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April 21, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: MM Docket No. 87-268

Dear Ms. Salas:

On behalf of Ramar Communications, Inc., licensee of television broadcast station KJTV, Channel 34 at Lubbock, Texas, there is transmitted herewith an original and eleven copies of the Engineering Statement of Thomas M. Wimberly associated with the April 20, 1998, Petition for Reconsideration in the above-referenced proceeding. A facsimile copy of this Engineering Statement was submitted on April 20, 1998, with the original to be filed upon receipt by counsel.

Should there be any questions concerning this matter, please contact the undersigned counsel.

Very truly yours,



Ross G. Greenberg

RGG:rg
Enclosures

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Engineering Statement
Prepared by Thomas M. Wimberly
Director of Engineering, Ramar Communications, Inc.

The Federal Communications Commission's Sixth Report and Order released April 21, 1997 allotted KJTV DTV channel 35 with 115.8kW power and 100% DTV/NTSC area match. The FCC's Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, FCC 98-24, released February 18, 1998, revised March 12, 1998 allotted KJTV DTV channel 35 with 121kW power and 94.5% DTV /NTSC service match.

Further review showed that two stations in Lubbock TX, KCBD channel 11 and KLBK channel 13, one station in Hobbs, NM, KHFT channel 29 and one station in Roswell, NM, KOBR channel 8, were assigned a different DTV channel. The Roswell station, KOBR, was changed from DTV channel 38 with 852.1kW and a 100% service match to DTV channel 35 with 839kW power and 97.2% service match. The separation between Lubbock, TX and Roswell, NM is 176.85 km. The Sixth Report and Order proposed spacing standards of 223.7 km for co-channel DTV to DTV in zone II and III. An informal conversation between Ramar staff and the FCC staff indicated that the channel changes were to accommodate LPTV. This change was made at the expense of two full power stations' coverage. FCC staff also said that the short spacing did not cause any theoretical interference, yet the FCC's table shows a loss of coverage of 2004 sq. km combined.

The two stations penalized are KOBR and KJTV as evidence by the service area reduction from 100% to 97.2% and 94.5% respectively. This results in a coverage loss of 1138 sq. km to KOBR AND 866 sq. km for KJTV. Over 2000 sq. km will be deprived of full power TV service to accommodate a secondary service. While the FCC staff believes in theory that there will be no interference, it remains a fact, that a co-channel station with seven times more power is short spaced to the west Texas region of our coverage area. An area that includes the Texas counties of Bailey, Cochran and Yoakum. These counties, comprised mostly of farms and ranches, rely on Lubbock broadcasters including KJTV to provide weather programming, Emergency Alert information in addition to other programming.

It is requested that the FCC return the four affected stations to the original DTV channel assignments, thereby allowing full 100% replication of the NTSC signal coverage.

Date: 4/20/98

Signed: Thomas M. Wimberly