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Akin Gump

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November 25, 2014

VIA COURIER

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Accepted/Files

NOV 25 2014

Federal Communications Commission
Office of the Secretary

DOCKET FILE COPY ORIGINAL

Attn: Video Division
Media Bureau

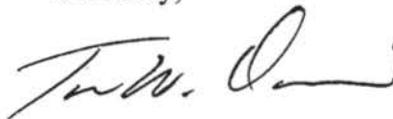
Re: KCEB(TV), Longview, Texas
Facility I.D. No. 83913

Dear Ms. Dortch:

On behalf of KCEB License Company, LLC, licensee of full-power, commercial television station KCEB(TV), Longview, Texas, we respectfully submit the original and four copies of the attached Petition for Rulemaking requesting the substitution of channel 26 for channel 51 at Longview, Texas in the DTV Table of Allotments.

If you have any questions regarding this Petition, please do not hesitate to contact me.

Sincerely,



Tom W. Davidson

Enclosures

cc: Joyce Bernstein (*via electronic mail*)

No. of Copies rec'd 0+4
List ABCDE
MB-Video 14-31

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)

Amendment of Section 73.622(i))
Post-Transition Table of Allotments,)
Digital Television Broadcast Stations)
(Longview, Texas))

MB Docket No. _____

RM- _____

Accepted/Files

NOV 25 2014

*Federal Communications Commission
Office of the Secretary*

**PETITION FOR RULEMAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS**

Pursuant to Sections 1.401, 73.616, and 73.623(a) of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ KCEB License Company, LLC (“Petitioner”), licensee of commercial digital television (“DTV”) station KCEB(TV), Longview, Texas (“KCEB”), by and through its attorneys, hereby submits this Petition for Rulemaking (“Petition”) to institute a rulemaking proceeding to amend the post-transition DTV Table of Allotments (“DTV Table”) set forth in Section 73.622(i) of the FCC’s rules by substituting channel 26 as KCEB’s post-transition DTV channel in lieu of channel 51.

KCEB is a full power television station seeking to relocate from channel 51 to channel 26 pursuant to a voluntary relocation agreement with T-Mobile USA, Inc., the wireless licensee in the lower 700 MHz A block, which is adjacent to channel 51. The proposed channel 51 substitution is in accordance with the FCC’s action to lift the current freeze on petitions for digital channel substitutions with regard to petitions filed by parties relocating from channel 51

¹ 47 C.F.R. §§ 1.401, 73.616, 73.623(a).

pursuant to a voluntary relocation agreement.² KCEB is submitting this Petition with the intention of licensing the substitute channel 26 facility by the pre-auction licensing deadline in order to receive interference protection for such facility in the FCC's repacking of the broadcast television bands in the incentive auction process.³

Specifically, KCEB requests that the DTV Table be amended as follows:

| | <u>Present</u> | <u>Proposed</u> |
|--------------|----------------|-----------------|
| Longview, TX | 31, 51 | 31, 26 |

KCEB's proposed channel 26 facility will operate with the same effective radiated power ("ERP") as the existing channel 51 operation and there will be no change in the antenna's present directional pattern, location, elevation above ground, or height above average terrain ("HAAT"). Notably, the proposed channel 26 coverage will replicate KCEB's current coverage area on channel 51 and serve 34,104 more persons than the current channel 51 facility. Importantly, the channel substitution will eliminate potential interference with wireless operations in the lower 700 MHz A block and facilitate the clearing of the adjacent television band as expeditiously as possible.

As explained more fully in the attached technical exhibit (i.e., Attachment A), the proposed facility complies with the Commission's rules for post-transition DTV operation. The entire principal community of license will be encompassed by the proposed facility's 48 dB μ contour in accordance with Section 73.625(a) of the Commission's rules.⁴ In addition, the

² See General Freeze on the filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications, Public Notice, DA 11-1428 (Med. Bur, rel. Aug. 22, 2011).

³ Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268, Report and Order, FCC 14-50, ¶ 203 (rel. June 2, 2014).

⁴ See Attachment A, Technical Exhibit at 2; 47 C.F.R. §§ 73.616(b), 73.625(a).

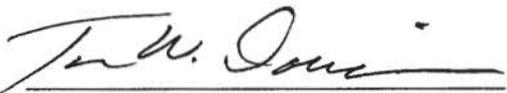
proposed technical parameters will comply with the FCC's interference standards and protection requirements.⁵

The proposed amendment is in the public interest. KCEB is requesting the channel substitution because the cessation of operations on channel 51 would eliminate potential interference with wireless operations in the adjacent lower 700 MHz A block. Granting the proposed amendment on an expedited basis would promote the Commission's objective of clearing broadcast operations from channel 51 as expeditiously as possible in order to facilitate deployment of wireless broadband service in the 700 MHz A block. Adoption also would serve the public interest by permitting KCEB to replicate its coverage area and serve more viewers than it could reach on its current channel.

For the foregoing reasons, Licensee respectfully requests that the Commission amend the DTV Table as proposed.

Respectfully submitted,

KCEB LICENSE COMPANY, LLC

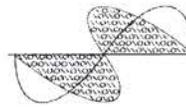
By: 
Tom W. Davidson
Lyndsey Grunewald

Its Attorneys

Akin Gump Strauss Hauer & Feld,
LLP 1333 New Hampshire Avenue,
N.W. Washington, D.C. 20036
(202) 887-4000

Dated: November 25, 2014

⁵ See Attachment A, Technical Exhibit at 3; 47 C.F.R. §§ 73.616(b), (e), 73.623(e), (f).



Engineering Statement
prepared for
KCEB License Company, LLC
KCEB(DT) Longview, Texas
Facility ID 83913

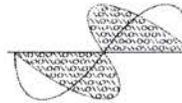
This engineering statement has been prepared on behalf of *KCEB License Company, LLC* (“*KLC*”), licensee of KCEB(DT) (Facility ID 83913, Longview, TX) in support of a *Petition for Rulemaking* to change KCEB’s digital television (“DTV”) channel assignment. KCEB is licensed to operate on Channel 51 (BLCDT-20100212AAO). As described herein, *KLC* requests substitution of Channel 26 in lieu of Channel 51.

KCEB’s Channel 51 operation (692-698 MHz) is immediately adjacent to spectrum now utilized for wireless services. *KLC* and T-Mobile USA, Inc., the Lower 700 MHz A Block licensee, have entered into a voluntary relocation agreement which involves KCEB changing to a new channel to eliminate the potential for interference with the wireless operations. The channel change proposal is exempt from the FCC’s May 31, 2011 freeze¹ on the filing of digital channel substitutions, according to a Public Notice of August 22, 2011.²

Implementation of the proposed channel change would involve replacement of KCEB’s Channel 51 antenna which is top-mounted on a tower structure. A replacement antenna having the same directional azimuthal pattern would be installed at the top-mount position. As proposed herein, KCEB’s effective radiated power (“ERP”) would remain at the presently licensed 500 kW. No change to the antenna’s location, elevation above ground, or height above average terrain (“HAAT”) would occur. A summary of the licensed Channel 51 and proposed Channel 26 technical parameters is provided in the following.

¹“Freeze On The Filing Of Petitions For Digital Channel Substitutions, Effective Immediately,” Public Notice, DA 11-959, May 31, 2011.

²“General Freeze On The Filing And Processing Of Applications For Channel 51 Effective Immediately And Sixty (60) Day Amendment Window For Pending Channel 51 Low Power Television, TV Translator And Class A Applications,” Public Notice, DA 11-1428, August 22, 2011. “To facilitate the clearing of channel 51, however, we hereby lift the current freeze as applied to, and will accept, petitions for rulemaking filed by full power television stations seeking to relocate from channel 51 pursuant to a voluntary relocation agreement.”



Licensed Channel 51 Parameters (BLCDT-20100212AAO)

| Facility ID | State and City | | DTV | | | | | | | | |
|-------------|----------------|----------|------|----------|----------|------------|-------------------|--------------------|--------------|--------------------|--------------------|
| | | | Chan | ERP (kW) | HAAT (m) | Antenna ID | Latitude (DDMMSS) | Longitude (DDMMSS) | Area (sq km) | Population (thous) | % Interf. Received |
| 83913 | TX | LONGVIEW | 51 | 500 | 379 | 96761 | 32-15-36 | 94-57-02 | 23,077 | 668 | 0.0 |

Antenna C/R AMSL: 516 meters

Proposed Channel 26 Parameters

| Facility ID | State and City | | DTV | | | | | | | | |
|-------------|----------------|----------|------|----------|----------|------------|-------------------|--------------------|--------------|--------------------|--------------------|
| | | | Chan | ERP (kW) | HAAT (m) | Antenna ID | Latitude (DDMMSS) | Longitude (DDMMSS) | Area (sq km) | Population (thous) | % Interf. Received |
| 83913 | TX | LONGVIEW | 26 | 500 | 379 | 96761 | 32-15-36 | 94-57-02 | 24,287 | 692 | 1.2 |

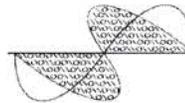
Antenna C/R AMSL: 516 meters

Since no change in directional antenna pattern is proposed, the azimuthal pattern described by FCC CDBS Antenna ID number 96761 (corresponding to the licensed KCEB Channel 51 directional antenna) is specified for the proposed Channel 26. The directional antenna pattern data and azimuthal plot is supplied as Figure 1. KCEB's 500 kW ERP does not exceed the maximum effective radiated power permitted by §73.622(f)(8)(i) for the 379 meter antenna HAAT.

A map is supplied as Figure 2, which depicts the standard predicted coverage contours. This map includes the boundaries of Longview, KCEB's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1) as the entire principal community will be encompassed by the 48 dBμ contour.

The channel substitution would not result in any loss area from the licensed Channel 51 facility. There will be no change to the ERP, HAAT, transmitting location, or directional pattern. Thus, KCEB's 41 dBμ noise limited service contour ("NLSC") location will not change and replication of the KCEB Channel 51 coverage area is assured. Since the NLSC is also not expanded this also satisfies the goals of the FCC's "freeze" Public Notice³ of April 5, 2013

³*Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television*



which imposed limitations on the filing and processing of full power station applications that propose an increase in their authorized NLSC. The channel substitution is therefore also consistent with the procedure described in the *Incentive Auction*⁴ proceeding which seeks to facilitate the clearing of television operations on Channel 51 as expeditiously as possible.

According to FCC OET Bulletin 69⁵ analysis (2000 Census), KCEB's interference-free DTV service population on Channel 26 will be 692,206 persons, which is a 103.6 percent match of the licensed facility's service population of 668,102 persons.

Interference study per OET Bulletin 69 shows that the proposal complies with the 0.5 percent limit of new interference caused to pertinent nearby digital television and Class A television stations as required by §73.616. The interference study output report is provided as Table 1. The site location is beyond the border areas requiring international coordination.

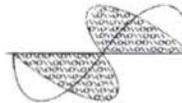
Conclusion

The proposed channel substitution complies with the FCC's principal community coverage requirements of §73.625 and the interference protection requirements of §73.616. Replication of the licensed Channel 51 facility will be provided, no extension of the NLSC will result, and the potential for interference to wireless operations in the Lower 700 MHz A Block will be eliminated. For these reasons, the proposed channel substitution would comply with the FCC's requirements and is in the public interest.

Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate, DA 13-618, Public Notice, released April 5, 2013.

⁴*"Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions",* Report and Order, FCC 14-50, released June 2, 2014, at para. 203.

⁵FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.



Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.

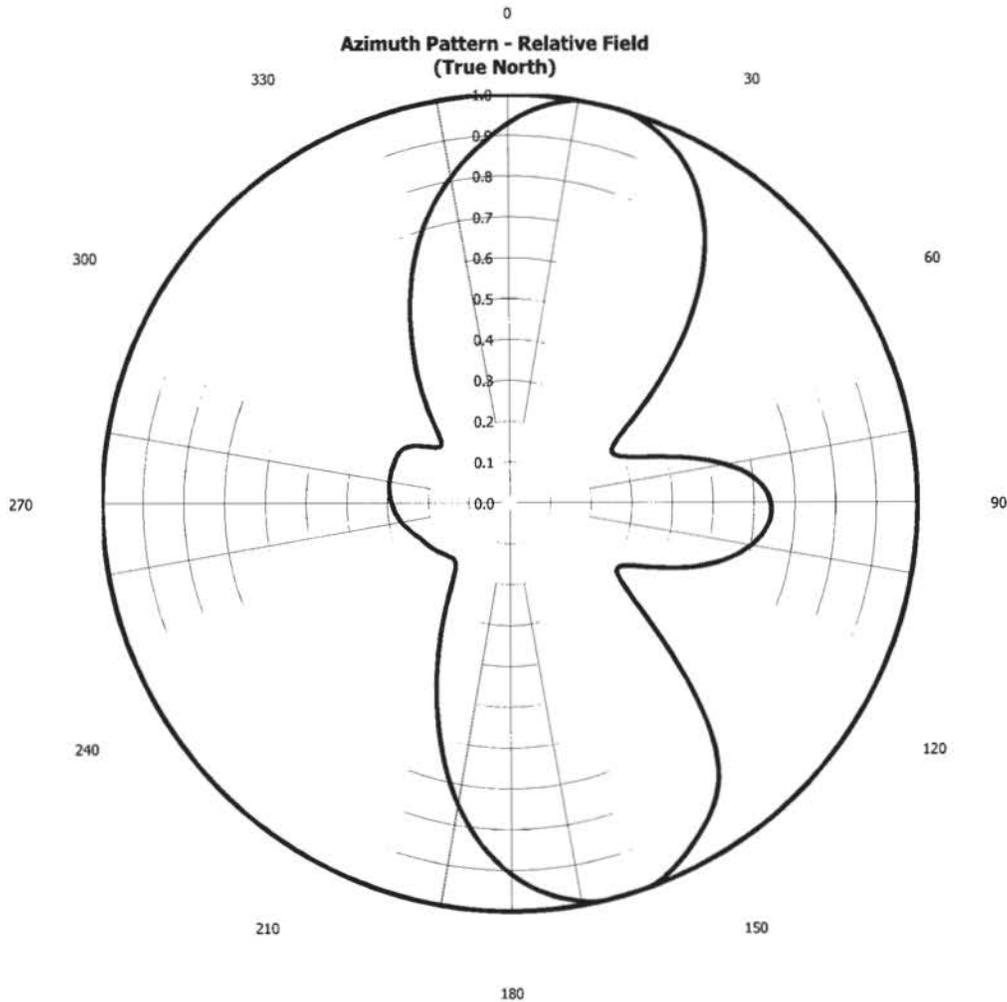
A handwritten signature in black ink, appearing to read "Joseph M. Davis". The signature is fluid and cursive.

Joseph M. Davis, P.E.
November 23, 2014

Chesapeake RF Consultants, LLC
207 Old Dominion Road
Yorktown, VA 23692
703-650-9600

List of Attachments

| | |
|----------|------------------------------------|
| Figure 1 | Antenna Pattern Data |
| Figure 2 | Proposed Coverage Contours |
| Table 1 | OET Bulletin 69 Interference Study |



| Azimuth (°T) | Relative Field | Azimuth (°T) | Relative Field | Azimuth (°T) | Relative Field | Azimuth (°T) | Relative Field |
|-----------------|-------------------|-----------------|-------------------|-----------------|-------------------|-----------------|-------------------|
| 0 | 0.930 | 90 | 0.640 | 180 | 0.910 | 270 | 0.290 |
| 10 | 1.000 | 100 | 0.600 | 190 | 0.750 | 280 | 0.300 |
| 20 | 0.990 | 110 | 0.460 | 200 | 0.530 | 290 | 0.300 |
| 30 | 0.910 | 120 | 0.310 | 210 | 0.330 | 300 | 0.280 |
| 40 | 0.740 | 130 | 0.440 | 220 | 0.210 | 310 | 0.220 |
| 50 | 0.500 | 140 | 0.780 | 230 | 0.200 | 320 | 0.320 |
| 60 | 0.300 | 150 | 0.930 | 240 | 0.220 | 330 | 0.480 |
| 70 | 0.330 | 160 | 1.000 | 250 | 0.240 | 340 | 0.660 |
| 80 | 0.540 | 170 | 0.990 | 260 | 0.270 | 350 | 0.810 |



Figure 1
Directional Antenna Data
Antenna ID # 96761
KCEB(TV) Longview, TX
Facility ID 83913
Ch. 26 500 kW 379 m

prepared for
KCEB License Company, LLC

November, 2014

Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Figure 2
Proposed Coverage Contours
KCEB(TV) Longview, TX
Facility ID 83913
Ch. 26 500 kW 379 m
 prepared for
KCEB License Company, LLC
 November, 2014

Proposed KCEB Ch. 26
 DTV City Grade (48 dBμ)
 DTV Service (41 dBμ)

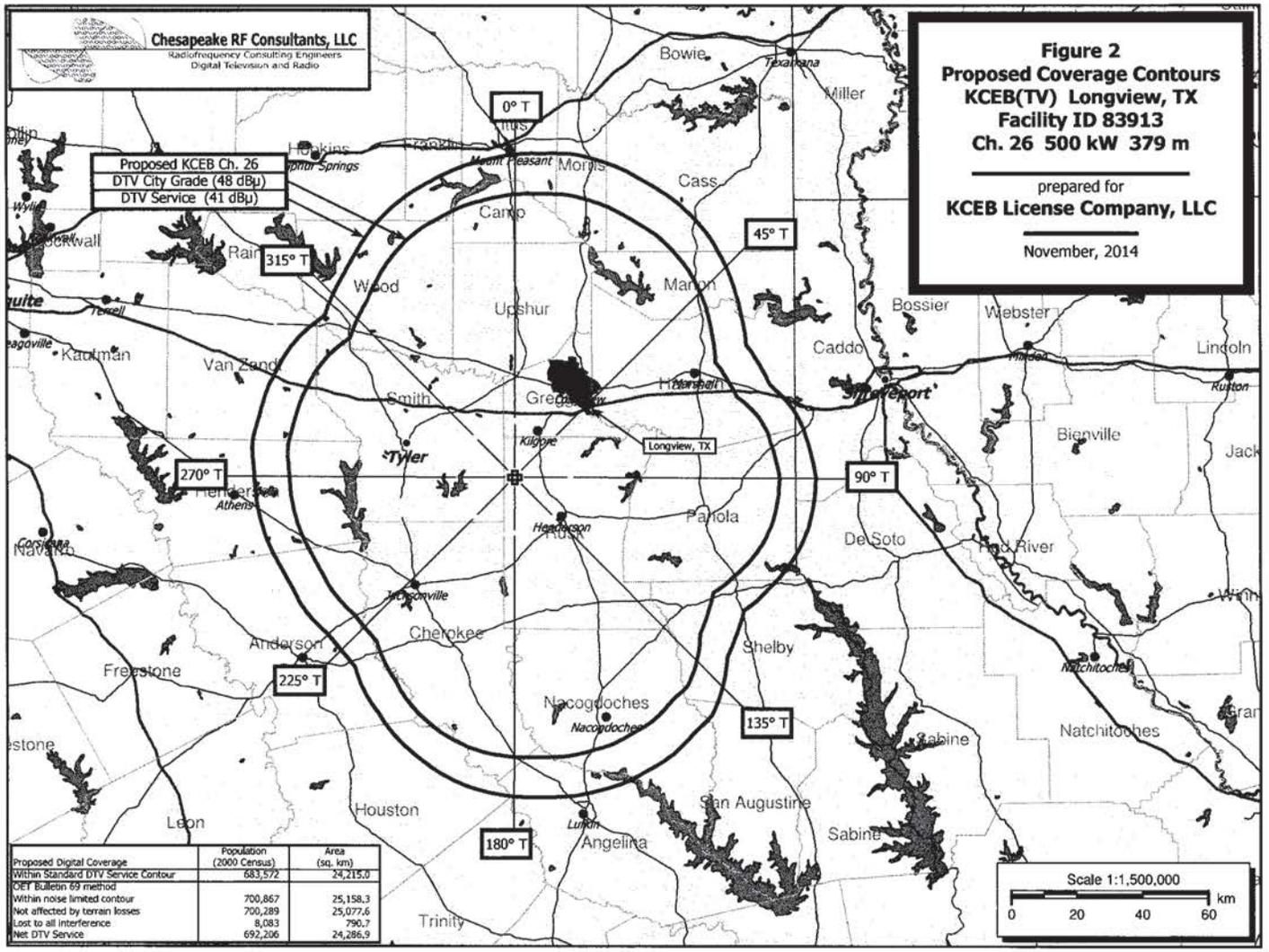


Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 1 of 8)

TW Census data selected 2000
Data Base Selected
/space/software/cdbs/pt_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 11-23-2014 Time: 14:34:28

Record Selected for Analysis

KCEB USERRECORD-01 LONGVIEW TX US
Channel 26 ERP 500.0 kW HAAT 380.0 RCAMSL 00516 m
Latitude 032-15-36 Longitude 0094 57 02
Status APP Zone 2 Border Site number: 01
Dir Antenna Make CDB Model 0000000096781 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

| Site number | ERP (kW) | HAAT (m) | 41.0 dBu F(50,90) (km) |
|-------------|----------|----------|------------------------|
| 0.0 | 432.450 | 397.3 | 98.2 |
| 45.0 | 192.200 | 383.3 | 91.0 |
| 90.0 | 204.800 | 392.1 | 92.0 |
| 135.0 | 186.050 | 370.4 | 89.9 |
| 180.0 | 414.050 | 385.8 | 97.0 |
| 225.0 | 21.013 | 369.8 | 74.8 |
| 270.0 | 42.050 | 367.9 | 79.2 |
| 315.0 | 36.450 | 369.8 | 78.4 |

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 2 of 8)

Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

| Channel | Call | City/State | ARN |
|---------|------|-------------|--------------|
| 26 | KCEB | LONGVIEW TX | USERRECORD01 |

Stations Potentially Affected by Proposed Station

| Chan | Call | City/State | Dist(km) | Status | Application Ref. No. |
|------|---------|----------------|----------|--------|----------------------|
| 26 | KVTH-DT | HOT SPRINGS AR | 293.9 | LIC | BLCDT 20090209ANJ |
| 26 | KLPA-TV | ALEXANDRIA LA | 239.5 | LIC | BLCDT 20100811AAY |
| 26 | KTEN | ADA OK | 277.1 | LIC | BLCDT 20060630ABA |
| 26 | KRLV | HOUSTON TX | 303.0 | LIC | BLCDT 2011212AHM |
| 26 | KXKV | WACO TX | 245.3 | LIC | BLCDT 20050630AFA |

Analysis of Interference to Affected Station 1

| Channel | Call | City/State | Application Ref. No. |
|---------|---------|----------------|----------------------|
| 26 | KVTH-DT | HOT SPRINGS AR | BLCDT -20090209ANJ |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application Ref. No. |
|------|---------|---------------|----------|--------|----------------------|
| 26 | KLPA-TV | ALEXANDRIA LA | 315.4 | LIC | BLCDT -20100811AAY |
| 26 | KTEN | ADA OK | 322.3 | LIC | BLCDT -20060630ABA |
| 27 | KIVE | EL DORADO AR | 162.5 | LIC | BLCDT -20070105ASB |
| 27 | KFTA-TV | FORT SMITH AR | 178.8 | LIC | BLCDT -20090331AEC |
| 26 | KCEB | LONGVIEW TX | 293.9 | APP | USERRECORD-01 |

Total scenarios = 1

Result Key: 1
Scenario 1 Affected station 1
Before Analysis

Results for: 26A AR HOT SPRINGS BLCDT 20090209ANJ LIC

| HAAT | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| 258.0 m, ATV ERP 66.4 kW | 266014 | 15121.9 |
| within Noise Limited Contour | 264201 | 14275.8 |
| not affected by terrain losses | 0 | 0.0 |
| lost to NTSC IX | 243 | 35.9 |
| lost to additional IX by ATV | 243 | 35.9 |
| lost to ATV IX only | 243 | 35.9 |
| lost to all IX | 243 | 35.9 |

Potential Interfering Stations Included in above Scenario 1

| | | |
|------------|-------|-----------------|
| 26A OK ADA | BLCDT | 20060630ABA LIC |
|------------|-------|-----------------|

Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 8)

Chesapeake RF Consultants, LLC
Radio Frequency Consultants & Engineers
LOCAL INTERFERENCE ANALYSIS

After Analysis

Results for: 26A AK HOT SPRINGS BLCDT 20090209ANJ LIC
HAAT 298.0 m, ATV ERP 66.4 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| Within Noise Limited Contour | 266014 | 15121.9 |
| not affected by terrain losses | 264201 | 14275.8 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 259 | 47.9 |
| lost to ATV IX only | 259 | 47.9 |
| lost to all IX | 259 | 47.9 |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|-----------------|--------------|-------------|-----|
| 26A OK ADA | BLCDT | 20060630ABA | LIC |
| 26A TX LONGVIEW | USERRECORD01 | | APP |

Percent new IX = 0.0061%

Worst case new IX 0.0061% Scenario 1

Analysis of Interference to Affected Station 2

Analysis of current record

| Channel | Call | City/State | Application Ref. No. |
|---------|---------|---------------|----------------------|
| 26 | KLPA-TV | ALEXANDRIA LA | BLEDT -20100811AAZ |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application Ref. No. |
|------|---------|----------------|----------|--------|----------------------|
| 25 | WLPS-TV | BATON ROUGE LA | 184.3 | LIC | BLEDT -20101201ALR |
| 25 | KPDM | BEAUMONT TX | 209.2 | LIC | BLCDT -20110513ABH |
| 25 | KPDM-DH | BEAUMONT TX | 209.2 | APP | SPPM -20100120ADA |
| 26 | KVTH-DT | HOT SPRINGS AR | 315.4 | LIC | BLCDT -20090209ANJ |
| 26 | NOHO | NEW ORLEANS LA | 305.7 | LIC | BLCDT -20121019AAK |
| 26 | KRIV | HOUSTON TX | 358.4 | LIC | BLCDT -20111212AMH |
| 27 | KIVE | EL DORADO AR | 170.8 | LIC | BLCDT -20070105ABH |
| 26 | KCEB | LONGVIEW TX | 239.5 | APP | USERRECORD-01 |

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 2
Before Analysis

Results for: 26A LA ALEXANDRIA BLEDT 20100811AAZ LIC
HAAT 413.0 m, ATV ERP 500.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| Within Noise Limited Contour | 407450 | 28544.0 |
| not affected by terrain losses | 407377 | 28507.9 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 277 | 112.4 |
| lost to ATV IX only | 277 | 112.4 |
| lost to all IX | 277 | 112.4 |

Potential Interfering Stations Included in above Scenario 1

Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 4 of 8)

Chesapeake RF Consultants, LLC
Radio Frequency Consultants & Engineers
LOCAL INTERFERENCE ANALYSIS

After Analysis

| | | | |
|------------------|-------|-------------|-----|
| 26A TX HOUSTON | BLCDT | 20111212AHM | LIC |
| 27A AR EL DORADO | BLCDT | 20070105ABH | LIC |

After Analysis

Results for: 26A LA ALEXANDRIA BLEDT 20100811AAZ LIC
HAAT 413.0 m, ATV ERP 500.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| Within Noise Limited Contour | 407450 | 28544.0 |
| not affected by terrain losses | 407377 | 28507.9 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 424 | 148.6 |
| lost to ATV IX only | 424 | 148.6 |
| lost to all IX | 424 | 148.6 |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|------------------|--------------|-------------|-----|
| 26A TX HOUSTON | BLCDT | 20111212AHM | LIC |
| 27A AR EL DORADO | BLCDT | 20070105ABH | LIC |
| 26A TX LONGVIEW | USERRECORD01 | | APP |

Percent new IX = 0.0361%

Worst case new IX 0.0361% Scenario 1

Analysis of Interference to Affected Station 3

Analysis of current record

| Channel | Call | City/State | Application Ref. No. |
|---------|------|------------|----------------------|
| 26 | KIEN | ADA OK | BLCDT -20060630ABA |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application Ref. No. |
|------|---------|------------------|----------|--------|----------------------|
| 26 | KVTH-DT | HOT SPRINGS AR | 322.3 | LIC | BLCDT -20090209ANJ |
| 26 | KSAS-TV | WICHITA KS | 389.4 | LIC | BLCDT -20021120AAN |
| 26 | KXKV | WACO TX | 343.1 | LIC | BLCDT -20050630AFE |
| 27 | KFOR-TV | OKLAHOMA CITY OK | 161.6 | LIC | BLCDT -20050701ABR |
| 26 | KCEB | LONGVIEW TX | 277.1 | APP | USERRECORD-01 |

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 3
Before Analysis

Results for: 26A OK ADA BLEDT 20060630ABA LIC
HAAT 426.0 m, ATV ERP 1000.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| Within Noise Limited Contour | 526180 | 38732.2 |
| not affected by terrain losses | 522869 | 38153.5 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 5980 | 407.0 |
| lost to ATV IX only | 5980 | 407.0 |
| lost to all IX | 5980 | 407.0 |

Potential Interfering Stations Included in above Scenario 1

Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 5 of 8)

Chesapeake RF Consultants, LLC
Full Frequency Consulting Engineers
Digital Television and Radio

| | | | |
|----------------------|-------|-------------|-----|
| 26A TX WACO | BLCDT | 20050630AFE | LIC |
| 27A OK OKLAHOMA CITY | BLCDT | 20050701ABR | LIC |

After Analysis

Results for: 26A OK ADA

| | | | |
|---------------------------------|------------|--------------|-----|
| HAAT 426.0 m, ATV ERP 1000.0 kW | BLCDT | 20060630ABA | LIC |
| | POPULATION | AREA (sq km) | |
| Within Noise Limited Contour | 526180 | 38732.2 | |
| not affected by terrain losses | 522869 | 38153.5 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 6625 | 466.9 | |
| lost to ATV IX only | 6625 | 466.9 | |
| lost to all IX | 6625 | 466.9 | |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|----------------------|--------------|-------------|-----|
| 26A TX WACO | BLCDT | 20050630AFE | LIC |
| 27A OK OKLAHOMA CITY | BLCDT | 20050701ABR | LIC |
| 26A TX LONGVIEW | USERRECORD01 | APP | |

Percent new IX = 0.1248%

Worst case new IX 0.1248% Scenario 1

Analysis of Interference to Affected Station 4

Analysis of current record

| Channel | Call | City/State | Application Ref. No. |
|---------|------|------------|----------------------|
| 26 | KRIV | HOUSTON TX | BLCDT -2011212AHM |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist (km) | Status | Application Ref. No. |
|------|---------|---------------|-----------|--------|----------------------|
| 25 | KFDM | BEAUMONT TX | 159.0 | LIC | BLCDT -20110513ABB |
| 25 | KFDM-DR | BEAUMONT TX | 159.0 | APP | SFRM -20100120ADA |
| 26 | KLPA-TV | ALEXANDRIA LA | 358.4 | LIC | BLCDT -20100811AAV |
| 26 | KFXL-TV | UVALDE TX | 343.6 | LIC | BLCDT -20090612AHU |
| 26 | KXXV | WACO TX | 262.1 | LIC | BLCDT -20050630AFE |
| 26 | KCRN | LONGVIEW TX | 303.0 | APP | USERRECORD-01 |

Total scenarios = 3

Result key: 4
Scenario 1 Affected station 4
Before Analysis

Results for: 26A TX HOUSTON

| | | | |
|--------------------------------|------------|--------------|-----|
| HAAT 598.0 m, ATV ERP 800.0 kW | BLCDT | 2011212AHM | LIC |
| | POPULATION | AREA (sq km) | |
| Within Noise Limited Contour | 4843640 | 40177.8 | |
| not affected by terrain losses | 4843562 | 40145.5 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 5559 | 403.9 | |
| lost to ATV IX only | 5559 | 403.9 | |
| lost to all IX | 5559 | 403.9 | |

Potential Interfering Stations Included in above Scenario 1

Table 1 KCEB OET Bulletin 69 Interference Study
(worst-case scenarios shown page 6 of 8)

Chesapeake RF Consultants, LLC
Full Frequency Consulting Engineers
Digital Television and Radio

| | | | |
|-------------------|-------|-------------|-----|
| 25A TX BEAUMONT | BLCDT | 20110513ABB | LIC |
| 26A LA ALEXANDRIA | BLCDT | 20100811AAV | LIC |
| 26A TX WACO | BLCDT | 20050630AFE | LIC |

After Analysis

Results for: 26A TX HOUSTON

| | | | |
|--------------------------------|------------|--------------|-----|
| HAAT 598.0 m, ATV ERP 800.0 kW | BLCDT | 2011212AHM | LIC |
| | POPULATION | AREA (sq km) | |
| Within Noise Limited Contour | 4843640 | 40177.8 | |
| not affected by terrain losses | 4843562 | 40145.5 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 5696 | 416.0 | |
| lost to ATV IX only | 5696 | 416.0 | |
| lost to all IX | 5696 | 416.0 | |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|-------------------|--------------|-------------|-----|
| 25A TX BEAUMONT | BLCDT | 20110513ABB | LIC |
| 26A LA ALEXANDRIA | BLCDT | 20100811AAV | LIC |
| 26A TX WACO | BLCDT | 20050630AFE | LIC |
| 26A TX LONGVIEW | USERRECORD01 | APP | |

Percent new IX = 0.0028%

Worst case new IX 0.0028% Scenario 1

Analysis of Interference to Affected Station 5

Analysis of current record

| Channel | Call | City/State | Application Ref. No. |
|---------|------|------------|----------------------|
| 26 | KXXV | WACO TX | BLCDT 20050630AFE |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist (km) | Status | Application Ref. No. |
|------|---------|-------------|-----------|--------|----------------------|
| 25 | KWRT-DR | WACO TX | 3.0 | APP | SFRM -20081106AWQ |
| 26 | KTGN | ADA OK | 343.1 | LIC | BLCDT -20060630ABA |
| 26 | KRIV | HOUSTON TX | 262.1 | LIC | BLCDT -2011212AHM |
| 26 | KFXL-TV | UVALDE TX | 233.4 | LIC | BLCDT -20090612AHU |
| 27 | KBYO | LLANO TX | 140.4 | LIC | BLCDT -20090622ABA |
| 26 | KCEB | LONGVIEW TX | 245.3 | APP | USERRECORD-01 |

Total scenarios = 3

Result key: 8
Scenario 2 Affected station 5
Before Analysis

Results for: 26A TX WACO

| | | | |
|---------------------------------|------------|--------------|-----|
| HAAT 361.0 m, ATV ERP 1000.0 kW | BLCDT | 20050630AFE | LIC |
| | POPULATION | AREA (sq km) | |
| Within Noise Limited Contour | 1399195 | 39128.2 | |
| not affected by terrain losses | 1374143 | 38814.5 | |
| lost to NTSC IX | 0 | 0.0 | |
| lost to additional IX by ATV | 6024 | 880.8 | |
| lost to ATV IX only | 6024 | 880.8 | |

Table 1 KCEB OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 7 of 8)

| | | | | |
|---|-------|-------------|-------|---|
| lost to all IX | | 60214 | 880.8 | |
| Potential Interfering Stations Included in above Scenario | | | | 2 |
| 25A TX WACO | SFRM | 20081106AMQ | APP | |
| 26A OK ADA | BLCDI | 20060630ABA | LIC | |
| 26A TX HOUSTON | BLCDI | 20111212AHM | LIC | |
| 26A TX UVALDE | BLCDI | 20090612AHU | LIC | |
| 27A TX LLANO | BLCDI | 20090622ABA | LIC | |

After Analysis

Results for: 26A TX WACO BLCDI 20050630AFE LIC
 HAAT 561.0 m, ATV ERP 1000.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 1399195 | 39128.2 |
| not affected by terrain losses | 1374143 | 38814.5 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 60277 | 884.8 |
| lost to ATV IX only | 60277 | 884.8 |
| lost to all IX | 60277 | 884.8 |

Potential Interfering Stations Included in above Scenario 2

| | | | |
|-----------------|--------------|-------------|-----|
| 25A TX WACO | SFRM | 20081106AMQ | APP |
| 26A OK ADA | BLCDI | 20060630ABA | LIC |
| 26A TX HOUSTON | BLCDI | 20111212AHM | LIC |
| 26A TX UVALDE | BLCDI | 20090612AHU | LIC |
| 27A TX LLANO | BLCDI | 20090622ABA | LIC |
| 26A TX LONGVIEW | USERRECORD01 | | APP |

Percent new IX = 0.0048%

Worst case new IX 0.0048% Scenario 2

Analysis of Interference to Affected Station 6

Analysis of current record

| Channel | Call | City/State | Application Ref. No. |
|---------|------|-------------|----------------------|
| 26 | KCEB | LONGVIEW TX | USERRECORD-01 |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist (km) | Status | Application Ref. No. |
|------|---------|----------------|-----------|--------|----------------------|
| 26 | KVTH-DT | HOT SPRINGS AR | 293.9 | LIC | BLCDI -20090209ANJ |
| 26 | KIJA-TV | ALEXANDRIA LA | 239.5 | LIC | BLCDI -20100811AAY |
| 26 | KTEN | ADA OK | 277.1 | LIC | BLCDI 20060630ABA |
| 26 | KRIV | HOUSTON TX | 303.0 | LIC | BLCDI -20111212AHM |
| 26 | KXXV | WACO TX | 245.3 | LIC | BLCDI -20050630AFE |

Total scenarios = 1

Result key: 10
 Scenario 1 Affected station 6
 Before Analysis

Results for: 26A TX LONGVIEW USERRECORD01 APP
 HAAT 380.0 m, ATV ERP 500.0 kW

Table 1 KCEB OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 8 of 8)

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 700867 | 25158.3 |
| not affected by terrain losses | 700289 | 25077.6 |
| lost to NISC IX | 0 | 0.0 |
| lost to additional IX by ATV | 8083 | 790.7 |
| lost to ATV IX only | 8083 | 790.7 |
| lost to all IX | 8083 | 790.7 |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|--------------------|-------|-------------|-----|
| 26A AR HOT SPRINGS | BLCDI | 20090209ANJ | LIC |
| 26A LA ALEXANDRIA | BLCDI | 20100811AAY | LIC |
| 26A OK ADA | BLCDI | 20060630ABA | LIC |
| 26A TX HOUSTON | BLCDI | 20111212AHM | LIC |
| 26A TX WACO | BLCDI | 20050630AFE | LIC |

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