

MINOR CHANGE APPLICATION
J.F. BROADCASTING, LLC
KWSD-DT TELEVISION STATION
CH 36 - 602-608 MHZ - 400.0 KW (DA)
SIOUX FALLS, SOUTH DAKOTA
February 2010

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of J.F.

Broadcasting, LLC ("JFB"), licensee of KWSD-DT, Channel 36, Sioux Falls, South Dakota.¹

In the KWSD-DT construction permit for Channel 36 at Sioux Falls, South Dakota (BMPCDT-20100104ADJ), the effective radiated power for KWSD-DT on Channel 36 was reduced from a maximum 400.0 kilowatts to 36.9 kilowatts. This reduction allowed JFB to implement service on Channel 36 with equipment on hand and allowed KWSD-DT to be licensed on its final digital channel. Pursuant to Condition 2 in the KWSD-DT permit, JFB herein proposes to increase the effective radiated power of KWSD-DT to 400.0 kilowatts at its licensed site.²

The proposed KWSD-DT facility will utilize the existing KWSD-DT directional antenna system already mounted on the tower. The data relating to the directional antenna system is attached hereto as Exhibit A. An interference review of the operation of digital Channel 36 was undertaken. The proposed Channel 36 digital operation complies with the Commission's interference rules, based on the use of the Longley-Rice, OET-69 Bulletin.³ It is noted that the terrain was sampled at 0.1 kilometer, and a signal cell size of 1.0 kilometer was used, with 2000

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- 1) JFB has a pending application for station license for KWSD-DT on Channel 36 (BLCDDT-20100201AFD) to cover construction permit BMPCDT-20100104ADJ.
 - 2) The facilities requested herein are the same facilities authorized in BPCDDT-20080321ACM.
 - 3) The Longley-Rice model was implemented on the Probe 3 computer model from V-Soft Communications. This model has been found to closely replicate the results provided by the Commission's computer model.

Census population reviews. Attached as Exhibit B is a tabulation of the results of the Longley-Rice review showing the proposed facility causes no interference to any other existing, applied for or proposed facility, based on the database used on the indicated study date. No full service station receives predicted interference above 0.5% of its population from this proposed facility. As indicated in Exhibit C, the proposed KWSD-DT facility will not exceed the radio frequency exposure limits.

It is noted that the existing/proposed KWSD-DT facility is located within 3.2 kilometers of directional AM station KXRB, 1000 kHz, Sioux Falls, South Dakota. As JFB intends to use the existing installed KWSD-DT antenna and associated transmission line, no tower construction will be required. Therefore, KXRB will not be impacted by this proposed facility. JFB, therefore, requests that the herein requested permit have no pre- or post-construction field strength measurement requirements regarding KXRB. All remaining exhibits used to prepare this application have been provided to JFB and are available for submission to the Commission upon request.³

3) The undersigned has evaluated only the radio frequency radiation exposure limits of this proposal. All data regarding broadcast facilities was extracted from the CDBS database on the date of the studies contained herein. We assume no liability for errors or omissions in that database that may be adverse to the requests contained herein.