

PROPOSED FACILITIES  
Journal Broadcast Corporation  
Tucson, AZ

Similar to many stations whose post-transition DTV operation is on a VHF channel, KGUN-TV has received many coverage complaints since they moved from their pre-transition UHF channel to their post-transition VHF channel, particularly from viewers using indoor antennas. The attached application, as amended, proposes to increase KGUN-TV's effective radiated power from 10.3 kilowatts to 36.5 kilowatts in an effort to partially overcome some of these reception problems.

The effective radiated power proposed in this application exceeds the maximum value permitted at an antenna height of 1140 meters above average terrain by Section 73.622(f)(7) of the FCC Rules. As shown below, however, it complies with the provisions of Section 73.622(f)(5) of the FCC Rules, which permits a station to propose facilities exceeding the limits specified in Section 73.622(f)(7) of the FCC Rules "up to that needed to provide the same geographic coverage area as the largest station within their market". Figure 1.0 is a map exhibit depicting the predicted 36 dBu noise limited contour for the facilities proposed for KGUN-TV in the attached application, as amended, in relation to the predicted 41 dBu noise limited contour for the licensed facilities of KUAT-TV - Tucson, Arizona, which has the largest coverage area of any TV station in the Tucson market. As shown in this map exhibit, the facilities proposed in the attached application are predicted to cover less area than the licensed KUAT-TV facilities.<sup>1</sup> As a result, it is obvious that the power increase proposed in the attached application is permitted by the provisions of Section 73.622(f)(5) of the FCC Rules.

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<sup>1</sup>The predicted 36 dBu noise limited contour for the facilities proposed for KGUN-TV in this amendment encompasses an area of 56,146.0 square kilometers, while the predicted 41 dBu noise limited contour for the licensed facilities of KUAT-TV encompasses an area of 58,687.6 square kilometers.

