

ORIGINAL

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

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

MM Docket No. 87-268

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**PETITION FOR FURTHER RECONSIDERATION
AND REQUEST FOR DECLARATORY RULING**

Journal Broadcast Corporation ("Journal"), by its attorneys and pursuant to Section 1.429 of the Commission's Rules, seeks reconsideration of the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order ("Reconsideration Order"), FCC 98-24, released February 23, 1998, and requests that DTV channel 12 be allotted to Station KTNV(TV), Las Vegas, Nevada. In the alternative, Journal seeks a declaratory ruling, pursuant to Sections 1.2 and 1.41 of the Rules, that the Engineering Statement attached hereto shows that Journal meets the technical standards set forth in Section 73.623 of the Rules for amendments to the DTV Table of Allotments.

Journal is the licensee of Station KTNV, which serves Las Vegas on NTSC channel 13. The Sixth Report and Order allotted DTV channel 17 to KTNV. Journal sought reconsideration of that allotment in its June 13, 1997 "Petition for Reconsideration" and its August 22, 1997 "Supplement to Petition for Reconsideration"

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eration.” (The Commission had invited parties which had filed reconsideration to supplement their petitions following release of OET Bulletin No. 69. Order, DA 97-1377, released July 2, 1997.) Journal supplied a detailed, 75-page Engineering Statement with its Supplement, which showed that channel 12 could be allotted to KTNV without causing prohibited interference or violating the Commission’s DTV policies. (Journal alternatively proposed a channel 9 allotment.) Journal showed that the channel 17 allotment would, by contrast, impose significant discriminatory burdens and costs on KTNV and create environmental issues, problems which would be obviated by making the alternative allotment on channel 12. The Reconsideration Order nonetheless allotted DTV channel 17 to KTNV.

Reconsideration Is Required and Would Achieve the Commission’s DTV Policies. Journal seeks reconsideration of this decision for five reasons. First, the Reconsideration Order failed to provide, as the law requires, a sufficient rationale for its action. Its basis for rejecting Journal’s proposal was contained in only one cursory sentence: “Our analysis indicates that use of channel 12 by KTNV-TV would impact and cause increased interference to other stations.” Id. at ¶ 545. This was legally inadequate. The Commission is required to provide an informed decision that fully explains the basis for its actions. It must “examine the relevant data and articulate a rational connection between the facts found and the choices made.” Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Ins. Co., 463 U.S. 29, 43 (1993). Here, however, there was no explanation or justification whatsoever. The Reconsideration Order did not explain what its “analysis” consisted of, or what

data it used for that analysis. Journal is unable to understand the Commission's assumptions or the methodology that it applied to those assumptions to reach its decision. This was clearly inadequate under long-settled principles of administrative law, which require agencies to inform interested parties of the rationale for their actions.

Second, the Reconsideration Order's treatment of Journal was also invalid because it failed to respond to information in the record. Its "analysis" did not address at all either Journal's technical showing or the additional arguments for allotting DTV channel 12 to KTNV. The Commission must, however, respond to the concerns of interested parties, because "the opportunity to comment is meaningless unless the agency responds to significant points made by the public." Home Box Office v. FCC, 567 F.2d 9, 35 (D.C. Cir. 1997). See also Illinois Public Telecommunications Ass'n v. FCC, 117 F.3d 555 (D.C. Cir. 1997) (reversing Commission because it "failed to respond" to information in the record). The cursory analysis here again falls well short of what the law requires.

Third, the Reconsideration Order ignored the comments of other parties that further supported a grant of Journal's request. Journal explained that its proposal for DTV channel 12 would moot the concerns of both an LPTV station operating on channel 17 and another full-power station in the same market, and neither of those entities opposed Journal's proposal. (In fact, the LPTV station opposed the Commission's allotment of channel 17 for KTNV. Petition of Innovative

Technologies, Inc., June 13, 1997.) But the Reconsideration Order did not reconcile its decision with these stations' concerns.

Fourth, by ignoring Journal's showing that the channel 17 UHF allotment would impose significant costs on Journal and create environmental issues (all of which could be avoided by allotting channel 12), the Reconsideration Order will only delay efficient conversion to DTV and burden the Commission's resources. Journal is now delayed in its ability to proceed toward DTV construction, even though it has shown through engineering analysis that its proposal meets the Commission's interference and other policies for DTV allotments. Absent grant of this Petition, Journal must turn to the Mass Media Bureau and seek an amended allotment through the petition for rulemaking process – even though the Bureau has not even decided how it will administer that process. This is clearly counter to the public interest in promoting the quick and efficient rollout of DTV service. And, the resulting delay and need for a new proceeding will burden scarce Commission resources, which would have to be devoted to addressing a proposal that can be granted now in full compliance with the Commission's DTV rules.

Fifth, in its Reconsideration Order, the Commission stated that it has been its intention throughout the DTV allotment process to “provide broadcasters with the flexibility to develop alternative allotment approaches and plans.” *Id.* at ¶ 187. The Commission has failed to adhere this principle of flexibility. Journal proposed channel 12 because the channel would not disrupt any other DTV station and would have at most a *de minimis* effect on NTSC stations. The Reconsideration Order

did not find, or even suggest, that Journal's showing was inaccurate. Indeed, the Engineering Statement submitted by Journal demonstrates that the use of Channel 12 would be more beneficial to achieving the Commission's goals for the new DTV service. Channel 12 also would not require a precise frequency offset to prevent interference to two stations which are currently operating on adjacent NTSC channels. Moreover, the Commission stated in developing the DTV Table that, while it attempted to minimize all interference, there were "some instances in which it was necessary to allow increased interference to NTSC service." This was to "provide for the transition to DTV service so that the benefits of the new technology can be brought to the American people in an expeditious and efficient manner." Id. at ¶ 149. Journal's proposal met these goals.

The Engineering Statement shows numerous other benefits that support the allocation of channel 12 to KTNV, including:

- The avoidance of the extra cost of purchasing UHF transmitter and other equipment for KTNV – equipment which could exceed \$1,000,000 – and the much higher cost of operating KTNV on an ongoing basis. Most of KTNV's competitors will not have to go incur these costs.
- The avoidance of environmental problems. UHF operation, which would involve higher ERP, would exacerbate the existing RF radiation situation on the Black Mountain antenna sites used by KTNV and other stations.
- DTV channel 12 can be allotted to KTNV without disrupting any of the other DTV allotments made in the Reconsideration Order.
- A net gain in interference-free television service, and a net reduction in interference caused to other stations.
- More interference-free service than the original allotment of channel 17.

A Ruling That Journal's Showing Complies With Section 73.623 Will Also Serve the Public Interest. If the Commission intends to maintain the initial allotment of channel 17 to KTNV, Journal requests a declaratory ruling regarding the Engineering Statement prepared by Carl E. Smith Consulting Engineers, which is attached to this Petition. Section 1.2 of the Rules authorizes the Commission to issue a ruling "removing uncertainty." A ruling that the Engineering Statement shows that Journal's proposal complies with Section 73.623 would achieve this purpose and would serve the public interest, because it would permit Journal to proceed more quickly with construction of DTV service on a channel that will not present the same problems as the channel 17 allotment.

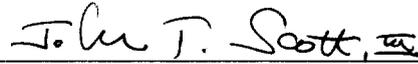
Section 73.623 sets forth the technical criteria and other rules for amending the DTV table of allotments. The attached Engineering Statement, supplied with Journal's Supplement to its Petition, shows that a channel 12 DTV allotment for KTNV fully complies with the requirements of Rule 73.623. It demonstrates that there would be no predicted interference from operation of KTNV on DTV channel 12 that violates any of the technical criteria of the rule. This proposal would in fact result in "a net gain in interference free television service and a net reduction in interference caused to other stations." Engineering Statement at 7. Journal thus requests that the Commission or its Staff in the Office of Engineering and Technology (OET) confirm through a declaratory ruling (or letter) that Journal's Engineering Statement meets the requirements of Section 73.623 and that the technical criteria for a channel amendment have been met.

This action will have multiple benefits. First, the Commission's Mass Media Bureau will not have to spend additional resources to conduct a technical evaluation on a separate petition to modify the table, and can expedite review of that petition. Questions that the Mass Media Bureau may have concerning the treatment of Journal's proposal in the Reconsideration Order will be resolved by confirmation now by OET that the proposal satisfies the technical criteria of Section 73.623. Second, construction of new DTV facilities will be expedited because Journal will be able to obtain assurance that its proposal meets the technical requirements of Section 73.623. Since the Commission has held that provision of DTV service clearly serves the public interest, so too will the ruling Journal requests here.

For the above reasons, the Commission should reconsider its action in this proceeding and immediately modify the DTV Table of Allotments to specify a DTV allotment of channel 12 for KTNV, Las Vegas, Nevada. In the alternative, the Commission should confirm by letter or other action that Journal's Engineering Statement shows that a channel 12 DTV allotment complies with the standards for in Section 73.623 for amending the DTV Table of Allotments.

Respectfully submitted,

JOURNAL BROADCAST CORPORATION



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Dated: April 20, 1998

ENGINEERING STATEMENT IN
SUPPORT OF SUPPLEMENT TO
PETITION FOR RECONSIDERATION

MM DOCKET 87-268

Journal Broadcast Group, Inc.
Las Vegas, NV

August 21, 1997

Prepared for: Mr. Randy Price
Journal Broadcast Group, Inc.
720 East Capitol Drive
Milwaukee, WI 53201

CARL E. SMITH CONSULTING ENGINEERS

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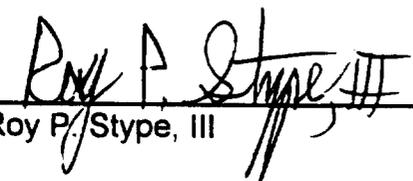
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ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

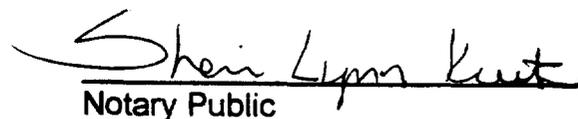
Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Journal Broadcast Group, Inc., to prepare the attached "Engineering Statement In Support Of Supplement To Petition For Reconsideration - MM Docket 87-268."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **June 12, 1997**.



Notary Public

SHERI LYNN KURTZ, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires June 14, 2000

/SEAL/

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of the Journal Broadcast Group, Inc., licensee of KTNV(TV) - Las Vegas, Nevada. It supports a supplement to a petition for reconsideration of the Sixth Report and Order in MM Docket 87-268. KTNV presently operates as an analog TV station on Channel 13 with an effective radiated power of 316 kilowatts at 610 meters above average terrain. The above referenced Sixth Report and Order allotted Channel 17 to Las Vegas for DTV use, paired with Channel 13 for use by KTNV. In order to replicate KTNV's present analog service area, the DTV allotment on Channel 17 was assigned a maximum effective radiated power of 565.2 kilowatts at 610 meters above average terrain from the present KTNV transmitter site.

On June 13, 1997, KTNV filed a timely petition for reconsideration of this Sixth Report and Order as it pertains to the allotment of Channel 17 to Las Vegas for DTV use by KTNV. This petition noted several serious environmental problems associated with high power DTV operation on Channel 17 from the present KTNV transmitter site, which is located in the Black Mountain antenna farm. It also suggested that these problems could be resolved by allotting Channel 9 to Las Vegas for DTV use by KTNV, rather than Channel 17, and allotting Channel 22, or another of many available UHF channels, to Saint George, Utah, for use by KUSG, rather than Channel 9.

At the time that this petition for reconsideration was originally filed, the FCC had not yet released OET Bulletin No. 69, which specifies the methodology which is to be utilized to calculate interference between TV stations for the purposes of Section 73.623(c) of the FCC Rules. This is also the same methodology which was employed by the FCC in making the interference calculations associated with the development of

the initial DTV Table of Allotments contained in this Sixth Report and Order. Simultaneously with the release of this document, the FCC also issued an Order providing an additional period of time, until August 22, 1997, for parties, such as KTNV, who filed petitions for reconsideration of their DTV allotments, to file supplemental supporting data based upon the methodology outlined in this bulletin. This engineering statement contains such supplemental data in further support of KTNV's petition for reconsideration.

Employing the methodology outlined in this OET bulletin, it appears that Channel 9 can be allotted to Las Vegas for DTV use by KTNV, rather than Channel 17, without having to substitute another channel in lieu of Channel 9 for DTV use in Saint George, Utah, as originally proposed. Furthermore, as discussed in detail below, it appears that an even more desirable option would be to allot Channel 12 to Las Vegas for DTV use by KTNV, rather than Channel 17. Channel 12 can be allotted to Las Vegas for DTV use by KTNV without having to disrupt any other DTV allotments and, unlike Channel 9, will not require the utilization of a precise frequency offset to insure that interference is not caused to a nearby analog TV station operating on a lower first adjacent channel.

All interference studies outlined in this engineering statement were conducted utilizing the computer program "HDTV", developed by the Institute For Telecommunications Sciences ("ITS"), a division of the National Telecommunications and Information Administration ("NTIA") of the U. S. Department of Commerce. This computer program implements the calculation methodology outlined in OET Bulletin No. 69 using the Longley-Rice propagation model developed by ITS and allows the user to select various study configurations and lists of protected and interfering stations

from both the FCC analog and DTV engineering databases or from a user created library of analog and DTV stations.

Initially, interference studies were conducted for the authorized KTNV DTV facilities on Channel 17. The results of these studies are contained in Appendix A of this engineering statement. These studies evaluated the noise limited interference free service area for DTV operation by KTNV on Channel 17 utilizing the allotment parameters outlined in Table 1.0. They also evaluated the predicted interference to other stations, both analog and DTV, which would result from DTV operation by KTNV on Channel 17, as well as the service gains which would be realized by these other stations if the DTV allotment on Channel 17 in Las Vegas is deleted. This data is summarized in Table 1.1, which shows that the deletion of the DTV allotment on Channel 17 in Las Vegas would yield a total gain in interference free service by three stations to 600 square kilometers containing a population of 12, 000.

Utilizing the procedures outlined in Appendix B of the Sixth Report and Order in MM Docket 87-268, calculations were then conducted to determine the required operating facilities for DTV operation by KTNV on Channel 12 to replicate the station's existing analog service area on Channel 13. The required facilities, which utilize a maximum effective radiated power of 25.3 kilowatts, are tabulated in Table 2.0. Interference studies were then conducted for these proposed DTV facilities on Channel 12. The results of these studies are contained in Appendix B of this engineering statement. These studies evaluated the noise limited interference free service area for DTV operation by KTNV on Channel 12 utilizing the allotment parameters outlined in Table 2.0. They also evaluated the predicted interference to other stations, both analog and DTV, which would result from DTV operation by KTNV on Channel 12, as well as the

service losses which would be realized by these other stations if Channel 12 is allotted to Las Vegas for DTV use by KTNV. Table 2.1 presents a comparison of the noise limited interference free DTV service areas for KTNV on Channel 12 and Channel 17. As shown by this data, DTV operation by KTNV on Channel 12 would provide noise limited interference free service to an area 1500 square kilometers larger than that which would receive such service on Channel 17.

Table 2.2 presents data regarding the service losses which would be predicted for other stations, both analog and DTV, if Channel 12 is allotted to Las Vegas for DTV use by KTNV. As shown in this table, these services losses would impact three stations and encompass a total land area of 460 square kilometers and a population of 1000. It should be noted, however, that the only station to which interference is predicted in a populated area is the analog operation of KTNV on Channel 13. Additionally, as outlined in the original KTNV petition for reconsideration, KUSG is an unbuilt construction permit for which multiple extensions of time have been granted and whose most recent extension request has been pending for a significant period of time. Should the KUSG construction permit be canceled, the slight service loss to KUSG shown in this table would no longer be a factor.

Finally, Table 2.3 presents a summary of the service gains and losses associated with the substitution on Channel 12 for Channel 17 for DTV use by KTNV. As shown in this table, this channel substitution would result in a net gain of service to 1640 square kilometers containing 11, 000 persons. Furthermore, as noted above, all of the population losing service would be associated with the analog operation of KTNV on Channel 13. Additionally, the loss figures outlined in this table will be reduced if the construction permit for KUSG - Saint George, Utah, is canceled.

As shown by the above data, the substitution of Channel 12 for Channel 17 for DTV use by KTNV will result in a net gain in interference free television service and a net reduction in interference caused to other stations. This substitution can be accomplished without disrupting any of the other DTV allotments made in the Sixth Report and Order in MM Docket 87-268. The reduced operating power required for DTV operation on Channel 12 will eliminate or significantly reduce the environmental problems, as noted in the original KTNV petition for reconsideration, associated with high power UHF DTV operation from the present KTNV transmitter site. Furthermore, the use of Channel 12 for this DTV operation, rather than Channel 9, as originally proposed, will eliminate the need to maintain a precise frequency offset to prevent interference to a nearby analog TV station operating on a lower first adjacent channel.

A similar analysis to that outlined above for Channel 12 was also conducted for the Channel 9 DTV operation originally proposed in the KTNV petition for reconsideration. This further analysis was conducted to document that the proposed use of Channel 12 for DTV operation by KTNV would be superior to the use of Channel 9, while also documenting that DTV operation by KTNV on Channel 9 would still be feasible if, for some reason, it is not possible to allot Channel 12 for DTV use by KTNV. This further data also documents that it would not be necessary to substitute another Channel for the DTV allotment on Channel 9 in Saint George, Utah, in order to accommodate DTV operation by KTNV on Channel 9, as was originally proposed in the KTNV petition for reconsideration.

Table 3.0 outlines the required DTV operating facilities for KTNV on Channel 9 to replicate its existing analog service area on Channel 13. These facilities, which were calculated utilizing the methodology outlined in Appendix B of the Sixth Report and

Order in MM Docket 87-268, are identical to those required to achieve this replication on Channel 12 and employ a maximum effective radiated power of 25.3 kilowatts. Interference studies were then conducted for these proposed DTV facilities on Channel 9. The results of these studies are contained in Appendix C of this engineering statement. These studies evaluated the noise limited interference free service area for DTV operation by KTNV on Channel 9 utilizing the allotment parameters outlined in Table 3.0. They also evaluated the predicted interference to other stations, both analog and DTV, which would result from DTV operation by KTNV on Channel 9, as well as the service losses which would be realized by these other stations if Channel 9 is allotted to Las Vegas for DTV use by KTNV. Table 3.1 presents a comparison of the noise limited interference free DTV service areas for KTNV on Channel 9 and Channel 17. As shown by this data, DTV operation by KTNV on Channel 9 would provide noise limited interference free service to an area 2330 square kilometers larger, with a population 2000 greater, than that which would receive such service on Channel 17.

Table 3.2 presents data regarding the service losses which would be predicted for other stations, both analog and DTV, if Channel 9 is allotted to Las Vegas for DTV use by KTNV. As shown in this table, these services losses would impact six stations and encompass a total land area of 1090 square kilometers and a population of 1000. It should be noted, however, that, as outlined in the original KTNV petition for reconsideration, the Channel 9 DTV allotment for KUSG - Saint George, Utah, is paired with an unbuilt construction permit for which multiple extensions of time have been granted and whose most recent extension request has been pending for a significant period of time. Should the KUSG construction permit be canceled, the slight service

loss to KUSG's Channel 9 DTV allotment shown in this table would no longer be a factor.

Finally, Table 3.3 presents a summary of the service gains and losses associated with the substitution on Channel 9 for Channel 17 for DTV use by KTNV. As shown in this table, this channel substitution would result in a net gain of service to 1840 square kilometers containing 13, 000 persons.

As shown by the above data, either Channel 12 or Channel 9 can be allotted to Las Vegas for DTV use by KTNV in lieu of Channel 17. Either of these channels can be allotted without disrupting any of the other DTV allotments made in the Sixth Report and Order in MM Docket 87-268 while yielding a net gain in interference free television service and a net reduction in interference caused to other stations. Furthermore, the allotment of either of these alternate DTV channels will eliminate or significantly alleviate the environmental problems associated with high power UHF DTV operation from the present KTNV transmitter site, which is located in the Black Mountain antenna farm. Of these two alternate DTV channels, Channel 12 is preferred for two reasons. First, all of the population which would be predicted to lose service due to the allotment of Channel 12 would be associated with KTNV's present analog operation on Channel 13. Furthermore, the use of Channel 12 would not require a precise frequency offset to prevent interference to a nearby analog TV station operating on a lower first adjacent channel, which would be required on Channel 9.

TABLE 1.0

**KTNV AUTHORIZED
CHANNEL 17 DTV FACILITIES**

Journal Broadcast Group, Inc.
Las Vegas, NV

<u>Azimuth (Degrees)</u>	<u>Relative Field</u>	<u>(dBk)</u>	<u>ERP</u>	<u>(kW)</u>
0	0.987	27.41		550.6
10	0.991	27.44		555.1
20	0.995	27.48		559.6
30	0.997	27.50		561.8
40	0.999	27.51		564.1
50	1.000	27.52		565.2
60	1.000	27.52		565.2
70	1.000	27.52		565.2
80	1.000	27.52		565.2
90	1.000	27.52		565.2
100	0.998	27.50		562.9
110	0.994	27.47		558.4
120	0.988	27.42		551.7
130	0.982	27.36		545.0
140	0.992	27.45		556.2
147	1.000	27.52		565.2
148	1.000	27.52		565.2
149	1.000	27.52		565.2
150	0.998	27.50		562.9
160	0.955	27.12		515.5
170	0.936	26.95		495.2
180	0.923	26.83		481.5
190	0.923	26.83		481.5

TABLE 1.0 (cont'd)

<u>Azimuth (Degrees)</u>	<u>Relative Field</u>	<u>(dBk)</u>	<u>ERP</u>	<u>(kW)</u>
200	0.924	26.84		482.6
210	0.925	26.84		483.6
220	0.925	26.84		483.6
230	0.929	26.88		487.8
240	0.931	26.90		489.9
250	0.940	26.98		499.4
260	0.942	27.00		501.5
270	0.962	27.19		523.1
280	0.981	27.36		543.9
290	0.993	27.46		557.3
300	0.998	27.50		562.9
310	1.000	27.52		565.2
320	0.999	27.51		564.1
330	0.997	27.50		561.8
340	0.995	27.48		559.6
350	0.991	27.44		555.1

Maximum ERP= 565.2 kilowatts= 27.52 dBk

Antenna height: 1393 m MSL/610 m AAT

Site coordinates: NL - 35° 56' 43"

WL - 115° 02' 32"

TABLE 1.1

REDUCTION IN PREDICTED
INTERFERENCE TO OTHER
STATIONS FROM DELETION
OF DTV CHANNEL 17 IN LAS VEGAS

Journal Broadcast Group, Inc.
Las Vegas, NV

<u>Station</u>	<u>Channel</u>	<u>Interference Free Service Within Grade B or Noise Limited Contour</u>			<u>Population(1990 Census)</u>		
		<u>Area (square kilometers)</u>		<u>Service Gain</u>	<u>Population(1990 Census)</u>		<u>Service Gain</u>
		<u>With KTNV</u>	<u>Without KTNV</u>	<u>Resulting From</u>	<u>With KTNV</u>	<u>Without KTNV</u>	<u>Resulting From</u>
		<u>Channel 17</u>	<u>Channel 17</u>	<u>Channel 17</u>	<u>Channel 17</u>	<u>Channel 17</u>	<u>Channel 17</u>
		<u>DTV</u>	<u>DTV</u>	<u>Deletion</u>	<u>DTV</u>	<u>DTV</u>	<u>Deletion</u>
KINC	15	8,150	8,300	150	758,000	764,000	6,000
KINC	16(DTV)	9,370	9,640	270	759,000	765,000	6,000
KUPN	21	8,270	8,450	180	764,000	764,000	0
Total Gain				600			12,000

TABLE 2.0

KTNV PROPOSED
CHANNEL 12 DTV FACILITIES
 Journal Broadcast Group, Inc.
 Las Vegas, NV

<u>Azimuth</u> <u>(Degrees)</u>	<u>Relative</u> <u>Field</u>	<u>(dBk)</u>	<u>ERP</u> <u>(kW)</u>
0	0.966	13.73	23.6
10	0.956	13.64	23.1
20	0.937	13.47	22.2
30	0.941	13.50	22.4
40	0.944	13.53	22.5
50	0.934	13.44	22.1
60	0.924	13.34	21.6
70	0.908	13.19	20.9
80	0.919	13.30	21.4
90	0.940	13.49	22.4
100	0.974	13.80	24.0
110	0.992	13.96	24.9
117	1.000	14.03	25.3
120	0.992	13.96	24.9
130	0.980	13.86	24.3
140	0.987	13.92	24.6
150	0.965	13.72	23.6
160	0.951	13.59	22.9
170	0.918	13.29	21.3
180	0.802	12.11	16.3
190	0.734	11.35	13.6
200	0.705	11.00	12.6
210	0.760	11.65	14.6

TABLE 2.0 (cont'd)

<u>Azimuth (Degrees)</u>	<u>Relative Field</u>	<u>(dBk)</u>	<u>ERP</u>	<u>(kW)</u>
220	0.788	11.96		15.7
230	0.806	12.16		16.4
240	0.821	12.32		17.1
250	0.854	12.66		18.5
260	0.906	13.17		20.8
270	0.913	13.24		21.1
280	0.918	13.29		21.3
290	0.930	13.40		21.9
300	0.933	13.43		22.0
310	0.934	13.44		22.1
320	0.938	13.48		22.3
330	0.942	13.51		22.5
340	0.952	13.60		22.9
350	0.954	13.62		23.0

Maximum ERP= 25.3 kilowatts= 14.03 dBk

Antenna height: 1393 m MSL/610 m AAT

Site coordinates: NL - 35° 56' 43"
 WL - 115° 02' 32"

TABLE 2.1

COMPARISON OF PREDICTED
SERVICE BY DTV OPERATION ON
CHANNEL 12 AND CHANNEL 17

Journal Broadcast Group, Inc.
Las Vegas, NV

<u>Interference Free Service Within Noise Limited Contour</u>			<u>Population(1990 Census)</u>		
<u>Area (square kilometers)</u>					
<u>KTNV</u>	<u>KTNV</u>	<u>Service Gain</u>	<u>KTNV</u>	<u>KTNV</u>	<u>Service Gain</u>
<u>Channel 17</u>	<u>Channel 12</u>	<u>Resulting From</u>	<u>Channel 17</u>	<u>Channel 12</u>	<u>Resulting From</u>
<u>DTV</u>	<u>DTV</u>	<u>Channel 12</u>	<u>DTV</u>	<u>DTV</u>	<u>Channel 12</u>
		<u>Substitution</u>			<u>Substitution</u>
23,670	25,170	1,500	707,000	707,000	0