

APR 25 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Amendment of Sections 73.606 and)	RM- _____
73.622 of the Commission's Rules)	
Table of Allotments,)	
Television Stations and)	
Digital Television Stations,)	MM Docket No. _____
)	
Galveston, Texas)	
)	
To: Chief, Video Division)	
Media Bureau)	

PETITION FOR RULE MAKING

Telemundo of Galveston-Houston License Corporation ("Telemundo"), licensee of television broadcast station KTMD, Channel 48, Galveston, Texas, and permittee of digital television station KTMD-DT, Channel 47, by its attorneys and pursuant to Sections 1.401 and 73.623 of the Commission's Rules, hereby petitions the Commission to amend Sections 73.606 and 73.622 of its rules - the Table of Allotments and the Digital Television Table of Allotments - by exchanging KTMD's analog and digital allotments, and to modify the authorization for KTMD to specify operation on NTSC Channel 47 and the authorization for KTMD-DT to specify operation on Channel 48c.

The requested amendments comply with Commission Rules. As noted in the attached Engineering Statement, the exchange of Telemundo's NTSC and DTV allotments would comply with all community coverage and interference requirements. Section 73.623(c)(2) of the Rules provides that a petition to modify a channel allotment included in the initial DTV Table of

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Allotments must demonstrate that the requested change will not result in more than an additional 2 percent of the population served by another station being subject to interference; provided, however, that no new interference may be caused to any station that already experiences interference to 10 percent or more of its population or that would result in a station receiving interference in excess of 10 percent of its population. *See Charleston, South Carolina*, MM Docket No. 01-222 (Chief, Video Services Division Mar. 6, 2002). As demonstrated in the Engineering Statement, the proposed DTV Channel 48 operation is in full compliance with the 2 percent/10 percent interference criteria. Moreover, the proposed DTV Channel 48 operation is in full compliance with the principal community coverage requirements of Section 73.625(a) of the Commission's Rules.

As further demonstrated in the attached Engineering Statement, the proposed NTSC allotment point for Channel 47 is in full accord with all applicable NTSC spacing requirements, would not cause prohibited interference to any authorized or allotted DTV facility, and operation from the proposed site will provide the required principal community coverage over Galveston based on supplemental coverage calculations previously approved by the Commission in television allotment rulemaking proceedings. *See Clermont, Florida*, 4 FCC Rcd 8320, 8322-8323 (Chief, Allocations Branch 1989), *aff'd*, 5 FCC Rcd 6566 (1990), *aff'd sub nom. Rainbow Broadcasting Co. v. FCC*, 949 F.2d 405 (D.C. Cir. 1991).

The proposed exchange of allotments would also further the public interest. The purpose of the proposed exchange is to permit Telemundo to locate its DTV facilities for KTMD-DT at the Houston-area antenna farm near Missouri City, Texas. Co-location at the Houston antenna farm would place the digital facilities for KTMD-DT at the same location as virtually all other Houston-area television stations. As the Commission has recognized, it is

important to place all digital antennas in virtually the same location because of the highly directional nature of DTV receive antennas.

The exchange of allotments proposed in this Petition will also facilitate the ultimate relocation of the NTSC facilities for KTMD to the Missouri City antenna farm. Location at the Missouri City antenna farm would enable Telemundo to provide improved service to residents of its current service area and to expand the area in which it provides service. This is particularly true with regard to KTMD'S Hispanic viewers, because the proposed move to the Missouri City site will eliminate antenna pointing losses and other interference effects that currently affect certain predominantly Hispanic communities in the Houston area. Indeed, viewer reports of poor reception or no reception of KTMD's signal have been confirmed by a measurement and picture quality survey.*

The proposed exchange will therefore result in a preferential arrangement of allotments. As explained above, the proposed exchange will allow KTMD-DT to provide improved and expanded service, especially to its core Latino audience, and will also ultimately permit Telemundo to locate its analog KTMD facilities at the Houston-area antenna farm with virtually all other Houston-area stations. Accordingly, Telemundo respectfully requests that the Commission accept this Petition for Rule Making, issue a Notice of Proposed Rule Making proposing the requested change, and after requisite notice and comment, amend the NTSC Table of Allotments and Digital TV Table of Allotments as follows:

* The Missouri City site would be short-spaced. Therefore, this Petition proposes a fully-spaced NTSC allotment for Channel 47. Telemundo is confident, however, that it will be able to obtain authorization to relocate the NTSC Channel 47 facilities for KTMD to the Missouri City antenna farm because all of the short-spacings are fully consistent with Commission precedent.

NTSC Table of Allotments

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Galveston, TX	*22, 48	*22, 47

Digital TV Table of Allotments

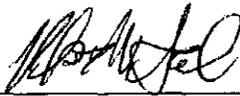
<u>City</u>	<u>Present</u>	<u>Proposed</u>
Galveston, TX	*23c, 47	*23c, 48c

Telemundo also requests that the Commission modify the authorizations for KTMD and KTMD-DT to specify operation on Channels 47 and 48c, respectively. Telemundo commits to file applications to specify the channels proposed herein. For the Commission's convenience, a draft Notice of Proposed Rule Making is attached.

Respectfully submitted,

TELEMUNDO OF GALVESTON-HOUSTON
LICENSE CORPORATION

By: _____


Meredith S. Senter, Jr.
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2000 K Street, N.W.
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April 25, 2002

Its Attorneys

**Telemundo of Galveston-Houston
License Corporation**

**Engineering Exhibit
In Support of Petition for Rulemaking
to Amend DTV and NTSC Tables of Allotments
Galveston, Texas**

April 25, 2002

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 **HAMMETT & EDISON, INC.**
CONSULTING ENGINEERS
SAN FRANCISCO

Telemundo of Galveston-Houston License Corporation

Proposal to Exchange NTSC and DTV Channel Allotments for Galveston, Texas

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Telemundo of Galveston-Houston License Corporation ("Telemundo") to prepare an engineering exhibit in support of its petition for rulemaking to amend the DTV and NTSC Tables of Allotments for Galveston, Texas.

Background

Telemundo operates TV Station KTMD, NTSC Channel 48, Galveston, Texas, and has been authorized to construct Station KTMD-DT, DTV Channel 47. In order to facilitate eventual collocation of these two stations at the "antenna farm" site common to most stations in the market, it is proposed to swap these NTSC and DTV channels. The instant proposal considers the substitution of Channel 48 for Channel 47 in the DTV Table of Allotments and of Channel 47 for Channel 48 in the NTSC Table of Allotments.

Proposed Amendments to DTV and NTSC Tables of Allotments

It is proposed to amend Section 73.622(b) of the FCC Rules (the DTV Table of Allotments) at Galveston, Texas, to delete Channel 47 and to add Channel 48c.¹ The proposed allotment on Channel 48 is at the following NAD-27 geographic reference coordinates:

North Latitude: 29° 34' 15"
West Longitude: 95° 30' 37"

This is the site of the 601.3-meter Richland Towers Inc., tower (ASR No. 1064696) near Missouri City, Texas (Fort Bend County).

It is also proposed to amend Section 73.606(b) of the FCC Rules (the NTSC Table of Allotments) at Galveston, Texas, to delete Channel 48 and to add Channel 47, still with zero frequency offset. The proposed allotment on Channel 47 is at the following NAD-27 geographic reference coordinates:

North Latitude: 29° 31' 35"
West Longitude: 94° 28' 34"

¹ Because DTV Channel 48 is upper adjacent to the NTSC Channel 47 allotment, the pilot frequency must be maintained at 5.082138 MHz above the visual carrier of the lower-adjacent NTSC station as required in Section 73.622(g).

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This site is 1.6 kilometers northeast of Gilchrist, Texas (Galveston County), and has been selected to meet the NTSC spacing requirements in the FCC Rules.

Proposed ERP for DTV Allotment

For purposes of the proposed allotment, it is assumed that the DTV station would operate at a height of 592.8 meters above ground (616.2 meters above mean sea level) at the allocation reference coordinates. For the proposed allotment, DTV operation is assumed at the maximum permitted omnidirectionally effective radiated power of 1,000 kilowatts. This ERP exceeds the maximum allowable for the proposed antenna height, as specified in Section 73.622(f)(8)(i). However, Section 73.622(f)(5) permits greater power levels "... up to that needed to provide the same geographic coverage area as the largest station within their market..." In this case, the largest DTV station in the market is Station KPRC-DT, DTV Channel 35, Houston, Texas, which has been licensed to operate omnidirectionally with 1,000 kW ERP.²

The applicable noise-limited service contour for the proposed allotment on Channel D48 is the 41.8 dBu (F50,90); the applicable service contour for KPRC-DT, Channel D35, is the 40.7 dBu. As shown in Figure 1, the service contour of the proposed allotment lies everywhere within the service contour of KPRC-DT. If waiver of 73.622(f)(8)(i) is deemed necessary to permit the requested allotment on Channel D48 at 1,000 kW, such waiver is respectfully requested.

DTV Principal Community Coverage

As calculated in accordance with Section 73.625(b), the proposed allotment places a calculated 48.8 dBu F(50,90) principal community contour over the entire land area and population of Galveston. The map of Figure 2 shows the calculated principal community coverage contour of the proposed allotment.

NTSC Principal Community Coverage

For purposes of the proposed allotment, coverage has been projected from an antenna mounted on a 2,000-foot (609.6-meter) AGL tower at the allotment reference coordinates. The terrain in the vicinity of this portion of the Texas Gulf Coast is exceptionally flat, and it is appropriate in this case to utilize a different terrain roughness factor, Δh , than the nominal value of 50 meters used to develop the field strength charts (Section 73.699, Figures 9-10c). Section 73.684(k)³ states, in

² BLCDT-19991022ABJ

³ A footnote to Section 73.684 states that Sections 73.684(k) and (l) are stayed indefinitely.

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pertinent part that, “[w]here the roughness factor for a particular propagation path is found to depart appreciably from this value [50 meters], a terrain roughness correction (ΔF) should be applied to field strength values along this path as predicted with the use of these charts.” The terrain roughness correction factor is given in Section 73.684(l) as

$$\Delta F = C - 0.03(\Delta h)(1 + f/300)$$

where C is equal to 4.8 dB for all UHF television channels and f is the frequency in MHz of the specific channel. The center frequency of TV Channel 47 is 671 MHz. For each of the eight cardinal azimuths and for the 231.2°T radial through Galveston, the terrain roughness factor, Δh , was calculated using an electronic implementation⁴ of the method prescribed in Section 73.685(k). An illustrative terrain profile from the proposed allotment site toward Galveston is shown in Figure 3. The terrain roughness factors and terrain roughness corrections so calculated were:

<u>Azimuth</u>	<u>Δh</u>	<u>ΔF</u>
0°T	10.0 m	3.8 dB
45	1.0	4.7
90	0.0	4.8
135	0.0	4.8
180	0.0	4.8
225	0.0	4.8
231.2	1.0	4.7
270	0.0	4.8
315	9.0	3.9

The terrain roughness corrections were applied to the field strength contour calculations along each of the nine azimuths to obtain the distance to the Principal Community contour. NTSC operation at the maximum permitted effective radiated power of 5,010 kilowatts, as calculated in accordance with Section 73.614(b)(5), places a calculated F(50,50) 80 dBu principal community contour over all of the land area of Galveston.

For comparison, and in accordance with Section 73.684(f), the 80 dBu Principal Community coverage contour was also calculated using the nominal terrain roughness value. It is found that 91.8% of the land area of Galveston is covered, as determined by use of a polar planimeter over a map of known scale. Of the 57,247 persons (2000 U.S. Census) residing within the Galveston city

⁴ Spot elevations at an interval of 0.1 kilometer were extracted from the USGS 3-second terrain database along each radial, over the range 9.7–49.9 kilometers specified in Section 73.684(h), and analyzed statistically.



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limits, 56,429 (98.6%) are contained within the principal community contour as determined by summing the 2000 U.S. Census Blocks whose centroid coordinates lie within that contour.

The map of Figure 4 shows the calculated population and land area contained within the adjusted and conventionally-calculated principal community contours. It is noted that an alternative propagation model (the Longley-Rice model) also predicts 80 dBu or better service from the proposed allocation reference site to 100% of both the area and population of Galveston.⁵

DTV Allocation Conditions

The proposed allotment on Channel D48 at Galveston complies fully with the requirements specified in Section 73.623(c) with respect to interference to all authorized, proposed, and allotted NTSC, Class A,⁶ and DTV stations. Interference to stations within the applicable culling distances was calculated using the OET-69 method. For purposes of this interference analysis, the existing Channel N48 facilities at Galveston (associated with TV Station KTMD) have been modified to match the proposed allocation on Channel N47, as described above. The existing Channel D47 allotment for KTMD-DT and the associated construction permit and application are, of course, ignored. The results of a complete interference (OET-69) study appear in Figure 5.

We note that small amounts of interference (within the *de minimis* limits) are predicted to three stations, as follows:

1. The proposed KTMD allotment on Channel N47 at Galveston,
2. The licensed and permitted facilities of TV Station KPXB, Channel N49, Conroe, Texas, and
3. The allotted and permitted facilities of DTV Station KSAT-TV, Channel D48, San Antonio.

The amount of predicted interference to the proposed N47 allotment at Galveston is *de minimis* under present FCC policy,⁷ and the applicant has agreed to accept any interference that may result by the proposed D48 allotment. The amount of predicted interference to the licensed and permitted

⁵ Counsel informs us that the Commission has previously approved such supplemental coverage calculations in television allotment rulemaking proceedings. See *Clermont, Florida*, 4 FCC Rcd 8320, 8322-8323 (Chief, Allocations Branch 1989), *aff'd*, 5 FCC Rcd 6566 (1990), *aff'd sub nom. Rainbow Broadcasting Co. v. FCC*, 949 F.2d 405 (D.C. Cir. 1991).

⁶ Although there is contour overlap with an application for construction permit associated with Class A Station KVT-LP, Channel N34, Victoria, Texas, and with the licensed facility of KHPX-LP, Channel N48, Georgetown, Texas, analysis using the method of OET-69 reports zero interference to either station from the proposed allotment on Channel D48. If waiver of Section 73.623(c)(5)(i) is deemed necessary, such waiver is respectfully requested present to Section 73.623(c)(5)(iii). It is noted that Class A Station KHPX-LP holds a construction permit to move to Channel N28.

⁷ "Additional Application Processing Guidelines for Digital Television," FCC Public Notice August 10, 1998.

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KPXB facilities is similarly *de minimis*. The licensee of that station has submitted an application⁷ to construct its Channel 49 facility at the antenna farm site, where it would be nearly collocated with the instant proposed allotment; no interference whatsoever is predicted to the applied-for facilities. The licensee of KPXB has agreed to accept any interference that may result from the proposed D48 allotment.

As shown in Figure 5, the predicted interference to the permitted and allotted facilities of DTV Station KSAT-TV, Channel D48, San Antonio, Texas, is largely "masked" by other authorized facilities, and the unique interference from the proposed allotment amounts to no more than 0.2% of the applicable baseline populations.

NTSC Allocation Conditions

NTSC. The proposed allotment reference site is fully spaced with respect to all existing and proposed full-service NTSC stations, as listed in the table below:

<u>Callsign</u>	<u>Channel</u>	<u>City of License</u>	<u>Status</u>	<u>Required Spacing</u>	<u>Actual Distance</u>
WLAE-TV	32	New Orleans, Louisiana	Lic.	119.9 km	440.5 km
WVLA	33	Baton Rouge, Louisiana	Lic.	95.7	321.4
KHWB	39	Houston, Texas	Lic.	31.4	99.3
WDBD	40	Jackson, Mississippi	CP	95.7	491.5
KPXD	42	Arlington, Texas	App.	31.4	414.5
KEJB	43	El Dorado, Arkansas	CP	41.4	448.2
WGMB	44	Baton Rouge, Louisiana	Lic.	31.4	321.4
KXLN-TV	45	Rosenberg, Texas	Lic.	31.4	99.4
KNCT	46	Belton, Texas	Lic.	87.7	344.0
deleted	47	Victoria, Texas	Allot.	329.0	261.8
WNTZ	48	Natchez, Mississippi	Lic.	87.7	361.5
KPXB	49	Conroe, Texas	App.	31.4	100.4
	50	none within 500 km		31.4	
KNWS-TV	51	Katy, Texas	Lic.	31.4	99.4
KFWD	52	Fort Worth, Texas	Lic.	31.4	414.5
KNVA	54	Austin, Texas	Lic.	95.7	332.9
KTBU	55	Conroe, Texas	App.	31.4	100.3
KZJL	61	Houston, Texas	Lic.	95.7	99.4
KAKW	62	Killeen, Texas	Lic.	119.9	338.1

⁷ FCC File No. BMPCT-20020107AAJ.

Telemundo of Galveston-Houston License Corporation

Proposal to Exchange NTSC and DTV Channel Allotments for Galveston, Texas

It is noted that the proposed allotment site is not fully spaced from a Channel 47 allotment at Victoria, Texas. However, the Commission deleted all vacant NTSC allotments not subject to a pending application or rule making proceeding as of September 21, 1996.⁸ Since no such application or petition was timely filed with the Commission, this vacant allotment is ignored. (The existing Channel 48 allotment for KTMD is, of course, also ignored.)

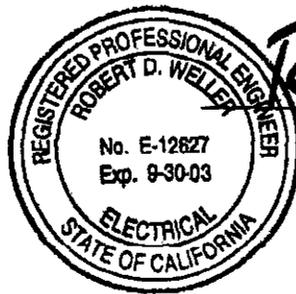
Class A NTSC. The proposed allotment fully protects all existing and proposed Class A NTSC stations. It is noted that the 29 dBu F(50,10) interfering contour of the proposed allocation does overlap the protected 74 dBu F(50,50) contour of K47DW. However, an OET-69 interference study, conducted with respect to Class A Station K47DW, predicted no new interference would be caused to that station by the proposed allotment. If deemed necessary, pursuant to Section 73.613(j), it is requested that interference protection of Class A Station K47DW by the proposed allotment be considered using the OET-69 method.

DTV. Based upon the separation requirements given in Section 73.623(d), the proposed allotment reference site is spaced fully with respect to all allotted, proposed, or authorized DTV stations. Interference to DTV stations within the applicable culling distances was calculated using the OET-69 method. No interference is thus predicted to any allotted, proposed, or authorized DTV station. (The existing Channel 47 DTV allotment for KTMD is, of course, ignored.) A summary of the results of the OET-69 study (including results for the Class A station) is given in Figure 6.

Summary

As discussed above, the proposed substitution of NTSC Channel 47 for Channel 48 in the NTSC Table of Allotments and of DTV Channel 48 for Channel 47 in the DTV Table of Allotments for Galveston, Texas, complies fully with the Commission's rules and policies with respect to spacing and interference.

April 25, 2002



Robert D. Weller
Robert D. Weller, P.E.

⁸ Sixth Report and Order, MM Docket 87-268, Released April 21, 1999, at paragraph 112.

Affidavit

State of California |
County of Sonoma | ss:

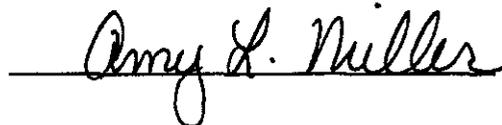
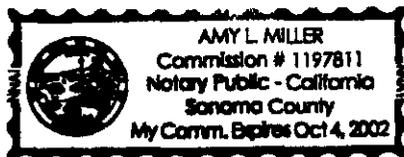
Robert D. Weller, being first duly sworn upon oath, deposes and says:

1. That he is a qualified Registered Professional Engineer, holds California Registration No. E-12627 which expires September 30, 2003, and is employed by the firm of Hammett & Edison, Inc., Consulting Engineers, with offices located near the city of San Francisco, California,
2. That he graduated from The University of California, Berkeley, in 1984, with a Bachelor of Science degree in Electrical Engineering and Computer Science, was an electronics engineer with the Federal Communications Commission from 1984 to 1993, with specialization in the areas of FM and television broadcast stations, cable television systems and satellite systems, and has been associated with the firm of Hammett & Edison, Inc., since June 1993,
3. That the firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Telemundo of Galveston-Houston License Corporation ("Telemundo") to prepare an engineering exhibit in support of its petition for rulemaking to amend the DTV and NTSC Tables of Allotments for Galveston, Texas,
4. That he has carried out such engineering work and that the results thereof are attached hereto and form a part of this affidavit, and
5. That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge except such statements made therein on information and belief and, as to such statements, he believes them to be true.



Robert D. Weller, P.E.

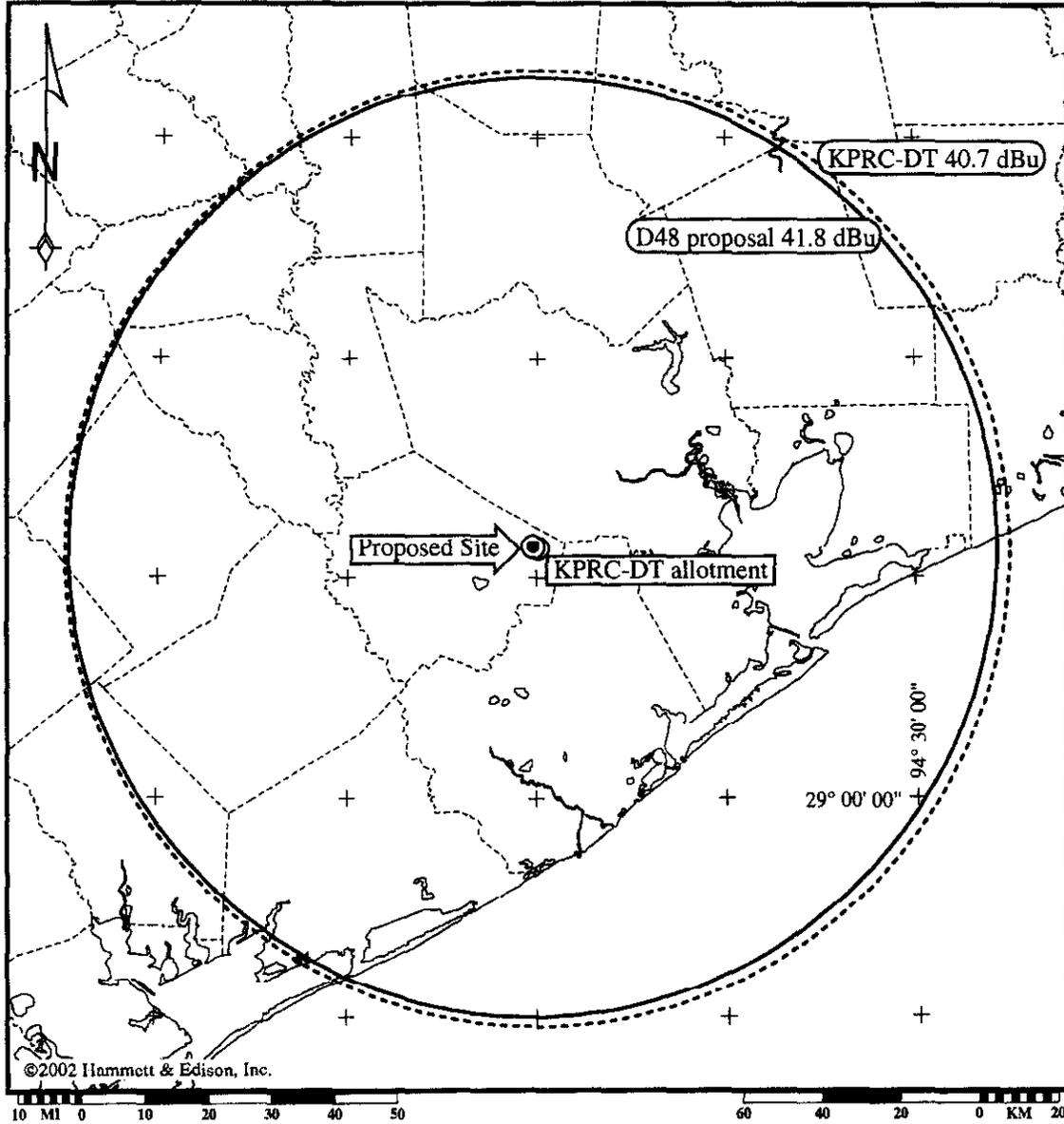
Subscribed and sworn to before me this 25th day of April, 2002



Telemundo of Galveston-Houston License Corporation

Proposal to Allot DTV Channel 48 to Galveston, Texas

Calculated Noise-Limited Service Contours of Proposed Allotment
and of Largest Station in Market (allotment for KPRC-DT, Channel D35, Houston)

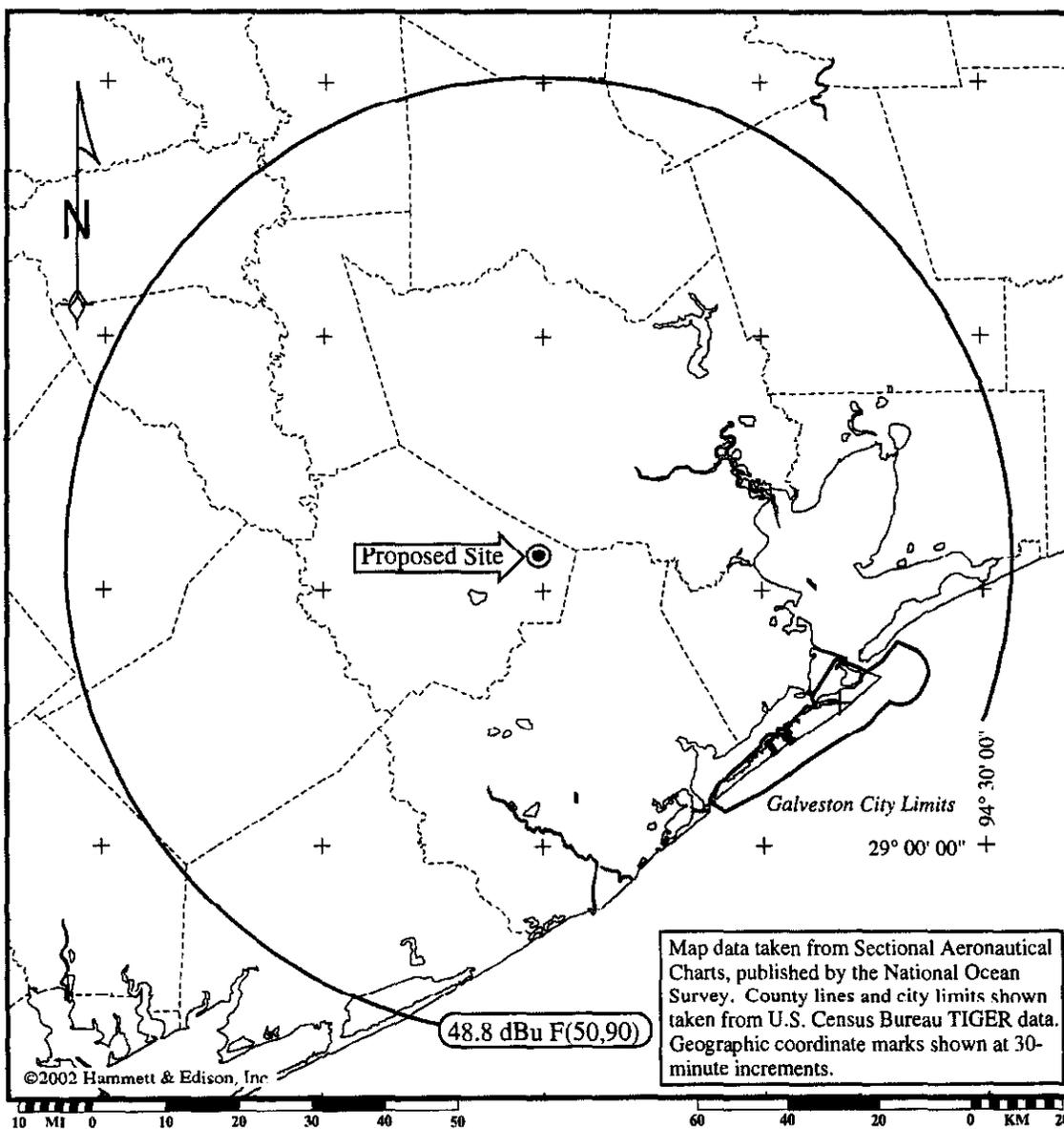


Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. County lines shown taken from U.S. Census Bureau TIGER data. Geographic coordinate marks shown at 30-minute increments.

Telemundo of Galveston-Houston License Corporation

Proposal to Allot DTV Channel 48 to Galveston, Texas

Calculated Principal Community Coverage from Allotment Reference Site



Telemundo of Galveston-Houston License Corporation
 Proposal to Allot NTSC Channel 47 to Galveston, Texas

Terrain Profile Toward Galveston from Allotment Reference Site

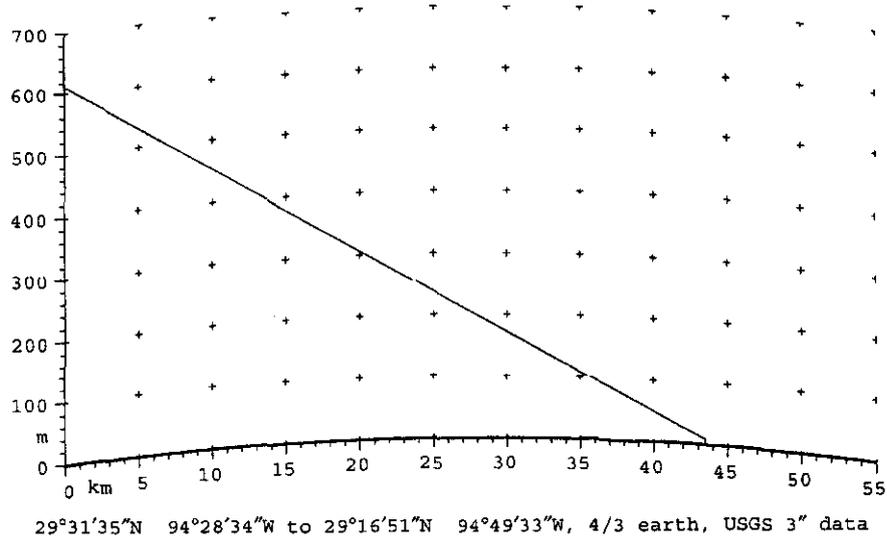


Figure 3A. Terrain profile from 2,000-foot tower at allotment reference site to Galveston reference coordinates at bearing 231.2°T.

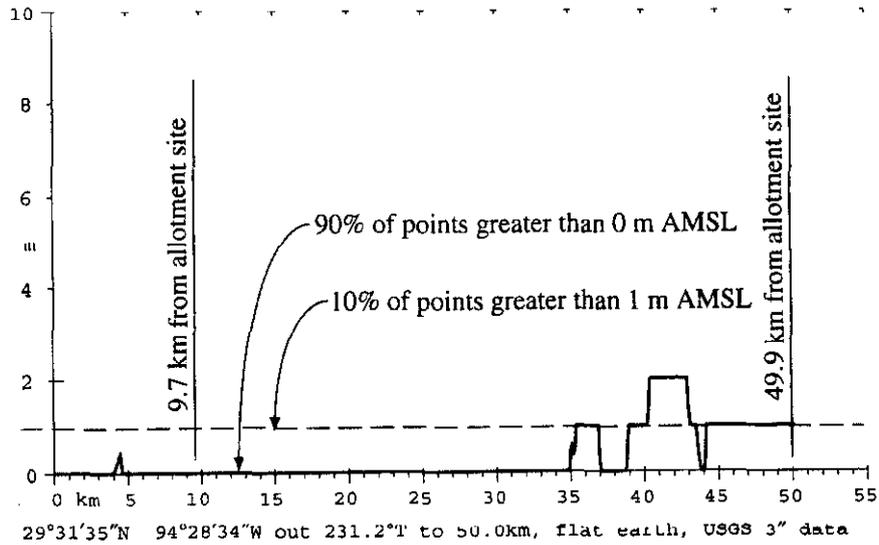
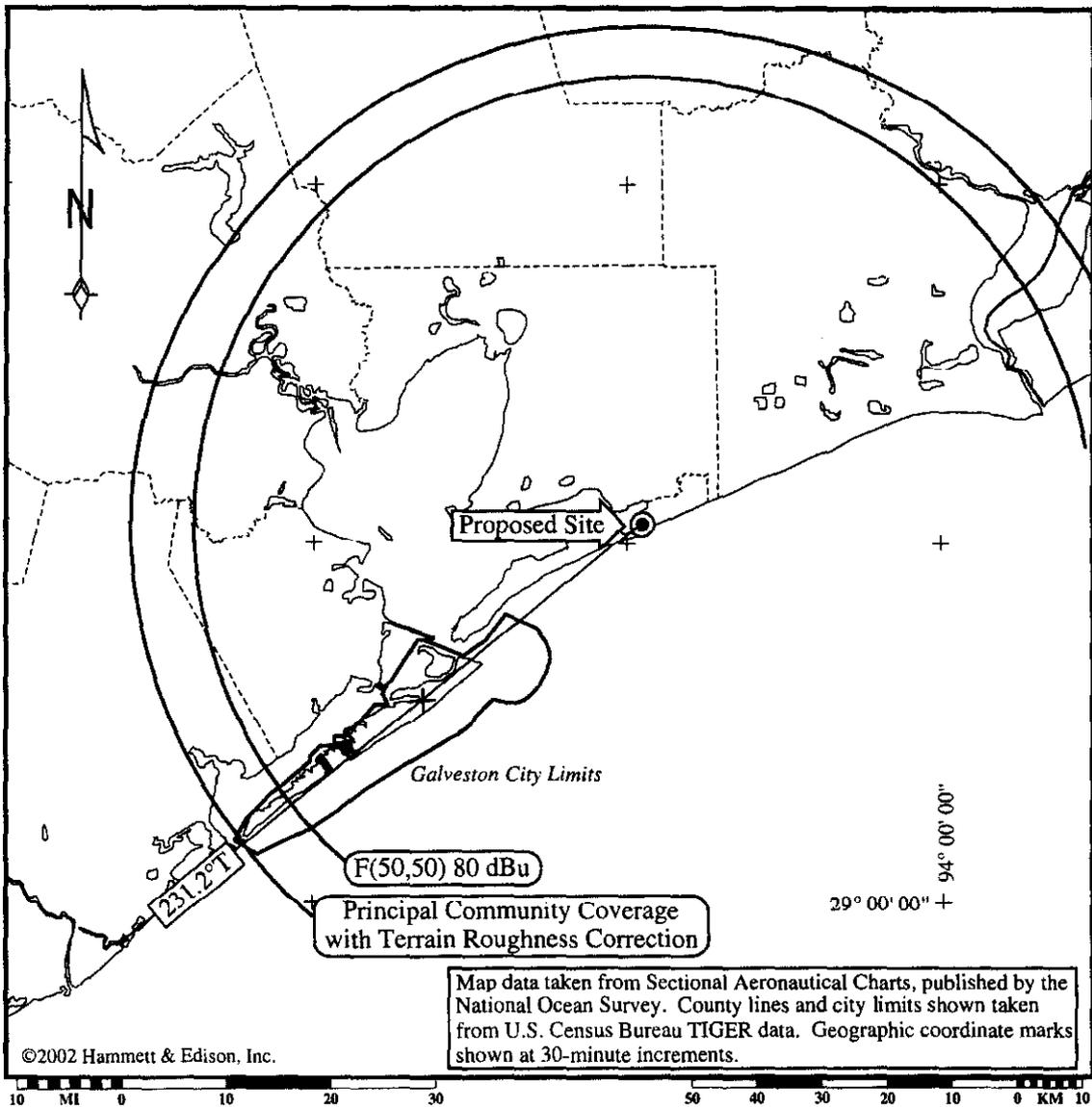


Figure 3B. Terrain used for roughness calculations along 231.2°T radial.

Telemundo of Galveston-Houston License Corporation

Proposal to Allot NTSC Channel 47 to Galveston, Texas

Calculated Principal Community Coverage from Allotment Reference Site



Principal Community Area and Population Coverage
119.5 square kilometers
57,247 persons (2000 U.S. Census)

Telemundo of Galveston-Houston License Corporation
Proposal to Allocate DTV Channel 48 to Galveston, Texas

OET-69 Interference Study

Interference analysis
tvixstudy 2.3.13

Before case parameters:

Station: D47 KTMD CP
City: GALVESTON, TX
Coordinates: N 29-27-56.2
W 95-13-23.2
Height AMSL: 345.3 m
Maximum ERP: 400 kW
Azimuth pattern: AND-29222_ALP16M4-
Orientation: 0.0
Elevation pattern: OET-69 generic
Service level: 41.7 dBu

After case parameters:

	--Modified-----	--Original-----
Station:	D48 KTMDDT allot	D47 KTMDDT allot
City:	GALVESTON, TX	GALVESTON, TX
Coordinates:	N 29-34-15.0 W 95-30-37.0	N 29-27-57.0 W 95-13-23.0
Height AMSL:	616.2 m	369.0 m
Maximum ERP:	1000 kW	168 kW
Azimuth pattern:	omnidirectional	DTV1422 (replication)
Orientation:		0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.8 dBu	41.7 dBu

Summary of protected stations studied:

Protected station	BasePop 1000s	Before		After		
		IX Change 1000s	%Base	IX Change 1000s	%Base	%Chng
N45 KXLN-TV LIC ROSENBERG, TX	3,656	1	0.0	1	0.0	0.0
N45 KXLN-TV CP ROSENBERG, TX	3,818	0	0.0	0	0.0	0.0
N47 KTMD LIC* GALVESTON, TX	3,130	2,754	88.0	25	0.8	-87.2
N47 KTMD APP* GALVESTON, TX	3,125	2,748	87.9	23	0.7	-87.2
N49 KPXB LIC CONROE, TX	3,334	9	0.3	25	0.7	0.4
N49 KPXB CP CONROE, TX	3,635	7	0.2	24	0.7	0.5
N49 KPXB APP CONROE, TX	3,790	3	0.1	3	0.1	0.0
N51 KNWS-TV LIC KATY, TX	3,688	2	0.1	2	0.1	0.0
N55 KTBU LIC CONROE, TX	3,818	10	0.3	10	0.3	0.0
N55 KTBU APP CONROE, TX	3,766	3	0.1	3	0.1	0.0
D48 KSAT-TV CP SAN ANTONIO, TX	1,572	17	1.1	21	1.3	0.2
D48 KSATDT allot SAN ANTONIO, TX	1,572	3	0.2	6	0.4	0.2
D48 KSTR-TV CP IRVING, TX	3,910	-141	-3.6	-141	-3.6	0.0
D48 KSTRDT allot IRVING, TX	3,910	0	0.0	0	0.0	0.0

* Station parameters modified from N48 to N47. See page 4B.

Telemundo of Galveston-Houston License Corporation
Proposal to Allocate DTV Channel 48 to Galveston, Texas
OET-69 Interference Study

Modified station parameters:

--Modified-----	--Original-----
Station: N47 KTMD LIC	N48 KTMD LIC
City: GALVESTON, TX	GALVESTON, TX
Coordinates: N 29-30-34.0	N 29-27-57.0
W 94-30-48.0	W 95-13-23.0
Height AMSL: 611.4 m	369.0 m
Maximum ERP: 5010 kW	4900 kW
Azimuth pattern: omnidirectional	AND-17193_ODD88012
Orientation:	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 64.7 dBu	64.8 dBu

Modified station parameters:

--Modified-----	--Original-----
Station: N47 KTMD APP	N48 KTMD APP
City: GALVESTON, TX	GALVESTON, TX
Coordinates: N 29-30-24.0	N 29-34-15.2
W 94-30-48.0	W 95-30-37.2
Height AMSL: 611.4 m	616.2 m
Maximum ERP: 5010 kW	5010 kW
Azimuth pattern: omnidirectional	AND-41991_ATW26HS4
Orientation:	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 64.7 dBu	64.8 dBu

The modified KTMD facilities shown above match the allotment proposed in the petition for rulemaking to substitute NTSC Channel 47 for Channel 48 in Galveston.

Note:

The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

Telemundo of Galveston-Houston License Corporation
Proposal to Allot NTSC Channel 47 to Galveston, Texas
OET-69 Interference Study

Interference analysis
tvixstudy 2.3.13

Before case parameters:
(same as "Original" below)

After case parameters:

	--Modified-----	--Original-----
Station:	N47z KTMD LIC	N48z KTMD LIC
City:	GALVESTON, TX	GALVESTON, TX
Coordinates:	N 29-30-24.0	N 29-27-57.0
	W 94-30-48.0	W 95-13-23.0
Height AMSL:	611.4 m	369.0 m
Maximum ERP:	5010 kW	4900 kW
Azimuth pattern:	omnidirectional	AND-17193_ODD88012
Orientation:		0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	64.7 dBu	64.8 dBu

Summary of protected stations studied:

Protected station	BasePop 1000s	Before		After		
		IX Change 1000s	%Base	IX Change 1000s	%Base	%Chng
D46 KXLN-TV CP ROSENBERG, TX	3,656	-187	-5.1	-187	-5.1	0.0
D46 KXLNDT allot ROSENBERG, TX	3,656	1	0.0	1	0.0	0.0
D47 KNCT CP BELTON, TX	611	-432	-70.7	-432	-70.7	0.0
D47 KNCTDT allot BELTON, TX	611	3	0.5	3	0.5	0.0
D47 KIIIDT allot CORPUS CHRISTI, TX	490	0	0.0	0	0.0	0.0
N47na K47DW LIC ALEXANDRIA, LA	96	0	0.0	0	0.0	0.0
D48 KTMD CP* GALVESTON, TX	3,461	N/A	--	N/A	--	--
D48 KTMD APP* GALVESTON, TX	3,461	N/A	--	N/A	--	--
D48 KTMDLT allot* GALVESTON, TX	3,461	N/A	--	N/A	--	--

* Station parameters modified from D47 to D48. See page 6B.

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Modified station parameters:

--Modified-----	--Original-----
Station: D48 KTMD CP	D47 KTMD CP
City: GALVESTON, TX	GALVESTON, TX
Coordinates: N 29-27-56.2	N 29-27-56.2
W 95-13-23.2	W 95-13-23.2
Height AMSL: 345.3 m	345.3 m
Maximum ERP: 400 kW	400 kW
Azimuth pattern: AND-29222_ALP16M4-	AND-29222_ALP16M4-
Orientation: 0.0	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 41.8 dBu	41.7 dBu

Modified station parameters:

--Modified-----	--Original-----
Station: D48 KTMD APP	D47 KTMD APP
City: GALVESTON, TX	GALVESTON, TX
Coordinates: N 29-34-15.2	N 29-34-15.2
W 95-30-37.2	W 95-30-37.2
Height AMSL: 616.2 m	616.2 m
Maximum ERP: 430 kW	430 kW
Azimuth pattern: AND-41990_ATW26HS4	AND-41990_ATW26HS4
Orientation: 0.0	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 41.8 dBu	41.7 dBu

Modified station parameters:

--Modified-----	--Original-----
Station: D48 KTMDDT allot	D47 KTMDDT allot
City: GALVESTON, TX	GALVESTON, TX
Coordinates: N 29-27-57.0	N 29-27-57.0
W 95-13-23.0	W 95-13-23.0
Height AMSL: 369.0 m	369.0 m
Maximum ERP: 168 kW	168 kW
Azimuth pattern: omnidirectional	DTV1422 (replication)
Orientation: 0.0	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 41.8 dBu	41.7 dBu

Note:

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