

Engineering Statement  
**CONFLICT RESOLUTION**  
**KTVT-DT FORT WORTH, TEXAS**  
prepared for  
**CBS Stations Group of Texas, L.P. and Gray Television Licensee, Inc.**

This statement has been prepared to provide certain “public interest” data on behalf of *CBS Stations Group of Texas, L.P.* (“*CBS*”) and *Gray Television Licensee, Inc.* (“*Gray*”). *CBS* is the licensee of television station KTVT(TV), Facility ID 23422, Fort Worth, TX. KTVT operates on NTSC (analog) Channel 11 and digital (DTV) Channel 19. In its first-round channel election filing (BFRECT-20050124ACF), *CBS* elected KTVT’s NTSC Channel 11 for final DTV operation.

A letter from the Commission June 7, 2005 advised that the election of Channel 11 would cause interference in excess of 0.1 percent to the election by KXII(TV) (Sherman, TX) of its NTSC Channel 12 and to the election by KWTX(TV) (Waco, TX) of its NTSC Channel 10. *Gray* is the licensee of KXII and KWTX. The Commission’s analysis indicates that 11.6 percent additional interference would be caused to KXII’s elected Channel 12 and 0.3 percent new interference to KWTX’s elected Channel 10. Additionally, the KWTX election of its NTSC Channel 10 would cause 0.5 percent interference to the KTVT Channel 11 election. KXII’s election was without conflict and was tentatively accepted by the Commission (Public Notice of June 23, 2005, DA 05-1743).

An interference acceptance agreement has been developed between these stations in order for the conflicted elections of KTVT and KWTX to proceed. Commission Staff informally advises that material showing that the public interest will be served by an interference agreement should be provided when the agreement involves additional interference of over 2 percent. Accordingly, this statement provides public interest data regarding the acceptance by KXII of 11.6 percent additional interference from KTVT’s election.

A recent FCC Public Notice<sup>1</sup> listed various factors which should be addressed concerning public interest matters. The resulting situation for KXII-DT Channel 12 is summarized in the following.

---

<sup>1</sup> “DTV Channel Election: First Round Conflict Decision Extension and Guidelines for Interference Conflict

Engineering Statement  
**CONFLICT RESOLUTION**  
**KTVT-DT FORT WORTH, TEXAS**  
 (page 2 of 4)

**The amount that the proposal exceeds the 0.1% interference level:**

The proposed KTVT-DT facility as elected will create additional interference to KXII-DT affecting a population of 122,043 persons, which is 11.55 percent of the KXII-DT baseline population of 1,056,585 according to OET Bulletin 69 analysis<sup>2</sup>. The remaining interference-free service population is 934,542 persons. This determination is pursuant the FCC's channel election conflict method, which considers interference from existing NTSC stations regardless of whether the NTSC station will vacate its channel post-transition.

**The cumulative level of interference that would be received by the affected station:**

No other additional interference is contemplated under the agreement with any other station, beyond the 11.55 percent as proposed in the agreement. Considering only the incoming interference from nearby stations based on current channel election results (omitting all NTSC station interference), the interference-free population is 946,157. This is 89.55 percent of the KXII-DT baseline population of 1,056,585, which implies a cumulative interference level of 10.45 percent. The OET Bulletin 69 results are summarized below, including a list of the interfering DTV facilities.

Results for: 12A TX SHERMAN		USERRECORD02	APP
HAAT	540.0 m, ATV ERP	14.4 kW	
		POPULATION	AREA (sq km)
	within Noise Limited Contour	1092782	39391.0
	not affected by terrain losses	1088118	38569.9
	lost to NTSC IX	0	0.0
	lost to additional IX by ATV	141961	232.3
	lost to ATV IX only	141961	232.3
	lost to all IX	141961	232.3
Potential Interfering Stations Included in above Scenario			2
11A OK LAWTON	BMPCDT	20030213AAF	CP
12A AR LITTLE ROCK	BLCDT	20041029AIX	LIC
12A TX COLLEGE STATION	DTVPLN	DTVP0107	PLN
13A OK OKLAHOMA CITY	USERRECORD03		APP
11A TX FORT WORTH	USERRECORD01		APP

(continued)

Analysis, Public Notice, DA 05-2233, August 2, 2005.

<sup>2</sup> FCC 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 standard cell size of 2 km was employed with 2000 Census data. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

Engineering Statement  
**CONFLICT RESOLUTION**  
**KTVT-DT FORT WORTH, TEXAS**  
(page 3 of 4)

**The availability of an in-core digital channel that the licensee could use for digital operations in lieu of its NTSC channel:**

KTVT's DTV Channel 19 is within the core. The proposed use of KTVT's NTSC Channel 11 would make Channel 19 available in the region for another station's subsequent election or future use by new entrants, while permitting *CBS* to employ the transmitting facilities associated with its long-established NTSC Channel 11.

**Where the interference occurs (e.g., whether it is outside the affected station's DMA):**

The attached **Figure 1** depicts the location of the proposed additional interference to KXII-DT Channel 12 attributable to KTVT-DT Channel 11. None of the interference occurs over Sherman, KXII's principal community. All of the interference is beyond KXII-DT's DMA (Sherman, TX – Ada, OK) and within that of the adjacent market (Dallas – Fort Worth, TX DMA). The area of predicted interference is fairly small and located along the edge of KXII-DT's service contour in a densely populated area where the service contour skims along the northern portion of the Dallas – Fort Worth metropolitan area. Since the FCC's interference limit is based upon population, the 0.1% limit is dramatically exceeded in such a case.

**The number of remaining services to the population in the loss area:**

**Figure 1** also depicts the alternate station service contours which overlap the area subject to interference. As shown thereon, 18 other digital television stations will provide service to the KXII-DT interference area. KXII and KTVT are both CBS network affiliates, and KTVT will provide CBS network service to the KXII-DT interference area. The contours are based on the facilities as "certified" by each station on FCC Form 381.

**Any other relevant public interest considerations:**

The proposed KXII-DT Channel 12 service population (considering KTVT-DT's additional interference) of 946,157 greatly exceeds the present interference-free service population achieved by the existing analog KXII Channel 12 facility. As depicted on **Figure 2**, the present analog KXII

Engineering Statement  
**CONFLICT RESOLUTION**  
**KTVT-DT FORT WORTH, TEXAS**  
(page 4 of 4)

Channel 12 facility experiences significant amounts of interference towards Dallas – Fort Worth. The analog KXII facility's interference-free service population is 441,234. Comparing **Figure 1** and **Figure 2**, it is apparent that even with the proposed interference from KTVT's DTV Channel 11, the existing situation of first-adjacent interference between KTVT and KXII would be improved with each station's conversion to DTV as elected on their NTSC channels. Even with interference from KTVT-DT Channel 11, the proposed KXII-DT Channel 12 service population of 946,157 is an increase of 114.4 percent over the present analog facility population of 441,234 (*i.e.*, a 214.4 percent match of the present analog Channel 12 operation).

**Certification**

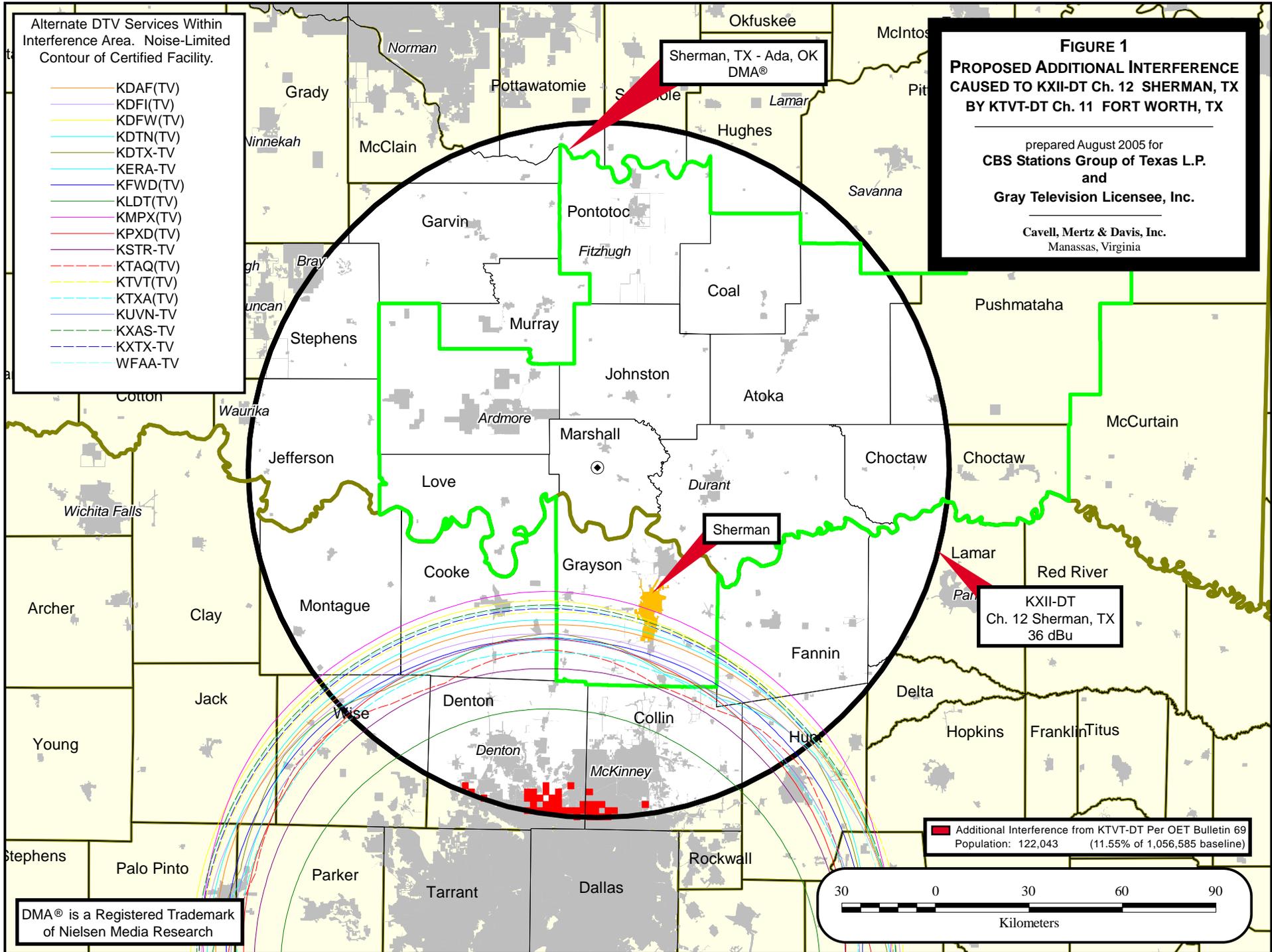
The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Joseph M. Davis, P.E.  
August 11, 2005

Cavell, Mertz & Davis, Inc.  
7838 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

List of Attachments

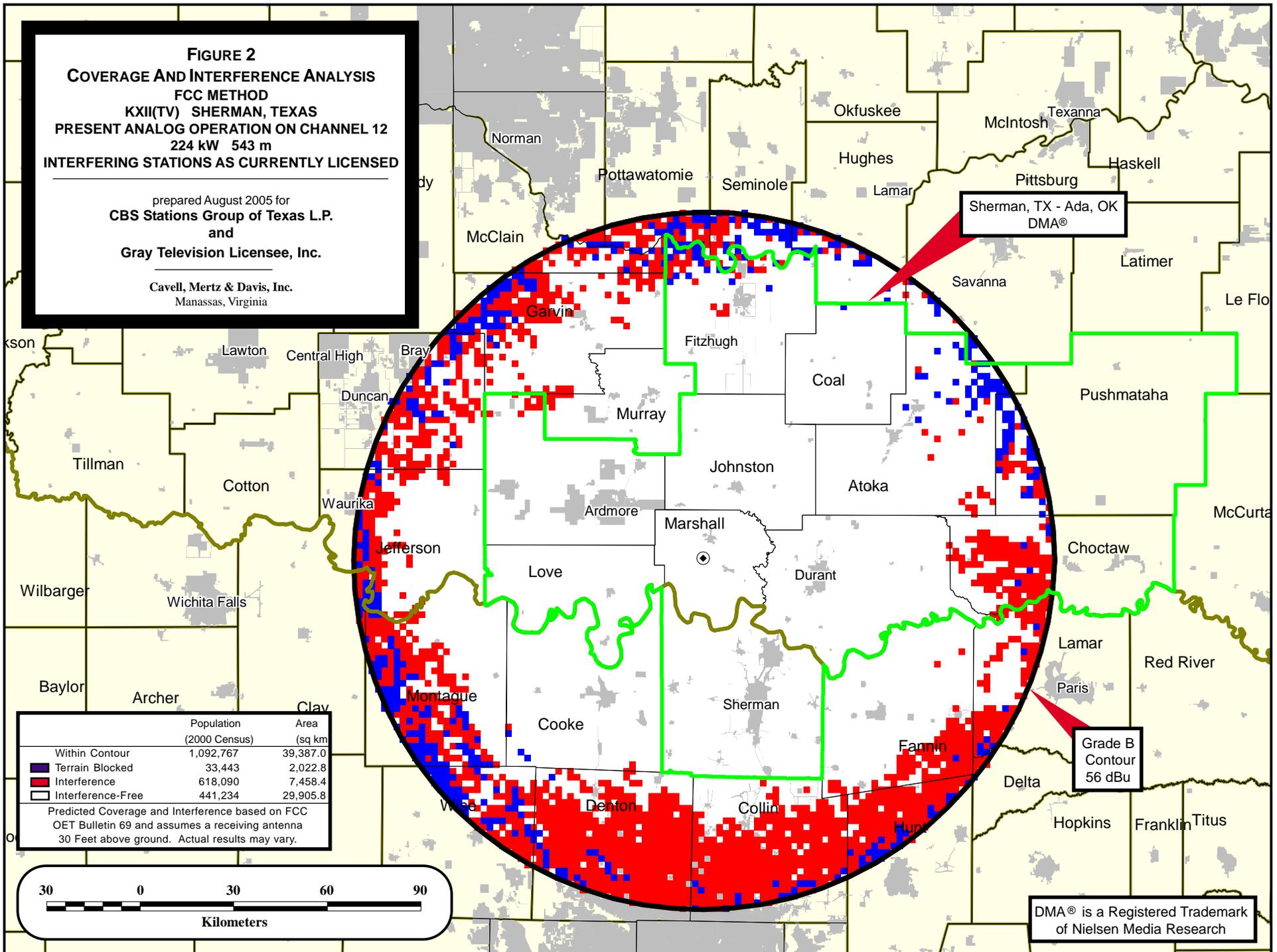
Figure 1      Proposed Additional Interference Caused to KXII-DT  
Figure 2      KXII(TV) Present Analog Operation on Channel 12



**FIGURE 2**  
**COVERAGE AND INTERFERENCE ANALYSIS**  
**FCC METHOD**  
**KXII(TV) SHERMAN, TEXAS**  
**PRESENT ANALOG OPERATION ON CHANNEL 12**  
**224 kW 543 m**  
**INTERFERING STATIONS AS CURRENTLY LICENSED**

prepared August 2005 for  
**CBS Stations Group of Texas L.P.**  
**and**  
**Gray Television Licensee, Inc.**

Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia



Sherman, TX - Ada, OK  
 DMA®

Grade B  
 Contour  
 56 dBu

DMA® is a Registered Trademark  
 of Nielsen Media Research

	Population (2000 Census)	Area (sq km)
Within Contour	1,092,767	39,387.0
Terrain Blocked	33,443	2,022.8
Interference	618,090	7,458.4
Interference-Free	441,234	29,905.8

Predicted Coverage and Interference based on FCC  
 OET Bulletin 69 and assumes a receiving antenna  
 30 Feet above ground. Actual results may vary.

