Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Malara Broadcast Group, licensee of TV Stations KDLH, N03/D33/TCD33, Duluth, MN, and WPTA, N21/D24/TCD24, Fort Wayne, IN, to prepare this engineering exhibit in support of comments to the MB Docket 87-268 Seventh Further Notice of Proposed Rulemaking (Seventh FNPRM) regarding the final Table of Allotments for post-transition DTV operation.

Modifications to the Seventh FNPRM TCD Parameters

Modifications to the Tentative Channel Designations (TCDs) for both KDLH-DT and WPTA-DT are needed, as follows:

KDLH-DT, D33/TCD33, Duluth, MN

KDLH-DT has a pending application for a modified construction permit, FCC File Number BMPCDT-20060519AAE, to relocate that station by 0.7 km and operate into a shared RFS Model RO-16 omnidirectional transmitting antenna with Station KBJR-DT, D19/TCD19, Superior, WI. Because of the August 3, 2004, "Freeze Order," the requested effective radiated power (ERP) had to be reduced from the currently permitted power and height of 505 kW ERP at 608 m AMSL/302 m HAAT, to 381 kW ERP omnidirectional at 618.5 m AMSL/331.9 m HAAT.

In its November 2004 FCC Form 381 Pre-Election Certification Form, NVG-Duluth II, LLC, then the permittee of KDLH-DT, checked Box 1c, replication facilities. Because the KDLH analog operation is a full-power (100 kW ERP) VHF low band TV station, a UHF DTV ERP of more than 1,000 kW would have been required to fully replicate that station's analog coverage; however, because of the 1,000 kW ERP maximum for UHF DTV stations, the KDLH-DT allotment was capped at 1,000 kW. Further, the KDLH-DT construction permit, FCC File Number BPCDT-19991028ADK, was for an ERP of 505 kW omnidirectional at 608 m AMSL/302 m HAAT, rather than 1,000 kW. In order to not extend the KDLH-DT protected contour in the direction of the move to the KBJR tower, and also to offset for the higher center-of-radiation (C.O.R.) height of the proposed KBJR-DT/KDLH-DT shared antenna, the maximum ERP that is possible for KDLH-DT is 381 kW. Therefore, it is requested that the KDLH-DT TCD33 parameters be changed to 46-47-21.3 N, 92-06-50.7 W, NAD27, and an ERP of 381 kW omnidirectional with a C.O.R. of 618.5 m AMSL/306.6 m HAAT. Once the August 2004 Freeze Order is lifted, greater power for KDLH-DT, more closely replicating the KDLH(TV) Grade B coverage area, may be possible.

WPTA-DT, D24/TCD24, Fort Wayne, IN

The TCD24 coordinates are 41-06-07 N, 85-11-04 W, NAD27, whereas the licensed WPTA-DT, D24, coordinates are 41-06-07.9 N, 85-11-04.8 W, NAD27 (FCC File Number BLCDT-20031031AGU). These coordinates were derived from the tower registration, ASR1029441, geographic coordinates. There are no discrepancies in the TDC power of 335 kW ERP or height of 470.0 m AMSL/224.0 m HAAT; these values exactly match the licensed parameters.

Summary

The KDLH-DT TCD33 needs to be changed to reflect the relocation to the nearby KBJR tower, and the ERP needs to be reduced to match the maximum ERP that is possible from the slightly higher KBRJ tower, without violating the August 2004 Freeze Order. The WPTA-DT TCD24 geographic coordinates need to be refined so as to exactly match the ASR coordinates.

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