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May 1, 2000

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Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals, TW-A325 Counter  
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Washington, D.C. 20554

RECEIVED  
MAY 01 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: KDOR-TV, Bartlesville, Oklahoma

Dear Ms. Salas:

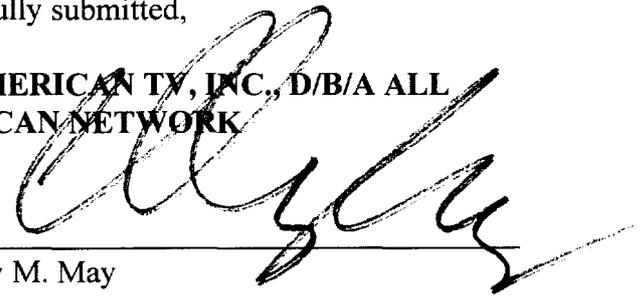
Transmitted herewith, on behalf of All American TV, Inc., d/b/a All American Network ("All American"), licensee of KDOR-TV, Bartlesville, Oklahoma, is an original and four copies of a Petition for Rulemaking proposing the substitution of DTV Channel 32 for DTV channel 15, Bartlesville, Oklahoma.

If any questions should arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

ALL AMERICAN TV, INC., D/B/A ALL  
AMERICAN NETWORK

By: \_\_\_\_\_  
Colby M. May  
Its Attorney



CMM:gmcC00006.008  
xc: KDOR-TV Public File  
Clay Pendarvis, Esq.  
T. J. Malievsky  
Gary Hodges

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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In the Matter of )  
 )  
 Amendment of Section 73.622(b), ) RM-  
 Digital Television Table of Allotments, )  
 (Bartlesville, Oklahoma) )

RECEIVED  
 MAY 01 2000  
 FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

To: Chief, Mass Media Bureau

**PETITION FOR RULEMAKING**

All American TV, Inc., D/b/a All American Network, licensee of Television Broadcast Station KDOR-TV, Bartlesville, Oklahoma ("Petitioner"), by its attorney and pursuant to Sections 1.419, 1.420 and 73.623 of the Commission's Rules, hereby requests that the Table of Allotments for Digital Television ("DTV") Stations, Section 73.622(b) of the Commission's Rules, be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Channel No.</u>	<u>Proposed</u>
Bartlesville, Oklahoma	15		32

In support of such request, the following is set forth.

1. Petitioner seeks to substitute DTV Channel 32 in lieu of DTV Channel 15 at Bartlesville, Oklahoma for use by Station KDOR at the same transmitter site authorized for use by KDOR for its NTSC operation on Channel 17. DTV Channel 32 was allocated for use by KDOR pursuant to the Sixth Report and Order in MM Docket No. 87-268, 12 FCC Rcd. 14588 (1997), recon. granted in part, 13 FCC Rcd. 7418 (1998).

2. As set forth in the attached engineering of Kevin T. Fisher, Smith and Fisher, the proposed DTV channel substitution is fully consistent with the requirements of Section 73.623(c) and 76.625(a) of the Rules. Specifically, the substitution of DTV Channel 32 at Bartlesville,

Oklahoma would comply with the principal community coverage requirements and will not result in more than a two percent (2%) increase in new interference to the population served by any other DTV station, DTV allotment or analog television broadcast station or result in any affected station receiving interference in excess of ten percent (10%) of its population (see Exhibit H of attached engineering).

3. The proposed substitution would benefit the public interest for the following reasons. If the Petition for Rulemaking is adopted, Petitioner intends to operate DTV channel 32 during the transition period with facilities which will provide service to a population of 905,150. Moreover, absent a change in DTV allocation from channel 15 to channel 32, Petitioner will not, during the interim DTV transition period, engage in full power DTV operations, but, rather, will operate at low power, providing interim DTV coverage to its city of license. As established by the attached engineering, an interim DTV operation on channel 32 would provide DTV service to a population of only 835,153. Thus, the proposed substitution of channel 32 would result in interim DTV service to over nine hundred thousand persons, an increase of nearly seventy thousand people.

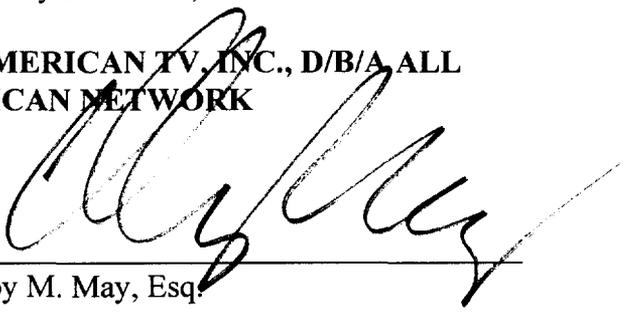
4. The proposed change also will enable Station KDOR to avoid the extra cost of purchasing a transmitter and other equipment which it will not use at the end of the DTV transition period. As reflected by the attached engineering, Petitioner would propose to operate on DTV channel 32 after the transition period, and therefore, will be able to use the antenna, transmission line, and transmitter employed during the transition period. If Petitioner's proposal to substitute Channel 32 in lieu of Channel 15 is adopted by the Commission, the resulting capital cost savings will make available additional resources for Petitioner to invest in promoting and providing DTV and public interest programming to the public.

5. The success of a DTV station operation is inherently related to viewer acceptance; the larger the audience size, the greater likelihood that viewers will purchase DTV receivers and, further, purchase receivers at an earlier point in time. The compelling public interest benefit herein is that almost seventy thousand additional persons will be served by a DTV Chanel 32 operation at the commencement of DTV operation in 2002 -- many years prior to the 2006 end of the transition period. Accordingly, a Channel 32 DTV allocation would better serve to expedite the public's acceptance and conversion to digital television.

6. The proposed substitution of DTV channel 32 for DTV channel 15 would permit station KDOR to replicate a substantially larger portion of its existing service area on analog channel 17 during the DTV transition period; and the proposed channel change complies with the coverage and allocation criteria set forth in the Commission's Rules. Accordingly, and for the reasons stated herein, Petitioner submits that its proposed DTV channel substitution would serve the public interest and the Commission is respectfully requested to issue a Notice of Proposed Rulemaking.

Respectfully submitted,

**ALL AMERICAN TV, INC., D/B/A ALL  
AMERICAN NETWORK**

By:   
Colby M. May, Esq.  
Its Attorney

Suite 609  
1000 Thomas Jefferson Street, N.W.  
Washington, D.C. 20007  
(202) 298-6348

May 1, 2000

**ATTACHMENT**

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of ALL AMERICAN NETWORK, licensee of KDOR(TV), Channel 17 in Bartlesville, Oklahoma, in support of its Petition for Rulemaking to substitute DTV Channel 32 for DTV Channel 15 in Bartlesville, Oklahoma.

Due to interference concerns on Channel 15 with respect to KHOG-DT (Channel 15 in Fayetteville, Arkansas) and KTBO-DT (Channel 55 in Oklahoma City, Oklahoma), KDOR-DT cannot be maximized on its present channel assignment. Indeed, whereas the licensee would have specified an omnidirectional effective radiated power of 500 kw for KDOR-DT, interference to KTBO-DT and KHOG-DT limited the allowable ERP to 200 kw, directional. Our detailed channel search reveals that DTV Channel 32 can be used in Bartlesville from the KDOR site and with specific, optimized, operating parameters.

The proposed site, at 36° 30' 59", 95° 46' 10", is plotted in Exhibit B. For the purposes of our interference studies, we assumed that an Andrew ATW22H3-HSO omnidirectional antenna would be side-mounted on the KDOR tower, as shown in Exhibit C. The proposed effective antenna height is 503 meters AMSL, and the main-lobe ERP is 500 kw. Proposed operating parameters are listed in Exhibit D, and Exhibit E provides the antenna elevation pattern for the proposed antenna. Exhibit F is a tabulation of terrain and contour data for the proposed facility.

The predicted 41 db $\mu$  contour is plotted in Exhibit G. As shown, the entire community of Bartlesville is contained within the proposed 41 db $\mu$  contour, as required by

EXHIBIT A

§73.623(c)(1) of the Rules. Exhibit H is an interference study, which concludes that the proposed facility meets the requirements of §73.623(c)(2) of the Rules with respect to both NTSC and DTV facilities.

It is thus respectfully requested that the FCC substitute DTV Channel 32 for DTV Channel 15 in Bartlesville, Oklahoma, in its Digital Television Table of Allotments in §73.622(b) of its Rules as follows:

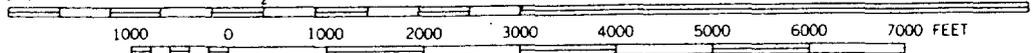
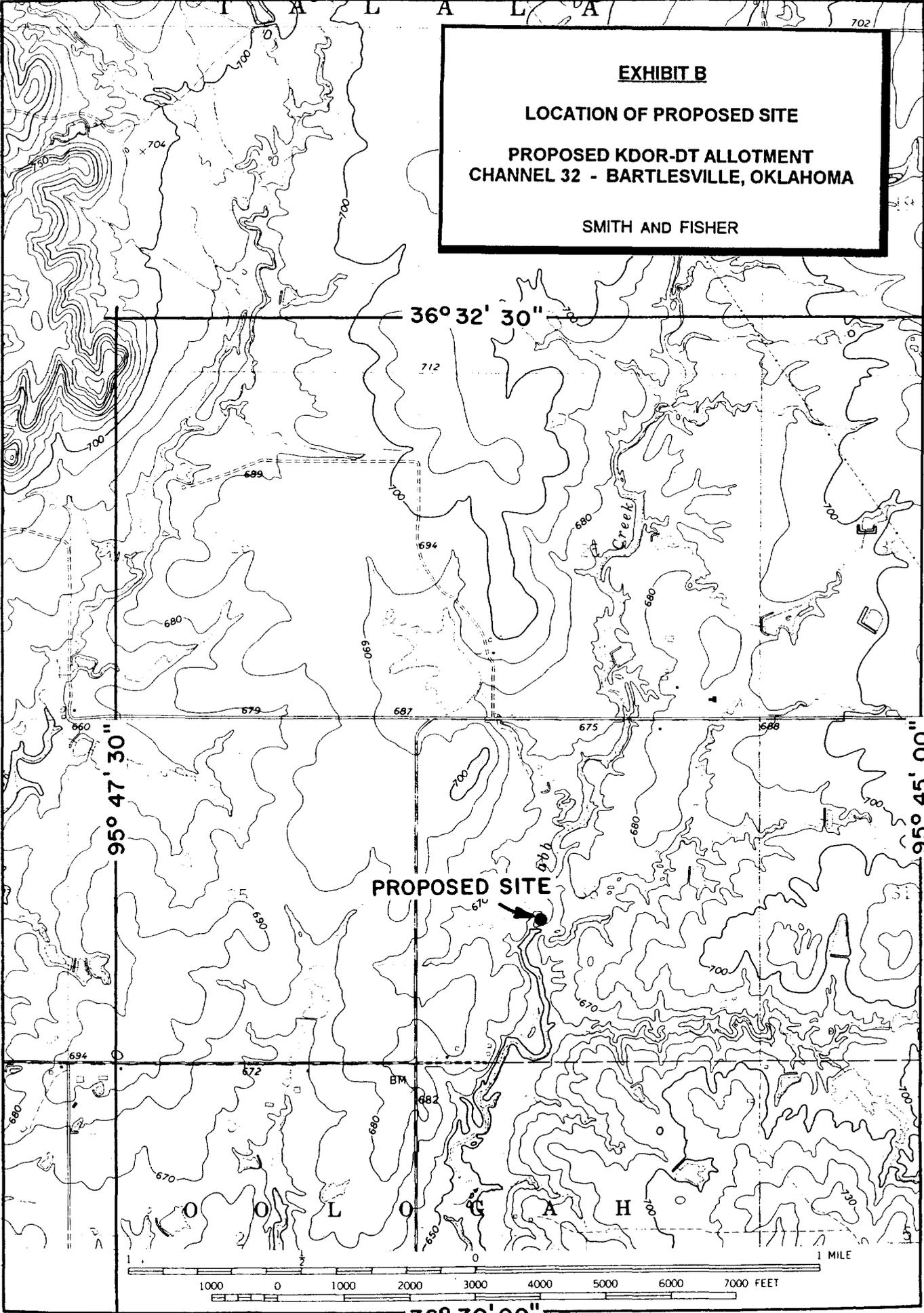
<u>Community</u>	<u>Present Allotments</u>	<u>Proposed Allotments</u>
Bartlesville, Oklahoma	15	32

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

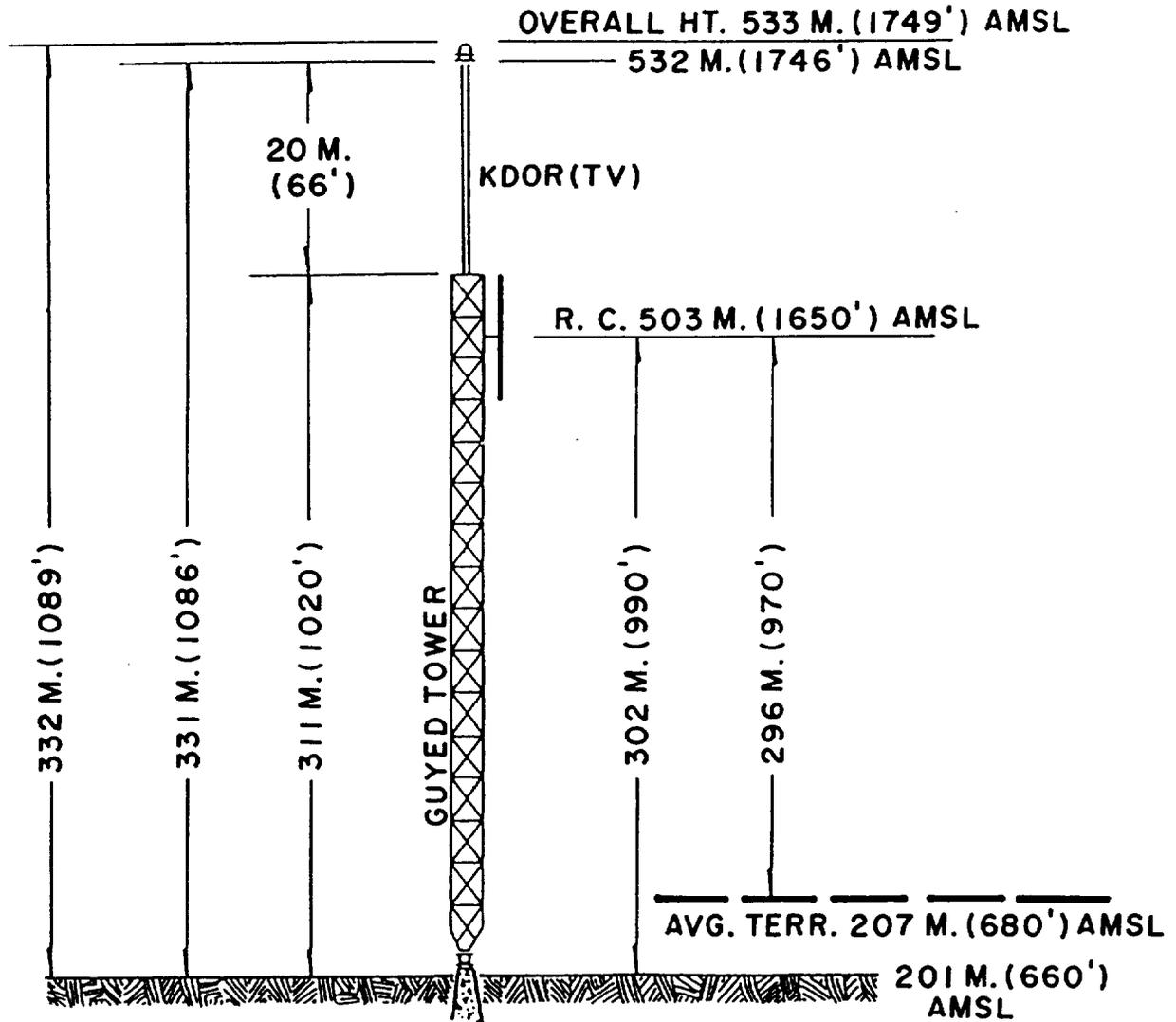
April 27, 2000

**EXHIBIT B**  
**LOCATION OF PROPOSED SITE**  
**PROPOSED KDOR-DT ALLOTMENT**  
**CHANNEL 32 - BARTLESVILLE, OKLAHOMA**  
**SMITH AND FISHER**



36° 30' 00"

NOT TO SCALE



NOTE: Due to rounding, metric figures may not add precisely.

SITE COORDINATES:

36° 30' 59"

95° 46' 10"

EXHIBIT C

ELEVATION OF ANTENNA STRUCTURE

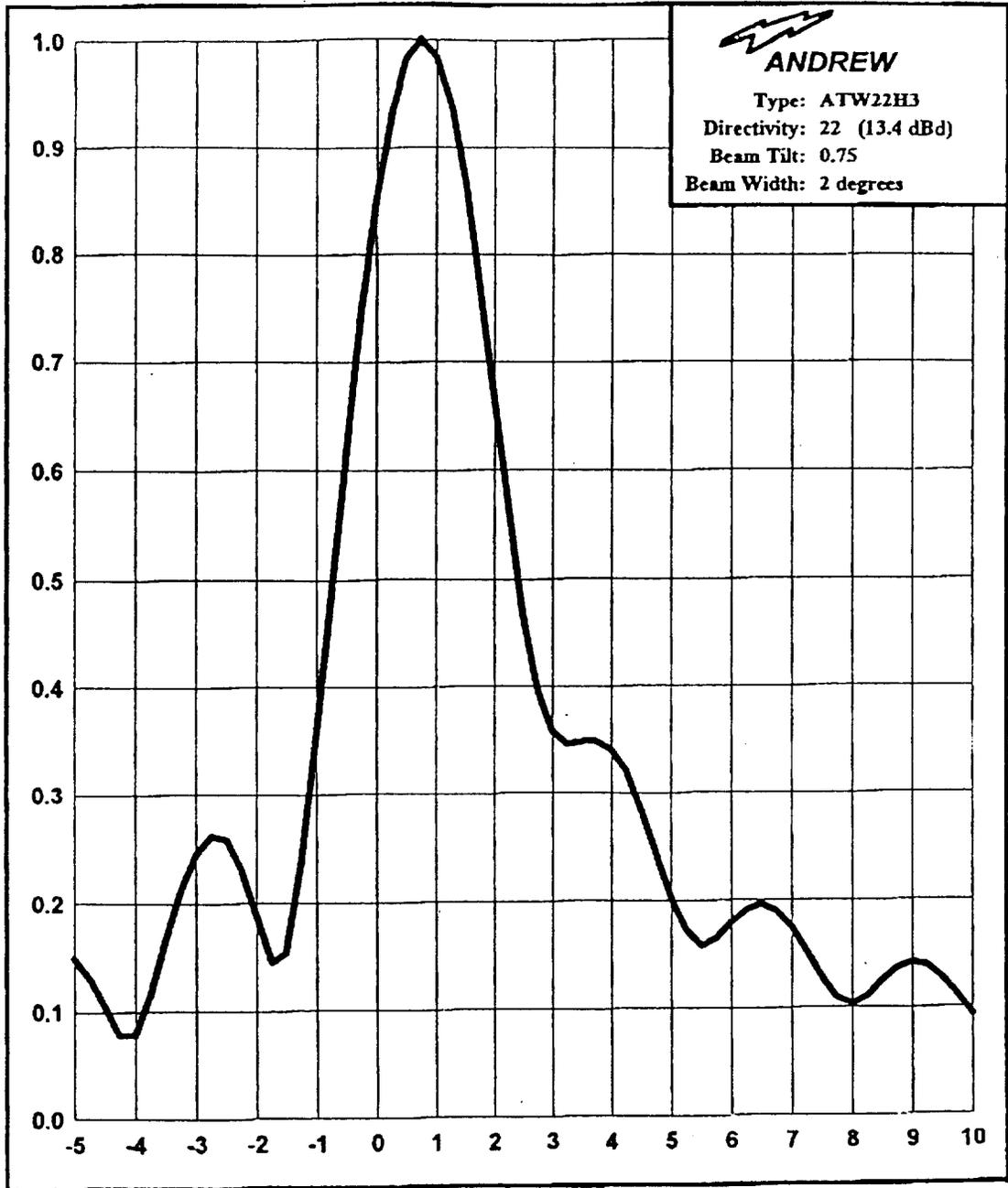
PROPOSED KDOR-DT ALLOTMENT  
CHANNEL 32 - BARTLESVILLE, OKLAHOMA

SMITH AND FISHER

PROPOSED OPERATING PARAMETERS

PROPOSED KDOR-DT ALLOTMENT  
CHANNEL 32 - BARTLESVILLE, OKLAHMA

Channel Number:	32
Zone:	2
Site Coordinates:	36-30-59N 95-46-10W
Antenna Structure Registration Number:	1201051
Tower Site Elevation (AMSL):	201 meters
Overall Tower Height Above Ground:	332 meters
Overall Tower Height Above (AMSL):	533 meters
Effective Antenna Height Above Ground:	302 meters
Effective Antenna Height (AMSL):	503 meters
Average Terrain Elevation (2-10 miles):	207 meters
Effective Antenna Height Above Average Terrain:	296 meters
Antenna Make and Model:	Andrew ATW22H3-HSO
Orientation:	Omnidirectional
Electrical Beam Tilt:	0.75°
Polarization:	Horizontal
Effective Radiated Power (main-Lobe, maximum):	500 kw



**EXHIBIT E**  
**ANTENNA ELEVATION PATTERN**  
**PROPOSED KDOR-DT ALLOTMENT**  
**CHANNEL 32 - BARTLESVILLE, OKLAHOMA**  
**SMITH AND FISHER**

ELEVATION AND CONTOUR DATA  
 PROPOSED KDOR-DT ALLOTMENT  
 CHANNEL 32 - BARTLESVILLE, OKLAHOMA

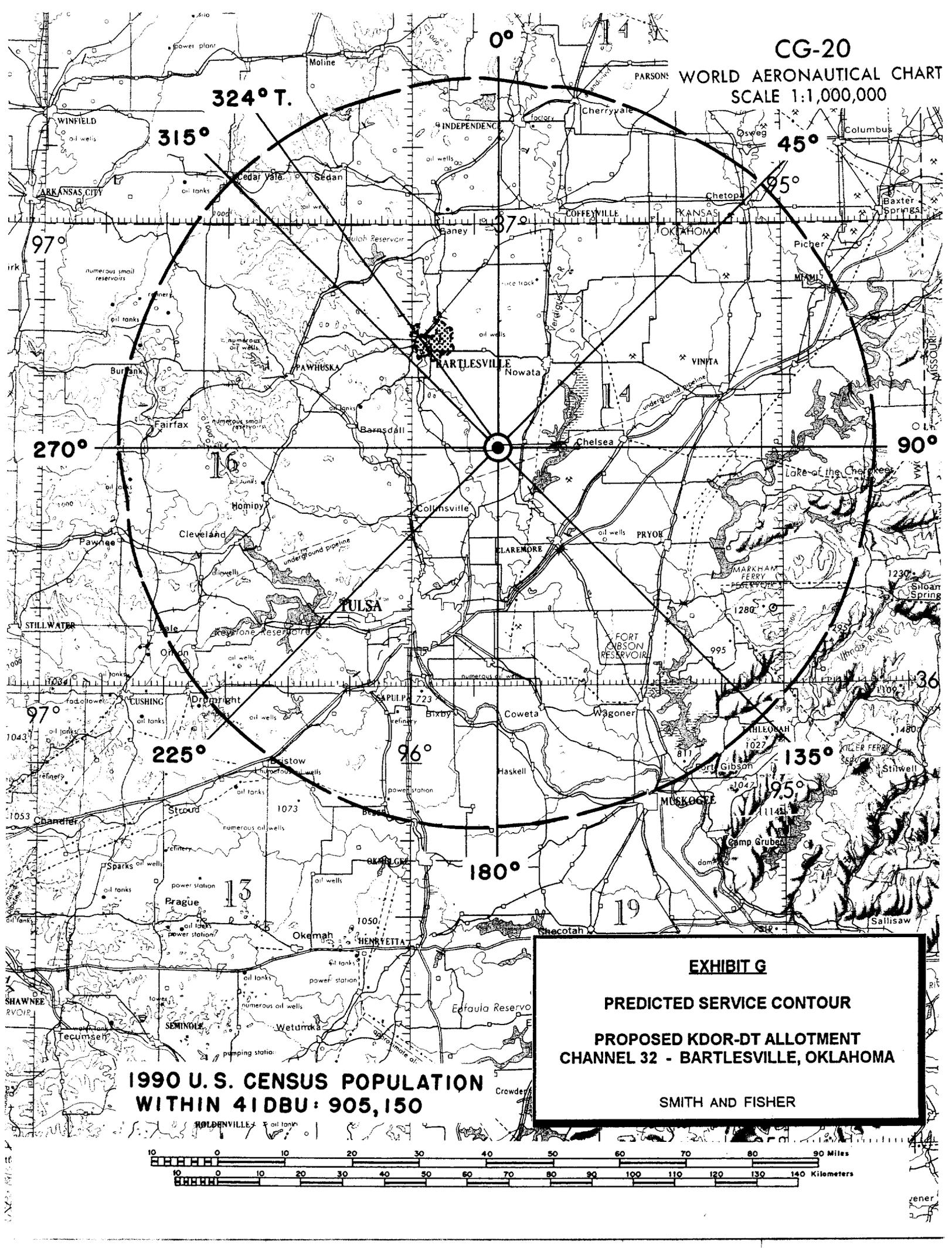
<u>Az.</u> <u>(° T)</u>	<u>Avg. Elv. AMSL</u> <u>2 to 10 Miles</u> <u>meters</u>	<u>Effective</u> <u>Ant. Ht. AAT</u> <u>meters</u>	<u>ERP</u> <u>(dbk)</u>	<u>Distance to Predicted</u> <u>Digital Contour (41 dbu)</u> <u>km.</u>
0	222	281	27.0	88.0
45	215	288	27.0	89.0
90	210	293	27.0	89.7
135	209	294	27.0	89.8
180	199	304	27.0	91.1
225	194	309	27.0	91.7
270	202	301	27.0	90.7
315	208	295	27.0	89.9
324*	205	297	27.0	90.2

*\*Radial through Bartlesville; not included in average.*

Height of radiation center above mean sea level	503 meters
Height of average terrain above mean sea level	207 meters
Height of radiation center above average terrain	296 meters
Effective radiated power, main lobe, maximum	27.0 dbk, 500 kw

Geographic Coordinates

N 36° 30' 59" W 95° 46' 10"



**1990 U. S. CENSUS POPULATION  
WITHIN 41 DBU: 905,150**

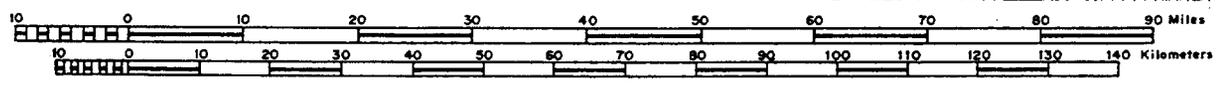
**EXHIBIT G**

**PREDICTED SERVICE CONTOUR**

**PROPOSED KDOR-DT ALLOTMENT**

**CHANNEL 32 - BARTLESVILLE, OKLAHOMA**

**SMITH AND FISHER**



ALLOCATION AND INTERFERENCE STUDY  
PROPOSED KDOR-DT ALLOTMENT  
CHANNEL 32 - BARTLESVILLE, OKLAHOMA

An interference study was conducted using the operating parameters of the facility described herein to determine if it meets the FCC's *de minimis* interference requirements of Section 73.623(c)(2) of the Commission's Rules. Specifically, the proposed facility may not cause more than two percent interference to the service population of a DTV or NTSC facility, nor can its interference contribution result in an excess of 10 percent total DTV interference to the service population of any DTV or NTSC facility.

The service area of a DTV station is defined as that which is calculated using the Longley-Rice propagation model to receive a signal of 41 db $\mu$  or greater and lies within the predicted 41 db $\mu$  contour of the station using the F(50,90) curves, the station's effective radiated power, and 2-10 mile terrain averages along each radial.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by the proposed allotment facility to other pertinent stations are tabulated in Exhibit H-2.

As indicated, the proposed allotment would not contribute more than two percent DTV interference to the service population of any potentially affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within the station's authorized or proposed service area.

Therefore, this proposal meets the FCC's *de minimis* interference standards as defined in Section 73.623(c)(3) of the Commission's Rules.

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KDOR-DT  
CHANNEL 32 - BARTLESVILLE, OKLAHOMA

NTSC FACILITIES

<u>Call Sign</u>	<u>City, State</u>	<u>Ch.</u>	<u>Grade B Population F(50,50)</u>	<u>INTERFERENCE LOSSES (POPULATION)</u>							
				<u>NTSC Only</u>	<u>NTSC &amp; DTV Without KDOR-DT</u>	<u>Unmasked DTV</u>	<u>%<sup>1</sup></u>	<u>NTSC &amp; DTV With KDOR-DT</u>	<u>Unmasked DTV</u>	<u>%<sup>1</sup></u>	<u>KDOR-DT Contribution</u>
-- NONE --											

DTV FACILITIES

<u>Call Sign</u>	<u>City, State</u>	<u>Ch.</u>	<u>NTSC/DTV<sup>3</sup> Grade B Pop. Longley-Rice</u>	<u>INTERFERENCE LOSSES (POPULATION)</u>								
				<u>NTSC Only</u>	<u>NTSC &amp; DTV Without KDOR-DT</u>	<u>Unmasked DTV</u>	<u>%<sup>1</sup></u>	<u>NTSC &amp; DTV With KDOR-DT</u>	<u>Unmasked DTV</u>	<u>%<sup>1</sup></u>	<u>KDOR-DT Contribution</u>	<u>%<sup>2</sup></u>
KOET-DT	Eufaula, OK	31	508,657	313	354	91	< 0.1	5,787	5,474	0.9	5,433	0.9
KETA-DT	Oklahoma City, OK	32	1,298,943	0	211	211	< 0.1	12,428	12,428	1.0	12,217	1.0

<sup>1</sup> Cannot exceed 10% of Grade B Population.

<sup>2</sup> Cannot exceed 2% of Grade Population.

<sup>3</sup> Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.