

Can KNTV's proposal be accommodated by a increasing the site restriction to the Willits allotment? If so, is there any reasonable assurance that a site would be available?

Increasing the 18.6 km site restriction for the Willits allotment is not a valid solution in Granite's specific instance. Section 73.685(b) of the FCC Rules, "Transmitter Location and Antenna System" in part reads, with respect to the transmitter, "The location should be chosen so that line-of-sight can be obtained from the antenna over the principal community to be served; in no event should there be a major obstruction in this path." With the existing site restrictions, there is no non-shortspaced point which does not suffer from significant path obstructions in the direction of Willits.

The 1990 U.S. Bureau of the Census indicates that Willits is a city of 5,027 people. Attached as Exhibit E-1 is a map illustrating the city boundary for Willits as of the 1990 Census. Marked in the city are the locations of all of the centers of the census block units ascribed to the city to indicate the distribution of residents of Willits. Exhibit E-1A is a tabulation of all of these points as taken from the U.S. Census data files. The source of the population data used in this study is the Census of Population and Housing, 1990 Public Law (P.L.) 94-171 Data on CD-ROM published by the Bureau of the Census, U.S. Department of Commerce. The census block is the lowest [smallest] level of census geography. The hierarchy of census geography units is as follows: State, County, County Subdivision, Census Tract/BNA (or Census Tract BNA part), Block Group (or block group part) and last, the Block.

Also shown on Exhibit E-1 are the only three identifiable points from which one might hope that there is an unobstructed path into Willits, the existing co-channel spacing constraints for KNTV and KRXI making up the current site restriction for Willits, and the increased site restriction Willits would have if KNTV were moved to one of its alternative points discussed later herein, named "Radar." While the three points shown offer the most hope of a clear path into Willits, a detailed study of the terrain

shows that there is no line-of-sight. All of the paths from these three most likely points suffer significant path obstructions, as does the FCC specified reference point. The latter however is usually only an approximate, least short-spaced point, irrespective of terrain.

The city of Willits is situated in a valley, nestled so that the western and northern edges of the city are up against hills 200 to 300 feet higher than the relatively level ground in the populated portion of the city. Exhibit E-2 has been prepared to illustrate the dramatic nature of the terrain to the north and west of Willits. Exhibit E-2a is a map showing a series of radials from a point on the southeastern edge of the city extending to the northwest. Exhibits E-2b through E-2s are terrain profiles along each of these radials, marked to show the city of Willits, the existing site restrictions, and other pertinent points. (The underlying topographic data is from U.S.G.S. 3 arc second Digital Elevation Model data files.) A much more detailed study was performed at increments spaced closer than one degree of azimuth. For practicality, the selection of radials shown here are in five (5) degree increments with the inclusion of the three most likely high points and the FCC reference point. It is clear from examining these profiles that the 200 - 300 foot higher hilltops immediate to Willits act to shadow the city along paths which also suffer from other terrain obstructions. Line-of-sight from any non-short-spaced point into Willits simply does not exist.

Exhibits E-3, E-4 and E-5 are similar sets of maps and terrain profiles run from each of the three most likely points identified in the study looking outwards from Willits. These sets of profiles show that the southeastern point in Willits is not a peculiar fluke. All of these paths show significant path obstructions from any non-short-spaced site and the absence of any line-of-sight into Willits.

Two of the three sites shown here would become short-spaced to KNTV at San Jose if an increased site restriction to

accommodate a move to the Radar site were made. From the FCC specified, 18.6 km restricted site, and all non-short-spaced points, there is no available site which does not suffer from path obstructions into the town of Willits. As can be seen from the various maps, the terrain profiles attached as Exhibits E-21(N 320° E) E-2m(N 321 2°E), E-3m(N 155° E), E-4b(N 140° E) and E-4c (N 141° E) pass through or close to the FCC reference point for Ch. 11 at Willits. From the FCC reference point there is no line-of-sight into Willits. Any increased site restriction will further exacerbate a fundamentally flawed allotment.

Can KNTV be operated in a manner designed to avoid interference to the Willits allotment?

What the Commission actually is asking in this instance is unclear when considering the established Television rules and policies concerning consideration of terrain, directionalization and other factors to protect an allotment from potential interference. There are no non-short-spaced sites to which KNTV can relocate without accepting worse service into its community of license. Similarly, because of existing shadowing problems, even at Loma Prieta, any reduction in effective radiated power to the north, the same direction as its community of license, would exacerbate existing coverage problems within the San Jose Metropolitan community. Attached as Exhibits E-6 and E-7 are maps illustrating the predicted City Grade, A, and B Service contours for Willits, at maximum permissible facilities at Strong Mountain and the existing licensed facilities for KNTV at Loma Prieta. Within the Grade B contour for Willits there are 167,500 people. Within the Grade B contour for KNTV there are over 6.6 million people. Over 1.4 million of those people reside in the city of San Jose (a density of 1,221.4 people per square kilometer). Willits, in contrast, is a city of 5,027 people. One must ask, is it correct to directionalize KNTV so as lose service to some critical part of its 6.6 million person viewing audience in order to protect maximum permissible facilities for a vacant allotment? One must ask, is it correct to protect maximum permissible

facilities which might never be built and which, if built, would encompass approximately 167,500 people with a Grade B signal? Most of the 167,500 people would not actually be able to receive service because of terrain shadowing. Would any prospective broadcaster build such maximum permissible facilities when the viewing audience is only a fraction of what appears to fall within the Grade B service contour? The actual city of Willits, as discussed above, certainly would not have an unobstructed path to its transmitter to ensure a high quality of signal. The Commission's policies and practices allow for directionalization between two existing facilities, but there is no identifiable precedent to establish just what should be protected, or to what extent, when the question is between a licensed station in a densely populated metropolitan community and a flawed, frozen allotment. Granite and KNTV seek only to refrain from tampering with San Jose's fully spaced allotment while moving away from Loma Prieta.

Are any non-short spaced sites available for KNTV and why are they are not suitable? How are any specifically selected sites less susceptible to earthquakes than others in the area?

KNTV is situated on Loma Prieta Peak. Because of the violent shaking suffered during the Loma Prieta earthquake and the probability of reoccurrence, Granite has studied seismological reports and determined that the Loma Prieta Peak is very close to the Sargent fault zone, the San Andreas fault zone and the lesser Berrocal fault zone. The historical records of epicenters show Loma Prieta to be in a location of continuing seismic activity. While KNTV can not be completely removed from the area, there are locations within a relatively short distance of Loma Prieta which, from the USGS landsat images and State of California seismic data submitted in the Petition for Rulemaking, are more dormant and stable.

Attached as Exhibit E-8a is a map showing the city of San Jose, the relocation constraints currently facing KNTV, and a series of radials, drawn from a point at the northern edge of the

city to subtend the area in which KNTV might relocate. Attached as Exhibits E-8b through E-8r are terrain profiles along each of these radials, marked to show the metropolitan community of San Jose, the existing site restrictions, other pertinent points, and seismically active areas (based on the fault and epicenter maps and information submitted with the Petition). (The underlying topographic data is from U.S.G.S. 3 arc second Digital Elevation Model data files.)

A much more detailed study was performed at increments spaced closer than one degree of azimuth. For practicality, the selection of radials shown here are in four (4) degree increments with the inclusion of five most likely high points and KNTV's licensed transmitter site. These radials illustrate that covering

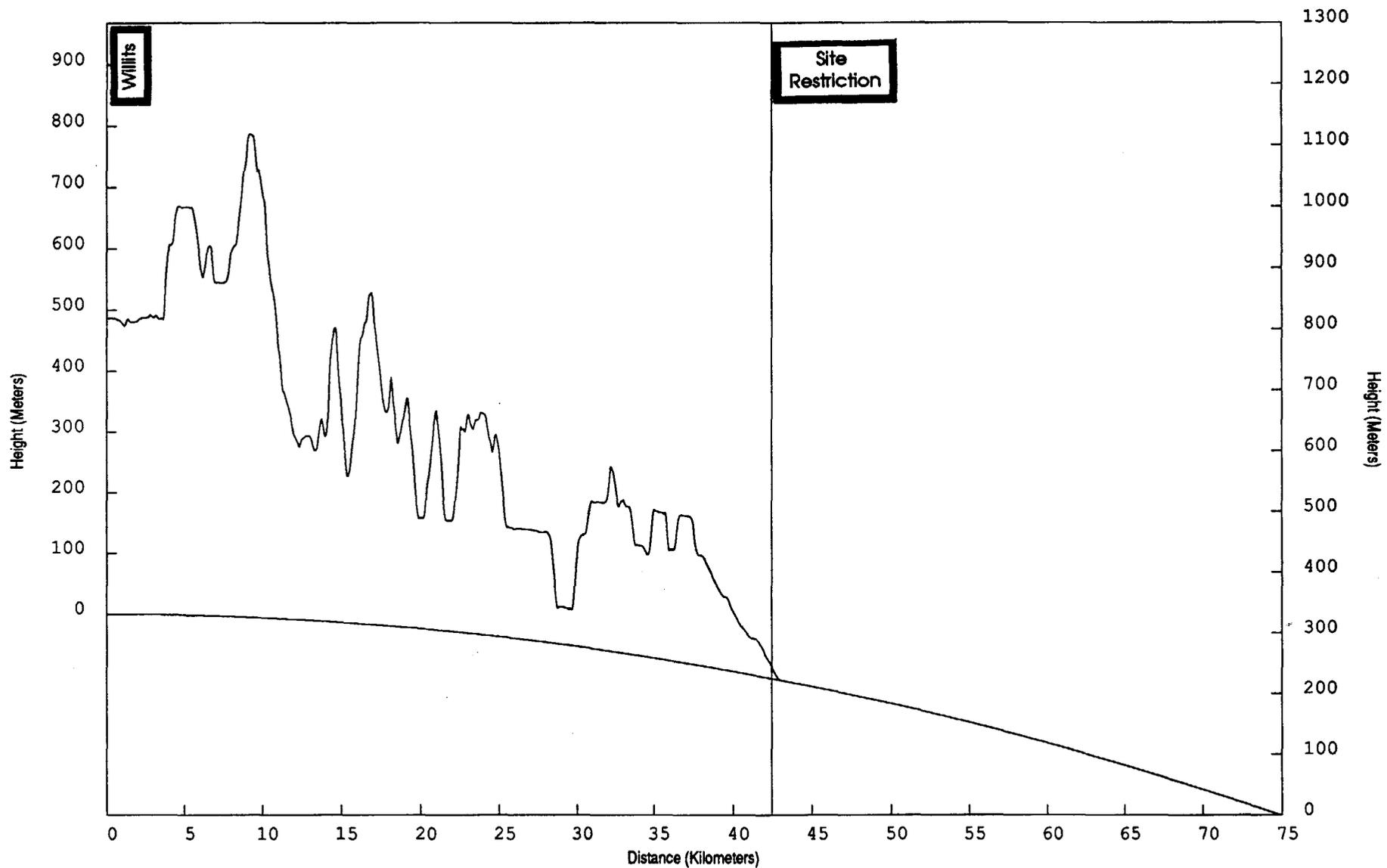
substantial improvement from the Loma Prieta site on top of the Sargent fault. There are no other sites from which San Jose can be served as well while still serving Salinas Seaside and Monterey.

Exhibits E-8a and E-9 in composite, are standard U.S.G.S. topographic maps showing the terrain, the location of KNMVL at Loma

continue to serve its viewing audience is, unfortunately, short-spaced to the Willits allotment.

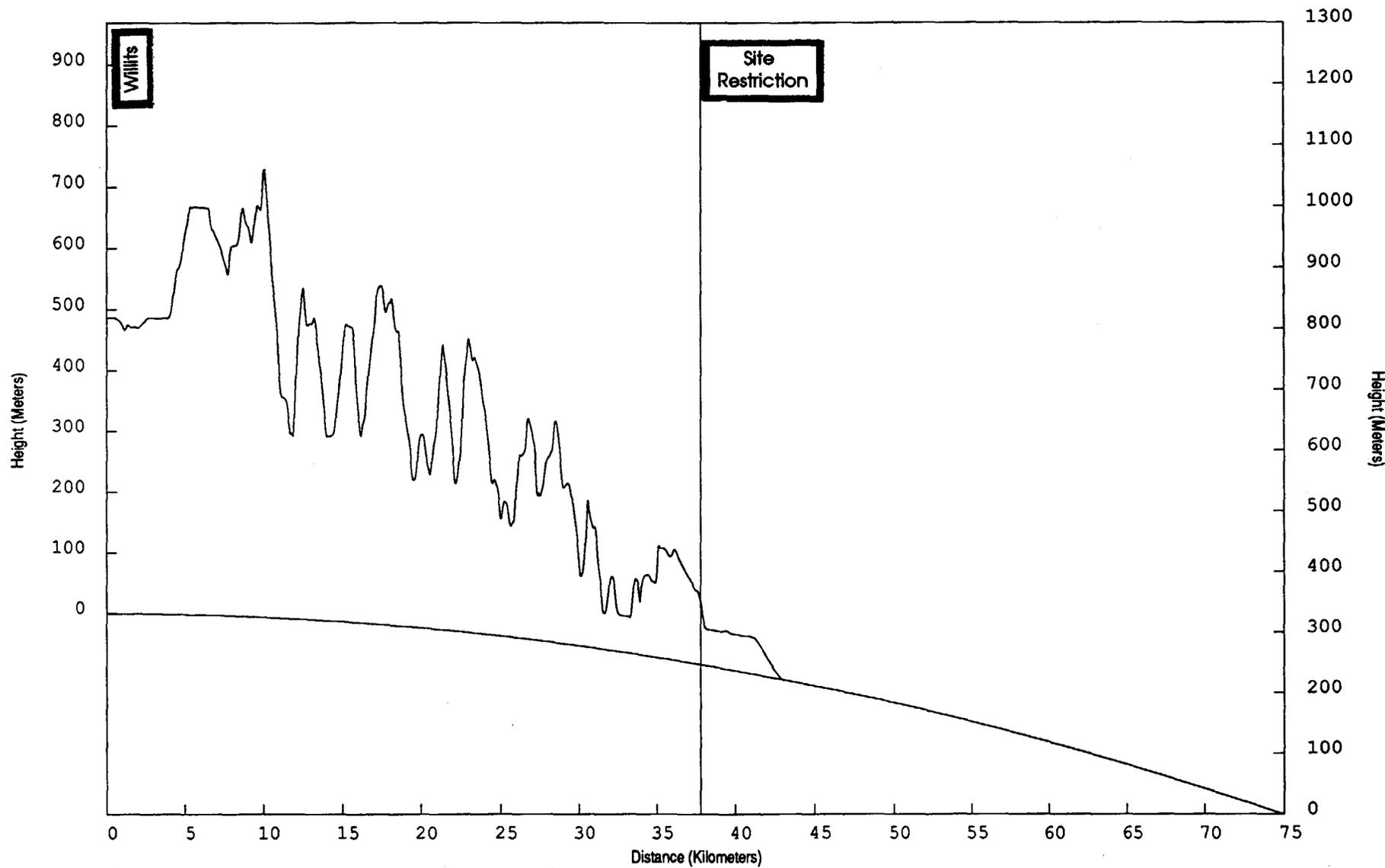
Granite is not suggesting that Willits is not deserving of an allotment. However, the Ch. 11 allotment to Willits is flawed beyond repair and not suitable for use. Because of terrain features, a site for Willits must essentially be overlooking the city, not 18.6 or more kilometers restricted. Ch. 11 at Willits must be deleted to enable KNTV to relocate. Alternatively, a UHF

channel with no site restrictions might be allotted to Willits.



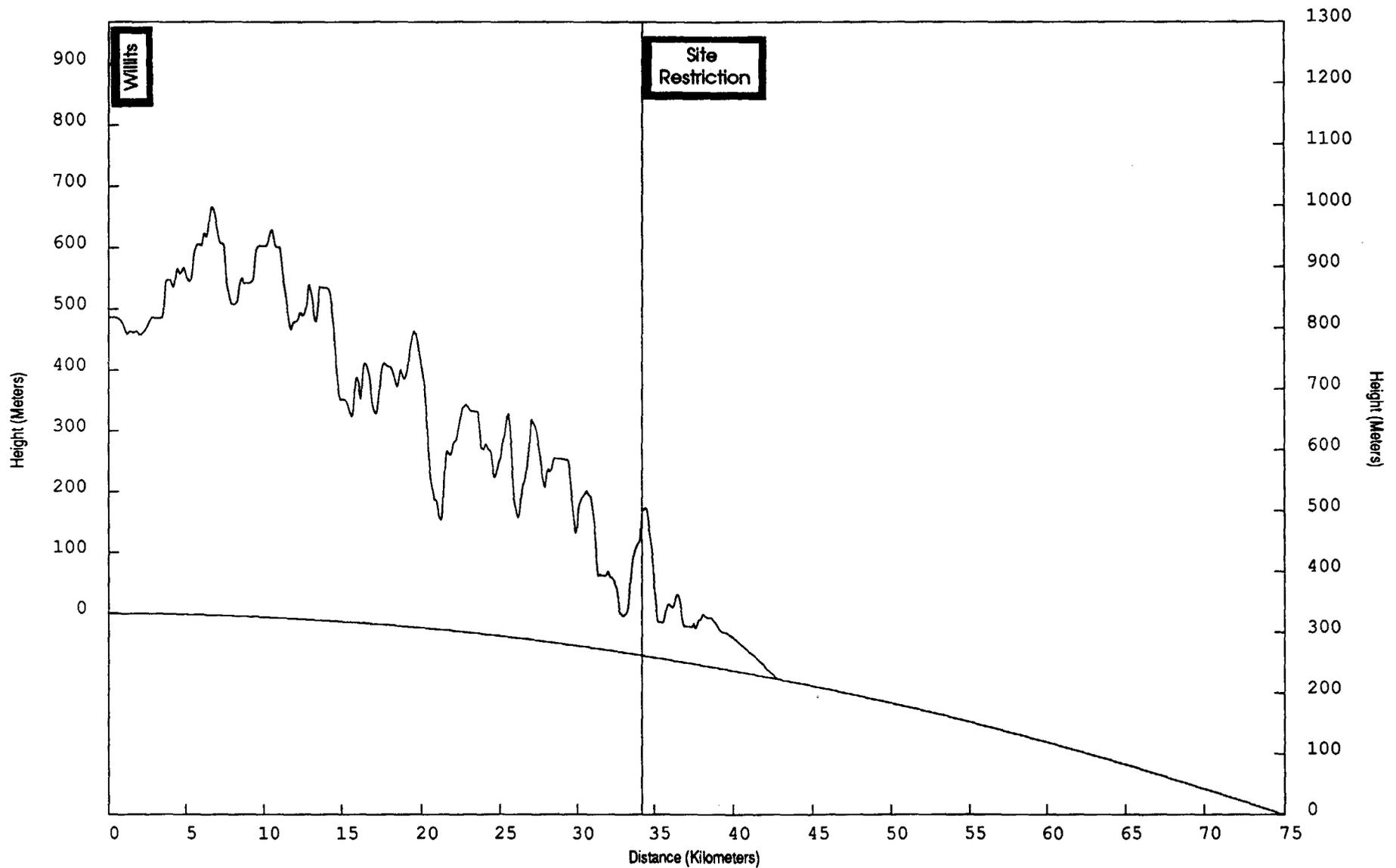
E-2b N 270° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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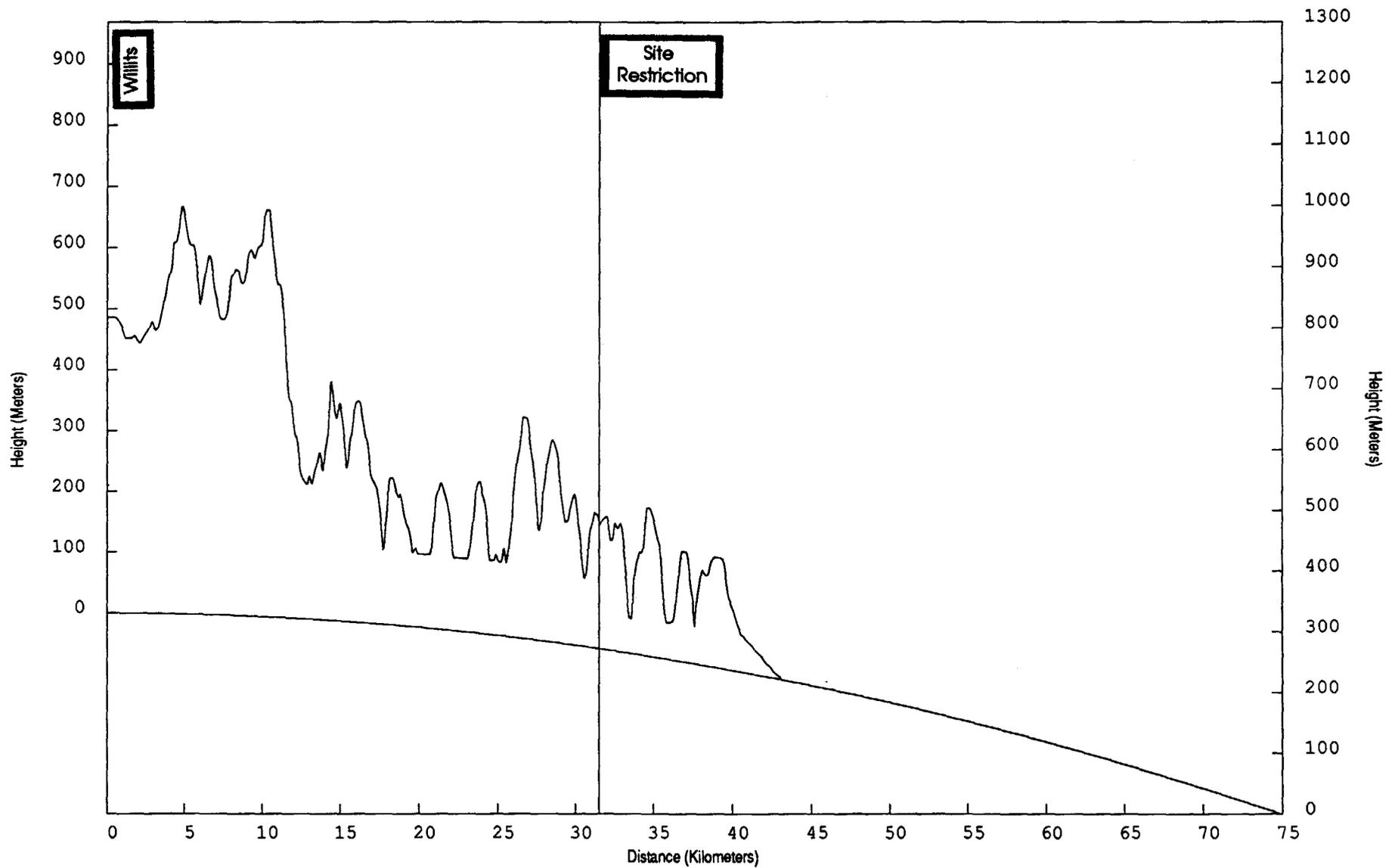
E-2c N 275° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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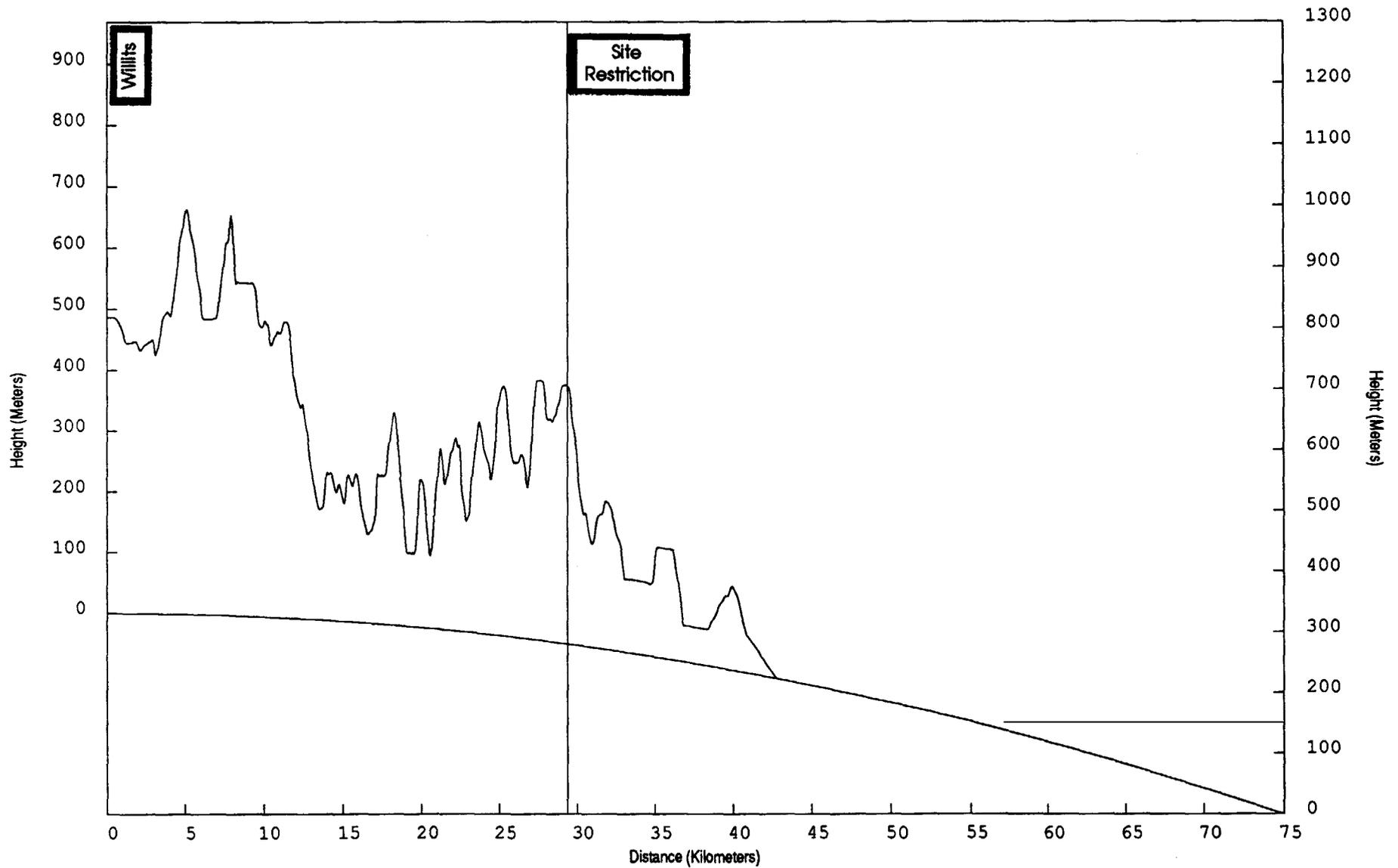
E-2d N 280° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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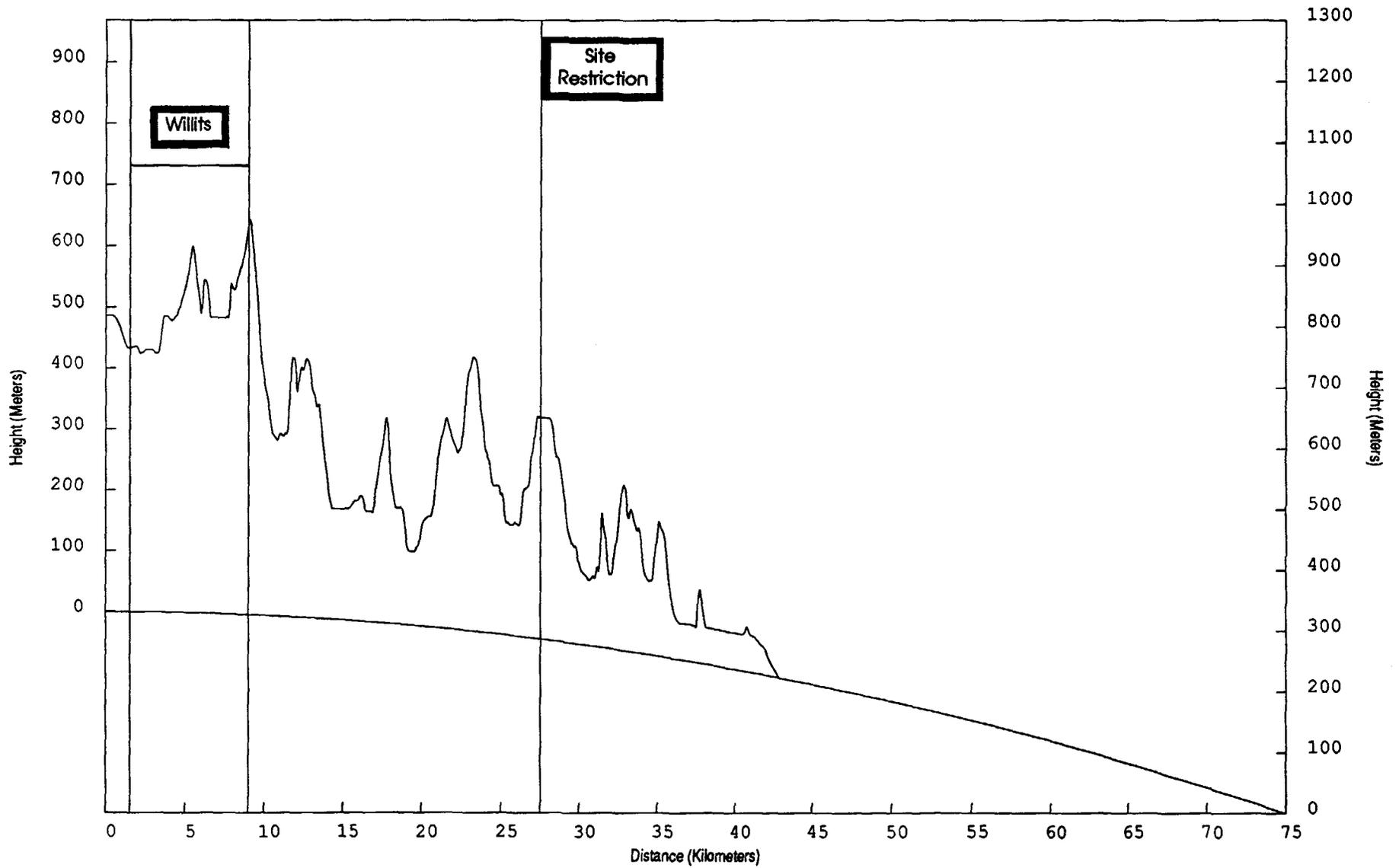
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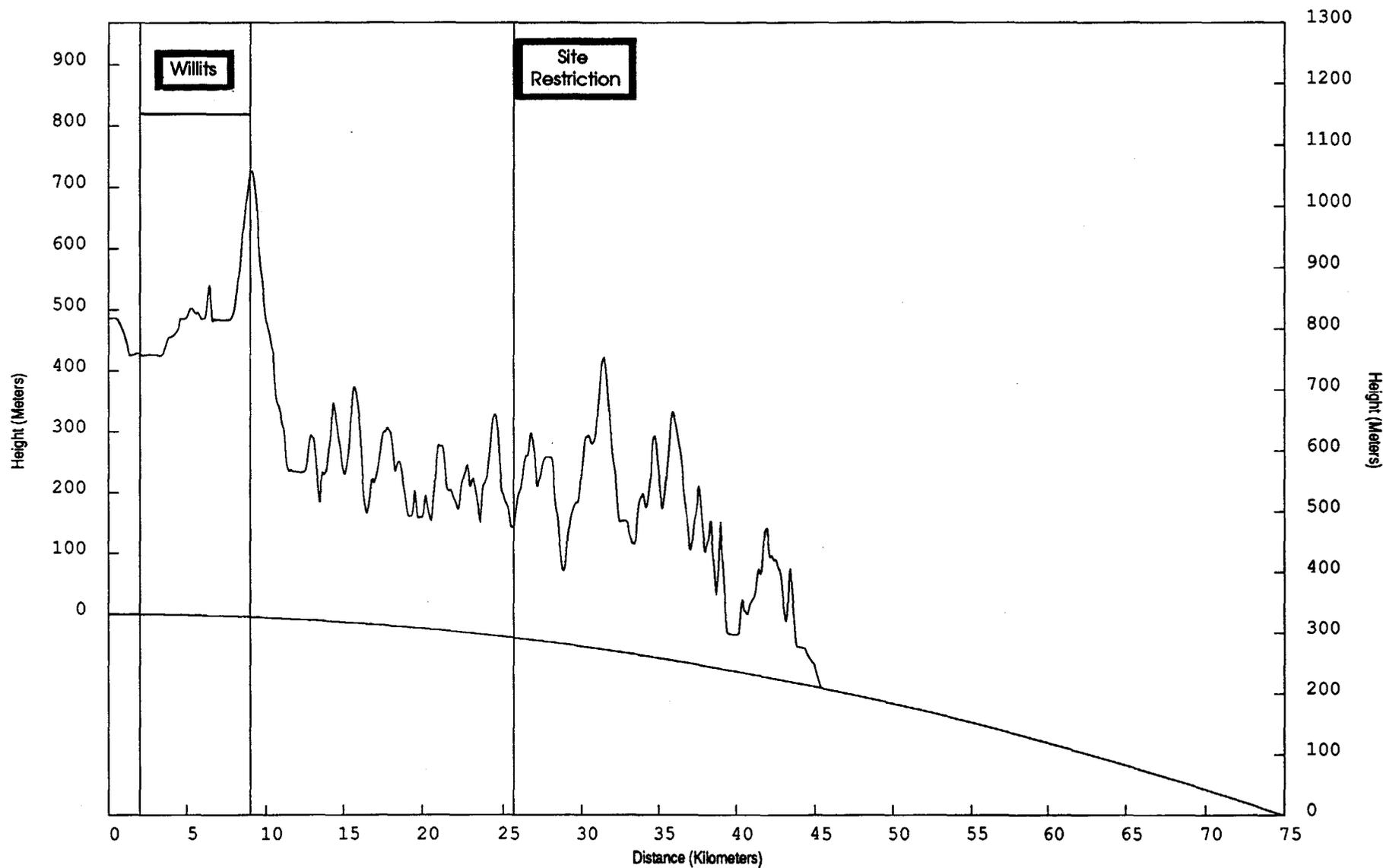


E-2f N 290° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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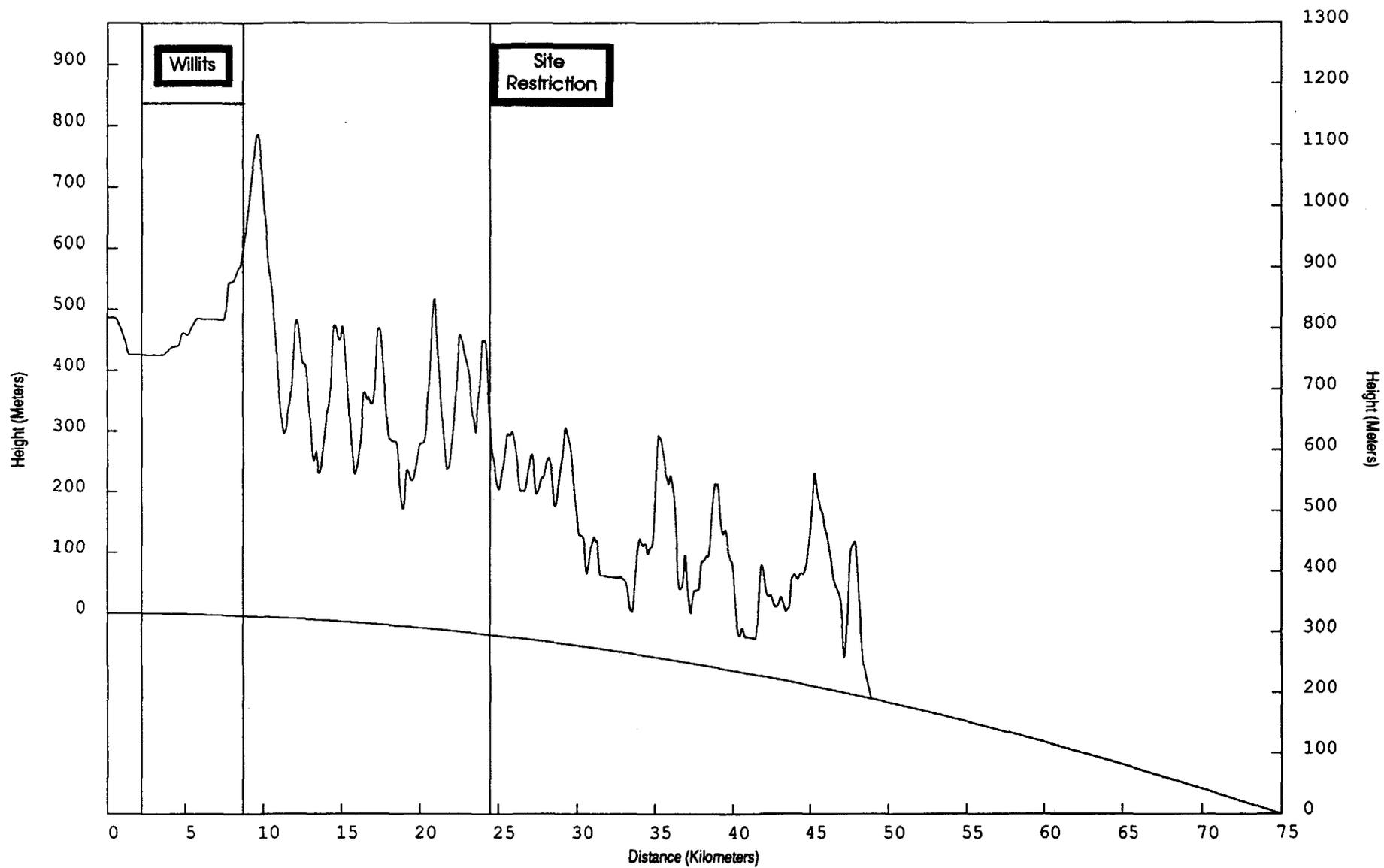


E-2g N 295° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits
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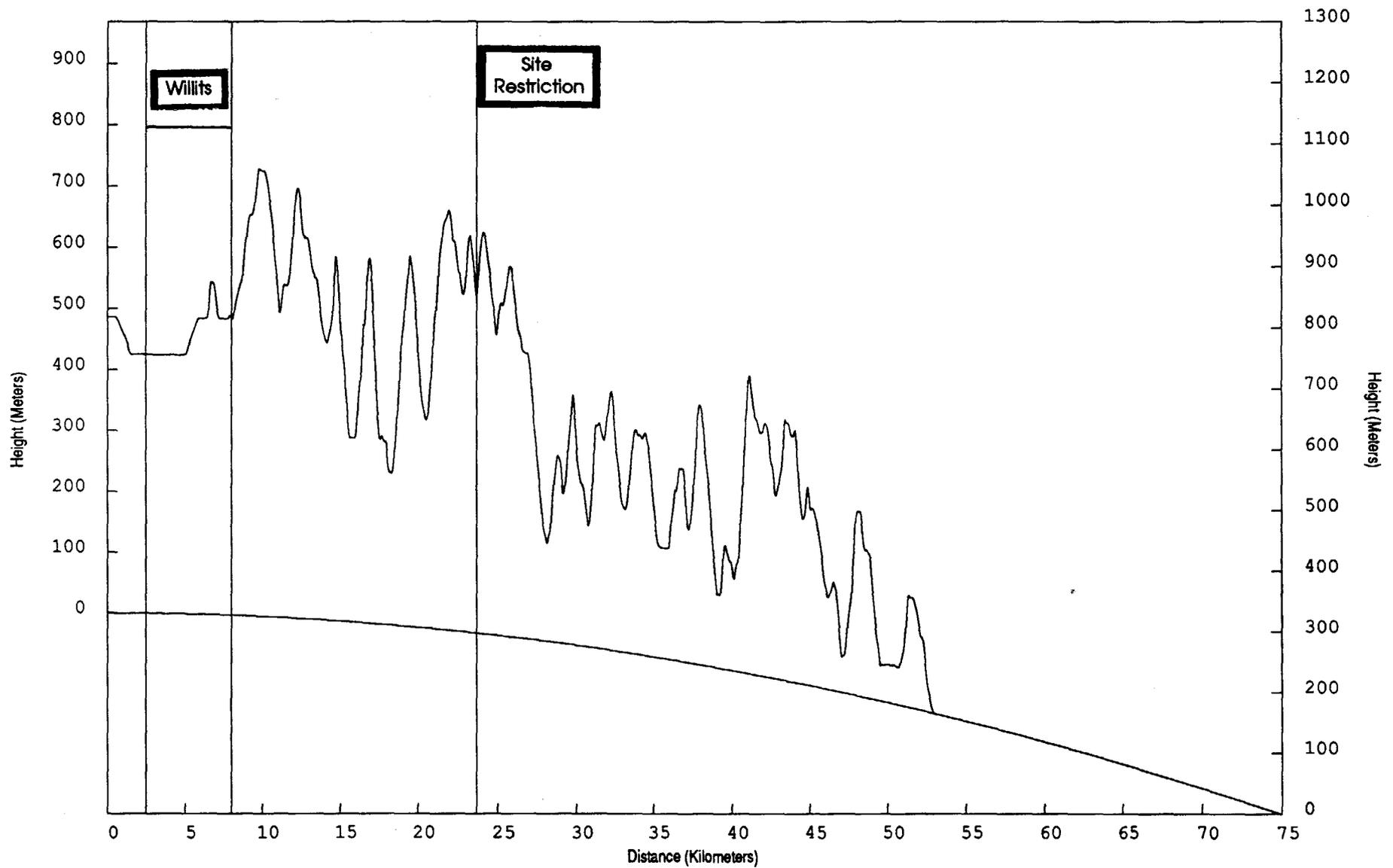
E-2h N 300° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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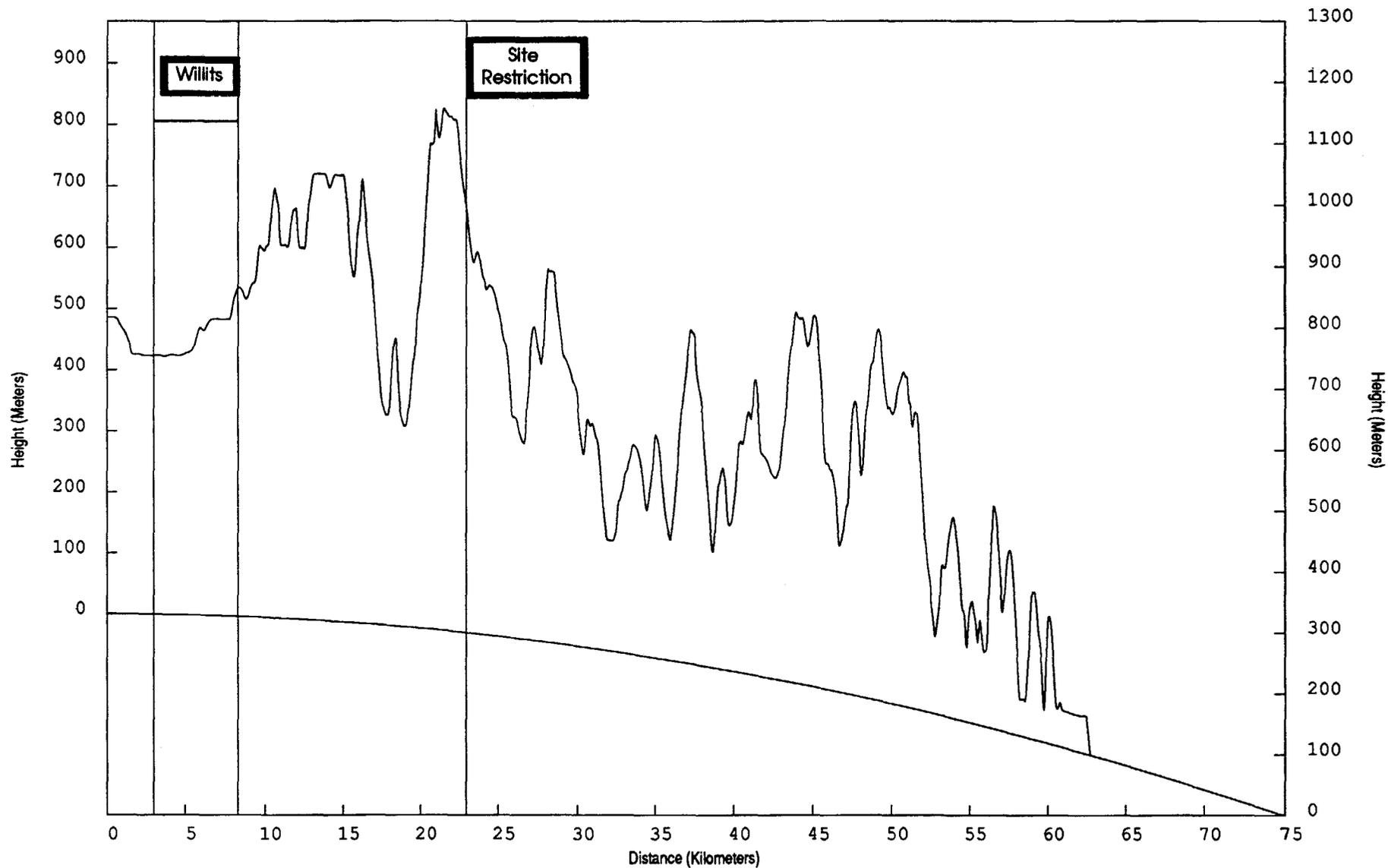


E-2i N 305° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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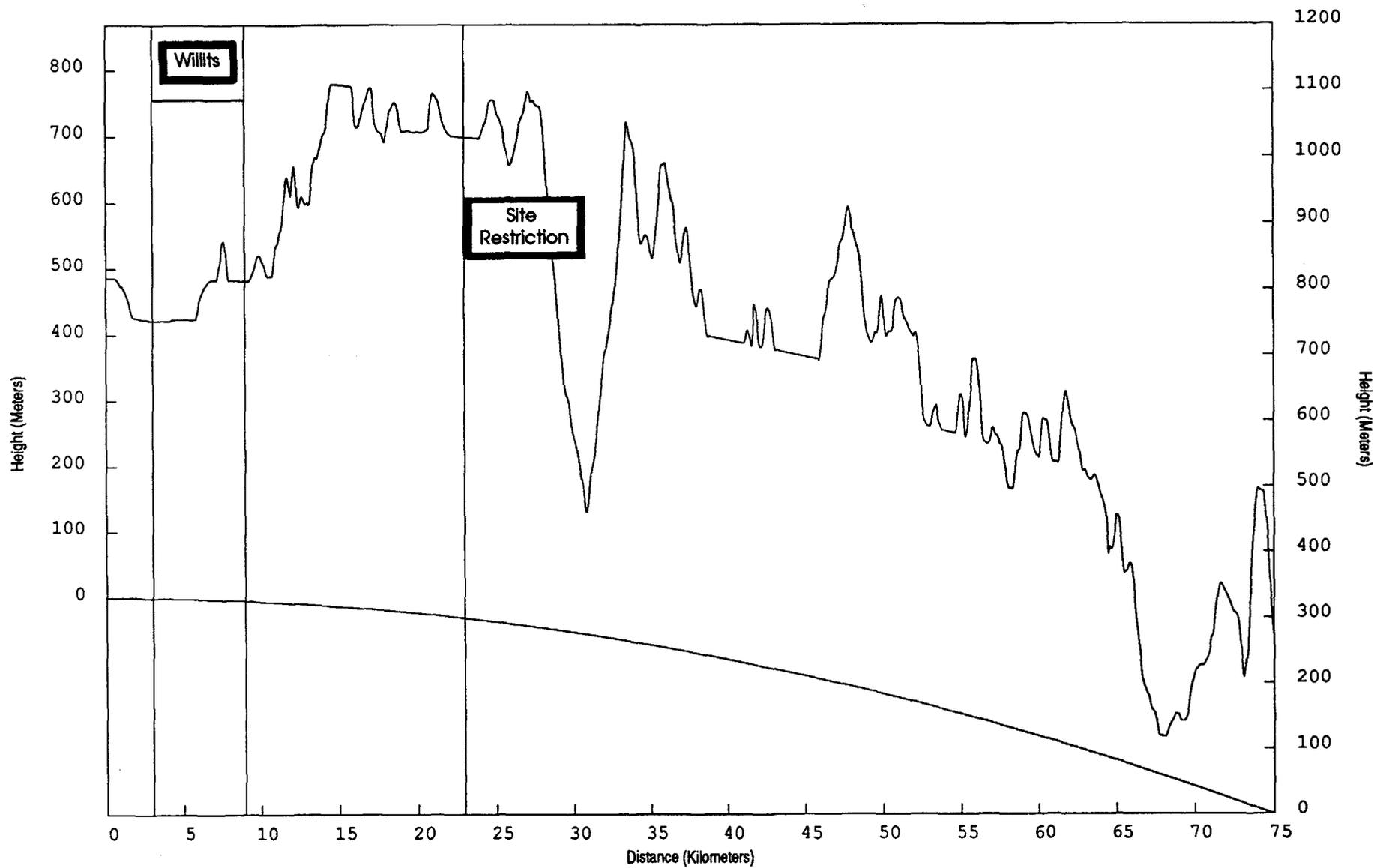


E-2j N 310° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits
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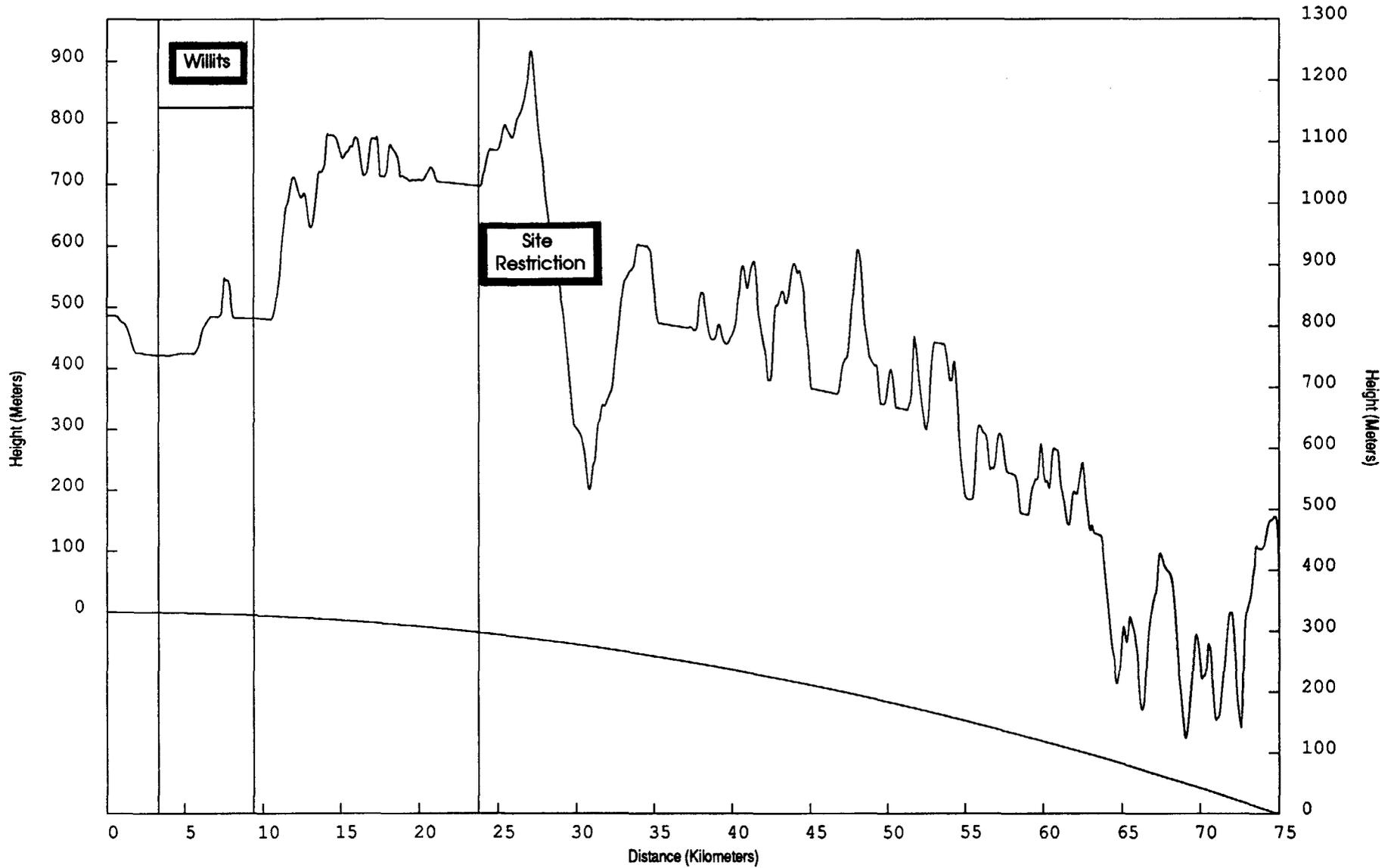
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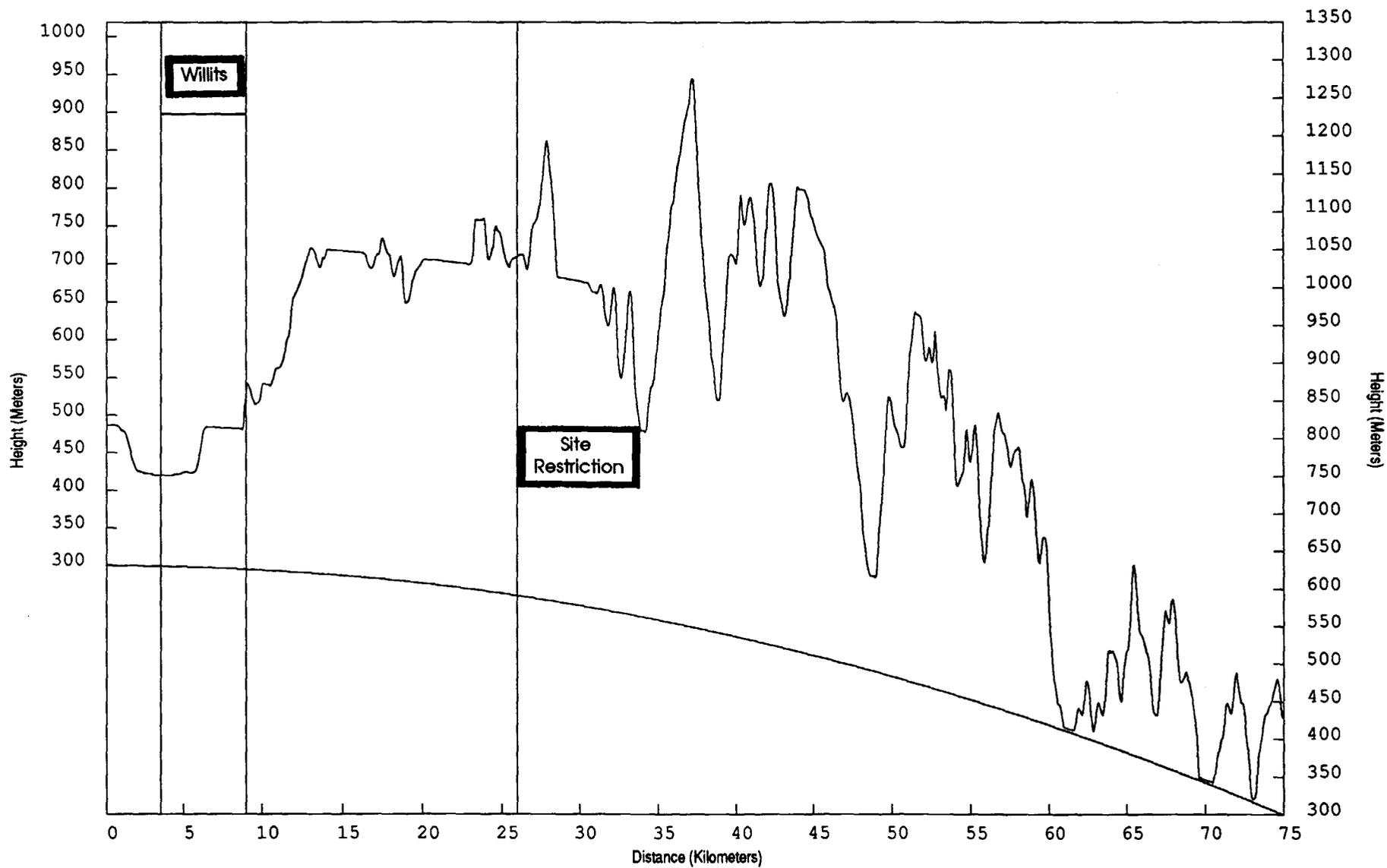
E-21 N 320° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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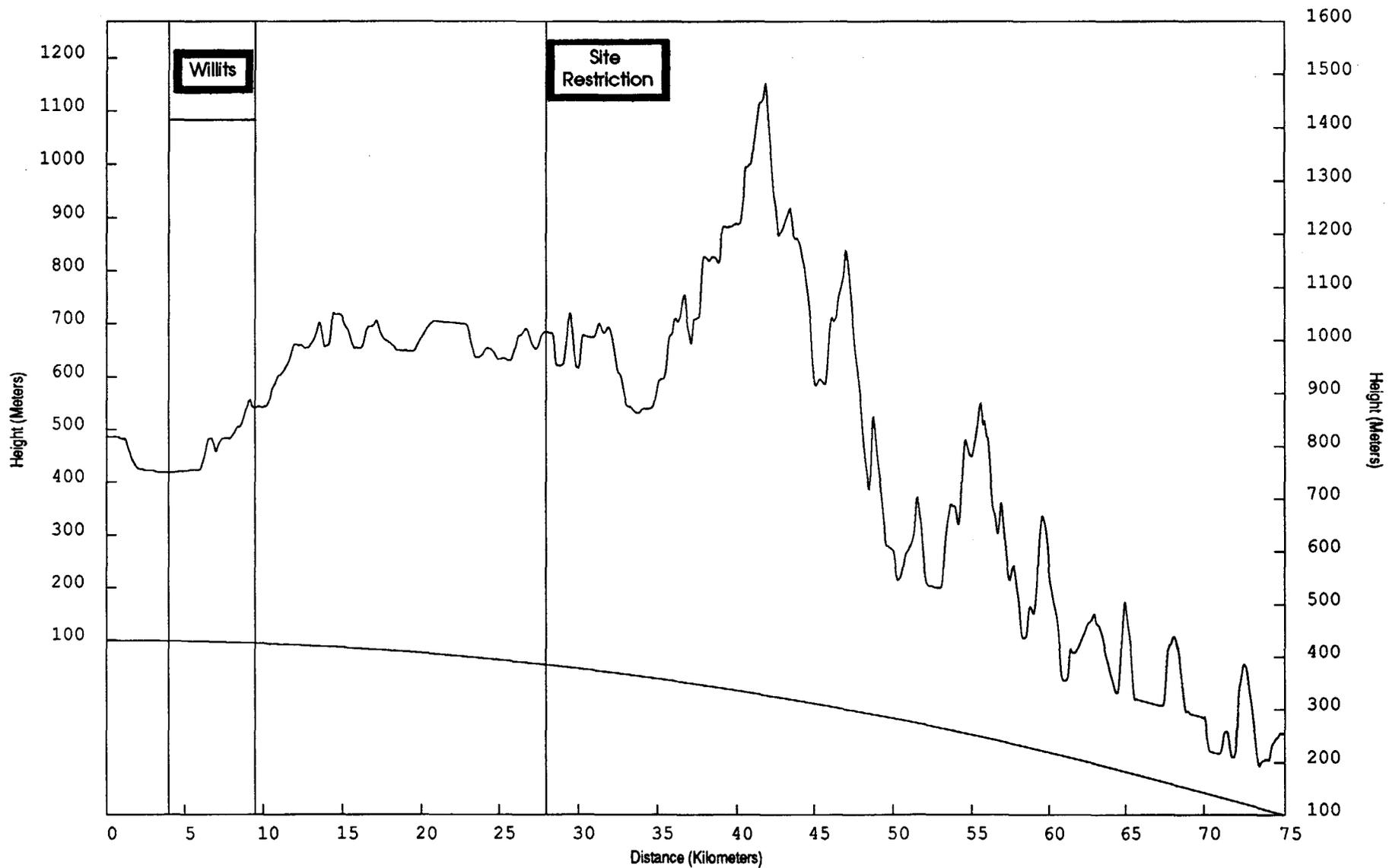
E-2m N 321.2° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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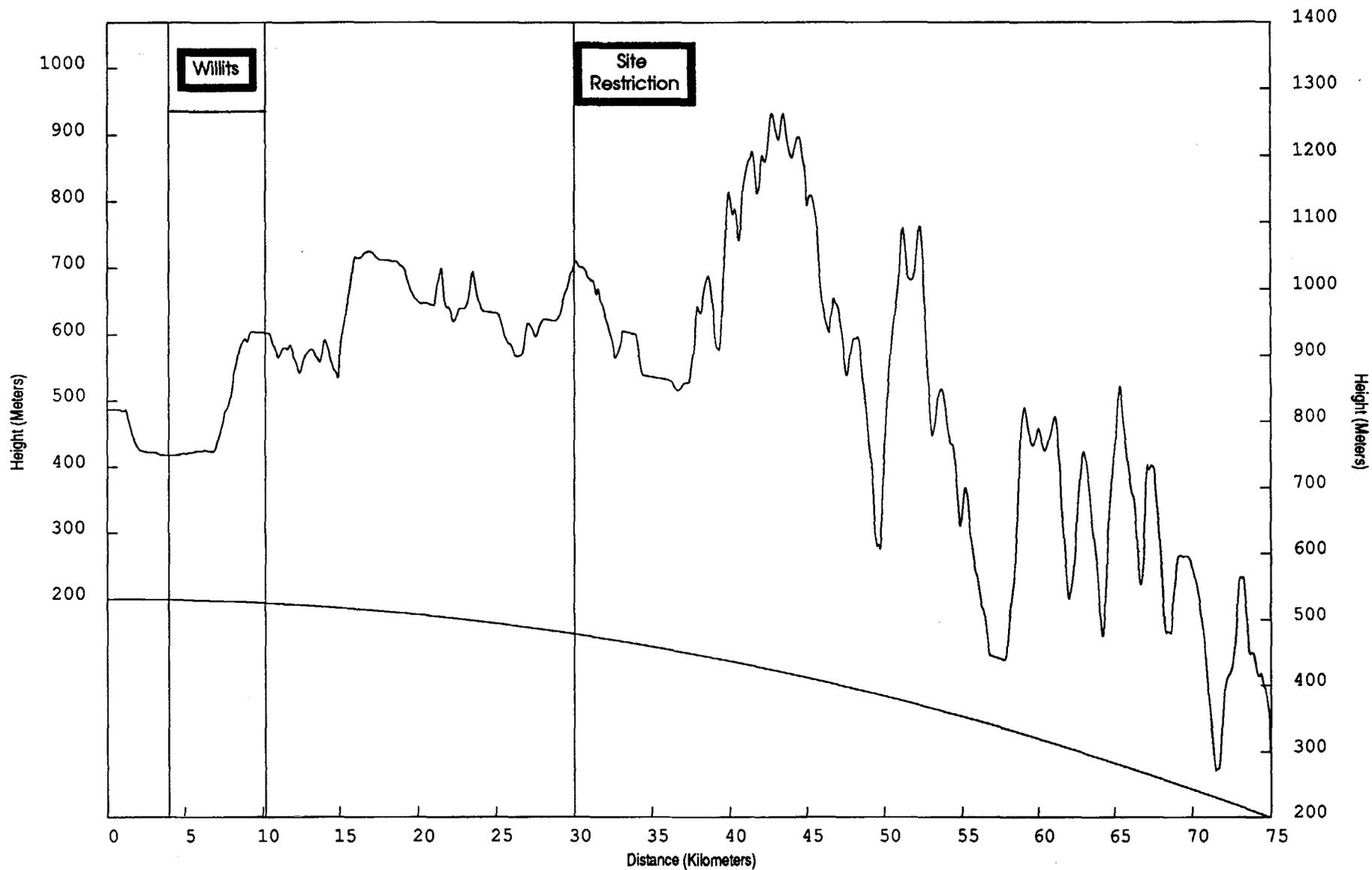
E-2n N 325° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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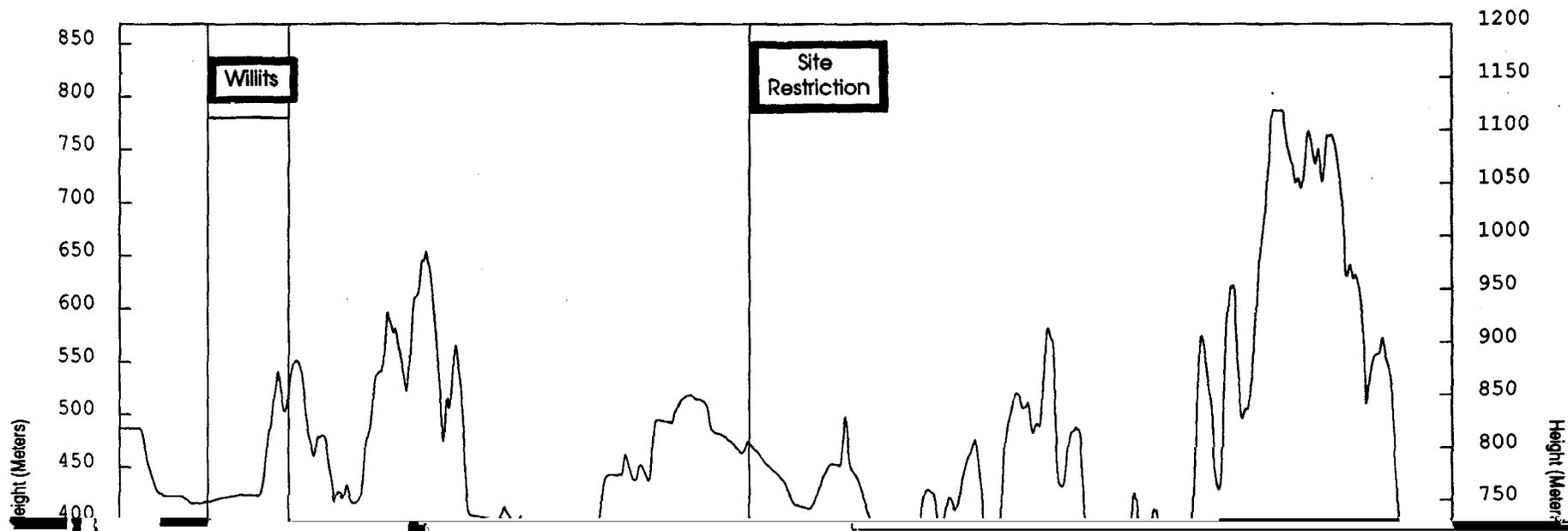
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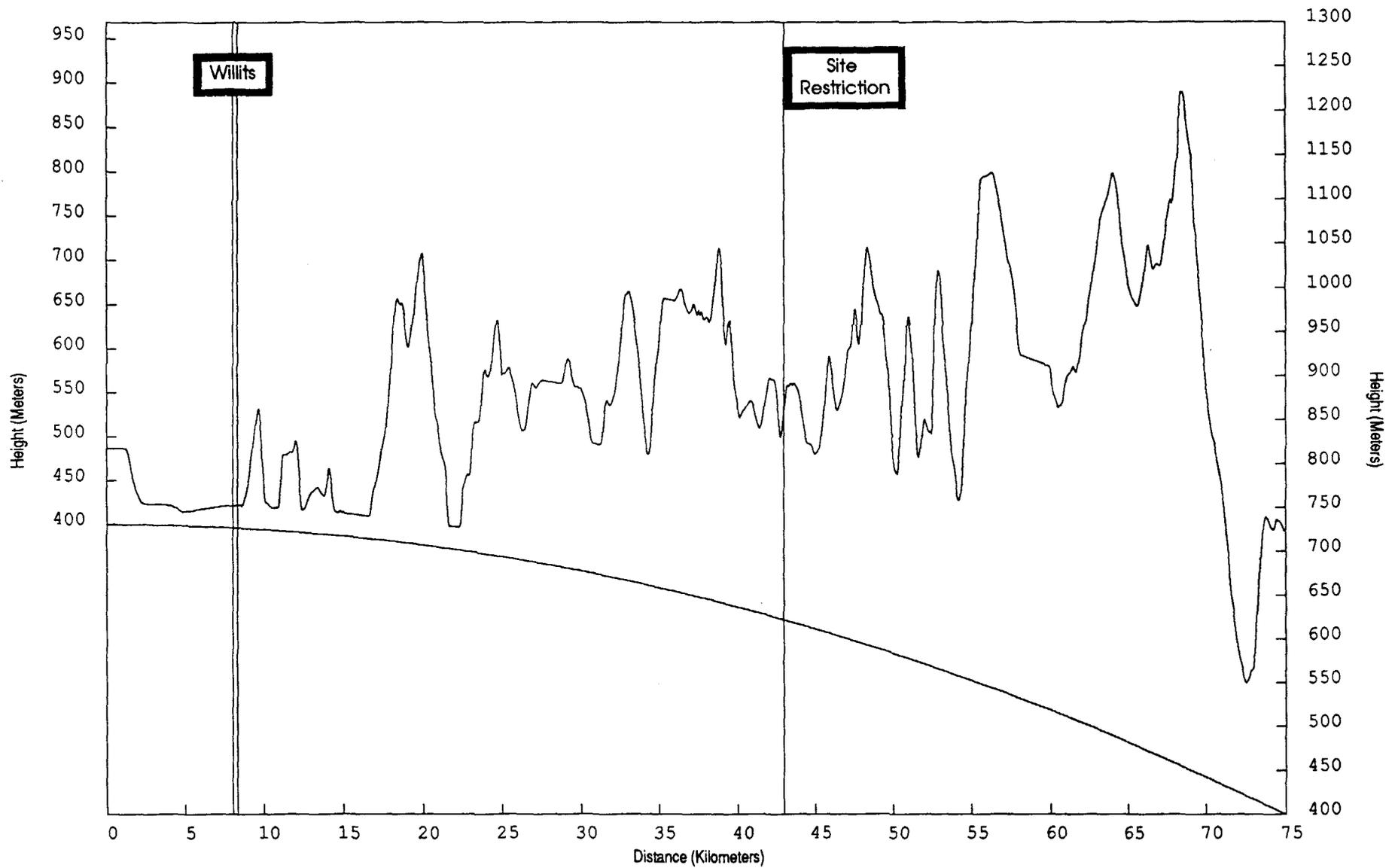
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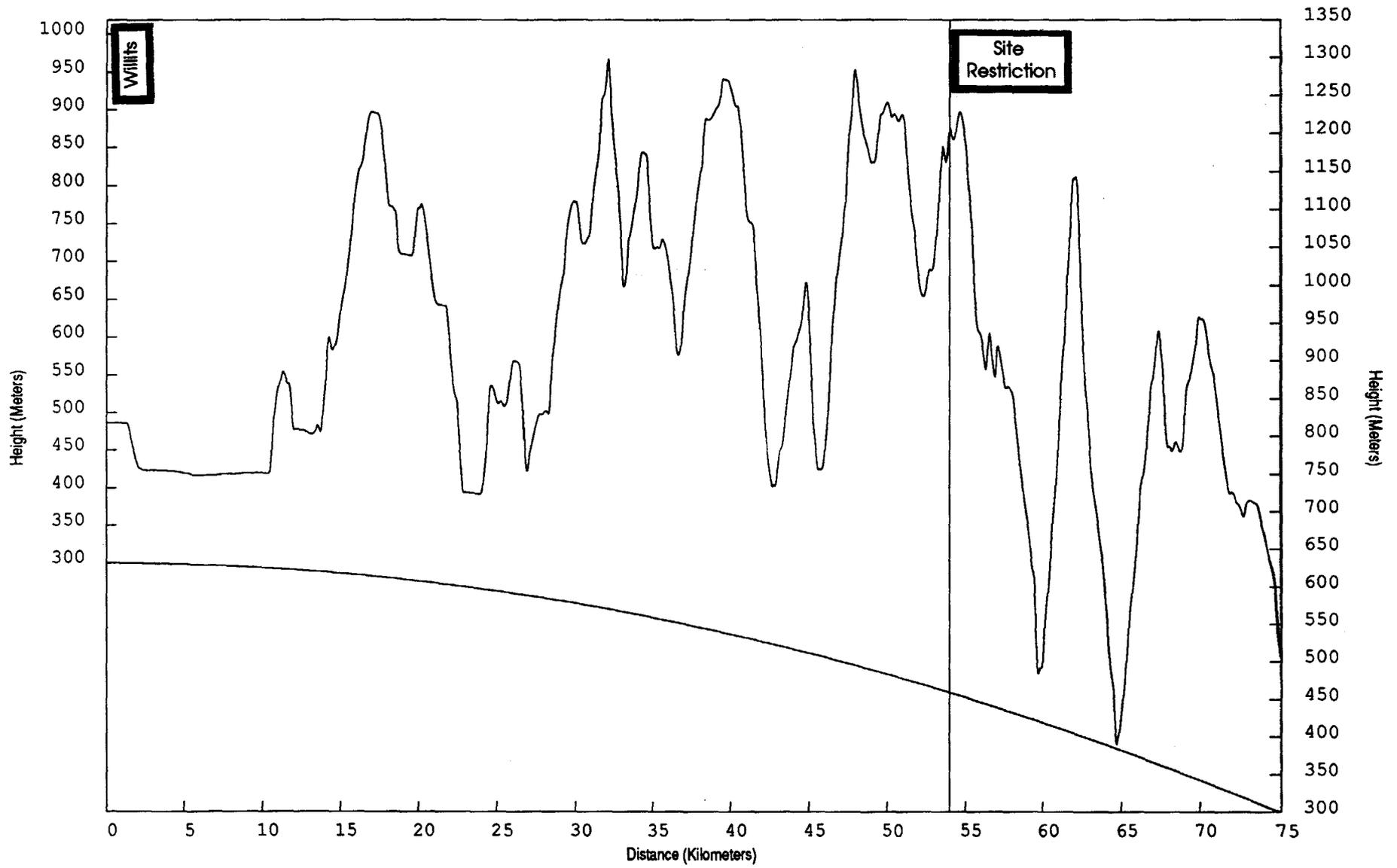
E-2p N 330° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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E-2r N 340° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits
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E-2s N 345° E • Profile From Point SE of Willits • Search for Location with Line-of-Sight into Willits

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