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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC

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

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Kentuckiana Broadcasting, Inc., licensee of Station WFTE(TV), Salem, Indiana, by its attorney, submits this supplement to its Petition for Reconsideration of the Fifth Report and Order, FCC 97-116 (April 21, 1997) and Sixth Report and Order, FCC 97-115 (April 21, 1997) in this proceeding. With respect thereto, the following is stated:

1. As indicated to the Commission in its earlier filing, the DTV channel currently proposed for use by WFTE appears not to be workable. WFTE currently operates on Channel 58, and in the Report and Order DTV Channel 57 was assigned for WFTE's use as a digital channel. Kentuckiana's Consulting Engineer previously expressed serious concerns whether the degree of precise frequency control necessary to allow operation on both Channel 57 (digital) and Channel 58 (analog) during the transition period is possible. See Petition, Attachment 1. Those concerns are again expressed herein. See Attachment.

2. Due to the fact that OET Bulletin 69 had not yet been released to the general public, it was impossible for Kentuckiana's Consulting Engineer to provide a recommendation concerning an alternative channel on which digital service for Salem, Indiana, should be proposed. Now that OET Bulletin 69 has been released, Kentuckiana's Consulting Engineer has

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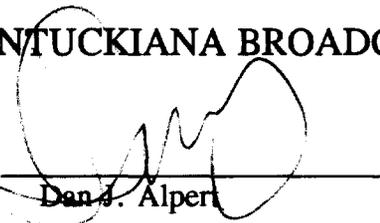
done a complete channel study, and has determined that Channel 51 is available for digital use from WFTE's existing site, and service on that channel theoretically will replicate existing service in the manner envisioned by the FCC in this Docket.

3. Consequently, the Commission should seriously re-evaluate its previous channel selection for WFTE, and should replace its previous selection and substitute instead Channel 51.

WHEREFORE, it is respectfully requested that the Commission reconsider its prior determinations, and revise its Report and Order in accord with the information provided herein.

Respectfully requested,

KENTUCKIANA BROADCASTING, INC.

By: 

Dan J. Alpert

Its Attorney

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August 22, 1997

ENGINEERING STATEMENT
ON BEHALF OF
WFTE(TV), SALEM, INDIANA
CONCERNING SUPPLEMENT
TO PETITION FOR RECONSIDERATION
MM DOCKET NO. 87-268

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 5th day of August, 1997.



Notary Public

My Commission Expires: 2/28/98

This engineering statement has been prepared on behalf of Kentuckiana Broadcasting Inc., licensee of television station WFTE(TV) licensed to Salem, Indiana. This engineering statement provides a further assessment than provided in its Petition for Reconsideration entitled, "Engineering Statement in Support of Petition for Reconsideration, MM Docket 87-268 on Behalf of Kentuckiana Broadcasting Inc., June 1997". This further assessment is based upon examination of OET Bulletin No. 69 released July 2, 1997.

Television station WFTE has been assigned a DTV channel on the lower adjacent channel to its NTSC Channel 58. Examination of data¹ which characterizes, among other things, out-of-band emission from DTV signals generated by a non-linear final radio-frequency (RF) amplifier. This data places in serious doubt the ability to generate and maintain a upper first-adjacent channel DTV Channel 57 suppression which will not interfere with its Channel 58 NTSC signal.

Therefore, WFTE(TV) has commissioned an allocation study to evaluate the prospect to change its assigned DTV channel. This study has revealed that DTV Channel 51 can be assigned to WFTE(TV) which will replicate the service envisioned by the Federal Communications Commission in MM Docket 87-268.

Attached hereto are the allocation studies for the assigned DTV Channel 57 and the requested DTV Channel 51.

¹"Transmitter Considerations for ATV", Harris Corp, Broadcast Division, Robert J. Plonka, November 22, 1996.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
PROPOSED CHANNEL 51 DTV TO NTSC
ALLOCATION STUDY
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	51	WFTE-DTV Salem, IN	--	--
N-15	36	None within 130 km	--	80.5
N-14	37	None within 130 km	--	80.5
N-8	43	None within 130 km	--	80.5
N-7	44	None within 130 km	--	80.5
N-3	48	None within 130 km	--	80.5
N-2	49	None within 130 km	--	80.5
N-1	50	None within 130 km	--	88.5
N	51	WEIU-TV Charleston, IL	237.3	217.3
N	51	New APP Hopkinsville, KY	213.5	217.3
N+1	52	WKON Owenton, KY	92.7	88.5
N+7	58	WFTE Salem, IN	0	≤24.1

TABLE II
DTV TO NTSC
FCC CHANNEL 57 ALLOCATION STUDY
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	57	WFTE-DTV Salem, IN	0	--
N-15	42	WCLJ Bloomington, IN	119.8	80.5
N-14	43	None within 130 km	--	80.5
N-8	49	None within 130 km	--	80.5
N-7	50	None within 130 km	--	80.5
N-4	53	None within 130 km	--	80.5
N-3	54	None within 130 km	--	80.5
N-2	55	None within 130 km	--	80.5
N-1	56	WDKY-TV Danville, KY	120.0	88.5
N	57	WYMT-TV Hazard, KY	267.8	217.3
N+1	58	WFTE Salem, IN	0	<9.7
N+2	59	None within 130 km	--	80.5
N+3	60	None within 130 km	--	80.5
N+4	61	None within 130 km	--	80.5
N+7	64	None within 130 km	--	80.5
N+8	65	None within 130 km	--	80.5

TABLE III
DTV TO DTV
ALLOCATION STUDIES
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	51	WFTE-DTV Salem, IN	--	--
N	51	WPGD Hendersonville, TN	216.3	196.3
N	51	WKEF Dayton, OH	205.1	196.3
N-1	50	None within 130 km	--	88.5
N+1	52	None within 130 km	--	88.5

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	57	WFTE-DTV Salem, IN	--	--
N-1	56	WCLJ Bloomington, IN	119.8	88.5
N	57	None within 250 km	--	196.3
N+1	58	None within 150 km	--	88.5