

November 22, 1996

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
 )  
Advance Television Systems )  
and Their Impact upon the ) MM Docket No. 87-268  
Existing Television Broadcast )  
Service )

Comments of  
Non-Commercial Television Stations, KUED and KULC

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## I. INTRODUCTION

This document has been prepared by non-commercial television stations KUED, licensed to the University of Utah, and KULC, licensed to State of Utah Board of Regents, in response to the Sixth Further Notice of Proposed Rule Making, and is intended to illustrate the potential loss of local broadcast television service to rural America if the proposed Table of Allotment for digital television and the spectrum recovery plan are initiated as outlined in this Notice of Proposed Rule Making.

To illustrate to the Federal Communications Commission how the Sixth Further Notice of Proposed Rule Making could affect one area of the country, **we have elected to use a single translator relay site, Lewis Peak, in northeast Utah, as our real life case study example.**

Lewis Peak is located 12.1 km north of Park City, Utah, and 35 km east of Salt Lake City, Utah, and is a major television translator relay site (see Exhibit 1) in Utah. As shown on the map, Lewis Peak provides input signals to many other translator relay sites, and this document will demonstrate what we call the **“Domino Effect”** caused by the loss of one or more translators in the system. The case study will show how the Sixth Further Notice of Proposed Rule Making, if initiated, **could ultimately remove the input signals to more than 60 translators in this region of Utah.** (See Exhibits 5 through 11 for a description on how a displaced translator channel at the Lewis Peak relay site will affect other translators in northeastern Utah, the “Domino Effect”.)

The highlighted translator paths on Exhibit 1 show the loss potential of TV signals being relayed from the Lewis Peak site if the Notice of Proposed Rule Making becomes law. **To our knowledge, Utah is the only state that has documented its translator network. This network has taken 40 years to construct, from 1956 to the present.** Other states that use television translator relays to provide local broadcast signals to rural areas could also experience the “Domino Effect”.

Based on the Sixth Further Notice of Proposed Rule Making, the Federal Communications Commission, (in Section IV, Item C, Paragraph No. 66), has estimated a loss of 10 to 20% of LPTV’s and translators due to the proposed DTV Table of Allotments, and an additional 17% due to the proposed spectrum recovery plan. **Based on our case study, demonstrating the “Domino Effect”, we believe that the loss of translators could be as much as 3 to 4 times higher.** The chart in Exhibit 2 highlights key Utah translator relay sites (first translator in a chain) and the primary stations they rebroadcast that could be displaced by the proposed rulemaking.

Exhibit 4, Lewis Peak Case Study, shows how difficult it will be to identify a new channel to relocate an existing translator station that has been displaced by this Notice of Proposed Rule Making. Also, the funding needed to relocate a existing translator station, if a new channel can be found, will be difficult since most television translator stations are licensed to non-profit or government groups, including Universities, city and county governments, and civic organizations.

**With the loss of translator services, rural cable operators will no longer be able to provide to their customers local and regional services, including local news, information, educational services, and notifications of local and regional emergency information.**

KUED's and KULC's individual translator networks are also shown in Exhibits 12 and 13, with Exhibits 14 and 15 showing the impact on rural television services in Utah if the proposed rule making is approved eliminating existing translators operating on channels 60 to 69.

## II. CASE STUDY

The Lewis Peak, Utah, case study was compiled using the Federal Communications Commission data base which includes all full power television, low power television, and television translator stations located within a 100 mile radius of Lewis Peak. The case study (see Exhibit 4) outlines our attempt to find new replacement channels for those that are being displaced by the proposed Draft DTV Table of Allotments for the State of Utah (see Exhibit 3), and by the proposed spectrum recovery plan for channels 60 to 69.

Based on this information, seven existing translator stations will be displaced at the Lewis Peak relay site. The call signs for the displaced translators, and their associated broadcast service are:

K17DG(PBS)	K19DU(UPN)	K22DM(Educational-KULC)
K43AA(FOX)	*K61AB(ABC)	*K63AC(NBC)
*K65AD(PBS-KUED)		

(\*) Displacement due to the proposed spectrum recovery plan, channels 60 to 69.

In addition to the displacement of seven translators at Lewis Peak, there will be eight additional translators displaced by the proposed DTV Allotment Plan which are located within 40 km of the Lewis Peak relay site. The call signs for the additional displaced translators are:

K43DA	K43AE	K48EI	K48AE
K48EA	K51AR	K51AP	K51BK

Based on the information provided in the case study in Exhibit 4, the only alternative channels available to relocate the existing television services would be adjacent channels to existing NTSC services, and channels that are either 7, 14 and 15 channels above and below a full or lower-power station. The use of adjacent channels and the 7, 14, and 15 channel taboos is prohibited in the operation of a television translator station by FCC rules 74.705(b)(1),(3), and 74.707(b)(3). Operation of a NTSC translator station on an adjacent channel with another NTSC translator station is not considered good engineering practice. Adjacent channel operation between the two stations will cause interference to the two stations, and degrade the video quality of the translator signal. Locating new channels for the seven displaced translator stations will be impossible under the conditions proposed by this the Sixth Further Notice of Proposed Rule Making. **The eventual loser will be the rural viewer.**

The case study only takes into account the Lewis Peak, Utah, site. As shown on the map in Exhibits 1, Utah has in operation a extensive translator system, and any channel displacement or changes at a site like Lewis Peak could have more far-reaching effects than we have shown in this study.

### III. OTHER ITEMS

KUED and KULC provide the following responses to the paragraphs listed in Section IV,

Item C:

67. KUED and KULC support the concept that will allow LPTV and TV translator stations displaced by DTV stations to apply for suitable replacement channels in the same area without being subject to competing applications. KUED and KULC also support the proposal that will allow LPTV and TV translator stations to file non-window displacement relief applications to change their operating parameter to cure or prevent interference caused to or received from a DTV station or other protected service.

68. KUED and KULC support the proposal that will permit low power TV and translator stations to operate on channels outside of the core digital TV spectrum. This paragraph should also include the following statement: “Television receiver manufacturers will be required to support the channels outside the core digital TV spectrum.” **KUED and KULC also support the comment that requires the new primary users of the spectrum to compensate the displaced TV translator licensee for their investments, and for their move to another channel.** Most TV translator licensees are non-profit or governmental groups. The non-profit and governmental groups include Universities, city and county governments, and civic organizations. Most of the licensees do not have the funds necessary for the replacement of equipment and antennas caused by displacement. A new TV translator station can cost up to \$50,000.

71. KUED and KULC support the proposal that will allow low power operations to have additional flexibility by allowing them to take into account terrain and other appropriate engineering factors when finding replacement channels.

72. KUED and KULC propose to the Federal Communication Commission the concept of including in this paragraph DTV TV translators in addition to DTV LPTV. The DTV translators are needed in states like Utah because the primary DTV broadcast station covers only 80% of the population living in only 20% of the geographical area, and the other 20% of the population living in 80% of the geographical area are being served by TV translator stations. These translators are the **primary** service for people living in rural areas. Television translators play an important role in providing regional news and information, notifying the state of emergency information (EAS), and educational services. Translators also serve as the primary EAS input for the majority of the nation's Western rural broadcasters and cable operators. Without DTV translators or allowing the conversion of existing NTSC TV translator stations to DTV services, the rural people in our country may be without (free) local and regional television services.

#### IV. SUMMARY

KUED and KULC do understand and support the technical advantages and the improved television services DTV offers to most viewers in the country, but KUED and KULC believe that further consideration should be given to the existing 6,600 television translator and LPTV stations in service today before a final decision is made by the Federal Communications Commission on this proposed rule making.

**KUED and KULC propose to the Federal Communications the following amendments to the Sixth Further Notice Of Proposed Rule Making, for consideration:**

**1. KUED and KULC recommend the use of the full broadcast spectrum, Channels 2 to 69 during the conversion to full DTV implementation. Once the DTV conversion is completed, KUED and KULC understand and believe that the FCC should be allowed to repack the spectrum to make available excess spectrum for recovery to be used for other services. By allowing the existing translator and LPTV broadcasters to have access to the full broadcast spectrum during the DTV conversion process, this would provide the necessary spectrum to minimize the displacement or interference caused to existing translator and LPTV services. If the spectrum recovery takes place before the DTV conversion is completed and, based on the Lewis Peak case study, many rural communities in this country will lose access to local and regional broadcast services.**

**2. KUED and KULC recommend to the Federal Communications Commission that individual markets be allowed to evaluate the current proposed DTV allotments plan, and make recommendations to the Commission of possible changes to the proposed DTV allotment plan that would help minimize the impact on existing LPTV and television translator stations. KUED and KULC recommend to the FCC an extended window of opportunity for individual markets to submit recommended changes to the proposed DTV allotment plan.**

If the Federal Communications Commission were to include KUED and KULC recommendations in the final rule making for the DTV channel allotment plan, television translators and LPTV providers will be provided with the flexibility needed to continue to provide "FREE" NTSC television service with minimal channel displacement and interference to rural citizens of this country during the 5 to 10 years conversion period to a full DTV service.

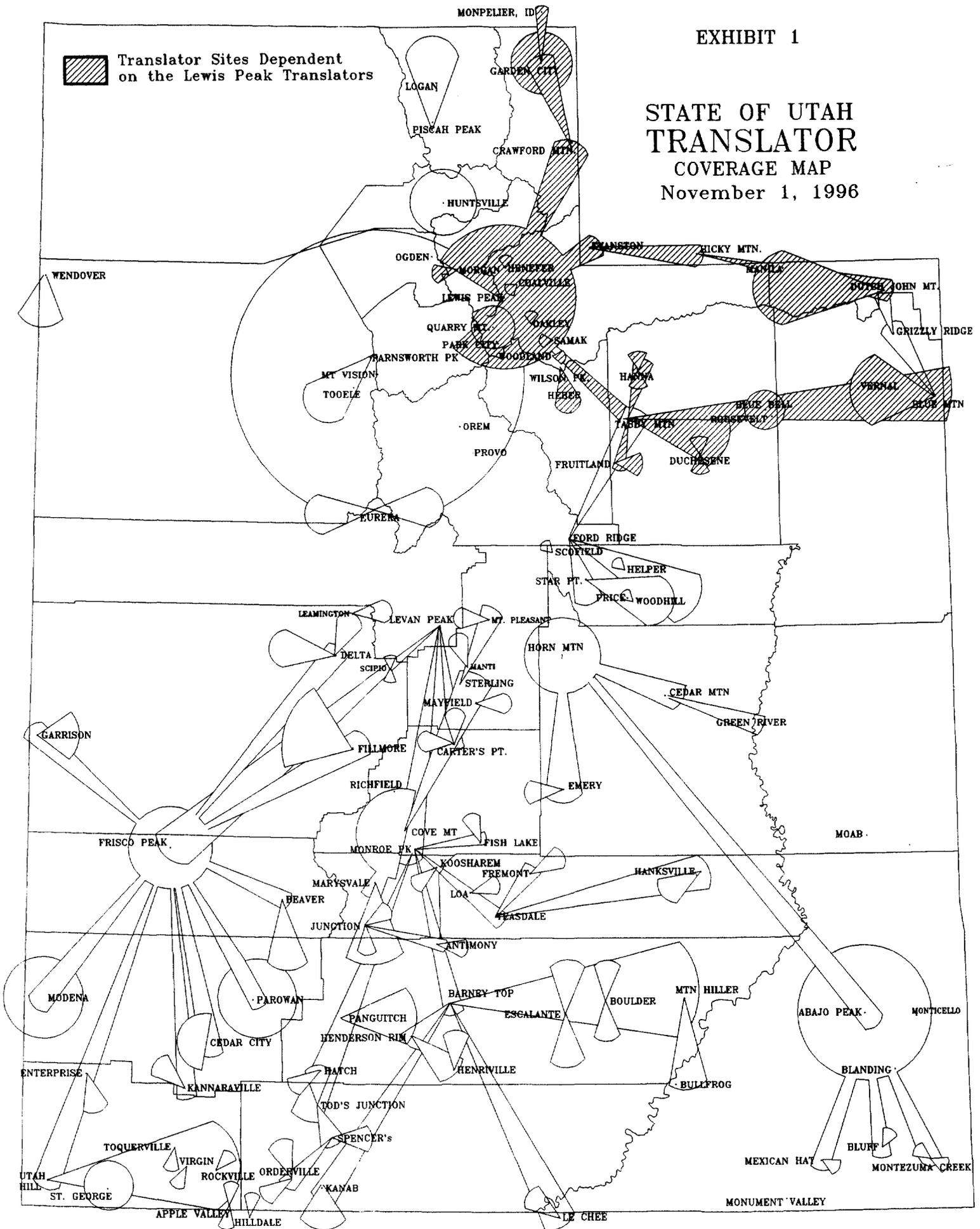
If you have any questions about our case study, or if you have any suggestions on how service can continue with the loss of spectrum due to the Notice of Proposed Rule Making, please contact us at:

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EXHIBIT 1

STATE OF UTAH  
TRANSLATOR  
COVERAGE MAP  
November 1, 1996

 Translator Sites Dependent on the Lewis Peak Translators



Utah Frequency Chart

TV Ch.	Full Power TV	DTV Alloment	LPTV	Lewis Pk	Levan Pk	Frisco Pk	Beaver Dam	Horn Mtn	Monroe Pk	Tabby Mtn	Ford Ridge	Pisach Pk (Logan)
2	KUTV											
3												
4	KTVX											
5	KSL											
6												
7	KUED											
8		KUED										
9	KULC											
10		KBYU										
11	KBYU											
12			Logan									
13	KSTU											
14	KJZZ											
15												
16	KZAR					KULC						
17		KZAR		KBYU								
18							KSL					
19		KSTU		KJZZ								
20					KULC							
21			Ogden							KJZZ		
22		KULC		KULC	KBYU							Future KUED
23									KJZZ			
24												
25									KULC			
26		KJZZ	SLC			KJZZ		KJZZ		KULC		
27									KBYU	KULC		
28			Mant									
29		KOOG									KULC	
30	KOOG											
31												
32												
33												
34												
35											KSTU	
36			SLC									
37	Not Available, Reserved for Radio Astronomy											
38			SLC									
39												
40												KBYU
41							Las Vegas					
42			SLC									
43		KUTV		KSTU			KSTU			KUTV		
44												
45			Park City									
46			SLC									
47					KSL		KUED					
48		KSL	SLC									
49					KUED						KUED	
50								KULC				
51		KTVX			KTVX							
52								KUTV				
53					KUTV							KSTU
54								KTVX				
55												KUTV
56					KSTU			KSL				
57										KUED		KTVX
58			SLC					KSTU				
59				KUTV		KSTU	KTVX		KUTV			KSL
60								KUED				
61				KTVX		KBYU	KSL		KTVX	KUTV		KUED
62								KBYU				
63				KSL		KUED	Las Vegas		KSL	KTVX		KULC
64			Ogden								KUTV	
65				KUED		KTVX	KUTV		KUED	KBYU		
66											KTVX	
67						KUTV			KSTU	KSTU		
68											KSL	
69						KSL				KSL		

Note: Shaded areas show the existing TV translators and the call signs of the stations they rebroadcast, displaced by the proposed rule making

Exhibit 3

Utah DTV Proposed Table of Allocations

	<u>NTSC</u>	<u>DTV</u>	
KUTV TV	2 .....	43	CBS NETWORK
KTVX TV	4 .....	51	ABC NETWORK
KSL TV	5 .....	48	NBC NETWORK
KUED TV	7 .....	8	PBS NETWORK
KULC TV	9 .....	22	EDUCATIONAL
KBYU TV	11 .....	10	RELIGIOUS & PBS
KSTU TV	13 .....	19	FOX NETWORK
KJZZ TV	14 .....	26	INDEPENDENT
KZAR TV	16 .....	17	PROVO, UTAH
KOOG TV	30 .....	29	OGDEN, UTAH
	4 .....	26	CEDAR CITY, UTAH

Exhibit 4

Lewis Peak Case Study

<u>CHANNEL</u>	<u>STATION</u>	<u>IMPACT</u>	<u>DISTANCE</u>	<u>LOCATION</u>	<u>DISPLACES</u>
14	KJZZ	PRIMARY STATION	39.4km	S.L.C.	
15		ADJACENT TO KJZZ	39.4km	S.L.C.	
16	KZAR	PRIMARY STATION	71.6km	PROVO	
17	<b>KZAR</b>	<b>ATV ALLOCATED</b>	71.6km	PROVO	<b>K17DG</b>
18		ADJACENT CHANNEL			
19	<b>KSTU</b>	<b>ATV ALLOCATED</b>	44.9km	S.L.C.	<b>K19DU</b>
20	K21DY	ADJACENT CHANNEL	20.2km	HEBER	
21	K21DY	TV TRANSLATOR	20.2km	HEBER	
22	<b>KULC</b>	<b>ATV ALLOCATED</b>	38.7km	S.L.C.	<b>K22DM</b>
23		ADJACENT CHANNEL			
24	K25DL	ADJACENT CHANNEL	12.1km	PARK CITY	
25	K25DL	TV TRANSLATOR	12.1km	PARK CITY	
26	<b>KJZZ</b>	<b>ATV ALLOCATED</b>	39.4km	S.L.C.	<b>K26DS</b>
27	K27DH	TV TRANSLATOR	10.9km	PEOA/OAKLEY	
28		14 CH. FROM KJZZ	39.4km	S.L.C.	
		7 CH. FROM K35OP	12.1km	PARK CITY	
		15 CH. FROM K43AA	0.0km	LEWIS PEAK	
		7 CH. FROM K21DY	20.2km	HEBER	
	K27DH	ADJACENT CHANNEL	10.9km	PEOA/OAKLEY	
29	<b>KOOG</b>	<b>ATV ALLOCATED</b>	47.3km	OGDEN	
30	KOOG	PRIMARY STATION	47.3km	OGDEN	
31	KOOG	ADJACENT CHANNEL	47.3km	OGDEN	
32	<b>K32AD</b>	<b>TV TRANSLATOR</b>	<b>88.9km</b>	PRESTON	
		14 CH. FROM K46BJ	21.7km	S.L.C.	
		15 CH. FROM K47AJ	12.1km	PARK CITY	
		7 CH. FROM K25DL	12.1km	PARK CITY	
		14 CH. FROM K46CT	23.3km	WOODLAND	
33	<b>K33DL</b>	<b>TV TRANSLATOR</b>	<b>71.1km</b>	EUREKA	
		7 CH. FROM K40DL	20.4km	HEBER	
		14 CH. FROM K47AJ	12.1km	PARK CITY	
		15 CH. FROM K48AE	23.3km	WOODLAND	
34	<b>K34AD</b>	<b>TV TRANSLATOR</b>	<b>88.9km</b>	PRESTON	
	<b>K34DW</b>	<b>TV TRANSLATOR</b>	<b>55.7km</b>	PROVO	

<u>CHANNEL</u>	<u>STATION</u>	<u>IMPACT</u>	<u>DISTANCE</u>	<u>LOCATION</u>	<u>DISPLACES</u>
		14 CH. FROM K48AE	23.3km	WOODLAND	
		7 CH. FROM K27DH	10.9km	PEOA/OAKLEY	
		ADJACENT CH. K35OP	12.1km	PARK CITY	
		15 CH. FROM K49AR	12.1km	PARK CITY	
35	K35CZ	TV TRANSLATOR	71.1km	EUREKA	
	K35CK	TV TRANSLATOR	94.0km	PRICE	
	K35OP	TV TRANSLATOR	12.1km	PARK CITY	
		ADJACENT TO K36CJ	21.1km	S.L.C.	
		14 CH. FROM K49AR	12.1km	PARK CITY	
		14 CH. FROM K21DY	20.2km	HEBER	
		15 CH. FROM K50AC	23.3km	WOODLAND	
36	K36CJ	TV TRANSLATOR	21.1km	S.L.C.	
		ADJACENT CH. K35OP	12.1km	PARK CITY	
		7 CH. FROM K43AA	0.0km	LEWIS PEAK	
		15 CH. FROM K51AR	12.1km	PARK CITY	
		14 CH. FROM K50AC	23.3km	WOODLAND	
		14 CH. FROM K22DM	0.0km	LEWIS PEAK	
		15 CH. FROM K21DY	20.2km	HEBER	
37	RESERVED FOR RADIO ASTRONOMY				
38	K38CN	TV TRANSLATOR	33.3km	S.L.C.	
	K38DN	TV TRANSLATOR	20.2km	HEBER	
	K38BZ	TV TRANSLATOR	44.8km	HICKEY MTN.	
	K38AL	TV TRANSLATOR	71.7km	LAKETOWN	
		14 CH. FROM K52AE	23.3km	WOODLAND	
		7 CH. FROM K45AX	12.1km	PARK CITY	
		15 CH. FROM K53BC	12.1km	PARK CITY	
39	K39DH	TV TRANSLATOR	47.3km	OGDEN	
	K39CO	TV TRANSLATOR	79.9km	PRICE	
	K39CR	TV TRANSLATOR	71.1km	EUREKA	
		ADJACENT TO K38DN	20.2km	HEBER	
		14 CH. FROM K25DL	12.1km	PARK CITY	
		ADJACENT TO K40DL	20.4km	HEBER	
		7 CH. FROM K46CT	23.3km	WOODLAND	
		15 CH. FROM K54AE	23.3km	WOODLAND	
		7 CH. FROM K46BJ	21.7km	S.L.C.	
		14 CH. FROM K53BC	12.1km	PARK CITY	
40	K40DL	TV TRANSLATOR	20.4km	HEBER	
	K40BX	TV TRANSLATOR	44.8km	BIGELOW BENCH	
		15 CH. FROM K55EQ	8.8km	ECHO	
		7 CH. FROM K47AJ	12.1km	PARK CITY	
		14 CH. FROM K26DN	19.2km	S.L.C.	

<u>CHANNEL</u>	<u>STATION</u>	<u>IMPACT</u>	<u>DISTANCE</u>	<u>LOCATION</u>	<u>DISPLACES</u>		
41	K41DC K41DM	14 CH. FROM K54AE	23.3km	WOODLAND			
		15 CH. FROM K25DL	12.1km	PARK CITY			
		TV TRANSLATOR	71.1km	EUREKA			
		TV TRANSLATOR	49.3km	FRUITLAND			
		14 CH. FROM K55EQ	8.8km	ECHO			
		14 CH. FROM K27DH	10.9km	PEOA/OAKLEY			
		15 CH. FROM K56AE	20.4km	HEBER			
		7 CH. FROM K48AE	23.3km	WOODLAND			
		ADJACENT TO K40DL	20.4km	HEBER			
		15 CH. FROM K26DN	19.2km	S.L.C.			
42	NEW-T	TV TRANSLATOR	22.6km	S.L.C.			
		7 CH. FROM K49AR	12.1km	PARK CITY			
		14 CH. FROM K56AE	20.4km	HEBER			
		ADJACENT TO K43AA	0.0km	LEWIS PEAK			
		7 CH. FROM K35OP	12.1km	PARK CITY			
		15 CH. FROM K27DH	10.9km	PEOA/OAKLEY			
		ATV ALLOCATION	25.0km	S.L.C.	<b>K43AA</b> <b>K43DA</b> <b>K43AE</b>		
44	K43AA	ADJACENT CH.	0.0km	LEWIS PEAK			
		14 CH. FROM KOOG	47.3km	OGDEN			
		7 CH. FROM K51AR	12.1km	PARK CITY			
		ADJACENT TO K45AX	12.1km	PARK CITY			
		15 CH. FROM K59AF	0.0km	LEWIS PEAK			
		45	K45AX K45AG K45DD	TV TRANSLATOR	12.1km	PARK CITY	
				TV TRANSLATOR	73.7km	DUCHESNE	
				TV TRANSLATOR	71.1km	EUREKA	
				15 CH. FROM KOOG	47.3km	OGDEN	
				ADJACENT TO K46BJ	21.7km	S.L.C.	
ADJACENT TO K46CT	23.3km			WOODLAND			
14 CH. FROM K59AF	0.0km			LEWIS PEAK			
7 CH. FROM K52AE	23.3km			WOODLAND			
7 CH. FOM K38DN	20.2km			HEBER			
46	K46BJ K46CT			TV TRANSLATOR	21.7km	S.L.C.	
		TV TRANSLATOR	23.3km	WOODLAND			
		ADJACENT TO K45AX	12.1km	PARK CITY			
		ADJACENT TO K47AJ	12.1km	PARK CITY			
		7 CH. FROM K53BC	12.1km	PARK CITY			
47	K47AJ K47AN K47AI	TV TRANSLATOR	12.1km	PARK CITY			
		TV TRANSLATOR	73.7km	DUCHESNE			
		TV TRANSLATOR	56.1km	RANDOLPH			

<u>CHANNEL</u>	<u>STATION</u>	<u>IMPACT</u>	<u>DISTANCE</u>	<u>LOCATION</u>	<u>DISPLACES</u>
48	KSL TV	ADJACENT TO K48AE	23.3km	WOODLAND	K48EI K48AE K48EA
		ADJACENT TO K46CT	23.3km	WOODLAND	
		ADJACENT TO K46BJ	21.7km	S.L.C.	
		7 CH. FROM K54AE	23.3km	WOODLAND	
		7 CH. FROM K40DL	20.4km	HEBER	
		ATV ALLOCATED	38.7km	S.L.C.	
49	K49AR K49AP	TV TRANSLATOR	12.1km	PARK CITY	
		TV TRANSLATOR	56.1km	RANDOLPH	
		ADJACENT TO K50AC	23.3km	WOODLAND	
		ADJACENT TO K48AE	23.3km	WOODLAND	
		7 CH. FROM K56AE	20.4km	HEBER	
50	K50AC	14 CH. FROM K35OP	12.1km	PARK CITY	
		TV TRANSLATOR	23.3km	WOODLAND	
		ADJACENT TO K49AR	12.1km	PARK CITY	
		14 CH. FROM K36CJ	21.1km	PARK CITY	
		7 CH. FROM K43AA	0.0km	LEWIS PEAK	
51	KTVX	15 CH. FROM K35OP	12.1km	PARK CITY	K51AR K51AP K51BK
		ATV ALLOCATED	40.0km	S.L.C.	
52	K52AE K52CS K52CO	TV TRANSLATOR	23.3km	WOODLAND	
		TV TRANSLATOR	37.5km	HUNTSVILLE	
		TV TRANSLATOR	98.1km	MALAD	
		7 CH. FROM K59AF	0.0km	LEWIS PEAK	
		7 CH. FROM K45AX	12.1km	PARK CITY	
		ADJACENT TO K53BC	12.1km	PARK CITY	
		ADJACENT TO K51AR	12.1km	PARK CITY	
		14 CH. FROM K38DN	20.2km	HEBER	
53	K53BC K53BB K53AP K53AX	TV TRANSLATOR	12.1km	PARK CITY	
		TV TRANSLATOR	77.0km	ROOSEVELT	
		TV TRANSLATOR	53.3km	LOGAN	
		TV TRANSLATOR	56.1km	RANDOLPH	
		ADJACENT TO K54AE	23.3km	WOODLAND	
		ADJACENT TO K52AE	23.3km	WOODLAND	
		7 CH. FROM K46BJ	21.7km	S.L.C.	
		7 CH. FROM K46CT	23.3km	WOODLAND	
		15 CH. FROM K38DN	20.2km	HEBER	
		54	K54AE	TV TRANSLATOR	
7 CH. FROM K47AJ	12.1km			PARK CITY	

<u>CHANNEL</u>	<u>STATION</u>	<u>IMPACT</u>	<u>DISTANCE</u>	<u>LOCATION</u>	<u>DISPLACES</u>
		14 CH. FROM K40DL	20.4km	HEBER	
		ADJACENT TO K55EQ	8.8km	ECHO	
		ADJACENT TO K53BC	12.1km	PARK CITY	
55	K55CS	TV TRANSLATOR	37.9km	HUNTSVILLE	
	K55BS	TV TRANSLATOR	56.1km	RANDOLPH	
	K55BM	TV TRANSLATOR	53.3km	LOGAN	
	K55EQ	TV TRANSLATOR	8.8km	ECHO	
	K55DG	TV TRANSLATOR	77.0km	ROOSEVELT	
		ADJACENT TO K54AE	23.3km	WOODLAND	
		7 CH. FROM K48AE	23.3km	PARK CITY	
		15 CH. FROM K40DL	20.4km	HEBER	
56	K56AE	TV TRANSLATOR	20.4km	HEBER	
	K56BA	TV TRANSLATOR	91.1km	MT. PLEASANT	
	K56BM	TV TRANSLATOR	92.2km	MALAD	
		ADJACENT TO K55EQ	8.8km	ECHO	
		7 CH. FROM K49AR	12.1km	PARK CITY	
57	K57AX	TV TRANSLATOR	53.3km	LOGAN	
	K57CK	TV TRANSLATOR	48.9km	TABBY MTN.	
		ADJACENT TO K56AE	20.4km	HEBER	
		14 CH. FROM K43AA	0.0km	LEWIS PEAK	
		7 CH. FROM K50AC	23.3km	WOODLAND	
58	K58ED	TV TRANSLATOR	39.4km	S.L.C	
	K58AR	TV TRANSLATOR	93.2km	MALAD	
		ADJACENT TO K59AF	0.0km	LEWIS PEAK	
		7 CH. FROM K51AR	12.1km	PARK CITY	
		15 CH. FROM K43AA	0.0km	LEWIS PEAK	
59	K59AF	TV TRANSLATOR	0.0km	LEWIS PEAK	
	K59EL	TV TRANSLATOR	54.1km	FRUITLAND	
		7 CH. FROM K52AE	23.3km	WOODLAND	
		14 CH. FROM K45AX	12.1km	PARK CITY	
		<b>ATV DISPLACEMENT.....</b>		<b>LEWIS PEAK</b>	<b>K61AB</b>
					<b>K63AC</b>
					<b>K65AD</b>

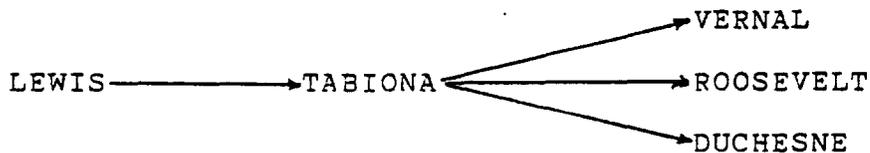
KBYU TV

LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K17DG

WITH DISPLACEMENT OF K17DG, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K17DU FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K49ATL	VERNAL	UINTAH COUNTY
K45AG	DUCHESNE	DUCHESNE COUNTY
K53BB	ROOSEVELT	UINTAH COUNTY
<b>K65CL</b>	TABIONA	DUCHESNE



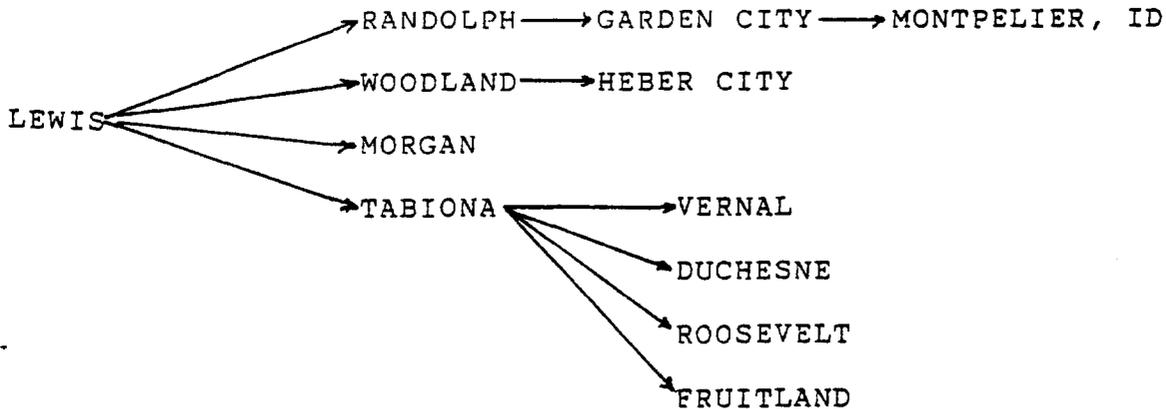
KJZZ TV

LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K19DU

WITH DISPLACEMENT OF K19DU, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K19DU FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K32EJ	WOODLAND	LARRY H. MILLER CORP.
K21DY	HEBER CITY	LARRY H. MILLER CORP.
K24EC	RANDOLPH	RICH COUNTY
K36DZ	GARDEN CITY	RICH COUNTY
K54DY	MONTPELIER, ID	BEAR LAKE COUNTY
K15	MORGAN	LARRY H. MILLER CORP.
K17DM	TABIONA	DUCHESNE COUNTY
K50EC	FRUITLAND	DUCHESNE COUNTY
K06MT	DUCHESNE	DUCHESNE COUNTY
K19CZ	ROOSEVELT	LARRY H. MILLER CORP.
K15DI	VERNAL	LARRY H. MILLER CORP.



LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K22DM

WITH DISPLACEMENT OF K22DM, THE FOLLOWING TRANSLATOR  
STATION WOULD ALSO BE DISPLACED BECAUSE IT DEPENDS ON  
K22DM FOR INPUT SIGNAL: :

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K25DL	PARK CITY	UNIVERSITY OF UTAH

LEWIS —————> PARK CITY

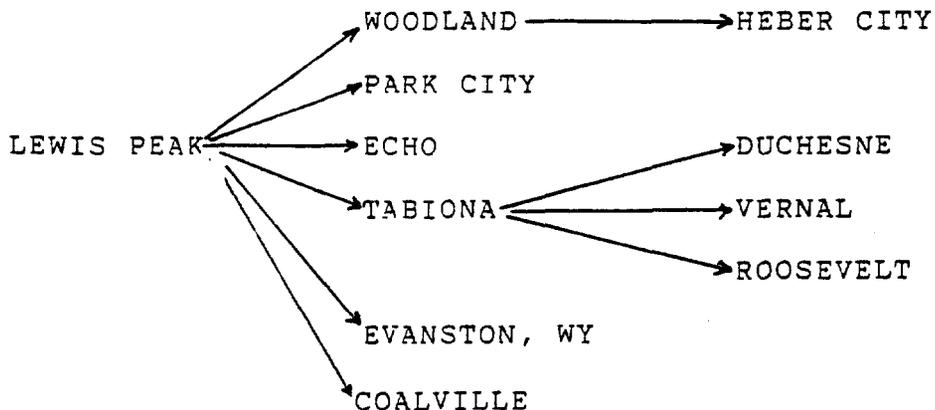
KSTU TV

LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K43AA

WITH DISPLACEMENT OF K43AA, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K43AA FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K46CT	WOODLAND	SUMMIT COUNTY
K40DL	HEBER CITY	WASATCH COUNTY
<b>K67CK</b>	TABIONA	DUCHESNE COUNTY
K51AO	VERNAL	UINTAH COUNTY
K35OP	PARK CITY	SUMMIT COUNTY
CH. 27	ECHO	SUMMIT COUNTY
K55DG	ROOSEVELT	DUCHESNE COUNTY
K47AN	DUCHESNE	DUCHESNE COUNTY
K11JQ	EVANSTON, WY	WYOMING COMMUNICATIONS
K26DS	COALVILLE	SUMMIT COUNTY
K13	HANNA	DUCHESNE COUNTY



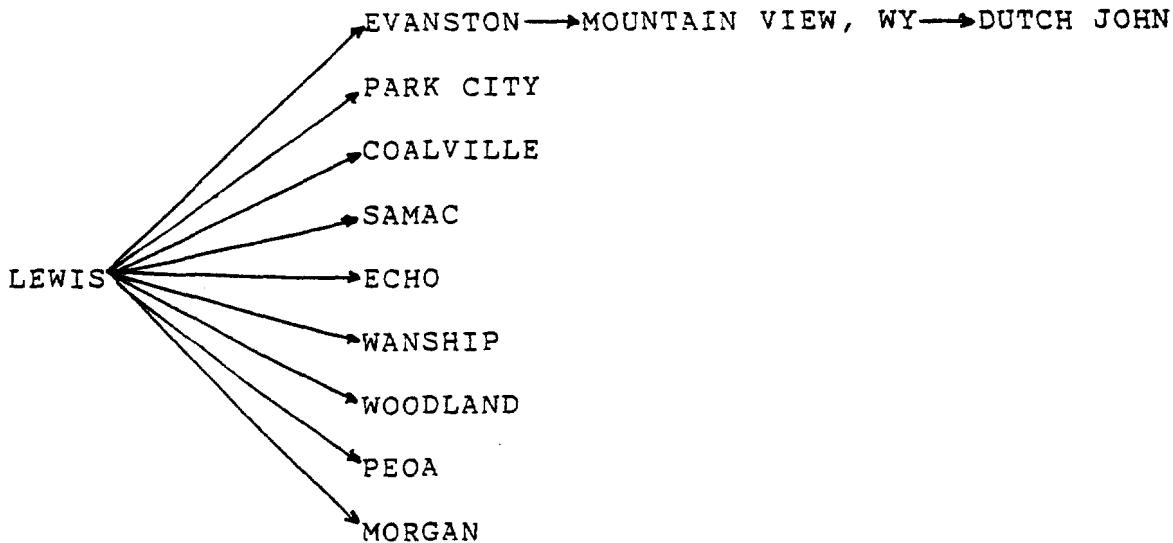
KTVX TV

LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K61AB

WITH DISPLACEMENT OF K61AB, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K61AB FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K40BX	EVANSTON, WY	WYOMING COMMUNICATIONS
K25EE	MOUNTIAN VIEW, WY	DAGGETT COUNTY
K04HN	DUTCH JOHN	DAGGET COUNTY
K49AR	PARK CITY	SUMMIT COUNTY
K11DW	COALVILLE	SUMMIT COUNTY
K11SX	SAMAC	SUMMIT COUNTY
K10AY	ECHO	SUMMIT COUNTY
K08JE	WANSHIP	SUMMIT COUNTY
K50AC	WOODLAND	SUMMIT COUNTY
K10JB	PEOA	SUMMIT COUNTY
K10FW	MORGAN	MORGAN COUNTY

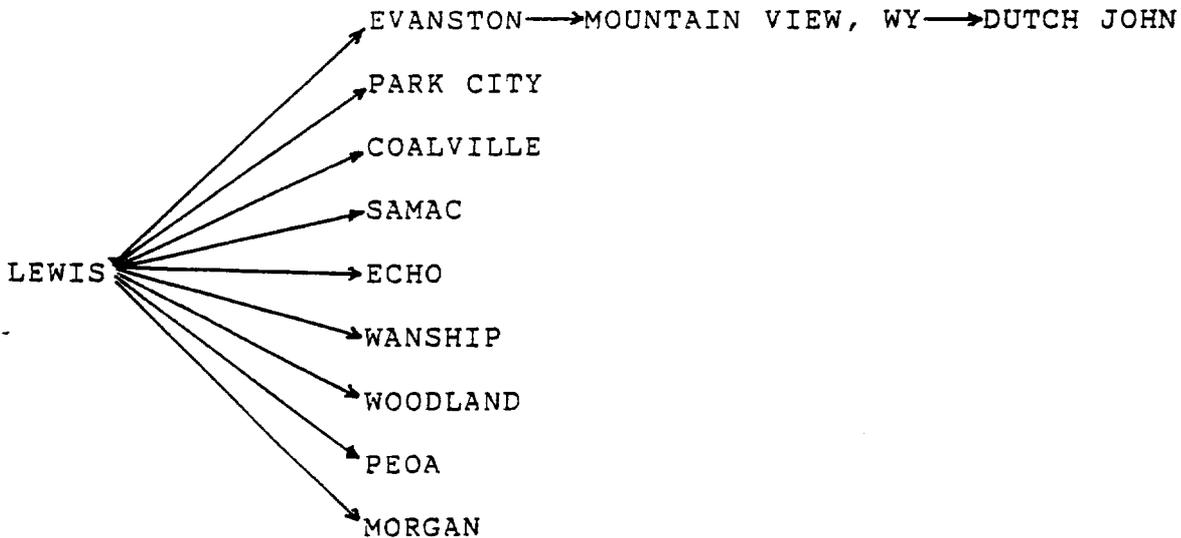


LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K63AC

WITH DISPLACEMENT OF K63AC, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K63AC FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K36DD	EVANSTON, WY	WYOMING COMMUNICATIONS
K27DZ	MOUNTIAN VIEW, WY	DAGGETT COUNTY
K05FJ	DUTCH JOHN	DAGGET COUNTY
K51AR	PARK CITY	SUMMIT COUNTY
K13DP	COALVILLE	SUMMIT COUNTY
K13VT	SAMAC	SUMMIT COUNTY
K12AY	ECHO	SUMMIT COUNTY
K10K0	WANSHIP	SUMMIT COUNTY
K52AE	WOODLAND	SUMMIT COUNTY
K12JM	PEOA	SUMMIT COUNTY
K12GI	MORGAN	MORGAN COUNTY



KUED TV

LEWIS PEAK

DISPLACEMENT OF TRANSLATOR STATION K65AD

WITH DISPLACEMENT OF K65AD, THE FOLLOWING TRANSLATOR STATIONS WOULD ALSO BE DISPLACED BECAUSE THEY DEPEND ON K65AD FOR INPUT SIGNALS:

<u>STATION</u>	<u>COMMUNITY SERVED</u>	<u>LICENSEE</u>
K06IF	EVANSTON, WY	DAGGETT COUNTY
K07LS	MOUNTAIN VIEW, WY	DAGGETT COUNTY
K09LZ	MANILA	DAGGETT COUNTY
K53BC	PARK CITY	SUMMIT COUNTY
K07LT	COALVILLE	SUMMIT COUNTY
K07US	SAMAC	SUMMIT COUNTY
K06IM	ECHO	SUMMIT COUNTY
K12LC	WANSHIP	SUMMIT COUNTY
K54AE	WOODLAND	SUMMIT COUNTY
<b>K69AR</b>	PEOA	SUMMIT COUNTY
<b>K69AP</b>	MORGAN	MORGAN COUNTY

