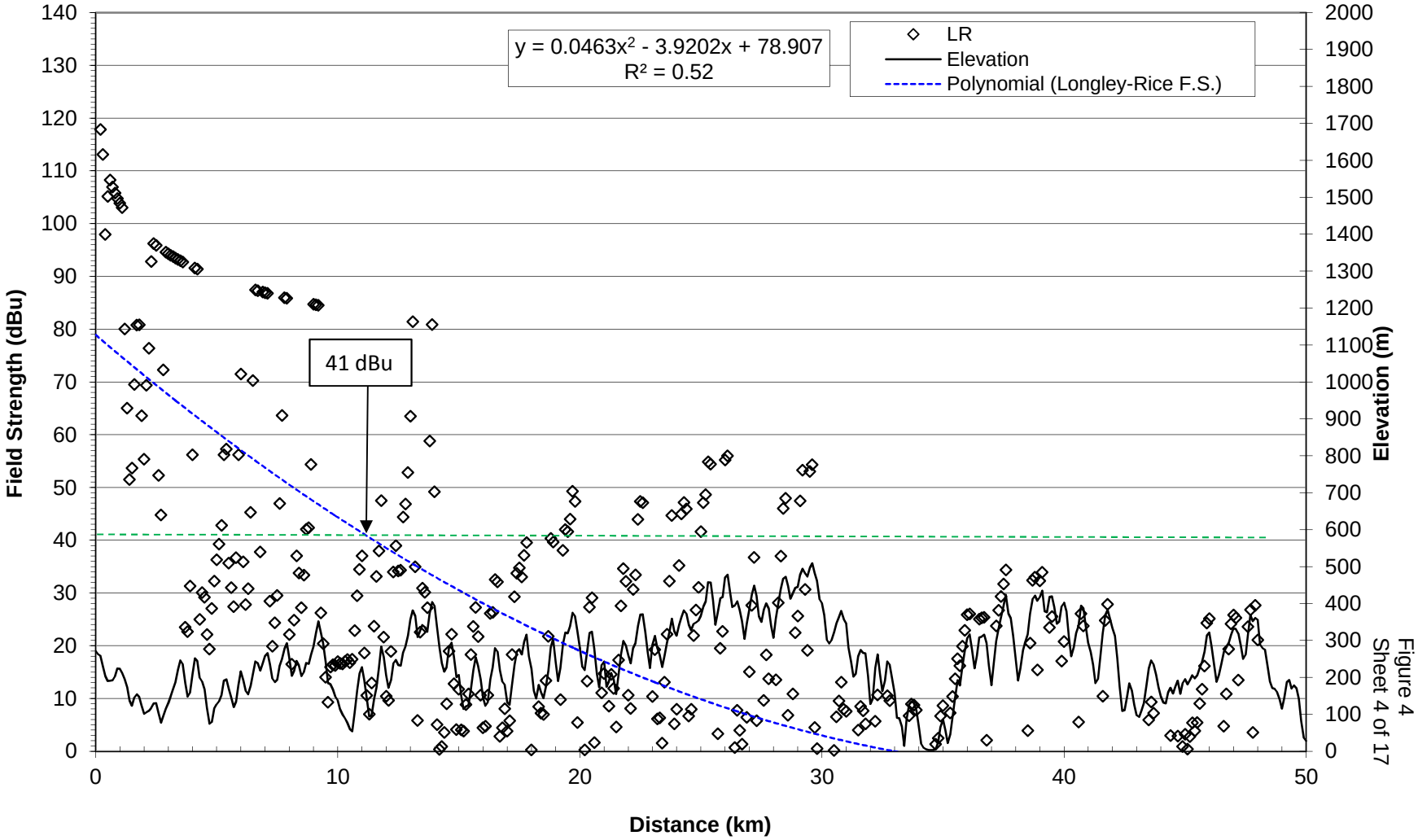

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 40 Degrees True

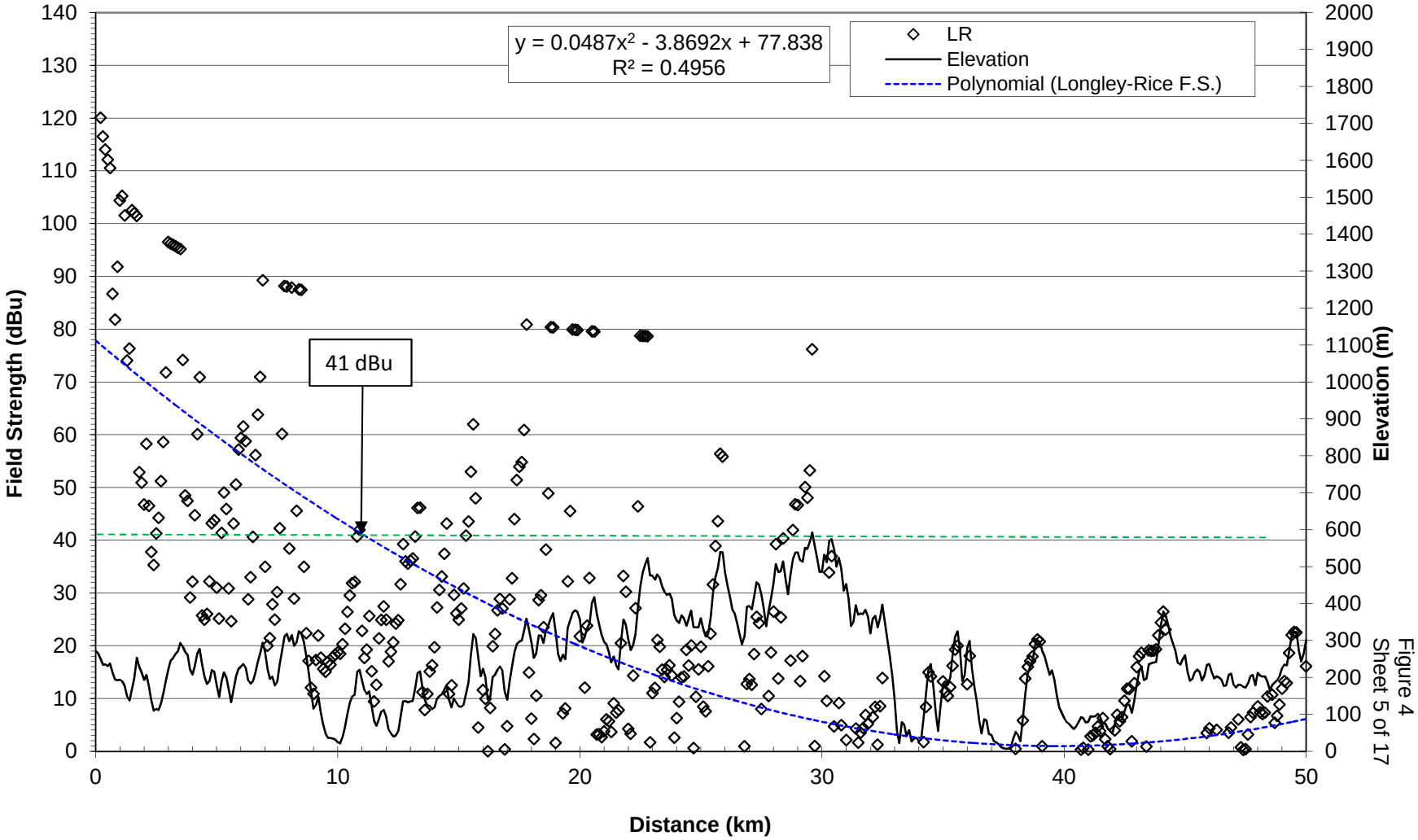

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 50 Degrees True

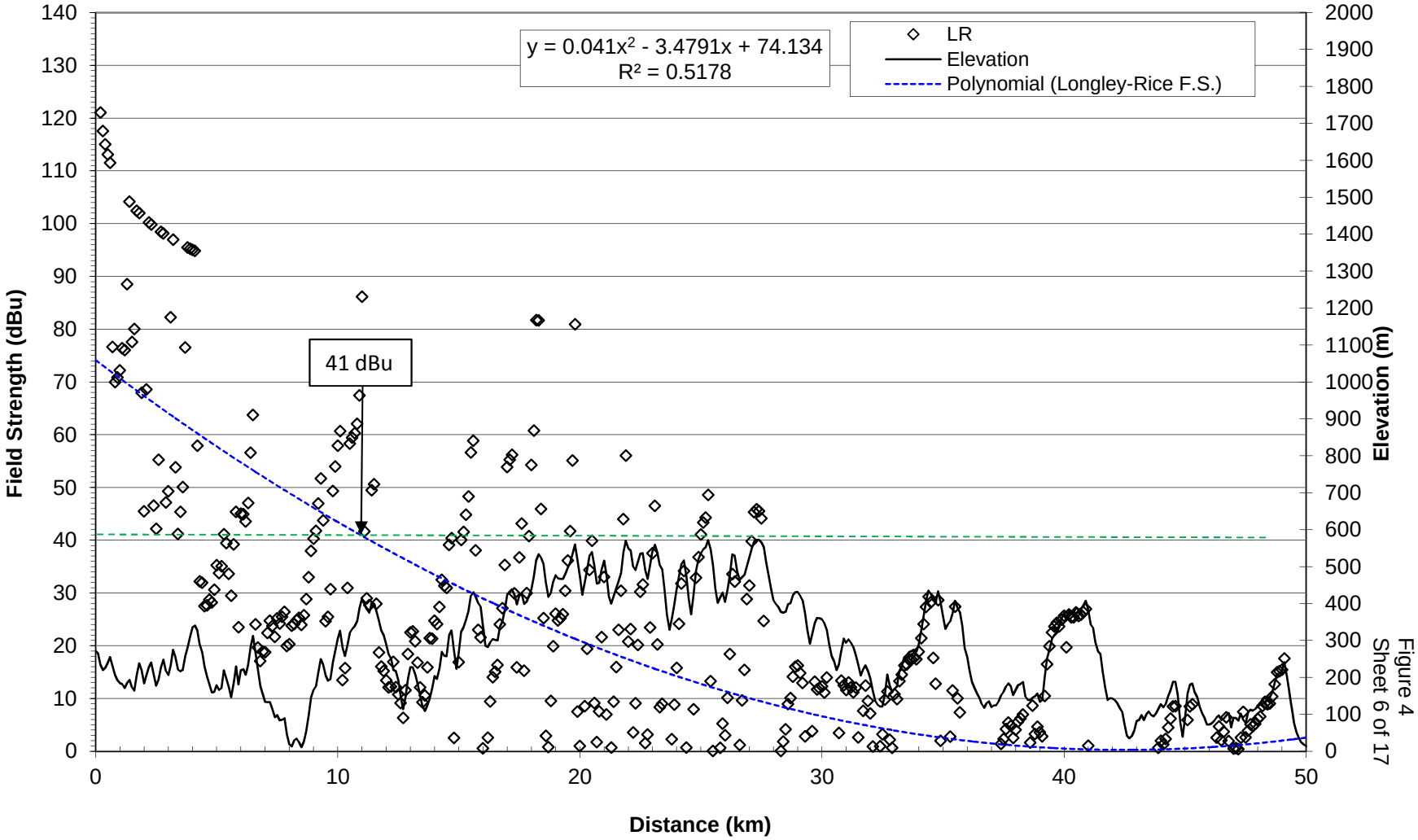

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 60 Degrees True

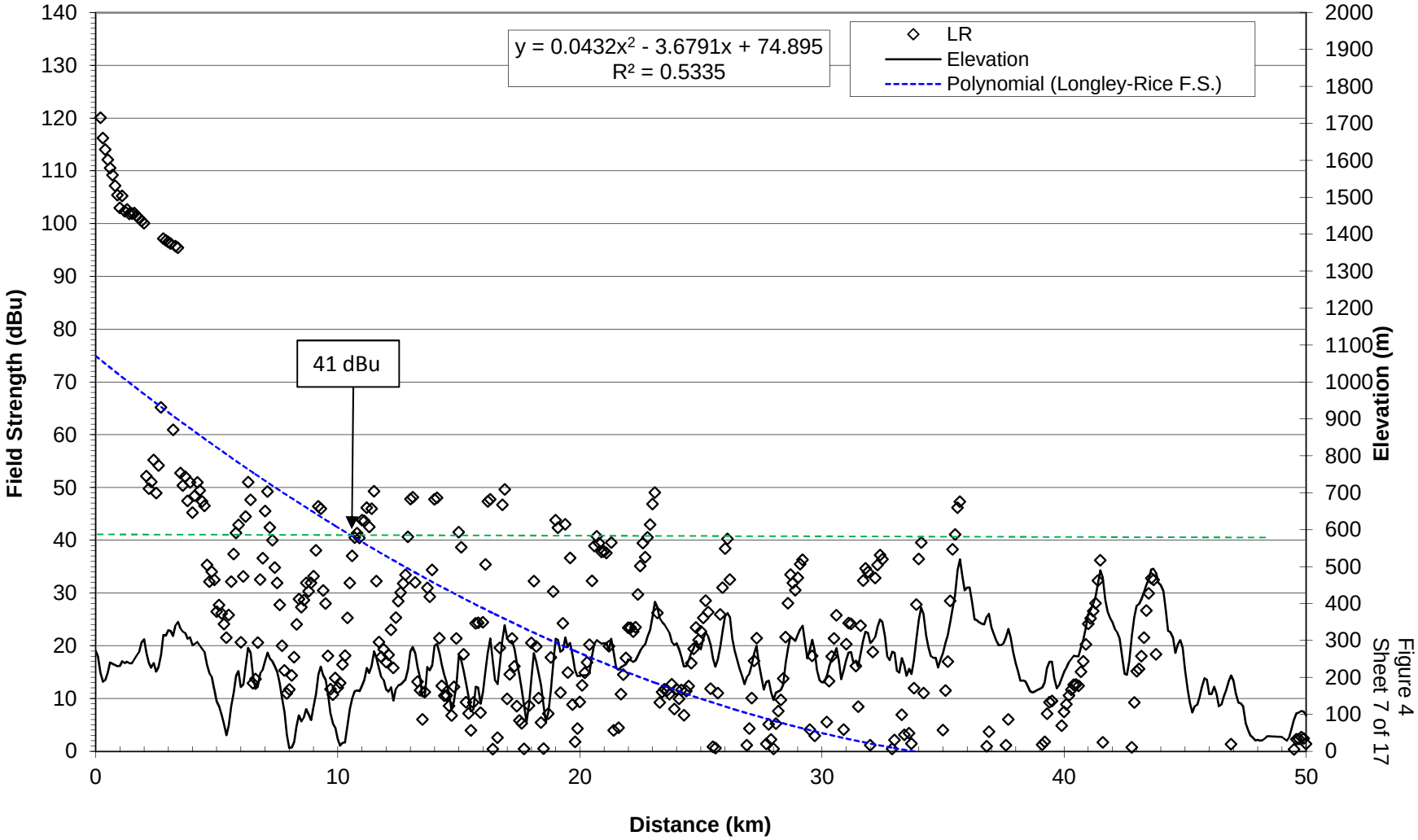

Figure 4
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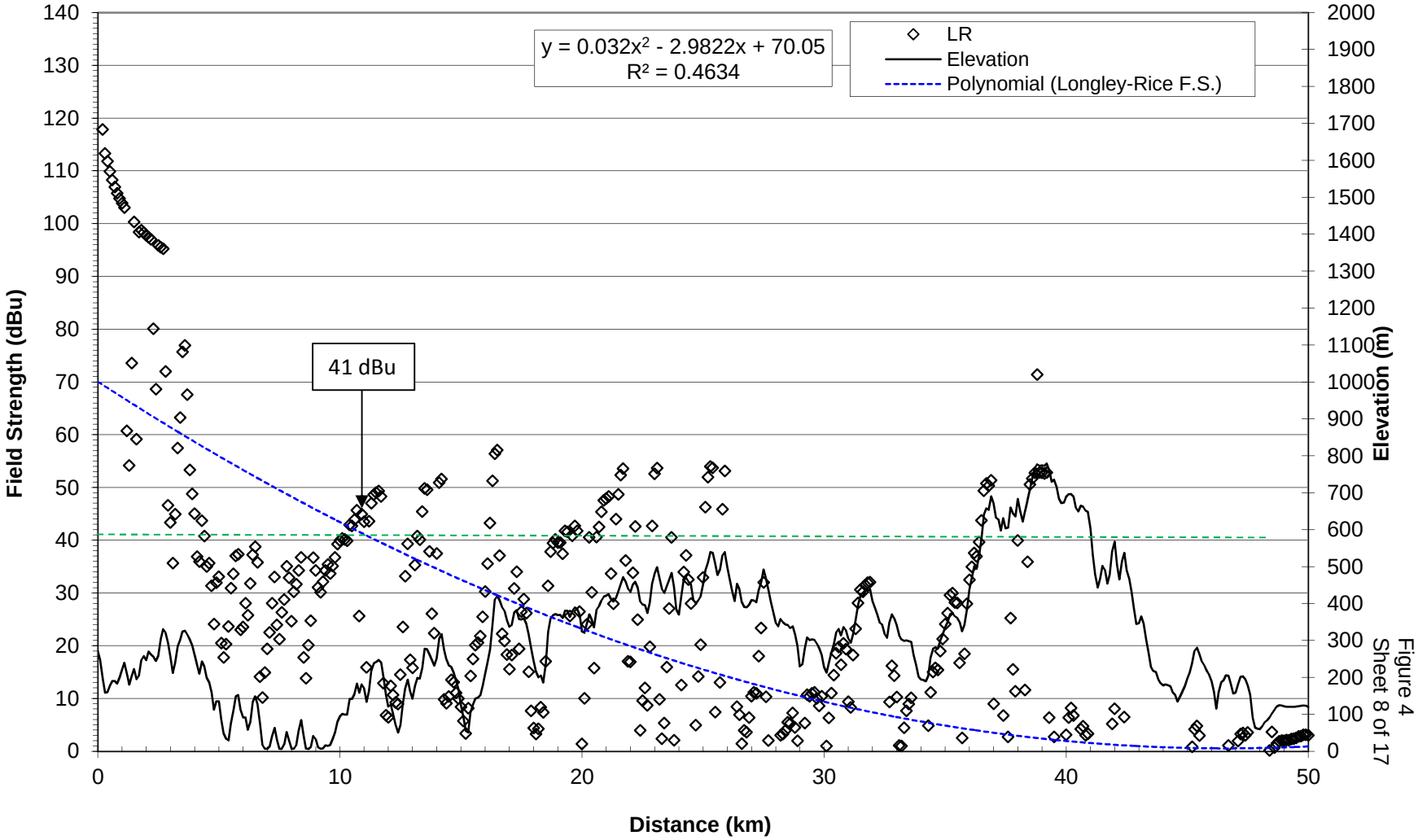

Figure 4
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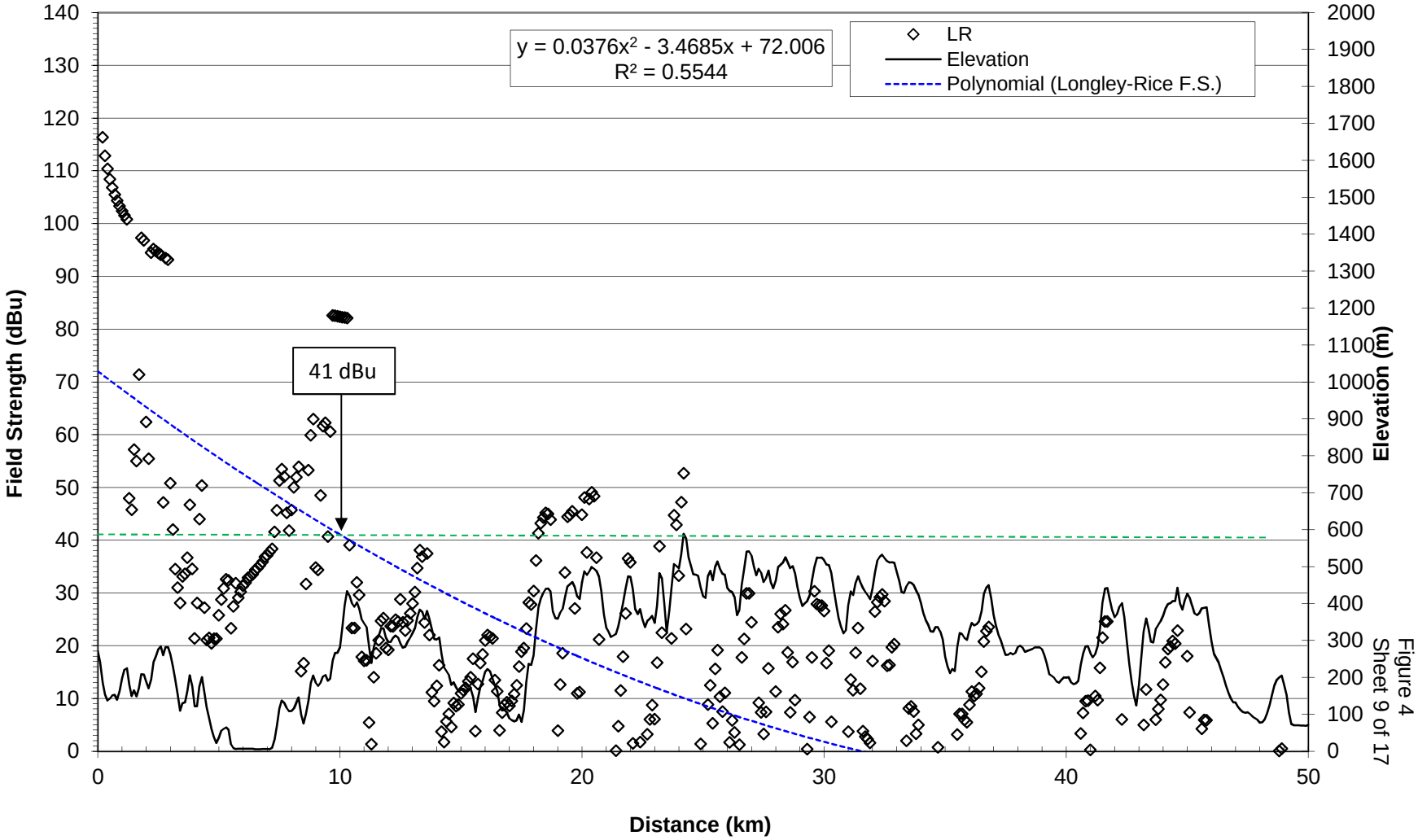
KMCB, Ch 22, Coos Bay, OR - 80 Degrees True
y = 0.0376x² - 3.4685x + 72.006
R² = 0.5544
LR
Elevation
Polynomial (Longley-Rice F.S.)
41 dBu
Field Strength (dBu)
Elevation (m)
Distance (km)
0
10
20
30
40
50
0
10
20
30
40
50
60
70
80
90
100
110
120
130
140
0
100
200
300
400
500
600
700
800
900
1000
1100
1200
1300
1400
1500
1600
1700
1800
1900
2000

KMCB, Ch 22, Coos Bay, OR - 90 Degrees True

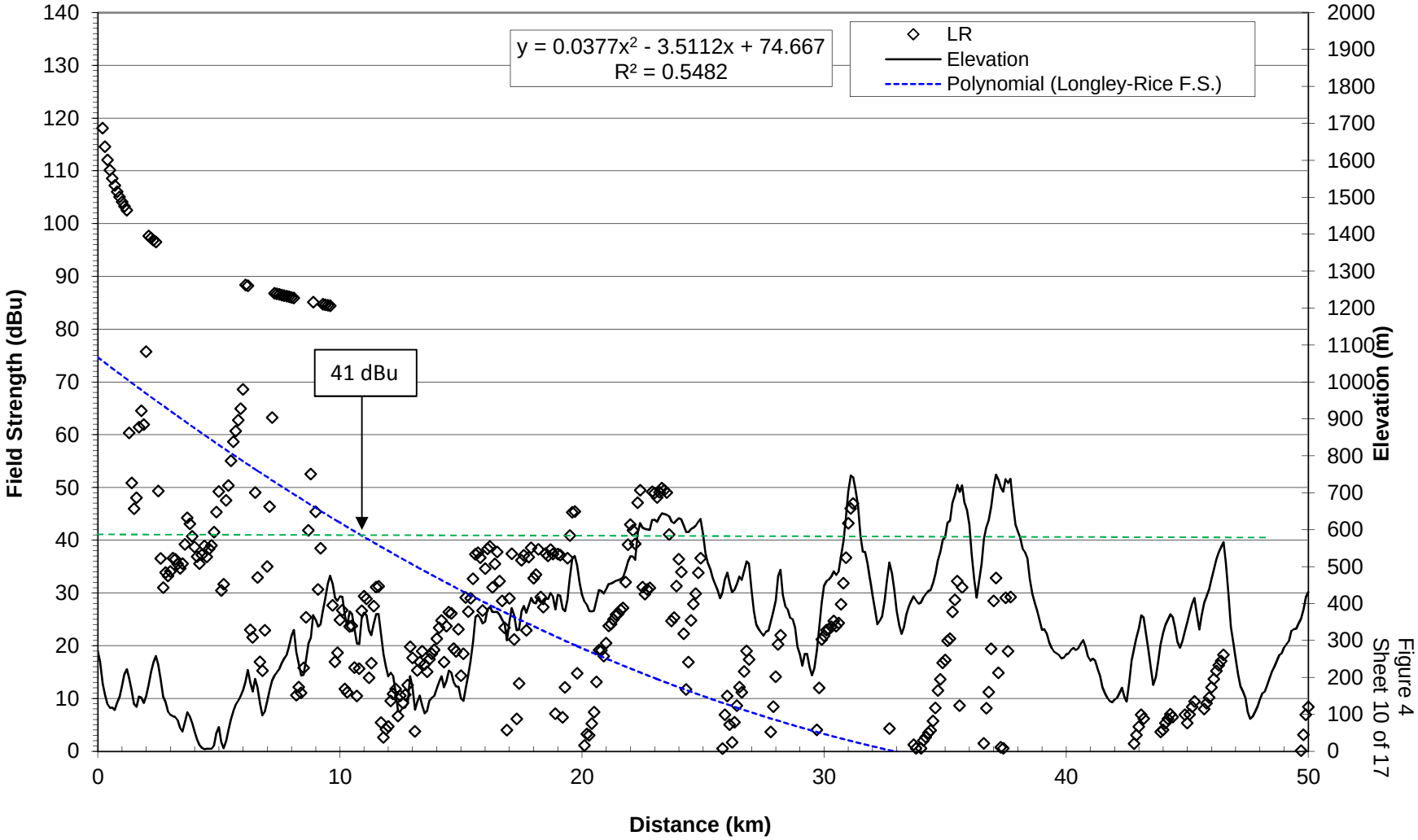

Figure 4
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KMCB, Ch 22, Coos Bay, OR - 100 Degrees True

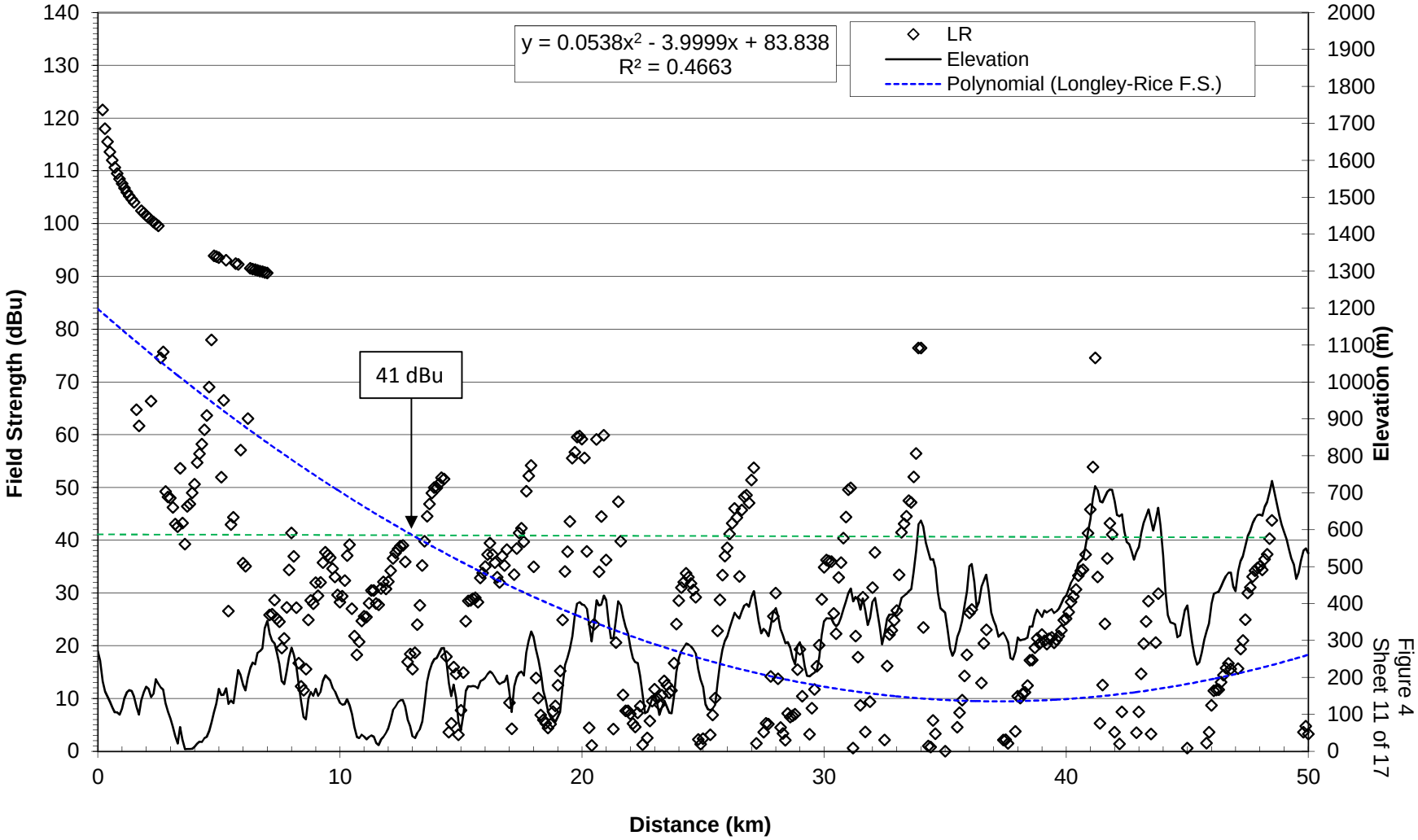

Figure 4
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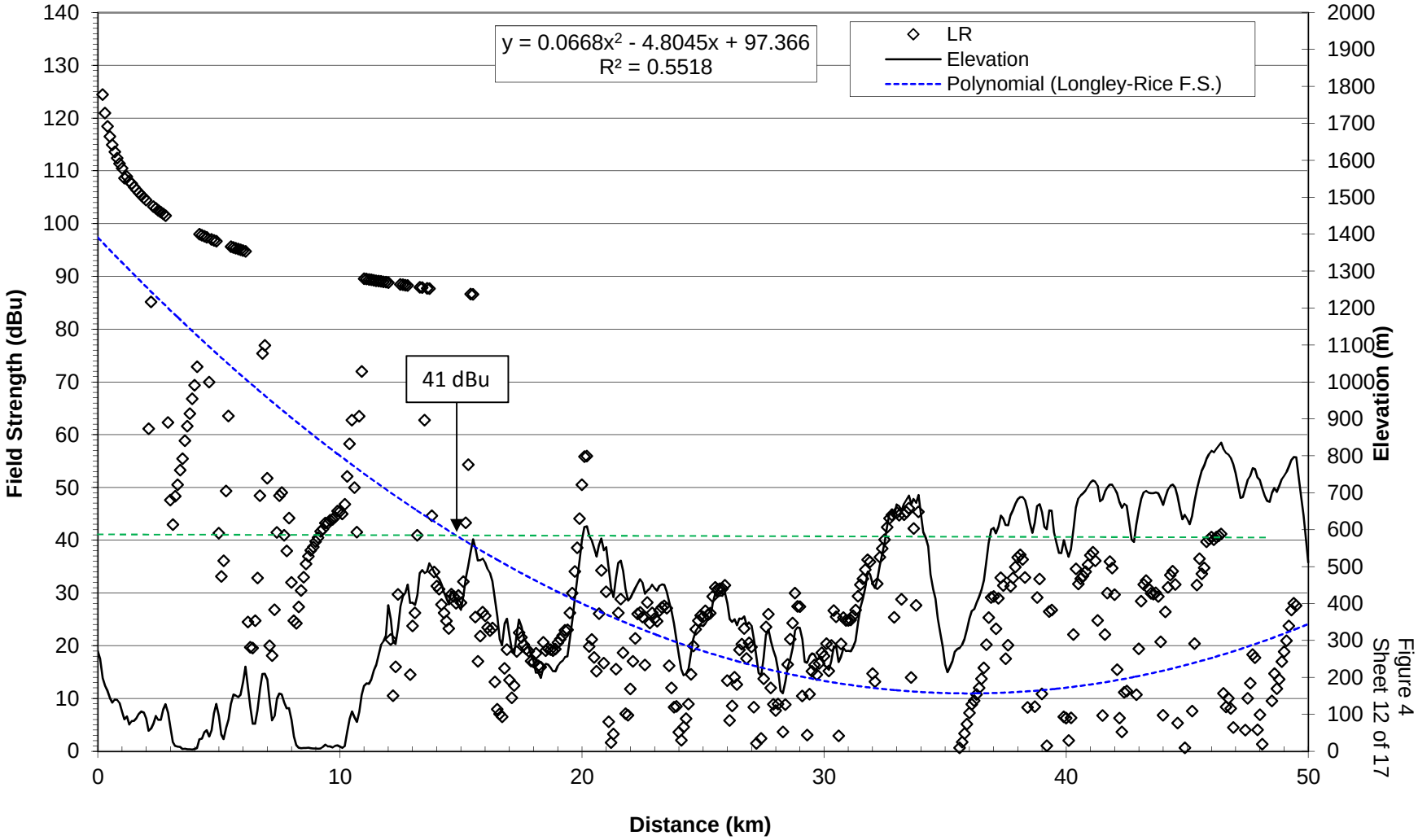
KMCB, Ch 22, Coos Bay, OR - 110 Degrees True



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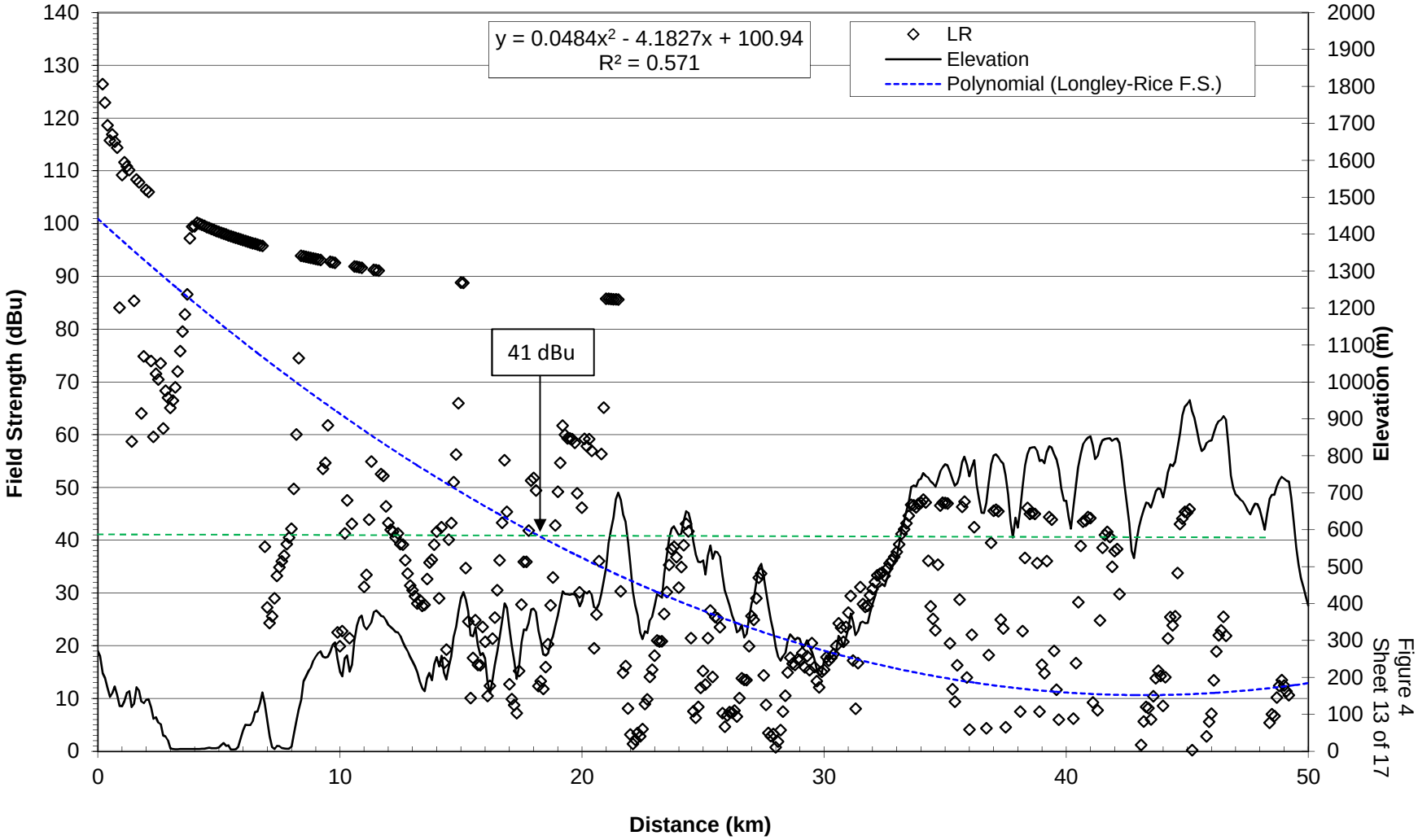
KMCB, Ch 22, Coos Bay, OR - 120 Degrees True



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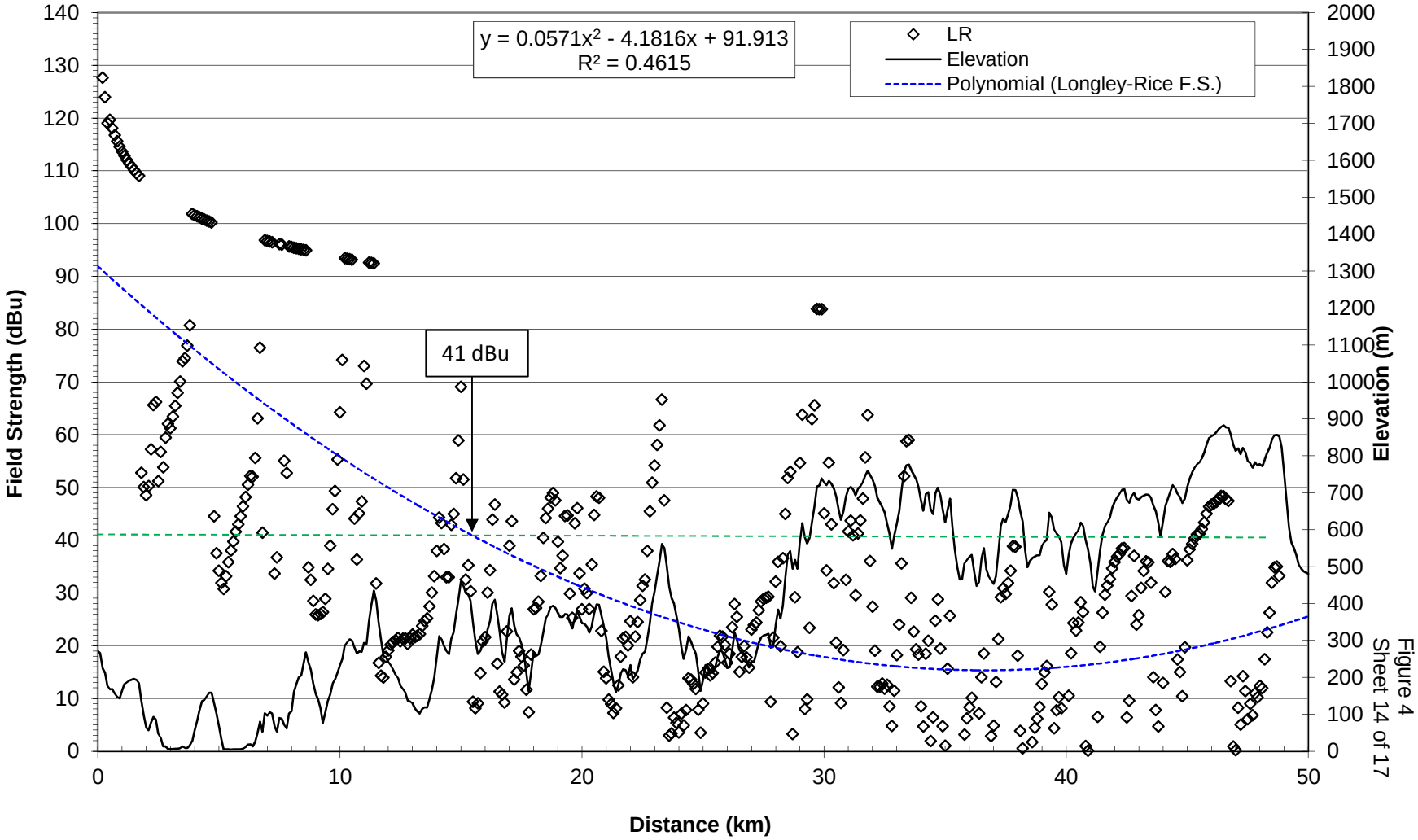
KMCB, Ch 22, Coos Bay, OR - 130 Degrees True



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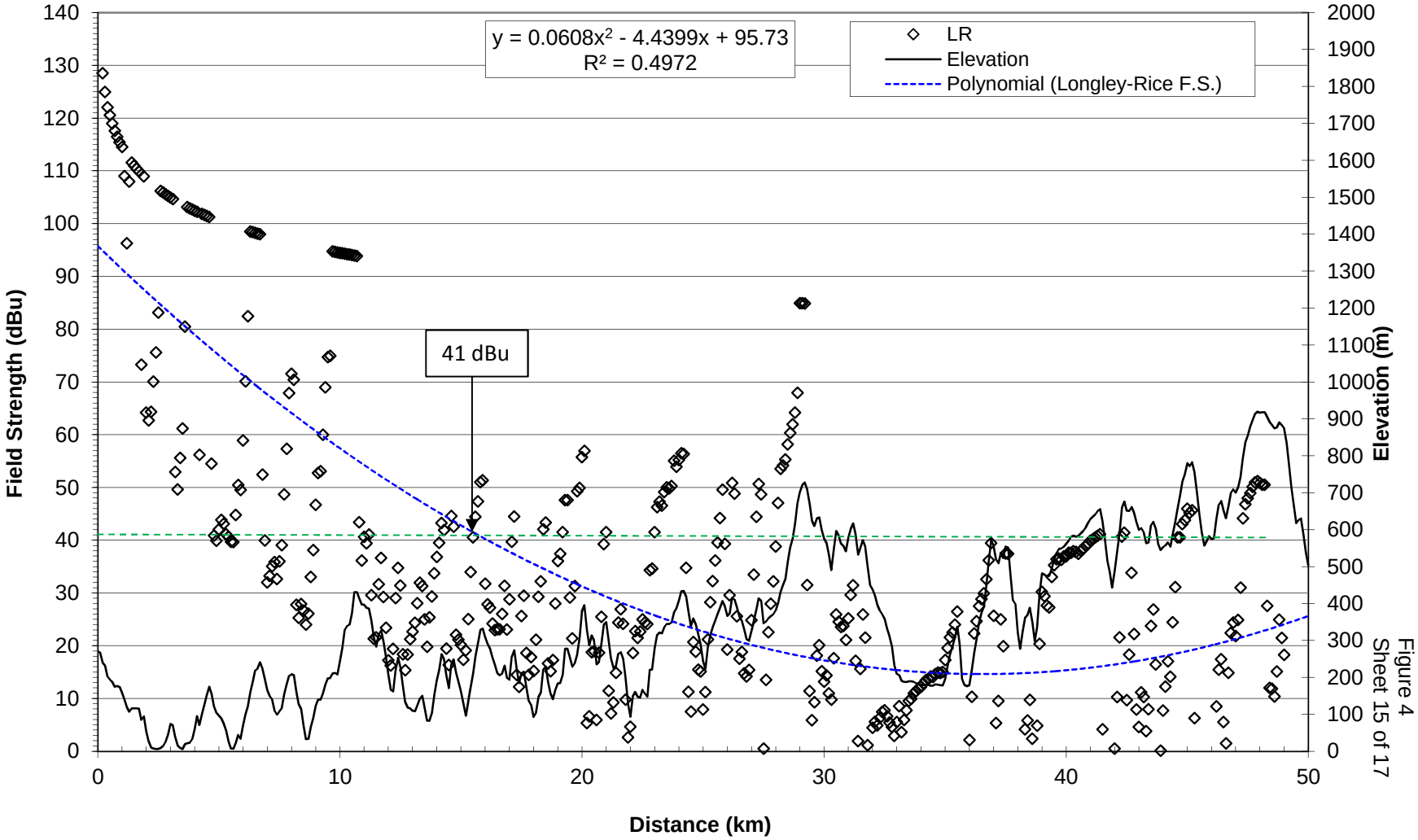
KMCB, Ch 22, Coos Bay, OR - 140 Degrees True



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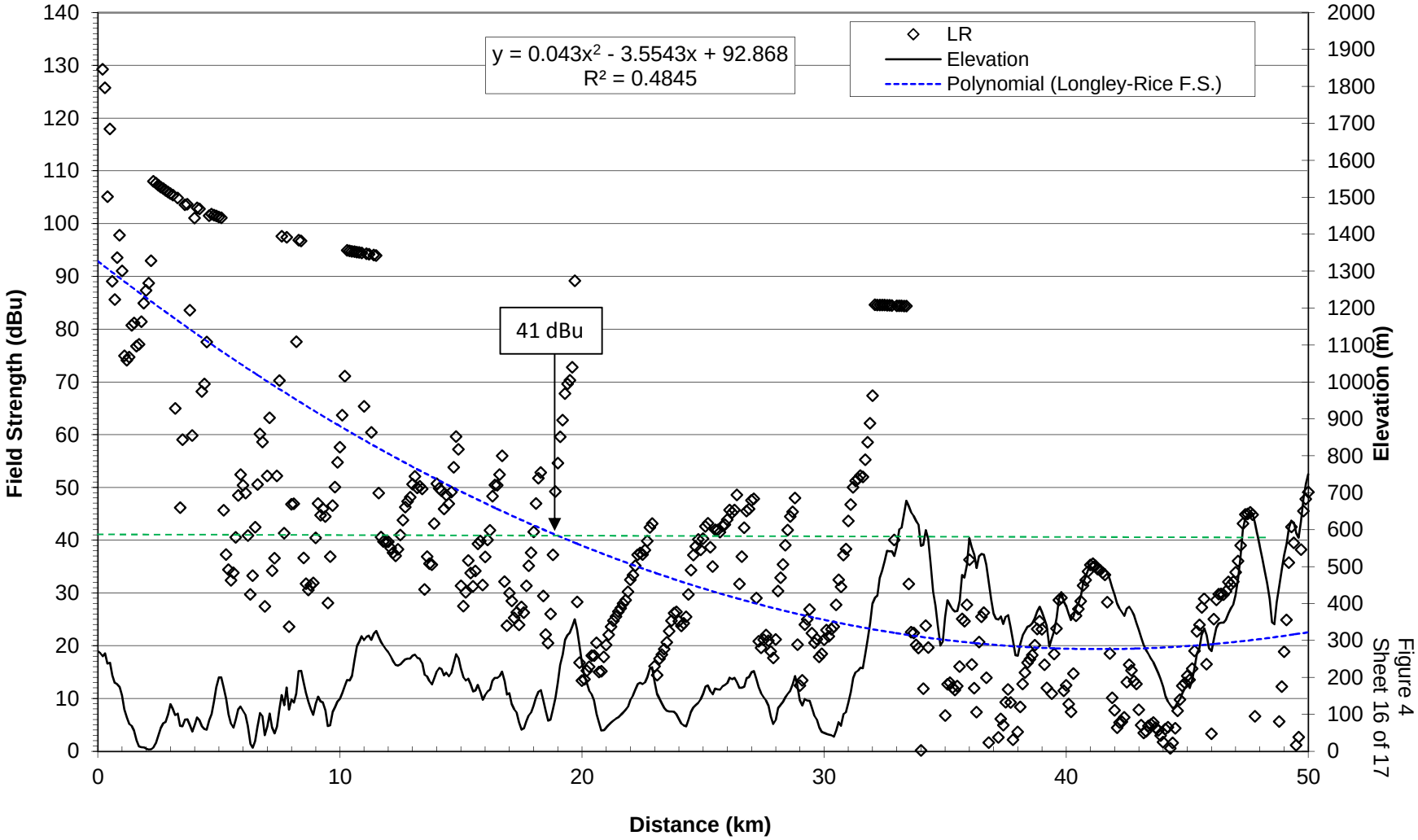
KMCB, Ch 22, Coos Bay, OR - 150 Degrees True



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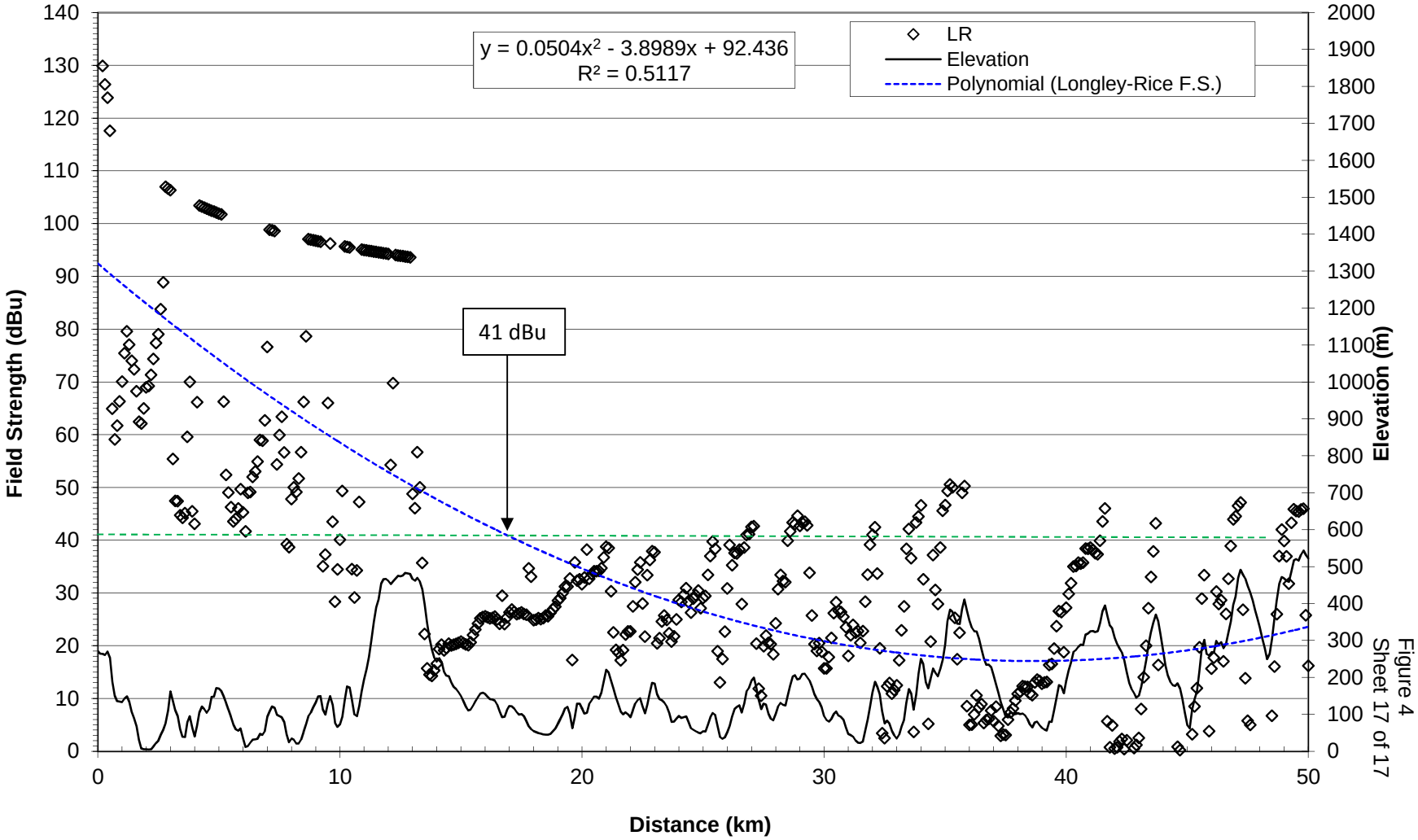
KMCB, Ch 22, Coos Bay, OR - 160 Degrees True



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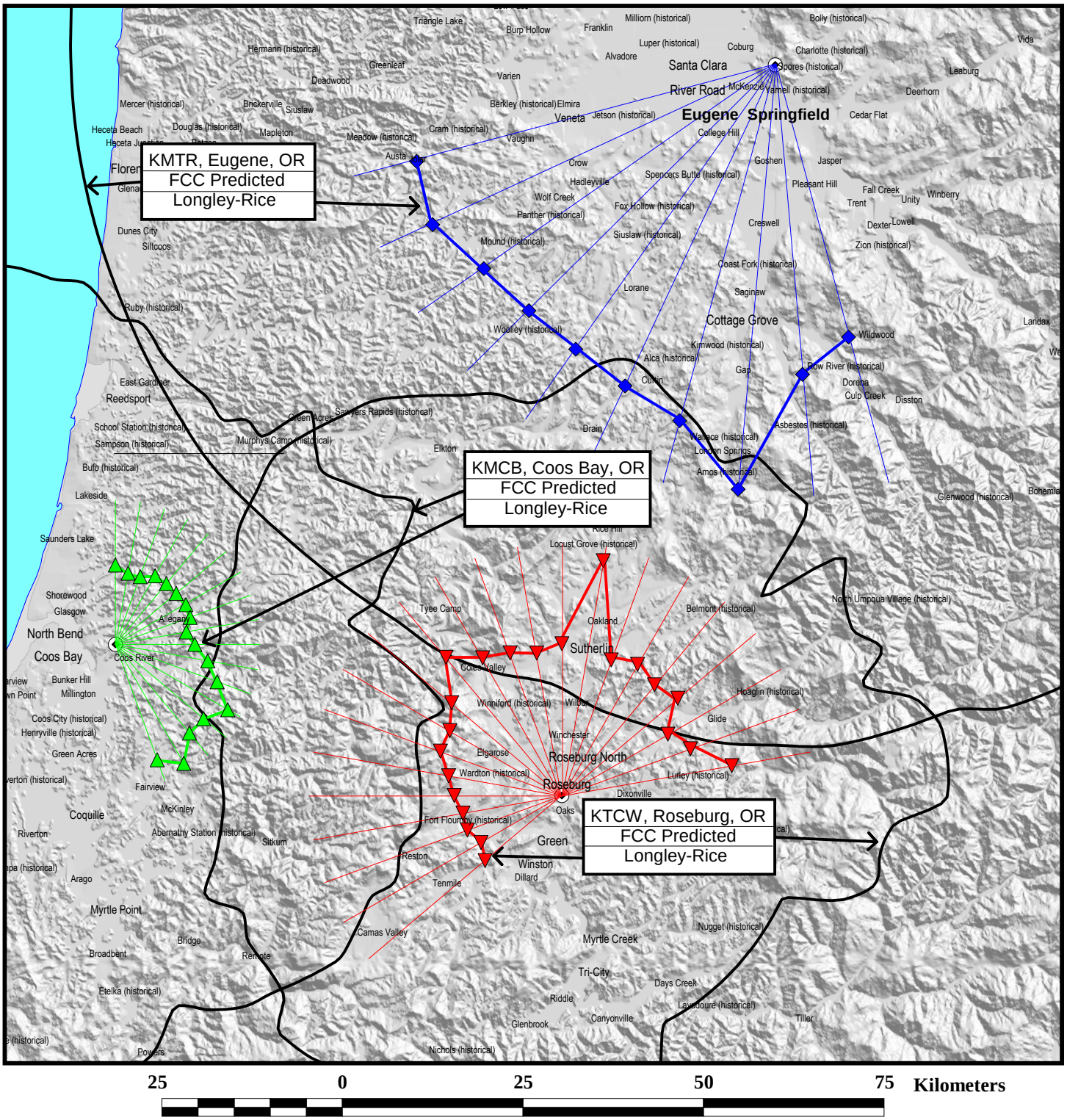

FCC AND LONGLEY-RICE PREDICTED NLSC COVERAGE

KMTR/KTCW/KMCB

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237