

Table 15c. Adjustments in the required separation distances for the NTSC->DTV table for the UHF band F(50,90)

Protected Class	Interfering Class	Old Separation Distance (km)	New Separation Distance (km)
A	A	81	99
A	B	125	162
A	C	196	241
A	LP	59	68
B	C	216	223
C	A	126	143
C	LP	104	155
LP	A	68	111
LP	B	112	174
LP	C	183	254
LP	LP	46	80
VU	A	150	192
VU	LP	137	204
VL	A	171	215
VL	B	191	197
VL	LP	158	227

Glossary

JTCAB	Joint Technical Committee on Advanced Broadcasting
DTV	Digital Television
ATV	Advanced Television
NTSC TV	Existing analog TV system
FCC	Federal Communications Commission (United States)
VU	Upper or High VHF TV band comprised of channels 7-13
VL	Lower or Low VHF TV band comprised of channels 2-6
Grade B	Limit of service at which an acceptable picture is available at 50% of the locations for 90% of the time
ERP	Effective Radiated Power from a dipole radiator
EIRP	Effective Isotropic Radiated Power from an isotropic radiator
EHAAT	Effective Height Above Average Terrain
HAAT	Height Above Average Terrain
dBkW/dBk	Power expressed in dB referenced to one kilowatt
kW	Power expressed in kilowatts
C/N	Ratio of carrier power to noise power expressed in dB
LNA	Low Noise Amplifier
T_a equiv	Value in dB for man-made noise expressed as the equivalent of antenna noise temperature
Balun	Device to convert the balanced 300 ohm antenna output to 75 ohm unbalanced output to match the 75 ohm downlead
C/I	Ratio of carrier power to interfering signal power expressed in dB
C/N+I	Ratio of carrier power to noise + interfering signal power expressed in dB
TOV	Threshold of Visibility; in digital television, the point at which degradations in the picture quality are visible
VSB	Vestigial Side Band

GA	Grand Alliance, the consortium of companies who formed an alliance to develop a single Digital Television system from several comparable competing systems
G/T	Receiver figure of merit; the ratio of the receiving system gain to the system noise temperature expressed in dB
Comb filter	A filter used to reduce the effect of NTSC interference by filtering out components of the NTSC spectrum
E_{RX}	required field strength at the receive system antenna
Φ	power flux density at the receive system antenna
k	Boltzmann's constant
B	system bandwidth
$G_i(1m^2)$	gain of a theoretical antenna with an aperture of 1 metre squared
G_A/T_e	G/T of the receive system
G_A	gain of the receive system (isotropic)
T_e	effective noise temperature
T(90) dB	dB increase required to assure that the E_{RX} is present for 90% of the time
L(70) dB	dB increase required to assure that the E_{RX} is present at 70% of the locations
L(90) dB	dB increase required to assure that the E_{RX} is present at 90% of the locations

STAMP & RETURN

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

AUG 22 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

MM Docket No. 87-268

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

The Eastern Washington and Northern Idaho DTV Channel Allocation Caucus (the "Caucus"), by its attorneys and pursuant to the Commission's Order in MM Docket 87-268, DA 97-1377, released July 2, 1997, 62 Fed. Reg. 37145 (July 11, 1997), hereby respectfully submits this Supplement to its Petition for Reconsideration of the Commission's Sixth Report and Order ("Sixth R & O"), FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997) (the "Petition").

INTRODUCTION

The Caucus is comprised of all affected full power stations in the eastern Washington State and northern Idaho region.¹ In its

¹ Specifically, the Caucus includes the following stations: KAPP, Yakima, WA, and KVEW, Kennewick, WA, authorized to Apple Valley Broadcasting, Inc.; KAUP (CP), Pendleton, OR, authorized to Communications Properties, Inc.; KUID, Moscow, ID, and KCDT, Coeur d'Alene, ID, authorized to the Idaho State Board of Education; KYVE, Yakima, WA, authorized to KCTS Television; KHQ-TV, Spokane, WA, authorized to KHQ, Incorporated; KREM-TV, Spokane, WA, authorized to King Broadcasting Company; KSKN, Spokane, WA, authorized to KSKN, Inc.; KAYU, Spokane, WA, authorized to Mountain Licenses, L.P.; KLEW, Lewiston, ID, KEPR, Pasco, WA, and KIMA, Yakima, WA, authorized to Retlaw Enterprises, Inc.; KSPS, Spokane, WA, authorized to Spokane School District No. 81; KXLY, Spokane, WA, authorized to Spokane Television, Inc.; and KTNW, Richland, WA, and KWSU, Pullman, WA, authorized to Washington State University.

Petition, the Caucus proposes a negotiated alternative (the "Caucus Plan") to the DTV allotments and assignment pairings prescribed by the Sixth R & O ("FCC Plan"). The Caucus Plan allocates and assigns paired digital television channels which improve coverage and lower power requirements while meeting the Commission's criteria for DTV table modification and supporting the Commission's other objectives in the DTV implementation process.

DISCUSSION

This Supplement: (1) amends the Petition to delete inadvertent references to Station KNDU (NTSC Ch. 25; FCC DTV Ch. 26), Richland, Washington; (2) eliminates the Longley-Rice and terrain profile showings submitted for vacant Channel 15, Grangeville, Idaho, in connection with KHQ-TV's proposed alternative DTV channel; (3) clarifies that no conflict exists between the alternative DTV channel requests of Station KPDX (NTSC Ch. 49; FCC DTV Ch. 48), Vancouver, Washington, and Caucus member KVEW (TV) (NTSC Ch. 42; FCC DTV Ch. 14), Kennewick, Washington; and (4) provides a technical statement affirming that the Caucus proposal has been evaluated in light of OET Bulletin No. 69, with no change in the overall conclusion of any interference showing.

KNDU(TV), Richland, WA

Station KNDU, Richland, Washington, licensed to Raycom Media, Inc. ("Raycom"), is not a member of the Caucus. The Petition inadvertently refers to Station KNDU on the third page of the Engineering Statement of Stephen S. Lockwood, P.E. (attached as Exhibit B to the Petition) in a table entitled "Proposed

Modifications to Table of Allotments" and in the first full paragraph of Page 7 of the Petition itself. In addition, because of Station KNDU's non-participation in the Caucus, Footnote 6 at Page 7 should be revised to refer to the station. An amended table and amended Page 7 are attached as Exhibits 1 and 2, respectively. The Caucus respectfully requests that these pages be removed from its initial filing and the revised pages attached in their place.²

Vacant Channel 15

The Caucus also respectfully requests that its Petition be amended to eliminate the separation and terrain studies of vacant Channel 15 at Grangeville, Idaho submitted in connection with Station KHQ-TV's proposed alternative DTV channel. The Commission has deleted all existing vacant DTV allotments. Sixth R & O at ¶ 112. Accordingly, the revised table attached herein as Exhibit 1 deletes references to the Longley-Rice and terrain profile showings in connection with KHQ-TV. The Caucus respectfully requests that its Petition also be amended to remove the separation study and terrain profile map of Channel 15 at Grangeville filed with the Engineering Statement attached as Exhibit B to the Petition.

KPDX(TV), Vancouver, WA

Simultaneously with the Caucus' Petition, on June 13, 1997, KPDX License Partnership, former licensee of Station KPDX (NTSC Ch. 49; FCC DTV, Ch. 48), Vancouver, Washington, filed a Petition for

²The Caucus' interference studies reveal no conflict between Station KNDU's use of the DTV channel assigned to it in the Sixth R & O, and the alternative DTV channels proposed by the Caucus. Based on its discussions with Raycom representatives, the Caucus understands that Raycom shares this view.

Reconsideration of the Sixth R & O seeking Channel 44 as an alternative DTV channel. Station KVEW (NTSC Ch. 42; FCC DTV Ch. 14), Kennewick, Washington, also proposes that it be assigned DTV Channel 44 as part of the Caucus Plan. Although both KPDX and KVEW propose to use DTV Channel 44, the two proposals meet the DTV-DTV co-channel spacing requirements set forth in the new DTV practice rules. See 47 C.F.R. § 73.623(d). Accordingly, this is to advise the Commission that KPDX' and the Caucus' proposals are believed to be technically compatible pursuant to the FCC's rules.

OET Bulletin No. 69

As described in the certified July 12, 1997 Memorandum of Stephen S. Lockwood, P.E. (attached herein as Exhibit 3), this will confirm that the Caucus has reviewed its technical proposal in light of OET Bulletin No. 69, released July 2, 1997, and concluded that there are no substantial changes in the Caucus Plan or interference showings submitted with the Petition.

CONCLUSION

As discussed in detail in the Petition, the Caucus Plan will alleviate the loss of coverage and hardship and delay in implementation which would afflict a number of stations in the eastern Washington-northern Idaho region if the FCC plan were implemented, meet the Commission's criteria for DTV table modifications, and support the Commission's other objectives in implementing DTV. Accordingly, the Caucus respectfully requests that the Commission promptly adopt the negotiated industry solution

proposed by the Caucus, permitting expeditious implementation of DTV service in the eastern Washington and northern Idaho region.

WHEREFORE, the premises considered, it is respectfully submitted that the public interest would be served through reconsideration of the Sixth R & O to the extent it allocates paired DTV channels in the Spokane and Yakima, Washington area, and adoption of the negotiated DTV channel allocation plan discussed in the Caucus' Petition and supplemented herein.

Respectfully submitted,

**THE EASTERN WASHINGTON AND NORTHERN
IDAHO DTV CHANNEL ALLOCATION CAUCUS**

APPLE VALLEY BROADCASTING, INC.

By:


Robert J. Rini

Rini, Coran & Lancellotta, P.C.
Dupont Circle Building
1350 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
(202) 296-2007

COMMUNICATIONS PROPERTIES, INC.

By: Michael Ray
Michael S. Ray

Akin, Gump, Strauss,
Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
(202) 867-4317

IDAHO STATE BOARD OF EDUCATION

By: _____
Peter Morrill
General Manager

1455 N. Orchard
Boise, Idaho 83707
(208) 373-7220

KCTV TELEVISION

By: _____
Todd D. Gray

Dow, Lohnes & Albertson, F.L.L.C.
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2571

XEQ, INCORPORATED

By: _____
John C. Quale

Skadden, Arps, Slate,
Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
(202) 371-7000

AUG -21' 97 (THU) 10:07
AUG-19-1997 18:16

IPTV
HAM

R. C. & L., P.C.

TEL: 3737245 P. 001
TO 042H503H12083737245 P.08/13

COMMUNICATIONS PROPERTIES, INC.

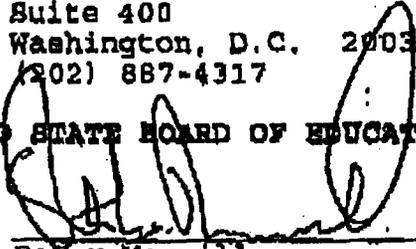
By:

Michael S. Ray

Akin, Gump, Strauss,
Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
(202) 887-4317

IDAHO STATE BOARD OF EDUCATION

By:


Peter Morrill
General Manager

1455 N. Orchard
Boise, Idaho 83707
(208) 373-7220

KCTS TELEVISION

By:

Todd D. Gray

Dow, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2571

KHQ, INCORPORATED

By:

John C. Quale

Skadden, Arps, Slate,
Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
(202) 371-7000

COMMUNICATIONS PROPERTIES, INC.

By:

Michael S. Ray

Akin, Gump, Strauss,
Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
(202) 887-4317

IDAHO STATE BOARD OF EDUCATION

By:

Peter Morrill
General Manager

1455 N. Orchard
Boise, Idaho 83707
(208) 373-7220

KCTS TELEVISION

By:

Todd D. Gray
Todd D. Gray

Dow, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2571

KHQ, INCORPORATED

By:

John C. Quale

Skadden, Arps, Slate,
Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
(202) 371-7000

COMMUNICATIONS PROPERTIES, INC.

By:

Michael S. Ray

Akin, Gump, Strauss,
Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036
(202) 887-4317

IDAHO STATE BOARD OF EDUCATION

By:

Peter Morrill
General Manager

1455 N. Orchard
Boise, Idaho 83707
(208) 373-7220

KCTS TELEVISION

By:

Todd D. Gray

Dow, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2571

KHQ, INCORPORATED

By:

John Quale/ly RTR
John C. Quale

Skadden, Arps, Slate,
Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111
(202) 371-7000

KING BROADCASTING COMPANY

By:

James R. Bayes
James R. Bayes

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KSKN-TV, INC.

By:

A. Wray Fitch III
A. Wray Fitch III

Gannon & Grange
8280 Greensboro Drive
7th Floor
McLean, VA 22102-3807
(703) 761-5013

MOUNTAIN LICENSES, L.P.

By:

Dennis P. Corbett
Dennis P. Corbett
Walter P. Jacob

Leventhal Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
(202) 429-8970

RETLAW ENTERPRISES, INC.

By:

Carl R. Ramey
Carl R. Ramey

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KING BROADCASTING COMPANY

By: _____

James R. Bayes

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KSKN-TV, INC.

By: _____

A. Wray Fitch III by RFR
A. Wray Fitch III

Gammon & Grange
8280 Greensboro Drive
7th Floor
McLean, VA 22102-3807
(703) 761-5013

MOUNTAIN LICENSES, L.P.

By: _____

Dennis P. Corbett
Walter P. Jacob

Leventhal Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
(202) 429-8970

RETLAW ENTERPRISES, INC.

By: _____

Carl R. Ramey

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KING BROADCASTING COMPANY

By:

James R. Bayes

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KSNV-TV, INC.

By:

A. Wray Fitch III

Gannon & Grange
8280 Greensboro Drive
7th Floor
McLean, VA 22102-3807
(703) 761-5013

MOUNTAIN LICENSES, L.P.

By:

Walter P. Jacob
Dennis P. Corbett
Walter P. Jacob

Leventhal Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
(202) 429-8970

REILAN ENTERPRISES, INC.

By:

Carl R. Ramsey

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KING BROADCASTING COMPANY

By:

James R. Bayes

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

KSKN-TV, INC.

By:

Al Wray Fitch III

Gannon & Grange
8280 Greensboro Drive
7th Floor
McLean, VA 22102-3807
(703) 761-5013

MOUNTAIN LICENSES, L.P.

By:

Dennis P. Corbett
Walter P. Jacob

Leventhal Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
(202) 429-8970

RETLAW ENTERPRISES, INC.

By:

Carl R. Ramey

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7064

SPOKANE SCHOOL DISTRICT NO. 81

By:

John Crigler

Haley, Bader & Potts, P.L.C.
4350 North Fairfax Drive
Suite 900
Arlington, Virginia 22203-1633
(703) 841-0606

SPOKANE TELEVISION, INC.

By:

Robert J. Rini

Rini, Coran & Lancellotta, P.C.
Dupont Circle Building
1350 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
(202) 296-2007

WASHINGTON STATE UNIVERSITY

By:

Wayne Coy, Jr.

Cohn & Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036-1573
(202) 452-4836

Their Attorneys

August 22, 1997
wefird\ewdtv.cle

SPOKANE SCHOOL DISTRICT NO. 81

By: _____

John Crigler

Haley, Bader & Potts, P.L.C.
4350 North Fairfax Drive
Suite 900
Arlington, Virginia 22203-1633
(703) 841-0606

SPOKANE TELEVISION, INC.

By: _____

Robert J. Rini

Rini, Coran & Lancellotta, P.C.
Dupont Circle Building
1350 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
(202) 296-2007

WASHINGTON STATE UNIVERSITY

By: _____

Wayne Coy, Jr.

Cohn & Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036-1573
(202) 452-4836

Their Attorneys

August 22, 1997
sefird\ewdtv.cla

SPOKANE SCHOOL DISTRICT NO. 81

By: _____

John Crigler

Haley, Bader & Potts, P.L.C.
4350 North Fairfax Drive
Suite 900
Arlington, Virginia 22203-1633
(703) 841-0606

SPOKANE TELEVISION, INC.

By: _____

Robert J. Rini

Rini, Coran & Lancellotta, P.C.
Dupont Circle Building
1350 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
(202) 296-2007

WASHINGTON STATE UNIVERSITY

By: _____

Wayne Coy, Jr.

Cohn & Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036-1573
(202) 452-4836

Their Attorneys

August 22, 1997
sefird\ewdtv.cla

EXHIBIT 1

PROPOSED MODIFICATIONS TO TABLE OF ALLOTMENTS

City of License	Call	NTSC (Analog) Channel	FCC DTV Channel	Caucus DTV Channel
Spokane/CDA	KREM	2	57	20
	KXLY	4	54	13 L-R, T
	KHQ	6	55	15
	KSPS	7	39	39
	KSKN	22	38	36 T
	KCDT	26	56	45
	KAYU	28	29	30 L-R, T
Pullman/Moscow/Lewiston	KLEW	3	32	32
	KWSU	10	17	17
	KUID	12	33	35 L-R
Richland/Pasco/Kennewick	KEPR	19	20	18
	KTNW	31	30	38
	KVEW	42	14	44
Pendleton	CP	11	4	8
Yakima/Wenatchee	KCWT	27	56	46
	KIMA	29	52	33 L-R
	KAPP	35	34	14 L-R
	KYVE	47	21	21

L-R Longley-Rice Propagation Study

T Terrain Profile Study

EXHIBIT 2

In contravention of its own objectives, the Commission also assigns five DTV channels in eastern Washington to channel slots first adjacent to existing NTSC operations.⁵ As the Commission recognized in the Sixth R & O, such assignments create substantial interference between the new DTV facility and the existing NTSC station. Sixth R & O at ¶ 195. Although the FCC Plan attempts to minimize the implications of such interference by assigning adjacent NTSC and DTV channels to the same licensee, a more complete solution is to reduce the number of instances of adjacent NTSC and DTV channels. The Caucus plan decreases the number of adjacent NTSC and DTV channels from five instances to only two channel pairs⁶ in the Spokane and Yakima DMAs.

Finally, the Sixth R & O creates substantial uncertainty for stations whose assigned DTV channels fall outside the FCC's central core of television broadcast frequencies (Channels 7 through 46). The Commission has specifically contemplated auctioning the frequencies above Channel 59, Sixth R & O at ¶ 80, stated its intention to reclaim Channels 52-59, Sixth R & O at ¶ 37; see Sixth Further Notice of Proposed Rule Making, MM Docket No. 87-268, 11 FCC Rcd. 10968 (1996) ("Sixth FNPRM"), and has reserved judgement as to the utility of Channels 2-6 in the DTV Service, Sixth R & O

⁵ The affected stations are KAYU (NTSC Ch.28), KEPR (NTSC Ch.19), KNDU (NTSC Ch.25), KTNW (NTSC Ch.31) and KAPP (NTSC Ch.35).

⁶ Under the Caucus Plan, only KEPR (NTSC Ch.19), at its own request, is assigned a DTV channel first adjacent below its NTSC station. Station KNDU (NTSC Ch. 25; FCC DTV Ch. 26), Richland, Washington has not proposed an alternative DTV channel assignment.

EXHIBIT 3