

ATTACHMENT A

MULLANEY ENGINEERING, INC.

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MONROVIA, MARYLAND 21770

ENGINEERING STATEMENT
IN SUPPORT OF COMMENTS OF PMCM TV, LLC.
MM DOCKET NO. 14-150

This engineering statement was prepared on behalf of PMCM TV, LLC. in support of its comments in MM Docket No. 14-150.

Attached herein is Table I that demonstrates that usage of a common PSIP¹ channel designator (both major and minor numbers) in areas where the respective rf service contours overlap is far more prevalent than previously known or reported.

Table I was prepared in the following manner;

PSIP major channel designators 2 to 51 were studied nationally using the data available within the Commission's databases (CDBS) and the PSIP data resources and data tools available at internet site: www.rabbitears.info

While the Commission databases may offer the operating radio frequency (rf) channel and the major_channel_number designated for a facility (mistakenly referred to in the FCC's database as the facility's "virtual channel"), they do not contain "publicly" any information concerning the minor PSIP channel designator in use by a facility.

The minor channel designator is to the right of the decimal point, for example with a PSIP Channel designator of 26.x, "x" is the minor PSIP channel designator in the two-part numbering system and can have a value of 1 to 99.

There is no such thing as an ATSC A/65 compliant PSIP designator of channel 26 or even channel 26.0. The first valid number would be 26.1.

The major and minor channel designator form an integral part of the PSIP standard and both must be present to be compliant with ATSC A/65.

"Rabbitears.info" offers major and minor PSIP channel information as well as programming information on each PSIP channel designator in use at each facility.

For each PSIP channel designator studied (first, the major channel number was considered) and a nationwide map was created using the respective digital rf service contours for the PSIP major channel number.

¹ Program and System Information Protocol as specified in ATSC Standard: "Program and System Information Protocol for Terrestrial Broadcast and Cable" ("ATSC A/65").

All digital television services (licensed and operating) were included (Full Service, Low Power, Low Power Translator, and Class A television facilities).

The inclusion of all digital television facilities is warranted, as the receiver/tuner does not know or understand FCC designated service classes. A signal is a signal.

Thus, for each PSIP major channel number, a channel map was created with the service contours of all facilities utilizing the same major PSIP channel number.

If on this national PSIP channel map overlapping service contours were found, the overlapping facility pair were further analyzed and the following filtered applied:

1. If the overlapping service contours were from stations operating with common ownership, OR broadcasting same source programming (for example a major network or other same source programming), then it was concluded that the overlap of PSIP major and/or minor designators were part of a local station network of facilities and the overlapping stations were NOT included in Table I.
2. Where programming information was not readily available - but common ownership between the facilities was present - the facilities were NOT included in Table I.
3. If the facilities were NOT commonly owned and the program material was NOT the same source, AND, if the PSIP minor channel numbers matched, then the facilities WERE included in Table I.

It should also be noted that in the Western States where there are a number of independently owned television translator associations, many of these association networks have overlapping PSIP channel (major and minor number) service contours, but were not included in Table I.

Additionally, other limited resources available on the internet was utilized, for example the published information on station web sites were used to validate the programming and PSIP channel (major/minor) when readily available.

Finally, in cases where a daisy chain of overlapping stations occurred, some relatively few stations are listed twice in the table, for example: Station A + Station B + Station C, would appear in the table as Station A and Station B, and Station B and Station C, as two areas of same channel PSIP overlap occurred.

The results of the tabulations of facilities in Table I can be briefly summarized as follows:

Instances of PSIP overlap involving at least a Class A or Full Service Station with any other facility:	88	Station Pairs/Groups
Instances of PSIP overlap LPTV to LPTV:	21	Station Pairs/Groups
Total of all instances of PSIP overlap:	109	Station Pairs/Groups

October 12, 2014

Mullaney Engineering, Inc.

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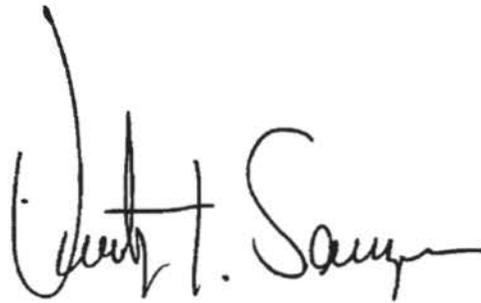


Table I

PSIP CHANNEL DESIGNATOR SERVICE OVERLAP

Yellow highlighted rows are Low Power Television Service (only) with unrelated programming.

rows are any service class overlap with either a Class A or Full Service Station, with unrelated programming.

Service Classes: FS=Full Service, CA= Class A, LP= Low Power

Sorted by PSIP Channel (High to Low) In-Core Channels Only

GROUP	SERVICE CLASS	CALL SIGN	RF	PSIP	CITY	ST	PROGRAMMING
1	LP	KBIT-LD	50	51.1	CHICO	CA	UNRELATED
1	LP	KMSZ-LD	42	51.1	SACRAMENTO	CA	UNRELATED
[REDACTED]							
[REDACTED]							
4	LP	KLSV-LD	50	50.1	LAS VEGAS	NV	UNRELATED
4	LP	K50HQ	50	50.1	OVERTON	NV	UNRELATED
[REDACTED]							
6	LP	WDTO-LD	28	50.1	ORLANDO	FL	UNRELATED
6	LP	WPXB-LD	50	50.1	DAYTONA BEACH	FL	UNRELATED
[REDACTED]							
8	LP	KUOC-LD	48	48.1	ENID	OK	UNRELATED
8	LP	KOCY-LP	48	48.1	OKLAHOMA	OK	UNRELATED
[REDACTED]							
[REDACTED]							
[REDACTED]							
12	LP	K18AD	18	47.1	EAST WENATCHEE, ETC.	WA	UNRELATED
12	LP	KWCC-LD	47	47.1	WENATCHEE	WA	UNRELATED

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GROUP	SERVICE CLASS	CALL SIGN	RF	PSIP	CITY	ST	PROGRAMMING
14	LP	K47JC	47	47.1	WADENA	MN	UNRELATED
14	LP	K47OD	47	47.1	ALEXANDRIA	MN	UNRELATED
17	LP	KSUD-LP	45	45.1	SALT LAKE CITY	UT	UNRELATED
17	LP	K45AX	45	45.1	PARK CITY	UT	UNRELATED
20	LP	WELL-LD	30	45.1	PHILADELPHIA	PA	UNRELATED
20	LP	W45CP	45	45.1	ATLANTIC CITY	NJ	UNRELATED
22	LP	WMDV-LD	45	44.1	DANVILLE	VA	UNRELATED
22	LP	W44CL	44	44.1	ROANOKE	VA	UNRELATED
23	LP	WDGT-LD	43	43.1	MIAMI	FL	UNRELATED
23	LP	W43CB	43	43.1	MATECUMBE	FL	UNRELATED

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[REDACTED]

[REDACTED]

[REDACTED]

28	LP	K17FA	17	41.1	WILLMAR	MN	UNRELATED
28	LP	K41MF	41	41.1	GRANITE FALLS	MN	UNRELATED
29	LP	K40HE	40	40.1	REDDING	CA	UNRELATED
29	LP	K40MX	40	40.1	CHICO	CA	UNRELATED

[REDACTED]

31	LP	WESV-LD	40	40.1	CHICAGO	IL	UNRELATED
31	LP	W40CN	40	40.1	SUGAR GROVE	IL	UNRELATED

[REDACTED]

33	LP	KWYT-LP	39	39.1	YAKIMA	WA	UNRELATED
33	LP	K39DL	39	39.1	MOSES LAKE	WA	UNRELATED

[REDACTED]

[REDACTED]

[REDACTED]

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50	LP	WWRD-LP	42	32.1	DAYTON	OH	UNRELATED
50	LP	WCSN-LD	33	32.1	COLUMBUS	OH	UNRELATED



52	FS	KFXP	31	31.1	POCATELLO	ID	UNRELATED
52	LP	K31HS	31	31.1	MALAD	ID	UNRELATED



57	LP	KEGW-LP	30	30.1	FAYETTEVILLE	AR	UNRELATED
57	LP	K44LG	44	30.1	ANDERSON, PINEVILLE	AR	UNRELATED



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62	LP	KPSE-LD	29	29.1	PALM SPRINGS	CA	UNRELATED
62	LP	K29GK	29	29.1	TWENTYNINE PALMS	CA	UNRELATED



66	LP	K28FP	28	28.1	ASTORIA	OR	UNRELATED
66	LP	K41KT	41	28.1	GRAYS RIVER	OR	UNRELATED
67	LP	K28GG	28	28.1	MEDFORD	OR	UNRELATED
67	LP	K28LA	28	28.1	YREKA	CA	UNRELATED



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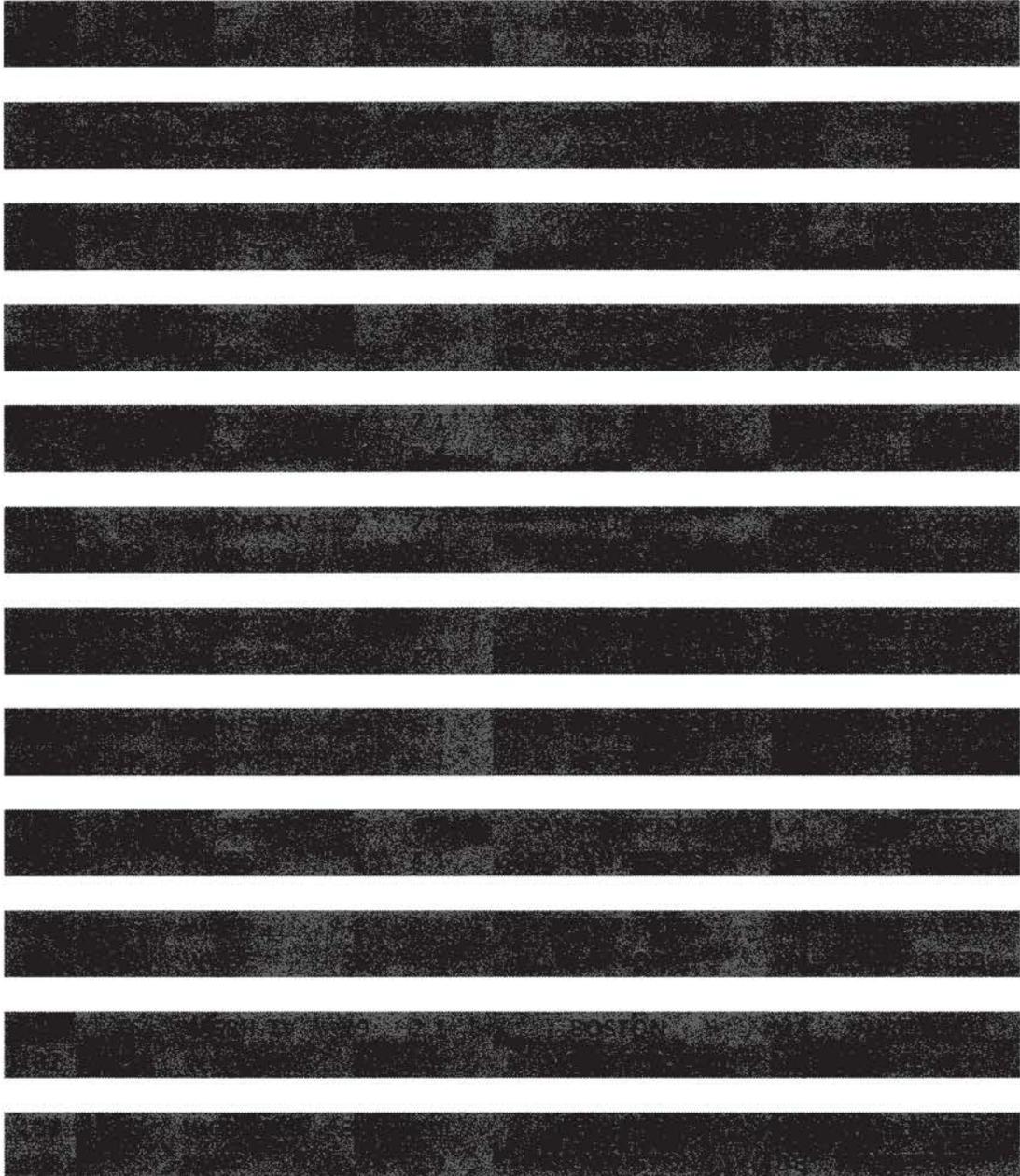


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Tabulation Summary

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ATTACHMENT B

3:38 PM

2-1 KUTV-HD
2-1 KTVN-DT
2-1 KUTV-HD
2-1 KTVN-DT

2-2 KTVN-2
2-2 KUTV2.2



5-1 KVVU-HD

5-1 KSL-HD

5-1 KVVU-HD

5-1 KSL-HD

5-2 KVVU-DT

5-2 COZI-TV

5-2 KSL-TV

5-3 KSL-WX

5-3 KSL-WX

8

8-1 KOLO-DT

8-1 KOLO-DT

◀◀ Page up

▶▶ Page down



CERTIFICATE OF SERVICE

I, Harry F. Cole, hereby certify that on this 14th day of October, 2014, I caused copies of the foregoing "Comments of PMCM TV, LLC" to be placed in the U.S. Postal Service, first class postage prepaid or, as noted below, sent by electronic mail to the following:

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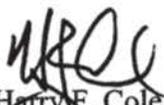
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