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

MAR 10 1998

Federal Communications Commission
Office of Secretary

In re Petition of)
)
 MERIDIAN COMMUNICATIONS COMPANY)
) RM-8902
 For Amendment of § 73.606(b),)
 TV Table of Allotments) MM Docket No. _
 to Delete Channel 34 from)
 Lake Havasu City, Arizona and to)
 Add Channel 34 at Laughlin, Nevada)

To: The Chief, Allocations Branch

SUPPLEMENT TO PETITION FOR RULEMAKING

Mojave Broadcasting Company ("Mojave"), as successor to Meridian Communications Company ("Meridian"),¹ permittee of unbuilt television station KMCC, authorized to operate on Channel 34 at Lake Havasu City, Arizona (the "Station"), hereby further supplements its Petition for Rulemaking ("Petition"), filed July 9, 1996, to change the community of license of Channel 34 from Lake Havasu City, Arizona, to Laughlin, Nevada, and modify the Station's construction permit to specify Laughlin, Nevada, as its city of license. Mojave, as successor permittee, further requests a change in the digital television ("DTV") allotment for the Station to specify the coordinates for a site at Oatman, Arizona.

¹ On July 30, 1997, the Commission approved the assignment of the construction permit for KMCC, Channel 34, Lake Havasu City, Arizona, from Meridian to its wholly-owned subsidiary, Mojave. BAPCT-970618IL.

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In its July 9, 1996, Petition, Meridian demonstrated that the proposed reallocation of Channel 34 to Laughlin, Nevada, would permit the new television station to serve a far larger area and population than would be possible with the currently authorized facility at Lake Havasu City, Arizona. Meridian also demonstrated that the optimal site for maximized coverage of Laughlin, Nevada, and the surrounding area is a site at Oatman, Arizona (with geographic coordinates 35° 01' 57" N, 114° 21' 56" W).

In its Sixth Report and Order in MM Docket No. 87-268 (Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service), FCC 97-115 (rel. Apr. 21, 1997), the Commission assigned DTV Channel 35 as the "paired" channel for digital transmissions by KMCC and specified the coordinates of the site currently authorized in the Station's construction permit. Subsequently, on February 9, 1998, Mojave, as successor permittee to Meridian, supplemented Meridian's Petition to demonstrate that a change in the DTV allotment for the new station to specify the proposed Oatman, Arizona, transmitter site can be made in full compliance with the Commission's technical requirements without causing appreciable interference to any other station.

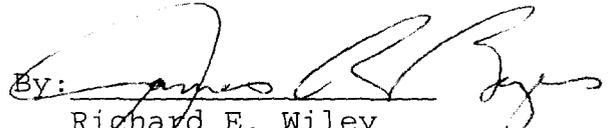
Recently, in its Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order in MM Docket No. 87-268 (Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service), FCC 97-115 (rel. Feb. 23, 1998), the Commission changed the DTV allotment of the Station from Channel 35 to Channel 32 at the Lake Havasu City, Arizona, site specified in the Station's construction permit. As the attached Engineering Statement confirms, however, operation of

DTV Channel 32 at the proposed Oatman, Arizona, site would be fully consistent with the Commission's separation requirements and, in fact, would resolve the potential interference problems with respect to a Mexican allotment that would have been present at the site currently authorized in the Station's construction permit.

Accordingly, for the reasons set forth above as well as in its July 9, 1996, Petition for Rulemaking, its November 20, 1996, Supplement to Petition for Rulemaking, and its February 9, 1998, Supplement to Petition for Rulemaking, Mojave requests that the Commission change the community of license for KMCC, Channel 34, from Lake Havasu City, Arizona, to Laughlin, Nevada, and change the new DTV allotment of the Station, Channel 32, to specify the coordinates for the Oatman, Arizona site (35° 01' 57" N, 114° 21' 56" W).

Respectfully submitted,

MOJAVE BROADCASTING COMPANY

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March 10, 1998

TECHNICAL STATEMENT
CONCERNING THE PROPOSAL TO
ALLOT TV CHANNEL 34 TO
LAUGHLIN, NEVADA

This Technical Statement supports comments from Mojave Broadcasting Company (Mojave), successor to Meridian Communications Company (Meridian) as the permittee for new TV station KMCC on channel 34 at Lake Havasu City, Arizona (BPCT-941031KN). On July 9, 1996 the permittee of KMCC filed a petition for rule making (RM-8902) at the Federal Communications Commission (FCC) to change the city of allotment for channel 34 from Lake Havasu City, Arizona to Laughlin, Nevada. The purpose of these comments is to address the effects of the FCC's Memorandum, Opinion and Order (MO&O) to reconsideration of the 6th Report and Order (6th R&O) in MM Docket No. 87-268 (the digital television, DTV, proceeding).

According to the FCC's TV database station KMCC holds a construction permit (CP, BPCT-941031KN) to operate on analog (NTSC) channel 34 from a site with coordinates: 34-33-06, 114-11-37. A directional antenna (DA) system is specified with a maximum visual effective radiated power (ERP) of 468 kilowatts (kW). The antenna height above average terrain (HAAT) is 817 meters.

KMCC's petition for rule making (PRM) requests a change in the city of allotment for analog channel 34 from Lake Havasu City, Arizona to Laughlin, Nevada. The coordinates for channel 34 at Laughlin are: 35-01-57,

114-21-56. This site is approximately 55.6 kilometers (34.6 miles) north-northwest of the KMCC CP site. This site is currently used by station KMOH-TV on channel 6 at Kingman, Arizona. Station KMOH-TV operates with a visual ERP of 100 kW and antenna HAAT of 585 meters.

In the 6th R&O, the FCC allotted DTV channel 35 to KMCC. The DTV allotment was based on the KMCC CP site. In the recent MO&O, the FCC changed the DTV allotment to channel 32 at KMCC's CP site. For comparison, channel studies have been conducted based on the FCC's minimum separation requirements. The studies have been run on analog channel 34 at the present CP site and the proposed Laughlin site. DTV channel 32 has been run from the same 2 sites. The following is a summary of the studies.

Analog Channel 34 - KMCC CP Site

<u>Station</u>	<u>Channel</u>	<u>Separation</u>	<u>FCC Requirement</u>
KMOH-TV, Kingman, AZ	DTV-19	55.6 km	None 24.1 to 96.6 km
KTVW-TV, Phoenix, AZ	DTV-34	238.9	244.6 km

Analog Channel 34 – Laughlin Site

<u>Station</u>	<u>Channel</u>	<u>Separation</u>	<u>FCC Requirement</u>
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No short-spacings assuming KMCC's DTV channel 32 is co-located with analog channel 34

DTV Channel 32 – KMCC CP Site

<u>Station</u>	<u>Channel</u>	<u>Separation</u>	<u>FCC Requirement</u>
Alloc., Mexicali, Mexico	NTSC-32	241.8 km	244 km

DTV Channel 32 – Laughlin Site

<u>Station</u>	<u>Channel</u>	<u>Separation</u>	<u>FCC Requirement</u>
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No short-spacings assuming KMCC's DTV channel 32 is co-located with analog channel 34.

What the above indicates, is that analog channel 34 and associated DTV channel 32 should not have an allocation problem at the proposed Laughlin site.

If there are questions concerning this technical statement, please contact the office of the undersigned.



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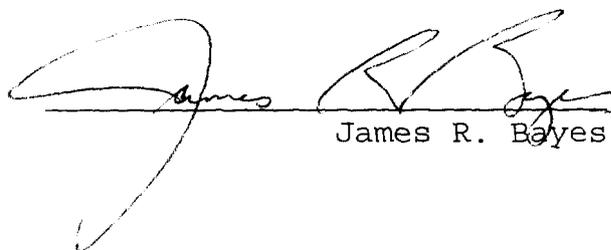
(941) 366-2611

March 9, 1998

CERTIFICATE OF SERVICE

I, James R. Bayes, hereby certify that on this 10th day of March, 1998, I caused a copy of the foregoing Supplement to Petition for Rulemaking to be delivered by hand to the following:

John A. Karousos
Federal Communications Commission
Mass Media Bureau
Chief, Allocations Branch
Policy and Rules Division
2000 M Street, NW, Room 565
Washington, DC 20554


James R. Bayes