

TECHNICAL EXHIBIT
AMENDMENT TO PENDING
DTV APPLICATION
STATION KRXI-TV
RENO, NEVADA
CH 44 950 KW (MAX-DA) 836 M

Technical Narrative

This Technical Exhibit supports an application for digital television (DTV) station KRXI-TV for its DTV operation at Reno, Nevada. This application requests a amendment to the pending construction permit (CP) for KRXI-DT digital television operation on channel 44 at Reno with directional effective radiated power of 950 kilowatts.¹ KRXI-DT intends to use a Dielectric TFU "Tri-Lobe" type of directional antenna.

The proposed KRXI-TV effective radiated power and antenna height above average terrain does not comply with Section 73.622(f)(8) of the Commission's Rules. However, the proposed KRXI-TV Channel 44 coverage area would be smaller than that of the largest station in the market,² and therefore, pursuant to Section 73.622(f)(5) of the Commission's Rules, KRXI-TV would be permitted this facility.

¹ See BLCDDT-20080619AIG.

² Station KREN-TV on Channel 26 assigned to Reno is the largest station in the market, defined by its geographic coverage. The KREN-TV noise-limited coverage contour defined by FCC license BLCDDT-20090227AAM is 49,287 square kilometers whereas the proposed KRXI-DT noise-limited coverage contour is 48,910 square kilometers.

Proposed Facilities

Station KRXI-TV proposes to operate DTV channel 44 from its licensed DTV site. The antenna height above average terrain for the channel 44 DTV operations will remain 836 meters. An allocation study was completed to ensure no prohibited interference would occur.

The proposed DTV transmitter site will continue to be located atop at the existing tower site. Therefore, the proposed site location is:

39° 35' 23" North Latitude
119° 55' 37" West Longitude

A sketch of antenna and pertinent elevations are included as Figure 1.

Figure 2 is a map showing the proposed DTV predicted coverage contour. The extent of the contours have been calculated using the normal FCC prediction method.

Population Served

The herein proposed KRXI-TV facility is predicted to serve 527,500 persons.

Allocation Considerations

The proposed KRXI-TV Channel 44 facility meets the requirements of Section 73.623 of the FCC Rules concerning predicted interference to other facilities. Longley-Rice interference analyses were conducted pursuant to the

requirements of the FCC Rules; OET Bulletin No. 69; and published FCC guidelines for preparation of such interference analyses. The Longley-Rice interference analyses were conducted using the software developed by du Treil, Lundin & Rackley, Inc. based on the FCC published software routines.³ Stations selected for analysis were determined pursuant to the distance requirements outlined in the FCC DTV Processing Guidelines Public Notice. The proposed facility will meet the 0.5% criterion outlined in the FCC Rules and published guidelines with respect to all considered stations.⁴

Radiofrequency Electromagnetic Field Exposure

A radiofrequency electromagnetic survey will be completed upon construction of the proposed facility to ensure no exposure in excess of the Commission's uncontrolled environment standard is accessible at ground level.

Access to the transmitting site is restricted and appropriately marked with warning signs. As this is a multi-user site an agreement between the stations will control access. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure.

³ The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed with 0.5 km grid spacing.

Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down. The proposed KRXI-TV operation appears to be otherwise categorically excluded from environmental processing.

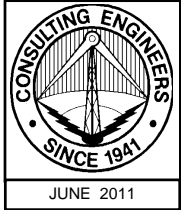
It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner.

Charles Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 32437
941.329.6000

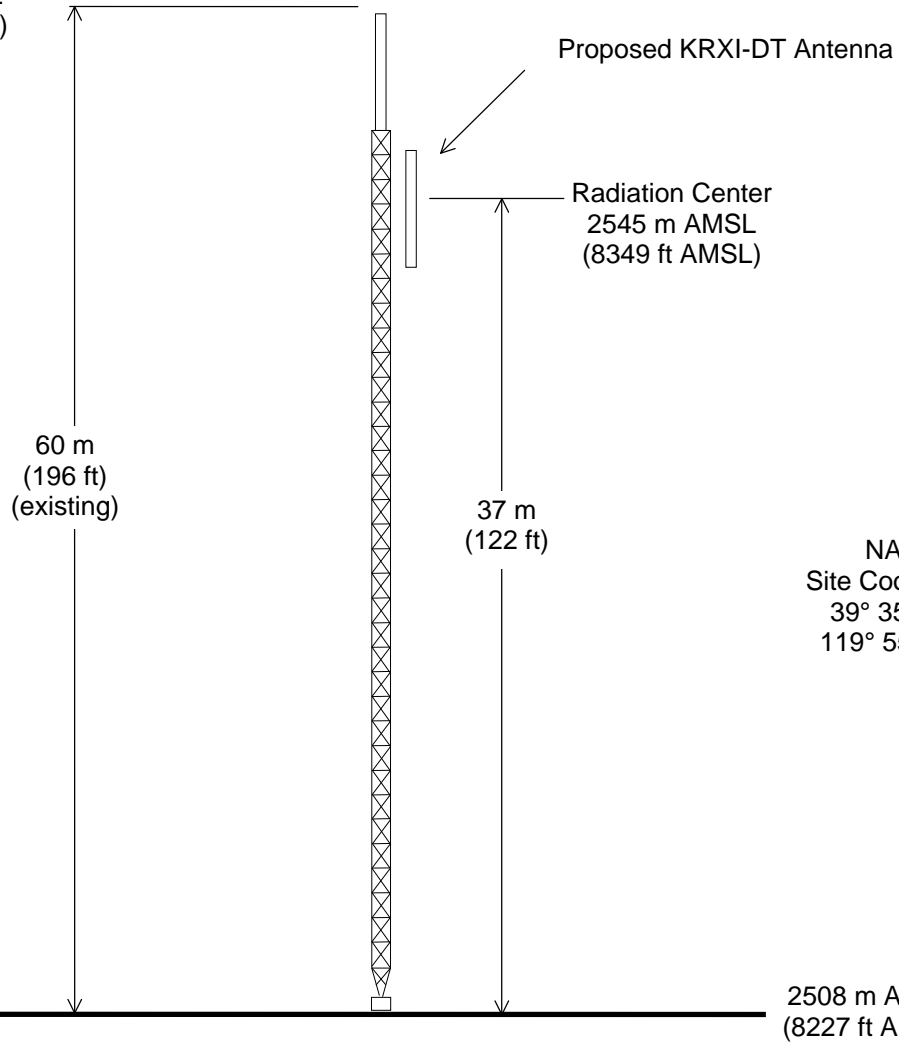
March 19, 2012

4 Interference analysis results reflect the net change in interference to a given station considering the interference predicted to occur from all other stations (i.e. "masking") including the allotment facility for KRXI-DT. This properly reflects the net interference change for determining compliance with the FCC 0.5% *de minimis* standard.



ASRN: 1010555

2567 m AMSL
(8423 ft AMSL)



NAD27
Site Coordinates:
39° 35' 23" N
119° 55' 37" W

Not to Scale

ANTENNA AND SUPPORTING STRUCTURE

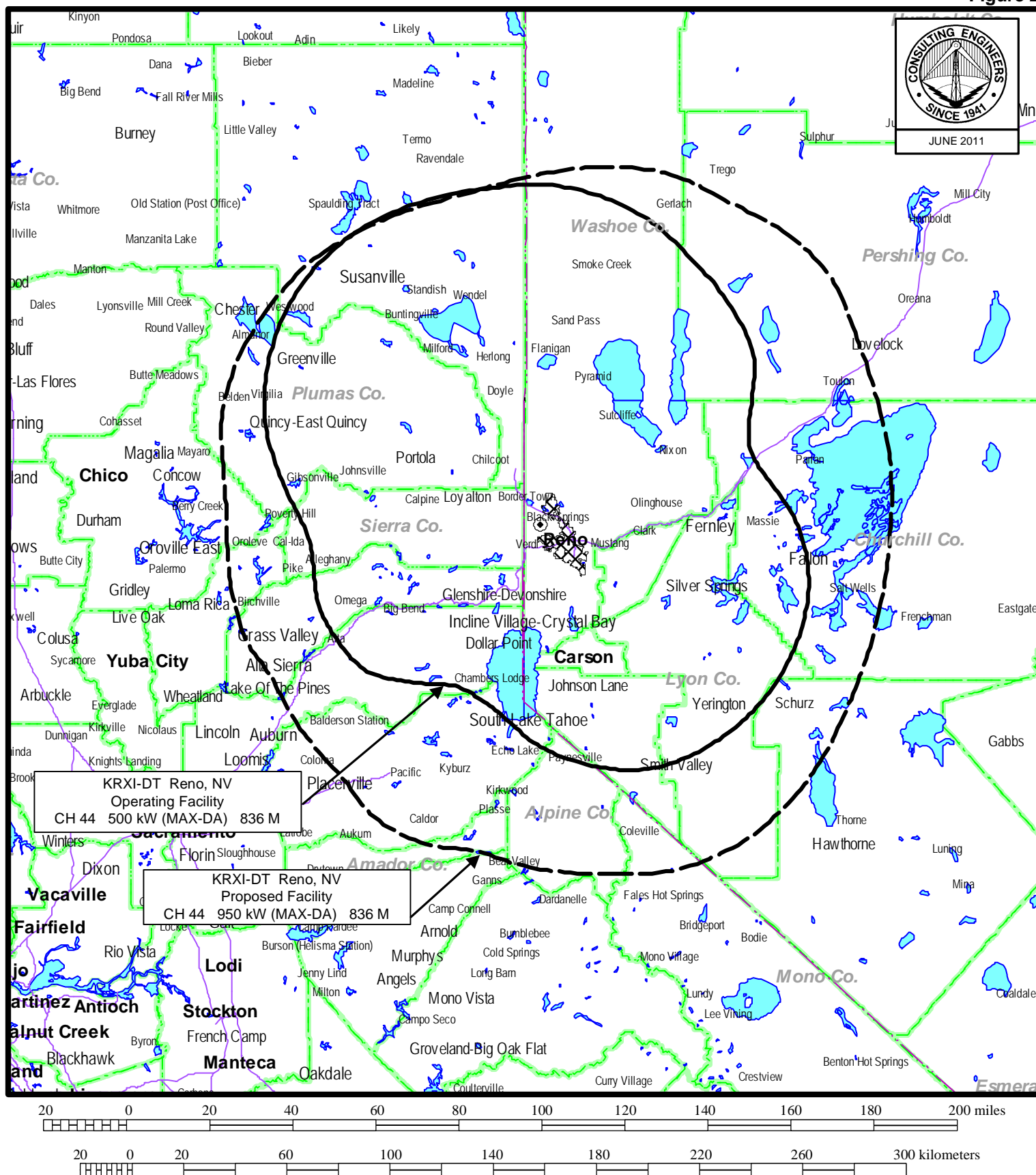
DTV STATION KRXI-TV

RENO, NEVADA

CH 44 950 KW (MAX-DA) 836 M

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

Figure 2



KRXI NOISE-LIMITED CONTOURS

DTV STATION KRXI-TV

RENO, NEVADA

CH 44 950 kW (MAX-DA) 836 M

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Figure 3

Percent allowed new interference: 0.500
Percent allowed new interference to non Class A LPTV: 2.000
TW Census data selected 2000
Data Base Selected
/export/home/cdbb/pt_tvdb.sff

WARNING WARNING WARNING

The following list of station records has been excluded from the analysis due to the fact that they have the same state, city and channel as the proposed station - This could cause the program to not find a potential fail situation

You can force the program to include these records by setting the state of the proposed record to ZZ and re-running the analysis

KRXI-TV	44	RENO	NV	BPCDT	20080619AIG
KRXI-TV	44	RENO	NV	BPCDT	20080619AIG
KRXI-TV	44	RENO	NV	BLCDT	20060707ACZ

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-10-2011 Time: 17:36:31

Record Selected for Analysis

KRXI USERRECORD-01 RENO NV US
Channel 44 ERP 950. kW HAAT 836. m RCAMSL 02545 m
Latitude 039-35-23 Longitude 0119-55-37
Status APP Zone 2 Border Site number: 01
Dir Antenna Make CDB Model 00000000087666 Beam tilt N Ref Azimuth 20.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility (site # 01) does not meet maximum height/power limits
Channel 44 ERP = 950.00 HAAT = 836.

Site number	1			
Azimuth	ERP	HAAT	41.0 dBu F(50,90)	
(Deg)	(kW)	(m)	(km)	
0.0	489.997	929.1	127.1	
45.0	888.189	1003.1	137.1	
90.0	418.068	962.0	126.6	
135.0	668.087	1029.7	134.5	
180.0	774.231	731.0	124.7	
225.0	421.378	669.0	115.7	
270.0	901.242	495.0	113.2	

Figure 3

315.0 552.317 868.0 126.4

Evaluation toward Class A Stations from site # 01

Contour overlap to Class A station

KRNS-CA 46 RENO, ETC NV BLTTA 20051114AFU

Contour overlap to Class A station

KRNS-CA 46 RENO, ETC. NV BSTA 20110218AAD

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KRXI 44 RENO NV USERRECORD01 Site # 01

and station

SHORT TO: KRXI-TV 44 RENO NV DTVPLN DTVP1587

39 -35-23 119 -55-37

Req. separation 223.7 Actual separation 0.0 Short 223.7 km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE from Site # 01

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Figure 3

Channel	Proposed Station Call	City/State	ARN
44	KRXI	RENO NV	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	KHSL-TV	CHICO CA	158.0	LIC	BLCDDT	20080711ADS
43	NEW	SACRAMENTO CA	165.7	APP	BNPEDT	20030922AFV
43	NEW	SACRAMENTO CA	133.4	APP	BNPEDT	20030922AFW
44	KTVU	OAKLAND CA	299.3	CP MOD	BMPCDDT	20080619AIJ
46	KRNS-CA	RENO, ETC NV	31.0	LIC	BLTTA	20051114AFU
46	KRNS-CA	RENO, ETC. NV	31.0	APP	BSTA	20110218AAD

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
43	KHSL-TV	CHICO CA	BLCDDT	-20080711ADS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	KGMC	CLOVIS CA	377.0	CP MOD	BMPCDDT	-20080620AAE
43	KGMC	CLOVIS CA	415.1	LIC	BLCDDT	-20090612AIA
43	NEW	SACRAMENTO CA	174.4	APP	BNPEDT	-20030922AFV
43	NEW	SACRAMENTO CA	165.0	APP	BNPEDT	-20030922AFW
43	KCSM-TV	SAN MATEO CA	253.0	LIC	BLEDT	-20091124AHY
44	KRXI-TV	RENO NV	158.0	PLN	DTVPLN	-DTVPLN1587
44	KRXI	RENO NV	158.0	APP	USERRECORD-01	

Proposed station is beyond the site to
nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
43	NEW	SACRAMENTO CA	BNPEDT	-20030922AFV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	KHSL-TV	CHICO CA	174.4	LIC	BLCDDT	-20080711ADS
43	KGMC	CLOVIS CA	215.6	CP MOD	BMPCDDT	-20080620AAE
43	KGMC	CLOVIS CA	251.4	LIC	BLCDDT	-20090612AIA
43	KCSM-TV	SAN MATEO CA	136.6	LIC	BLEDT	-20091124AHY
44	KTVU	OAKLAND CA	136.6	CP MOD	BMPCDDT	-20080619AIJ

Figure 3

44	KRXI-TV	RENO NV	165.7	PLN	DTVPLN	-DTVP1587
44	KRXI	RENO NV	165.7	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
43	NEW	SACRAMENTO CA	BNPEDT	-20030922AFW

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	KHSL-TV	CHICO CA	165.0	LIC	BLCDDT	-20080711ADS
43	KGMC	CLOVIS CA	213.4	CP MOD	BMPCDDT	-20080620AAE
43	KGMC	CLOVIS CA	251.0	LIC	BLCDDT	-20090612AIA
43	KCSM-TV	SAN MATEO CA	170.0	LIC	BLEDDT	-20091124AHY
44	KTVU	OAKLAND CA	170.0	CP MOD	BMPCDDT	-20080619AIJ
44	KRXI-TV	RENO NV	133.4	PLN	DTVPLN	-DTVP1587
44	KRXI	RENO NV	133.4	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
44	KTVU	OAKLAND CA	BMPCDDT	-20080619AIJ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	NEW	SACRAMENTO CA	136.6	APP	BNPEDT	-20030922AFV
43	NEW	SACRAMENTO CA	170.0	APP	BNPEDT	-20030922AFW
43	KCSM-TV	SAN MATEO CA	0.0	LIC	BLEDDT	-20091124AHY
44	KRXI-TV	RENO NV	299.3	PLN	DTVPLN	-DTVP1587
45	KBCW	SAN FRANCISCO CA	0.0	LIC	BLCDDT	-20020709AAQ
45	KBCW	SAN FRANCISCO CA	0.0	CP	BPCDDT	-20080603AAH
44	KRXI	RENO NV	299.3	APP	USERRECORD-01	

Total scenarios = 4

Result key: 1
 Scenario 1 Affected station 4
 Before Analysis

Results for: 44A CA OAKLAND BMPCDDT 20080619AIJ CP
 HAAT 512.0 m, ATV ERP 1000.0 kW
 POPULATION AREA (sq km)

Figure 3

within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	52	16.1
lost to ATV IX only	52	16.1
lost to all IX	52	16.1

Potential Interfering Stations Included in above Scenario 1

44A NV RENO DTVPLN DTVP1587 PLN

After Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP

HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	32335	321.3
lost to ATV IX only	32335	321.3
lost to all IX	32335	321.3

Potential Interfering Stations Included in above Scenario 1

44A NV RENO USERRECORD01 APP

Percent new IX = 0.4975%

Result key:	2		
Scenario	2	Affected station	4
Before Analysis			

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP

HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1448	44.2
lost to ATV IX only	1448	44.2
lost to all IX	1448	44.2

Potential Interfering Stations Included in above Scenario 2

43A CA SACRAMENTO BNPEDT 20030922AFV APP

44A NV RENO DTVPLN DTVP1587 PLN

After Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP

HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	33643	333.3

Figure 3

lost to ATV IX only	33643	333.3
lost to all IX	33643	333.3

Potential Interfering Stations Included in above Scenario 2

43A CA SACRAMENTO	BNPEDT	20030922AFV	APP
44A NV RENO	USERRECORD01		APP

Percent new IX = 0.4963%

Result key: 3
Scenario 3 Affected station 4
Before Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP
HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	7185	281.1
lost to ATV IX only	7185	281.1
lost to all IX	7185	281.1

Potential Interfering Stations Included in above Scenario 3

43A CA SACRAMENTO	BNPEDT	20030922AFW	APP
44A NV RENO	DTVPLN	DTVP1587	PLN

After Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP
HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	35527	490.0
lost to ATV IX only	35527	490.0
lost to all IX	35527	490.0

Potential Interfering Stations Included in above Scenario 3

43A CA SACRAMENTO	BNPEDT	20030922AFW	APP
44A NV RENO	USERRECORD01		APP

Percent new IX = 0.4373%

Result key: 4
Scenario 4 Affected station 4
Before Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP
HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8

Figure 3

lost to NTSC IX	0	0.0
lost to additional IX by ATV	52	16.1
lost to ATV IX only	52	16.1
lost to all IX	52	16.1

Potential Interfering Stations Included in above Scenario 4

44A NV RENO DTVPLN DTVP1587 PLN

After Analysis

Results for: 44A CA OAKLAND BMPCDT 20080619AIJ CP
 HAAT 512.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	7401991	35289.7
not affected by terrain losses	6488976	29602.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	32335	321.3
lost to ATV IX only	32335	321.3
lost to all IX	32335	321.3

Potential Interfering Stations Included in above Scenario 4

44A NV RENO USERRECORD01 APP

Percent new IX = 0.4975%

Worst case new IX 0.4975% Scenario 1

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
46	KRNS-CA	RENO, ETC NV	BLTTA	-20051114AFU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	NEW	SACRAMENTO CA	113.2	APP	BNPEDT	-20030922AFW
44	KRXI-TV	RENO NV	31.0	PLN	DTVPLN	-DTVP1587
45	K45GZ	DAYTON NV	36.9	LIC	BLTT	-20020715AAH
45	K45GZ	DAYTON NV	36.9	APP	BPTT	-20000824AAR
45	NEW	FERNLEY NV	63.7	APP	BNPDTL	-20100512AGX
46	KQCA	STOCKTON CA	181.5	LIC	BLCDT	-20060623AAM
46	K46HL	SUSANVILLE CA	132.4	CP	BPTT	-20080611ACD
46	K46HL	SUSANVILLE, ETC CA	132.3	CP	BDFCDTT	-20100330ADD
46	K46CC	SCHURZ NV	94.0	LIC	BLTTV	-19890516IF
46	K46CC	SHURZ NV	93.9	CP	BDFCDTT	-20100430ADP
47	K47NI-D	CARSON CITY NV	16.5	CP	BNPDTL	-20100326ADE
47	K47KJ-D	VERDI NV	29.7	LIC	BLDTT	-20090102ABO
44	KRXI	RENO NV	31.0	APP	USERRECORD-01	

Proposal causes no interference

Figure 3

#####

Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
46	KRNS-CA	RENO, ETC. NV	BSTA	-20110218AAD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
43	NEW	SACRAMENTO CA	113.2	APP	BNPEDT	-20030922AFW
44	KRXI-TV	RENO NV	31.0	PLN	DTVPLN	-DTVP1587
45	K45GZ	DAYTON NV	36.9	LIC	BLTT	-20020715AAH
45	K45GZ	DAYTON NV	36.9	APP	BPTT	-20000824AAR
46	KQCA	STOCKTON CA	181.5	LIC	BLCDDT	-20060623AAM
46	K46HL	SUSANVILLE CA	132.4	CP	BPTT	-20080611ACD
46	K46HL	SUSANVILLE, ETC CA	132.3	CP	BDFCDTT	-20100330ADD
46	K46CC	SCHURZ NV	94.0	LIC	BLTTV	-19890516IF
46	K46CC	SHURZ NV	93.9	CP	BDFCDTT	-20100430ADP
47	K47NI-D	CARSON CITY NV	16.5	CP	BNPDTL	-20100326ADE
47	K47KJ-D	VERDI NV	29.7	LIC	BLDDT	-20090102ABO
44	KRXI	RENO NV	31.0	APP	USERRECORD-01	

Total scenarios = 1

Result key: 5
Scenario 1 Affected station 6
Before Analysis

Results for: 46N NV RENO, ETC.	BSTA	20110218AAD	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	198861	1095.5	
not affected by terrain losses	155004	938.5	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	3907	4.0	
lost to all IX	3907	4.0	

Potential Interfering Stations Included in above Scenario 1

47A NV VERDI	BLDDT	20090102ABO	LIC
--------------	-------	-------------	-----

After Analysis

Results for: 46N NV RENO, ETC.	BSTA	20110218AAD	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	198861	1095.5	
not affected by terrain losses	155004	938.5	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	3966	8.1	
lost to all IX	3966	8.1	

Potential Interfering Stations Included in above Scenario 1

Figure 3

47A NV VERDI BLDTT 20090102ABO LIC
44A NV RENO USERRECORD01 APP

Percent new IX = 0.0297%

Worst case new IX 0.0297% Scenario 1

#####

Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
44	KRXI	RENO NV	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
43	KHSL-TV	CHICO CA	158.0	LIC	BLCDT -20080711ADS
43	NEW	SACRAMENTO CA	165.7	APP	BNP EDT -20030922AFV
43	NEW	SACRAMENTO CA	133.4	APP	BNP EDT -20030922AFW
44	KTVU	OAKLAND CA	299.3	CP MOD	BMPCDT -20080619AIJ

Total scenarios = 1

Result key: 6
Scenario 1 Affected station 7
Before Analysis

Results for: 44A NV RENO USERRECORD01 APP
HAAT 836.0 m, ATV ERP 950.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	705159	48910.4
not affected by terrain losses	527468	30461.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

#####

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED