

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.622(b))
Digital Television Table of Allotments)
Sheridan, Wyoming)

MM Docket No. 99-_____
BPRM-19991028ZJ

To: Chief, Allocations Branch

SUPPLEMENT TO PETITION FOR RULE MAKING

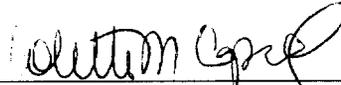
1. On October 28, 1999, Duhamel Broadcasting Enterprises ("Duhamel"), licensee of television station KSGW-TV (NTSC Channel 12), Sheridan, Wyoming, filed with the Commission a Petition for Rule Making (the "Petition") requesting the Commission to amend Section 73.622(b) of its rules to substitute DTV Channel 13 for DTV Channel 21 at Sheridan, Wyoming, as the digital television channel assigned to KSGW-TV.

2. By its undersigned attorneys, Duhamel hereby supplements its Petition to show that the allotment of DTV Channel 13 to Sheridan, Wyoming would not adversely impact any Class A eligible stations. The supporting Technical Narrative is attached as Exhibit A hereto.

3. A copy of this should be associated with the underlying Petition.

Respectfully submitted,

DUHAMEL BROADCASTING ENTERPRISES

By: 
Richard R. Zaragoza
Colette M. Capretz

Its Attorneys

SHAW PITTMAN
2300 N Street, NW
Washington, D.C. 20037-1128

Dated: July 24, 2000

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TECHNICAL STATEMENT
CLASS A IMPACT STUDY
STATION KSGW-DT
(FACILITY ID: 123171)
SHERIDAN, WYOMING
CH 13 50 KW 372 M

Technical Narrative

This Technical Statement has been prepared as a supplement to the KSGW-TV digital rulemaking (BPRM-20000504AAA), Ch. 13 at Sheridan, Wyoming. Specifically, the statement has been prepared to show that the allotment of DTV channel 13 to Sheridan, Wyoming would not adversely impact any Class A eligible stations.

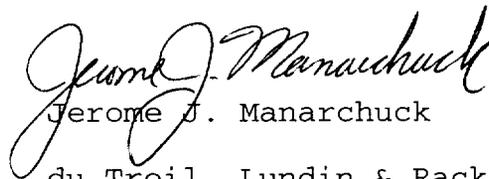
The Federal Communications Commission (FCC) assigned channel 21 as KSGW-TV's DTV allotment in the Memorandum, Opinion and Order (MO&O) concerning reconsideration of the 6th Report and Order in MM Docket No. 87-268. However, station KSGW-DT filed an application to modify its DTV allotment by proposing operation on VHF channel 13. The KSGW-DT digital rulemaking (BPRM-20000504AAA) requests a DTV facility on channel 13 with a non-directional effective radiated power (ERP) of 50 kilowatts and an HAAT of 372 meters.

On June 2, 2000, the FCC issued a Public Notice entitled Certificates of Eligibility for Class A Television Station Status (DA 001224), listing those LPTV stations that are eligible to file an application for Class A status. The list has been examined for potential impact.

The following is a listing of pertinent surrounding LPTV stations eligible to file for Class A status, and the distance from the KSGW-DT site.

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Distance</u>
K12MA	Rexburg, ID	12	399.3
K13LY	Hoback Junction, WY	13	322.0
K13FZ	Jackson, WY	13	320.0

An interference analysis was prepared with respect to each of the stations tabulated above, based on the procedures outlined in the FCC's OET-69 Bulletin. Results of the analysis indicate that no calculated interference is predicted to be caused to any of the above stations.¹ Therefore, it is believed the proposed KSGW-DT channel 13 operation will not adversely impact any Class A eligible stations.



Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237

July 19, 2000

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.