

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

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Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )

MM Docket No. 87-268

DOCKET FILE COPY ORIGINAL

TO: The Commission

**JOINT COMMENTS OF LIN TELEVISION CORPORATION, 54  
BROADCASTING, INC., CHANNEL 41, INC., KXTX OF TEXAS, INC., AND K-W  
TV, INC. TO THE SIXTH FURTHER NOTICE OF PROPOSED RULEMAKING**

December 6, 1996

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## SUMMARY

LIN Television Corporation, 54 Broadcasting, Inc., Channel 41, Inc., KXTX of Texas, Inc., and K-W TV, Inc. have long supported the efforts of broadcasters and the Commission to devise a digital television ("DTV") allotment/assignment scheme that is founded on objective, scientifically based criteria and that preserves and improves free-over-the-air television service. We therefore support the basic proposal of the Sixth Further Notice of Proposed Rulemaking ("Notice") to allot and assign DTV channels on the basis of engineering principles, full accommodation, and replication of NTSC service areas (with the opportunity for station maximization of DTV service areas).

In order to facilitate this DTV allotment/assignment approach, the Notice proposes rules regarding the consideration of applications for NTSC facility modifications. Although we fully support the Notice's decision to continue accepting applications for NTSC facility changes, we disagree that all applications filed prior to, but granted after, adoption of the Notice should be granted subject to the DTV coverage areas defined by the final DTV table of allotments/assignments (the "DTV condition"). First, the Notice's proposed treatment of modification applications filed before July 25, 1996 deprives broadcasters of fair notice. Moreover, the proposal produces inequitable and arbitrary results. We urge that routine, minor facility modification applications which were unopposed and were filed on or before July 25, 1996 be processed without the DTV condition. Furthermore, those approved NTSC facility modifications which are constructed in a timely fashion should be incorporated into the corrected NTSC database upon which the final DTV table will be based.

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BROADCASTING, INC., CHANNEL 41, INC., KXTX OF TEXAS, INC., AND K-W  
TV, INC. TO THE SIXTH FURTHER NOTICE OF PROPOSED RULEMAKING**

These joint comments are submitted on behalf of LIN Television Corporation, 54 Broadcasting, Inc., Channel 41, Inc., KXTX of Texas, Inc., and K-W TV, Inc. ("the Modifiers") in response to the Sixth Further Notice of Proposed Rulemaking (FCC 96-317, released August 14, 1996) ("Notice"). As discussed more fully below, the Modifiers urge that routine, minor facility modification applications which were unopposed and were filed on or before July 25, 1996 should be processed without the DTV condition and, if constructed in a timely fashion, should be incorporated into the corrected NTSC database upon which the final DTV table will be based.<sup>1/</sup>

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<sup>1/</sup> These comments are being filed within a "reasonable period of time" after November 22, 1996 and, consistent with the Commission's Order Extending Time for Filing Reply Comments, MM Docket 87-268 (November 20, 1996), should be accepted as comments to the Notice.

## **I. REVIEW AND DISPOSITION OF THE MODIFIERS' APPLICATIONS WAS DELAYED.**

Within the past year, the Modifiers have filed five applications for routine, minor modifications of existing NTSC facilities. All of these applications proposed alterations that would provide better coverage to the stations' existing NTSC service areas and that would expand those service areas, and all were filed more than six months before the adoption of the Notice on July 25, 1996. One of these applications, for WOTV in Battle Creek, Michigan, was granted prior to July 25 and is not conditioned on the final DTV table.<sup>2/</sup> Although filed before or within weeks of the WOTV application,<sup>3/</sup> the remaining four applications were not granted until after July 25.<sup>4/</sup> As a result, the Commission conditioned the grants of authorization "on the outcome of the [DTV] rule making proceeding" and included in each grant limiting language stating that, "[t]o the extent that the station's Grade B contour or potential for causing interference is

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<sup>2/</sup> See Application of WOTV, Battle Creek, Michigan, File Number BPCT-960112KF. WOTV's application was granted on July 5, 1996, resulting in an increase of power from 2000 kW to 5000 kW.

<sup>3/</sup> See Application of KXAN-TV, Austin, TX, File Number BPCT-951205KE; Application of KNVA(TV), Austin, TX, File Number BPCT-951207KG; WBNE-TV, New Haven, CT, File Number BPCT-951208KE; Application of KXTX(TV), Dallas, TX, File Number BPCT-960118KI.

<sup>4/</sup> KXAN-TV's application was granted on August 6. The application of KNVA(TV) was granted August 12. The applications of WBNE-TV and KXTX(TV) were granted on August 6 and October 7, respectively.

extended into new areas by this authorization, the Commission may require the facilities authorized to be reduced or modified."<sup>5/</sup>

None of the applications pending as of July 25 contained unusual or technically difficult requests that should have led to a delay in approval. All were unopposed. Moreover, the granting was not delayed through any fault of the Modifiers. The Commission, for example, found no shortcomings with, or inaccuracies in, any of the applications that might have justified delayed consideration. Our review of actions that were reported in 1995 weekly editions of the *Television & Cable Act Update*, the addenda to Warren Publishing, Inc.'s *TV & Cable Factbook*, shows that the average processing time for routine, minor modification applications was approximately 18 weeks. (Extraordinary applications required more processing time.) Some delay in 1996 agency review may be attributable to the government shutdown beginning in December 1995 and ending in January 1996; however, the shutdown cannot account for the six-month delay in FCC consideration that ensued in the four cases discussed above. In fact, the application for WOTV was filed over four weeks after the filing of three of the applications in question and six days before the fourth, yet the agency granted this application on July 5,

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<sup>5/</sup> LIN Television Corporation ("LIN TV"), on behalf of its stations and those of the other Modifiers with whom it has local marketing agreements, has considered the effect of the NTSC modification applications on the DTV process. Specifically, LIN TV participated in the Broadcasters' national campaign on DTV allotments and assignments and requested assistance in evaluating the effect of NTSC facility changes on the DTV table of allotments and assignments, as proposed by the Broadcasters.

1996 (over one month before any of the other applications were granted) subject to no DTV condition.<sup>6/</sup>

To construct the facilities requested in these four applications, the stations will spend in excess of \$10,000,000 for new transmitters and antenna and transmission lines.<sup>7/</sup> Three of the applications are to upgrade seriously underpowered UHF facilities, one independent station and two WB affiliates. As shown in the attached engineering exhibit, the modifications increase the predicted population coverage of the four stations by more than 1,000,000 persons, and by as much as 24% for one of the stations. Moreover, because these are UHF stations, which have greater terrain blockage problems, the actual coverage increases will be substantially greater in relation to current coverage.

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<sup>6/</sup> The Notice does not directly address the treatment of applications for modification that were granted *prior* to the Notice's adoption but *after* the date of the FCC TV Engineering Data Base that was used to engineer the FCC DTV table. The Notice states that the "table allots a DTV channel to each eligible existing broadcaster, with eligibility determined by the proposed allotment principles, and existence established by presence in the FCC TV Engineering Data Base dated May 13, 1996." Notice, at B-1. Power needed to replicate NTSC coverage and antenna height "was determined from information" in the May 13 engineering database. Id. The NTSC database was "frozen" on May 13 apparently for reasons of administrative convenience in generating the draft table. In any event, even under the rationale utilized in the Notice, the NTSC database used to calculate DTV allotments and assignments should be amended to reflect WOTV's facility modifications.

NTSC database corrections were submitted to the Broadcasters Caucus, and the corrections appear in the appendix to the Broadcasters Comments. Like the Broadcasters, the Modifiers urge that these corrections be incorporated into the final DTV plan as soon as possible.

<sup>7/</sup> The upgrades at WOTV and WBNE have been completed. Construction is underway at KXAN and KNVA, and the upgrades should be completed in the next two months. The tower of station KXTX collapsed during the installation of the new antenna, but a new tower has been ordered and that upgrade should be complete by April 1, 1997.

In short, these upgrades are essential to the efforts of the Modifiers to make these stations vigorous competitors.

Because of the delay in granting the four applications, the approved NTSC facility changes are subject to limiting conditions described above and have not been incorporated into the DTV allotment/assignment process.

**II. UNDER THE NOTICE'S PROPOSAL, COMMUNITIES THAT CAN NOW BE SERVED BY THE MODIFIERS' STATIONS MAY LOSE NTSC SERVICE DURING THE TRANSITION AND WILL BE UNABLE TO RECEIVE THESE STATIONS' DTV SERVICE.**

According to the Notice, the Commission will continue to permit the filing of applications to modify the technical facilities of existing or authorized NTSC TV stations during the transition to DTV. Notice, at 26. The Notice recognizes that to do otherwise would "pose hardships for broadcasters." Notice at 26. The Modifiers strongly support the Commission's proposal to continue accepting modification applications. We anticipate that the complete conversion to DTV will take well over a decade. Some stations undoubtedly will not even have their DTV operations up and running for some years. In many cases, modifications of existing NTSC stations can be made without affecting any NTSC or DTV station. NTSC service should not be held hostage during the DTV transition -- it should be preserved and improved whenever possible. Indeed, the Commission has commented in the DTV proceeding that "maintaining existing service is extremely important, and that the public interest would be served by avoiding any

substantial dislocation of existing television broadcast service."<sup>8/</sup> Thus, broadcasters should be allowed to continue modifying their NTSC stations so they can continue to provide reliable NTSC service to as many viewers as possible.

The Notice goes on to state, however, that in order to maintain its "ability to develop the DTV table," the Commission "will henceforth condition the grant of applications for modification of technical facilities, including those for applications on file before the date of the adoption of this Further Notice, but granted after that date, on the outcome of our final decision on the DTV Table of Allotments." Id. at 26, 46. The Notice cautions that "to the extent that an existing station's service or potential for causing interference are extended into new areas by grant or application, the condition may require the station's authorized facilities to be reduced or modified." Id. at 26. Implicitly recognizing the inequity of such a rule and the hardship it could impose on those broadcasters who filed before July 25, the Notice seeks comment on whether the condition "should involve different consequences for applications for modifications on file as of the date of adoption of this Further Notice, as opposed to such applications filed after that date." Id. at 26-27.

The Modifiers strongly support different treatment for applications that were on file before the adoption of the Notice. In particular, we propose that routine, minor facility modification applications which were unopposed and were filed on or

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<sup>8/</sup> Tentative Decision and Further Notice of Inquiry, 3 FCC Rcd. 6520, 6536 (1988); see also id. at 6521; Notice of Proposed Rule Making, 6 FCC Rcd. 7024, 7024 (1992).

before July 25, 1996 should be processed without the DTV condition. Moreover, the approved NTSC facility modifications should be incorporated into the corrected NTSC database upon which the final DTV table will be based. The Modifiers recognize that the Commission must attempt to balance the ongoing management of NTSC service against the development of the final DTV table. Stations should not be permitted to use the NTSC modification application process solely to reserve larger NTSC and DTV service areas that they have no concrete plans to serve. We propose that, in order to provide some resolution and finality to the DTV process, the Commission establish a reasonable date by which such NTSC facility modifications must be constructed in order for stations to preserve their rights to the modified NTSC and DTV service areas.

The Commission's proposal, as it now stands, deprives broadcasters of fair notice, leads to inequitable results, and frustrates broadcasters' efforts to provide maximum NTSC and DTV service to the public -- a cornerstone of the Notice's proposal to incorporate principles of replication and maximization. See Notice, at 8. First, the Commission provided no notice to broadcasters that routine NTSC modification applications would be subject to limiting conditions and disregarded in the DTV allotment/assignment process. Some warning of a freeze or a change in processing could have been issued to broadcasters at some point in the DTV proceeding. A rule which conditions applications filed after, not before, July 25 would provide broadcasters with due notice and, with the construction requirement described above, still would enable the Commission to proceed with developing the final DTV table.

Second, the proposal is unfair to broadcasters who filed modification applications before the adoption of the Notice in several respects. On the one hand, under the proposal, broadcasters who filed applications after having had the opportunity to examine and consider the Notice are treated in the same manner as those who filed applications well before July 25. This is not a case in which the Modifiers reviewed the Notice and, after examining proposed DTV coverage, decided to seek NTSC facility changes in an effort to engineer larger service areas during the DTV transition. All of the modification applications were contemplated and filed well before the Notice as a routine part of the business of providing and improving current television service to viewers. On the other hand, the Notice treats non-operational NTSC stations differently from NTSC stations that filed timely modification applications. Surely stations that filed timely modification applications seeking to enhance and improve service to viewers should be given the same accommodation as authorized but non-operational NTSC stations.

Finally, both viewers and stations suffer with inferior service under the Notice's approach. Under the Notice's basic allotment/assignment process, the optimal DTV channel assignment that will achieve replication and minimize interference is determined on the basis of the technical parameters of the NTSC station. See, e.g., Notice, at 37, B-1-B-4. If the NTSC facility parameters are inaccurately recorded or arbitrarily constricted in the NTSC database used to allot and assign DTV channels, the existing service area and proposed replicated DTV service area will be underestimated.

By failing to review and to grant applications timely filed by broadcasters before the Notice's adoption and then subjecting such applications to the DTV condition, the Commission has undercut these broadcasters' opportunity to provide NTSC and DTV service to audiences their facilities are equipped to reach. Audiences who, as a result of the approved NTSC facility changes, become accustomed to the stations' NTSC service over the next few years will not have the benefit of receiving these stations' DTV coverage.

Instead, by providing stations that filed unopposed modifications before July 25 with the full opportunity to modify their facilities to expand NTSC service and to replicate such coverage in the digital environment, the Commission would be assisting these stations to become viable, full service players in their respective television markets. Competition provides viewers with more choices and better service. In this case, for example, the facility modifications granted to the Modifiers will have a significant impact on these stations' ability to compete in their markets. This is likely to be the case with respect to the vast majority of affected applications. With the advent of the fledgling UPN and WB Networks, a substantial number of independent stations which either were not built or were operating with inferior facilities have found the resources to upgrade their facilities. They should not be condemned to return to that inferior status in the digital environment.

In any event, there is no justification to support arbitrary treatment of the station modification applications here. The Modifiers filed five applications at roughly

the same time, yet only one application was granted. The delay in the granting of the other four applications was not caused by the Modifiers. We, like many broadcasters, have long believed that the transition to DTV should minimize viewer disruption and preserve and enhance television service. We want to reach as many viewers in both the NTSC and digital environments. Viewers receiving service from the Modifiers as a result of the approved facility changes should not suffer NTSC or DTV service losses because of delay beyond the stations' control. We urge the Commission to treat like applications in a like manner and to incorporate these modified NTSC service areas into the final DTV allotment and assignment process.

WHEREFORE, the Modifiers respectfully submit that routine, minor facility modification applications which were unopposed and were filed on or before July 25, 1996 should be processed without the DTV condition and, if constructed in a timely fashion, should be incorporated into the corrected NTSC database upon which the final DTV table will be based.

Respectfully submitted,

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December 6, 1996

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF COMMENTS IN  
SIXTH FURTHER NOTICE OF PROPOSED RULE MAKING IN  
MM DOCKET NO. 87-268

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of LIN Television Corporation ("LIN"), 54 Broadcasting, Inc., Channel 41, Inc., KXTX of Texas, Inc., and K-W TV, Inc. in support of their comments in the Federal Communications Corporation's (FCC) Sixth Further Notice Of Proposed Rule Making ("FNPRM") in MM Docket No. 87-268. This proceeding concerns the implementation of digital television (DTV) and its impact on the existing television broadcast service. The purpose of this Technical Exhibit is to provide information concerning the number of persons who would gain TV service as a result of the upgraded facilities of a LIN TV station and stations with whom LIN has local marketing agreements ("LMAs").

LIN is the licensee of KXAN-TV on channel 36 at Austin, Texas and has LMAs with the KNVA(TV), channel 54, Austin, Texas, WBNE-TV, channel 59, New Haven, Connecticut and KXTX(TV) on channel 39 at Dallas, Texas. Each of these stations filed "minor change" applications to upgrade their transmitting facilities within the past year which would result in expanded service areas.<sup>1</sup> Each application was subsequently granted by the FCC. Figure 1 provides the licensed and authorized facilities for each station as contained in the FCC's TV Database.

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<sup>1</sup>See application of KXAN-TV, Austin, TX, FCC File No. BPCT-951205KE; Application of KNVA(TV), Austin, TX, FCC File No. BPCT-951207KG; WBNE-TV, New Haven, CT, FCC File No. BPCT-951208KE; Application of KXTX(TV), Dallas, TX, FCC File No. BPCT-960118KI.

Figures 2 through 5 depict the City Grade (80 dBu), Grade A (74 dBu) and Grade B (64 dBu) contours for the licensed/authorized<sup>2</sup> and upgraded (CP) facilities for KXAN-TV, KNVA, WBNE and KXTX, respectively. The following chart tabulates the number of persons within each City Grade, Grade A and Grade B contour based on licensed/authorized and upgraded facilities for each station, the number of persons who would "gain" City Grade, Grade A and Grade B services and the percent of the total within the licensed contour the gain area represents.

Operation	Population (1990 Census)		
	City Grade	Grade A	Grade B
KXAN License	824,895	857,397	967,969
KXAN CP	844,839	881,276	1,094,262
Gain	19,944	23,879	126,293
% Gain	2.4	2.8	13.0
KNVA License	767,057	823,792	883,543
KNVA CP	844,839	881,276	1,094,262
Gain	77,782	57,484	210,719
% Gain	10.1	7.0	23.8
WBNE Former CP	2,426,114	2,955,493	4,714,256
WBNE CP	2,641,033	3,291,844	5,283,023
Gain	214,919	336,351	568,767
% Gain	8.9	11.4	12.1
KXTX License	3,598,939	3,782,465	4,016,232
KXTX CP	3,659,568	3,885,449	4,101,093
Gain	60,629	102,984	84,861
% Gain	1.7	2.7	2.1

<sup>2</sup> The formerly authorized facilities of WBNE (BPCT-950726KE) have been considered for this analysis.

The distances to predicted coverage contours were determined in accordance with the provisions of Section 73.684 and Figure 10b of Section 73.699 except that, pursuant to current FCC practice, no consideration was given to terrain roughness correction factors. The average elevations from 3.2 to 16.1 kilometers from the transmitter site were obtained from NGDC 30-second terrain database. The standard eight radials evenly spaced at 10-degree intervals were used for determining the average elevations and the distances to coverage contours. The population to be served within the predicted coverage contours was determined by a computer program which totals the population within census enumeration districts located within the Grade B contour. The 1990 Census was employed.



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November 19, 1996

**1. KXAN, Austin, TX**

Call	City Name	State	Country	Channel	Offset	Facility	Status
KXANTV	AUSTIN	TX	A	36	Z	TV	LIC
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
30-19-33.0	97-47-58.0	BLCT-900503KS		910926			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
2000	392	464	615	Y	C		
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
M	3	C	KXAN, INC.	961114			

Call	City Name	State	Country	Channel	Offset	Facility	Status
KXANTV	AUSTIN	TX	A	36	Z	TV	CP
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
30-19-33.0	97-47-58.0	BPCT-951205KE		960812			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
5000	374	446	597	N	Y	E	
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
M	3	C	KXAN, INC.	961114			

**2. KNVA, Austin, TX**

Call	City Name	State	Country	Channel	Offset	Facility	Status
KNVA	AUSTIN	TX	A	54	Z	TV	LIC
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
30-19-20.0	97-48- 3.0	BLCT-940913KF		950524			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
3470	267	335	486	Y	Y	H	0
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
M	3	C	54 BROADCASTING, INC.	961114			

Call	City Name	State	Country	Channel	Offset	Facility	Status
KNVA	AUSTIN	TX	A	54	Z	TV	CP
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
30-19-33.0	97-47-58.0	BPCT-951207KG		960815			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
5000	374	446	597	Y	E		
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
M	3	C	54 BROADCASTING, INC.	961114			

**3. WBNE-TV, New Haven, CT**

Call	City Name	State	Country	Channel	Offset	Facility	Status
WBNE	NEW HAVEN	CT	A	59	+	TV	CP
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
41-25-23.0	72-57- 6.0	BPCT-950726KE		950921			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
2820	314	385	412	Y	H		
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
C	1	C	K-W TV, INC.	951109			

Call	City Name	State	Country	Channel	Offset	Facility	Status
WBNE	NEW HAVEN	CT	A	59	+	TV	CP MOD
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
41-25-23.0	72-57- 6.0	BMPCT-951208KE		960812			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
5000	314	385	412	Y	E		
Border	Zone	E/C	Applicant/Licensee Name	TV Database	Date		
C	1	C	K-W TV, INC.	961114			

**4. KXTX(TV), Dallas, TX**

Call	City Name	State	Country	Channel	Offset	Facility	Status
KXTXTV	DALLAS	TX	A	39	Z	TV	LIC
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
32-35- 7.0	96-58- 6.0	BLCT-811208KI		961114			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
4470	512	548	702	Y	Y	H	0
Ant-Make	Ant-Type	Applicant/Licensee Name	TV Database	Date			
RCA	ODDKXTXTV	UNITED STATES MEDIA CORPORATION	961114				
Border	Zone	E/C					
	2	C					

Call	City Name	State	Country	Channel	Offset	Facility	Status
KXTXTV	DALLAS	TX	A	39	Z	TV	CP
Latitude	Longitude	File Number	Docket No.	Last Updated	Cutoff		
32-35- 7.0	96-58- 6.0	BPCT-960118KI		961114			
ERP-kW	HAAT-m	MaxHAAT-m	RCamsl-m	DA	BT	Pol	Ref-Az
5000	512	548	702	N	Y	E	
Ant-Make	Ant-Type	Applicant/Licensee Name	TV Database	Date			
		KXTX OF TEXAS, INC.	961114				
Border	Zone	E/C					
	2	C					

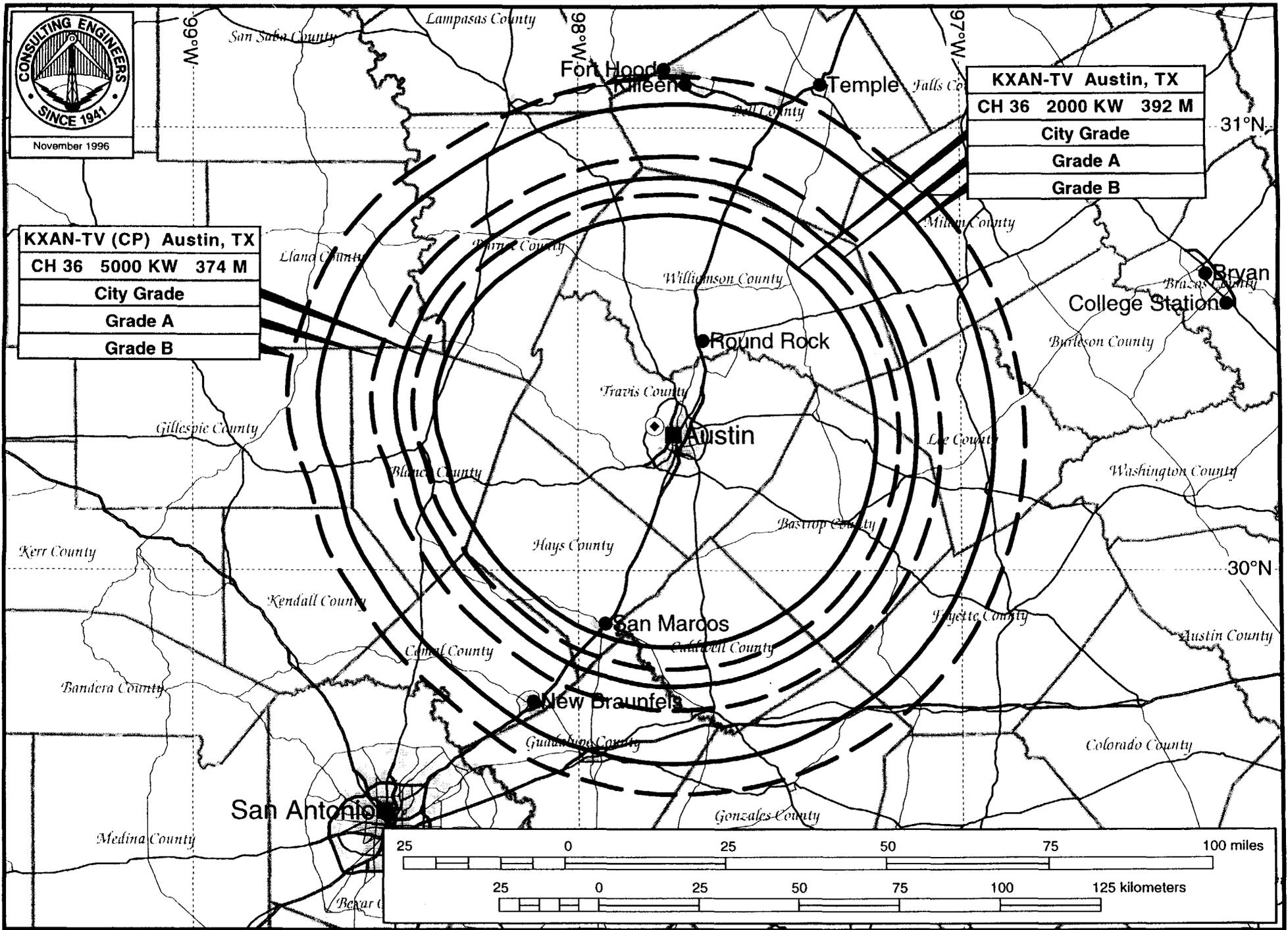


Figure 2

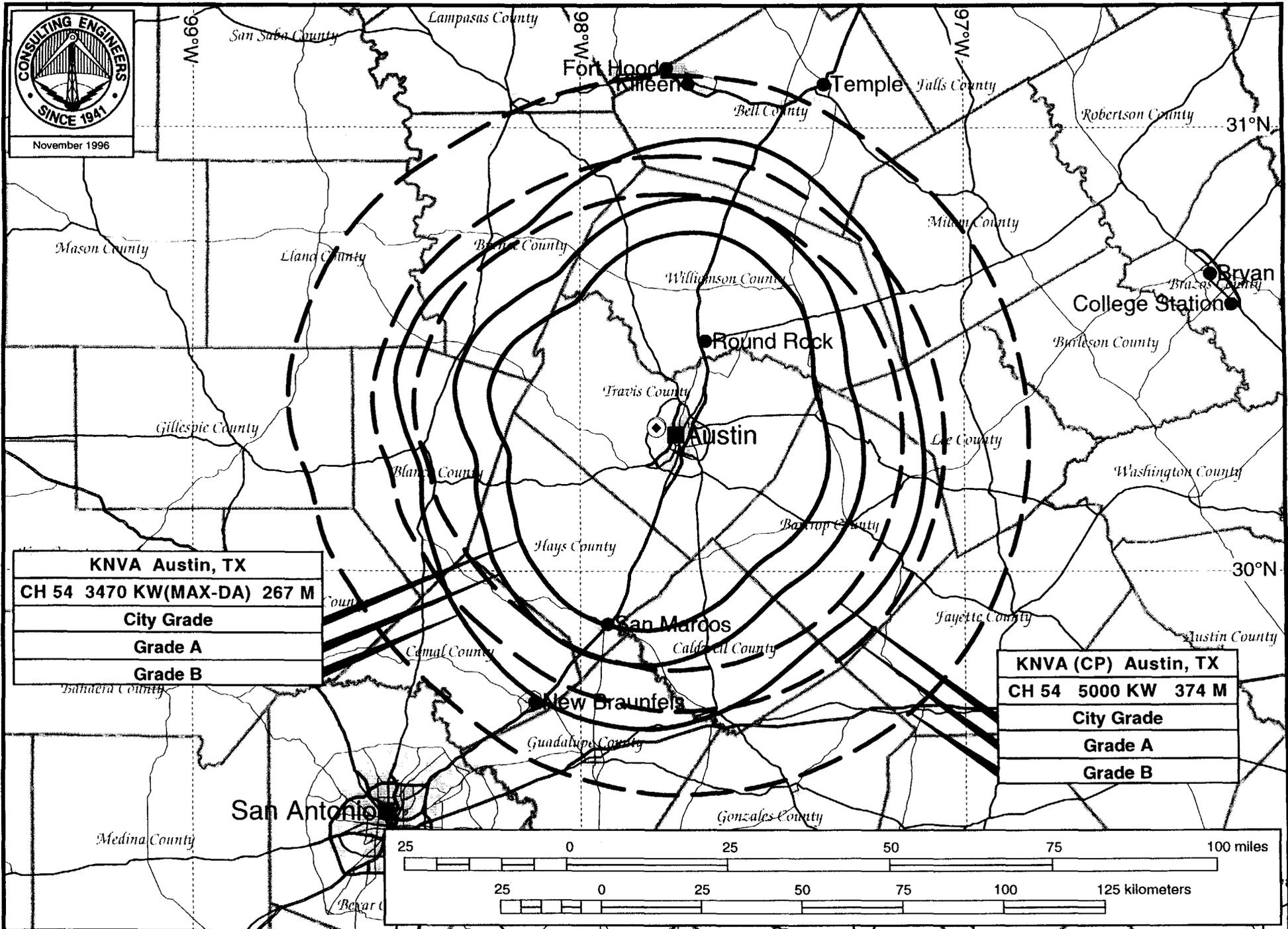


Figure 3



November 1996

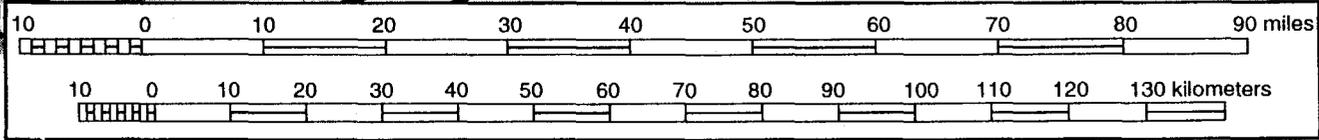
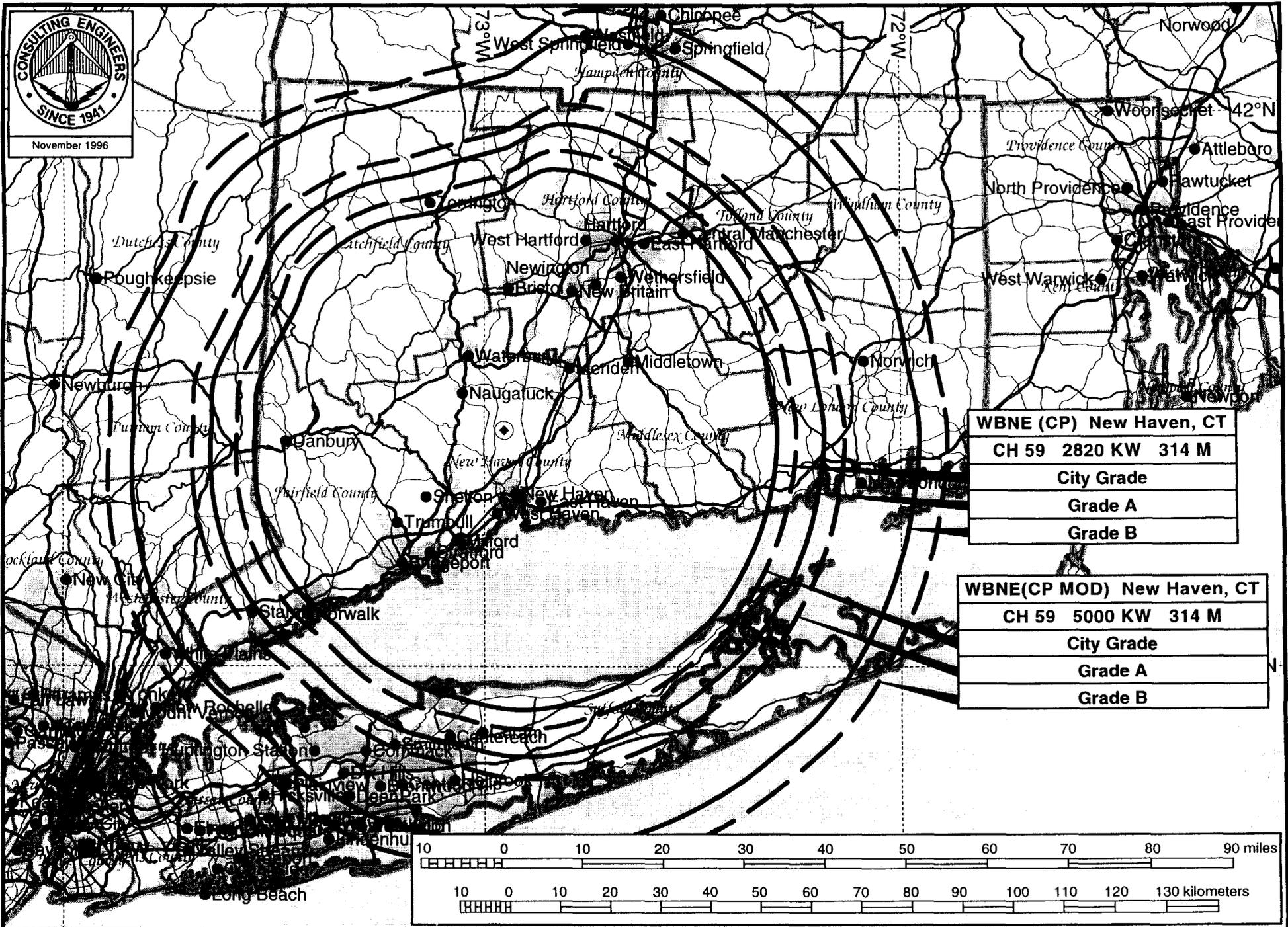


Figure 4

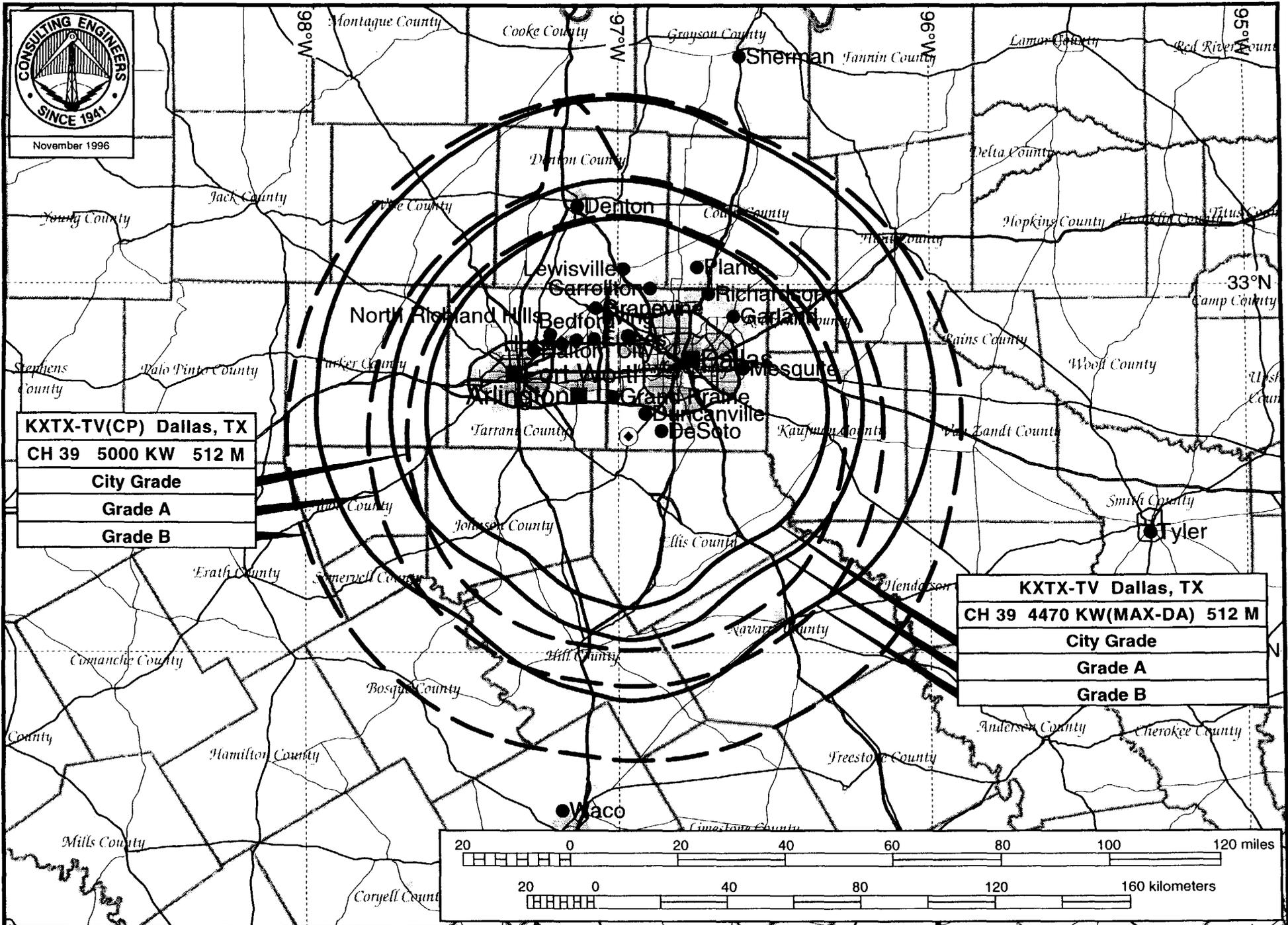


Figure 5