

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of Advanced Television Systems        )  
and Their Impact upon the                                ) MB Docket No. 87-268  
Existing Television Broadcast Service                )

**COMMENTS OF CBS CORPORATION ON SEVENTH FURTHER NOTICE OF  
PROPOSED RULE MAKING**

CBS Corporation (“CBS”), the ultimate owner of the television stations referred to herein, submits these comments in response to the Commission’s *Seventh Further Notice of Proposed Rulemaking* (the “*Notice*”) <sup>1</sup> in the above docket, in which the Commission proposes a new digital allotment table (the “Proposed DTV Table”) for the post-transition period. For the reasons set forth below, CBS respectfully requests the following changes in the specified parameters of several of its owned stations.

**1. WBBM-TV, Chicago, Illinois.** The licensed WBBM-TV analog facility is on Channel 2 and its digital operation is licensed on Channel 3. In the first round of channel elections, CBS successfully obtained a tentative channel designation (“TCD”) for WBBM-TV on Channel 11, pursuant to a Negotiated Channel Arrangement

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<sup>1</sup> *Seventh Further Notice of Proposed Rulemaking* in MB Docket No. 87-268, *In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, 21 FCC Rcd 12100 (2006).

(“NCA”) with station WTTW(TV).<sup>2</sup> CBS now proposes that WBBM-TV’s channel assignment be changed to Channel 12, with revised technical parameters.

The *Notice* indicates that the Commission will consider requests for alternative channel assignments where a licensee is unable to construct the full, authorized DTV facilities to which it certified on FCC Form 381, because a reduction of facilities is required in order to operate on its preferred channel without causing impermissible interference to another station. *Notice* at ¶ 25. As described below, that is the case as to WBBM-TV.

Thus CBS certified on Form 381<sup>3</sup> that WBBM-TV would be operated after the digital transition with facilities corresponding to those specified in its application to construct “maximized” facilities on Channel 3.<sup>4</sup> However, as shown in the Engineering Statement of Joseph M. Davis attached as Exhibit 1 (“WBBM Engineering Statement”), carrying over the parameters of WBBM-TV’s maximized (and now licensed) facility on Channel 3 to its operation on Channel 11 would require facilities that would cause 10.64 percent additional interference to the adjacent channel TCD of WWTO-TV, La Salle,

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<sup>2</sup> See, File No. BFRECT-20050124AEY.

<sup>3</sup> See, File No. BCERCT-20041101AER.

<sup>4</sup> See, Application for Construction Permit, File No. BPCDT-20040722AAQ. Due to international coordination issues, CBS’s construction permit application had not been granted at the time of certification. Although licensees were generally permitted to certify only authorized facilities, they were allowed to certify maximized facilities based on a construction permit application where international coordination was required prior to grant. See, *Report and Order*, MM Docket 03-15, *In the Matter of Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, 19 FCC Rcd 18279, 18294 (2004); Instructions to FCC Form 381, “Replication/Maximization Certification.” CBS’s application was subsequently granted, and WBBM-DT is now licensed with the maximized facilities that were certified. See, File No. BLCDDT-20050623ABL.

Illinois. Therefore, in order to receive its preferred tentative designation on Channel 11, CBS was required to specify reduced facilities for WBBM-TV, which would provide service to an area substantially smaller than that reached by its maximized Channel 3 facility. WBBM Engineering Statement at 2 and Figure 1.

Changing WBBM-TV's post-transition channel assignment to Channel 12 would allow a substantial increase in ERP (to 13.6 kW) and a corresponding increase in interference-free service population. As shown by the contour comparison map provided in Figure 1 of the WBBM Engineering Statement, the proposed Channel 12 facility contour extends well beyond the current TCD contour, and nearly matches the certified "maximized" contour. The result would be interference-free service to a total of 9,588,359 persons, a 6.9 percent increase over the population that would receive such service from a Channel 11 operation.

The WBBM Engineering Statement also demonstrates that, with the slightly reduced facilities proposed, a post-transition WBBM-TV operation on Channel 12 would not cause more than 0.1 percent new interference to any other station's TCD, and would not cause more than the Commission's 0.5 percent interference limit to any Class A station.<sup>5</sup>

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<sup>5</sup> As set forth in the WBBM Engineering Statement, when a 0.9 km cell size is utilized -- which provides a finer resolution than the Commission's standard 2 km cell size -- an analysis conducted in accordance with OET Bulletin 69 shows that a WBBM-TV operation on Channel 12 would result in 0.4987 percent additional interference to Class A station WOCK-CA. WBBM Engineering Statement at 4. While this is within the Commission's 0.5 percent limit for new interference to Class A stations, we also note that WBBM-TV's present channel assignments are both in the low-VHF band. Thus, the station was among those with two in-core assignments that were afforded special flexibility to seek a more desirable channel in a later round by not making a first round election. *See, Report & Order*, MM Docket No. 03-15, *Second Periodic Review of the Commission's Rules and*

We respectfully submit that by allowing WBBM-TV to nearly duplicate its existing, maximized service area – and thus provide interference-free service to more than 600,000 additional viewers – granting the requested channel change would clearly serve the public interest.

2. **KCBS-TV, Los Angeles, California.** CBS seeks revised technical parameters for KCBS-TV’s operation on Channel 43, its post-transition digital allotment, to correspond to those recently authorized on the same channel for co-owned KCAL-TV, which was assigned Channel 43 as its digital frequency during the transition, but will be returning to its NTSC allotment (Channel 9) after the transition is completed. CBS obtained Channel 43 as a TCD for KCBS-TV pursuant to a negotiated channel arrangement with its sister station in the first round of channel elections.<sup>6</sup>

In its pre-election certification, CBS indicated that KCBS-TV’s permanent DTV facilities would replicate those of its transitional allotment on Channel 60, an out-of-core frequency. However, the parameters necessary to achieve replication of the Channel 60 service area on Channel 43 -- KCBS-TV’s tentatively-designated digital assignment -- would have caused impermissible additional interference (2.16 percent) to the post-transition operation of KWHY-TV, Los Angeles, California, on adjacent Channel 42. *See*, Engineering Statement of Joseph M. Davis attached as Exhibit 2, at 2 (“KCBS Engineering Statement”).

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*Policies Affecting the Conversion To Digital Television*, 19 FCC Rcd 18279, 18297, n.87 (2004).

<sup>6</sup> As noted, KCAL-TV obtained a tentative channel designation on Channel 9, its NTSC frequency.

Accordingly, in March 2005, CBS specified a facility reduction for KCBS-TV on digital Channel 43 to avoid causing over 0.1 percent new interference to the proposed digital operation of KWHY-TV.<sup>7</sup> The parameters specified for that facility reduction corresponded to the parameters of KCAL-TV's licensed operation on Channel 43 during the transition.<sup>8</sup> *See, KCBS Engineering Statement at 2.*

Subsequently, on March 27, 2006, KCAL-DT received a construction permit for a minor modification to authorize operation at 495 kW ERP and 951 meters HAAT.<sup>9</sup> CBS now seeks modification of the parameters assigned to KCBS-TV in the Proposed DTV Table to correspond to those specified in the KCAL construction permit.

In its *Seventh Further Notice*, the Commission recognized that in some cases a station had “constructed or received authorization to construct facilities on its TCD that provide service to areas that extend beyond that to which the station certified using FCC Form 381.” In such cases, the Commission stated, if a licensee could “demonstrate that the area served by its authorized or constructed facilities extends beyond the area to which it certified,” proposals for the modification of the certified facilities to match such authorized or constructed facilities would be entertained. *Notice at ¶ 28.*

In this instance, the requested parameters do *not* extend the service area of the proposed Channel 43 operation beyond that certified by KCBS-TV on FCC Form 381. Rather, the contour of the proposed TCD extends beyond the current TCD as specified in the Proposed DTV Table, but is still *within* the certification contour of KCBS-TV's

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<sup>7</sup> *See, File No. BFRCT-20050303AAH.*

<sup>8</sup> *See, File No. BLCDT-19991119AR0.*

<sup>9</sup> *See, File No. BPCDT-20040730AWC.*

original DTV allotment on Channel 60. *See*, KCBS Engineering Statement at 2 and Figure 1. The case for approving the change in parameters proposed here – which would more nearly duplicate KCBS-TV’s certified service area, but would not exceed it -- is thus even stronger than in the similar situation described by the Commission in the *Notice*. Since an engineering analysis conducted in accordance with OET Bulletin 69 demonstrates that the proposed parameters would not cause new interference in excess of 0.1 percent to any station, and that no change in interference to any Class A station would result,<sup>10</sup> approving the instant proposal would clearly serve the public interest.

**3. KBCW (TV), San Francisco, California.**

CBS also seeks a change in the TCD parameters of KBCW (TV), San Francisco, to conform to those of its currently licensed digital facility.<sup>11</sup> As discussed below, a change in parameters is sought due to CBS’s inadvertent certification of replication rather than maximized facilities.

In the first round of channel elections, CBS successfully elected KBCW’s digital allotment on Channel 45 for the station’s post-transition digital operation.<sup>12</sup> The technical parameters for the current Channel 45 TCD are based upon CBS’s pre-election certification on Form 381,<sup>13</sup> specifying that the station’s post-transition DTV facility would be operated with replication facilities. However, along most azimuths, the

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<sup>10</sup> *See*, KCBS Engineering Statement at 3-4, and Table 1.

<sup>11</sup> KBCW is licensed to San Francisco Television Station KBCW Inc., a wholly-owned subsidiary of CBS. For purposes of convenience, we refer to CBS herein as if it were the licensee of the station.

<sup>12</sup> *See*, File No. BFRECT-20050121AGB.

<sup>13</sup> *See*, File No. BCBRECT-20041028AF1.

contours of the currently licensed digital facilities of KBCW exceed those resulting from the “replication” facilities assigned to the station by the initial DTV Table of Allotments. *See*, Engineering Statement of Joseph M. Davis attached as Exhibit 3, at 1-2 and Figure 1 (“KBCW Engineering Statement”). Accordingly, the station’s licensed operation should properly have been considered a “maximized” facility, and CBS’s certification of replication facilities in its Form 381 filing for KBCW was in error.

As noted above, the Commission stated in the *Notice* that

We are . . . aware that there are cases where a station already has constructed or received authorization to construct facilities on its TCD that provide service to areas that extend beyond that to which the station certified using FCC Form 381. . . . If a licensee can demonstrate that the area served by its authorized or constructed facilities extends beyond the area to which it certified, it may file comments proposing to modify its certified facilities to match its authorized or constructed facilities.

*Notice* at ¶ 28.

A change in technical parameters is thus expressly contemplated by the *Notice* in the circumstances here presented.

An interference study performed in accordance with OET Bulletin 69 shows that the requested KBCW parameters would cause in excess of 0.1 percent new interference only to the digital operation of KQCA, Stockton, California. That station currently receives 0.46 percent interference from KBCW-DT’s presently licensed operation, and would continue to do so after the final transition if KBCW keeps its existing facilities. While it is questionable whether this minimal interference – which KQCA has been receiving since KBCW-DT signed on in 2002 – can be considered “new” interference in any meaningful sense, KQCA has agreed to accept it. *See* Interference Acceptance

Agreement, attached as Exhibit 4. There is accordingly no obstacle to amending the Proposed DTV Table to conform to KBCW's licensed parameters.

**4. WPCW, Jeannette, Pennsylvania.**

Finally, CBS requests a change in the parameters for WPCW, Jeannette, Pennsylvania,<sup>14</sup> to correct an apparent error in the Proposed DTV Table, which specifies the reference coordinates, ERP, HAAT and antenna type assigned to the station in the 1997 DTV Table of Allotments, instead of the parameters approved by the Commission in a recent rulemaking proceeding.

The background is as follows. On February 15, 2006, the Commission released its *Report and Order* amending the DTV Table of Allotments to substitute Channel 49 for Channel 30 as the digital frequency of WPCW (formerly WNPA), and reallocating DTV channel 49 from Johnstown, Pennsylvania to Jeannette.<sup>15</sup> (A copy of the *Report and Order* is attached as Exhibit 5.) In so doing, the Commission also approved new technical parameters for the station's digital operation, including changes in its transmitter site, power, antenna height, and antenna type (directional to non-directional), all of which had been requested on behalf of the station in an amended petition for rulemaking filed by WPCW's then-licensee on August 14, 2001. (*See, Amended*

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<sup>14</sup> The licensee of the station is Pittsburgh Television Station WPCW Inc., a wholly owned subsidiary of CBS. Once again, for convenience we refer to CBS as if it were the licensee of the station.

<sup>15</sup> *See, Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Johnstown and Jeanette, Pennsylvania)*, MB Docket No. 05-52, 21 FCC Rcd 1350 (released February 15, 2006) (the "*Report and Order*"). A petition for reconsideration of the *Report and Order*, filed by the licensee of Class A television station WLLS-CA, is currently pending.

Petition for Proposed Rulemaking of Paramount Stations Group of Pittsburgh Inc, Engineering Statement at 3, attached hereto as Exhibit 6.) Thus the Commission's *Report and Order* in the rulemaking proceeding stated:

DTV channel 49 can be allotted to Jeannette in compliance with the principle [sic] community coverage requirement of Section 73.625(a) at coordinates 40-23-34 N. and 79-46-54 W. . . . In addition, we find that this channel is acceptable under the 2 percent criterion for *de minimis* impact that is applied in evaluating requests for modification of initial DTV allotments . . . with the following specifications:

<u>DTV State &amp; City</u>	<u>Channel</u>	<u>DTV power (kW)</u>	<u>Antenna HAAT (m)</u>	<u>DTV Service Pop. (thous.)</u>
PA Jeannette	49	437	301	2851

The parameters approved in the *Report and Order* are nearly identical to those given for WPCW-DT in the Commission's data base.<sup>16</sup> (See Exhibit 7 attached.) However, while taking account of the channel change granted by the *Report and Order*, the Proposed DTV Table lists the same technical parameters for WPCW's post-transition digital operation as the ones assigned to the station by the 1997 DTV Table of Allotments.<sup>17</sup> (The relevant page of the Proposed DTV Table is attached as Exhibit 8; relevant pages of the 1997 DTV Table of Allotments are attached as Exhibit 9). With

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<sup>16</sup> Small discrepancies between the ERP and HAAT specified in the *Report and Order* and those found in the data base are due to the slightly different parameters requested in CBS's application for construction permit. See, File No. BPCDT-20060510AA

<sup>17</sup> See, *Sixth Report and Order*, MM Docket 87-268, *In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, 12 FCC Rcd 14588, Appendix B (1997). The greater power assigned to WPCW in the Proposed DTV Table is accounted for by the change in the station's digital assignment to a higher UHF Channel.

these parameters, the Proposed DTV Table shows WPCW-DT as receiving 22.4 percent interference from other stations.

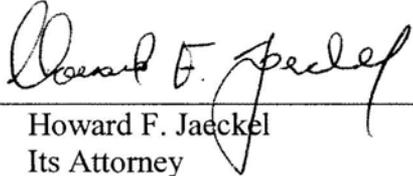
Obviously, a transcription error has occurred and must be corrected. CBS respectfully requests that the Proposed DTV Table be amended to conform to the *Report and Order*, specifying WPCW-DT's reference coordinates as 40° 10' 52.00" N Latitude, 79° 07' 46.00" W Longitude, operating with a non-directional antenna at an ERP of 437 kW and HAAT of 301 meters.<sup>18</sup>

### **CONCLUSION**

For these reasons, CBS respectfully requests that the channel change requested for WBBM-TV, and the changes in technical parameters sought for KCBS-TV, KBCW and WPCW, be granted.

Respectfully submitted,

**CBS CORPORATION**

By:   
Howard F. Jaeckel  
Its Attorney

51 West 52<sup>nd</sup> Street  
New York, New York 10019  
January 25, 2007

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<sup>18</sup> We note in this connection that at least 18 stations have received a change in digital channel during the transition that expanded coverage beyond their original replication areas as certified on FCC Form 381, and received TCD parameters based on the expanded coverage area corresponding to their channel change parameters. Several of these also involved site location changes. A list of these stations is appended as Exhibit 10.

## **Exhibit 1**

**Engineering Statement**  
in support of  
**COMMENTS in MB DOCKET 87-268**  
prepared for  
**CBS Broadcasting Inc.**  
WBBM-TV Chicago, Illinois  
Facility ID 9617

This engineering statement has been prepared on behalf of *CBS Broadcasting Inc.* (“CBS”), licensee of WBBM-TV (Facility ID 9617, Chicago, Illinois), in support of *Comments* being filed in the Seventh Further Notice of Proposed Rulemaking (“FNPRM”), Media Bureau Docket 87-268.<sup>1</sup> The subject docket sets forth a proposed new digital television (“DTV”) allotment table for the post-transition period. A Tentative Channel Designation (“TCD”) is listed in Appendix B of the FNPRM for each eligible television station. *CBS* requests an alternative channel assignment for WBBM-TV.

The FNPRM (§ 25-27) allows qualifying licensees to propose an alternative channel assignment. *CBS* herein proposes that the WBBM-TV TCD be changed from Channel 11 to Channel 12 with revised technical parameters.

**Discussion - Background**

The licensed WBBM-TV analog facility is on Channel 2 (BMLCT-20050729AHG) and its digital operation is licensed on Channel 3 (BLCDT-20050623ABL). *CBS* successfully obtained Channel 11 as a TCD for WBBM-TV in the first round of channel elections pursuant to a Negotiated Channel Arrangement (“NCA”, see BFRECT-20050124AEY) with station WTTW(TV) (NTSC Ch. 11, DTV Ch. 47, Chicago, IL).

*CBS*’s pre-election certification on Form 381 (BCERCT-20041101AER) specified that the post-transition WBBM-TV DTV facility will be operated with facilities corresponding to its Channel 3 DTV Construction Permit (“CP”) application for “maximization” specified in file number BPCDT-20040722AAQ (not granted at the time due to international coordination issues). That CP was subsequently granted and WBBM-TV is now licensed with those maximized facilities (BLCDT-

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<sup>1</sup>*Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 06-150, released October 20, 2006.

## Engineering Statement

(page 2 of 5)

20050623ABL). The certified parameters on Channel 3 involved an effective radiated power (“ERP”) of 4.4 kW at 448 meters antenna height above average terrain (“HAAT”).

Carry-over of the maximization facility parameters to Channel 11 (at the WTTW antenna location) would involve a maximum ERP of 13.6 kW at 497 meters antenna HAAT with a calculated directional pattern to mimic the certified WBBM-TV DTV Channel 3 coverage area. This facility would cause 10.64 percent additional interference to the WWTO-TV TCD on Channel 10 (La Salle, IL). Therefore, in March 2005 CBS specified a facility reduction for WBBM-TV on digital Channel 11 (BFRCT-20050303AAG) to avoid causing over 0.1 percent new interference to WWTO-DT. The WBBM-TV digital Channel 11 facility reduction specified an ERP of 1.18 kW at 497 meters HAAT, which describe the current WBBM-TV TCD.

### **Proposed Alternative Channel Assignment**

CBS proposes herein to employ Channel 12 in lieu of the current TCD Channel 11. This substitution will permit a substantial increase in ERP (to 13.6 kW) and a corresponding increase in interference-free service population. The attached **Figure 1** provides a contour comparison map of the current and proposed WBBM-TV TCD facilities, as well as that of the certified “maximized” WBBM-TV digital Channel 3 facility. The proposed TCD facility contour extends well beyond the current TCD contour and matches the certified “maximized” contour at nearly every azimuth except for a few bearings to the east where a slight facility reduction is taken to avoid causing impermissible interference to WINM(TV) TCD Channel 12 (Angola, IN).

The FNPRM states that an alternative channel assignment may be requested by a station that has received a TCD which included a facility reduction to avoid causing over 0.1 percent interference (§ 25). For the case at hand, the current WBBM-TV Channel 11 TCD involves a substantial facility reduction to avoid causing over 0.1 percent interference. Thus WBBM-TV qualifies for the proposed alternative channel change. A slight facility reduction on Channel 12 is required to comply with the interference limit.

## Engineering Statement

(page 3 of 5)

Technical parameters sought herein are summarized in the attached **Schedule B** (“Tech Box”) of FCC Form 383 (conflict decision facility data).<sup>2</sup> The results of an engineering interference analysis per OET Bulletin 69<sup>3</sup> are supplied in **Table 1**, and demonstrate that interference to any other station’s TCD does not exceed the 0.1 percent limit in compliance with the FNPRM.

The engineering analysis was conducted using the same methodology that the Commission’s staff employed to identify conflicts during the three election rounds, as described in the following text from the FNPRM (§ 21):

“New interference to post-transition DTV operations was defined as interference beyond that caused by existing analog and DTV operations, as set forth in the certification database information. . . . In performing conflict analyses, the staff applied the standard that an interference conflict exists when it was predicted that more than 0.1 percent new interference would be caused to another station.”

It is acknowledged that in seeking the modified parameters, *CBS* will accept interference from any other TCD already approved. The service and interference statistics for the WBBM-TV present Channel 11 TCD and proposed Channel 12 TCD are summarized below. As a matter of public interest, the WBBM-TV post-transition interference-free service population will increase by 6.9 percent to 9,588,359 persons.

	<u>Present TCD 11</u>	<u>Proposed TCD 12</u>
Service Area (sq. km)	22,111.1	34,125.2
Service Population (2000 census)	8,967,576	9,588,359
Interference	2.16 %	0.12 %

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<sup>2</sup> Note that “replication” antenna make and model data, as well as beamtilt information, for the proposed TCD parameters are provided as generic in the Tech Box since final data will be provided at the Construction Permit “application” stage.

<sup>3</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

(page 4 of 5)

### **Class A Station Protection**

The proposed TCD Channel 12 does not involve prohibited contour overlap to any authorized Class A station, except for WOCK-CA (BLTVA-20021125AAU, Ch. 13, Chicago, IL, 2.5 km distant).

An OET Bulletin 69 analysis<sup>4</sup> per §73.623(c) of interference to WOCK-CA was conducted based on the use of a 0.9 km cell size, which provides a finer resolution than the Commission's standard 2 km cell size. Commission processing using a 0.9 km cell size is requested. The results, summarized in **Table 2**, show that the additional interference (0.4987 percent) does not exceed the Commission's 0.5 percent interference limit to Class A station WOCK-CA.

### **Conclusion**

CBS seeks herein to obtain an alternative channel assignment for WBBM-TV. Channel 12 is proposed, with a minor facility reduction. Interference to any other station's TCD does not exceed 0.1 percent, and interference to any Class A station does not exceed 0.5 percent.

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<sup>4</sup>Consistent with Commission policy, 1990 census data was utilized for Class A station interference evaluation. A cell size of 0.9 km was employed.

**Engineering Statement**  
(page 5 of 5)

**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.  
January 24, 2007

Cavell, Mertz & Davis, Inc.  
7839 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

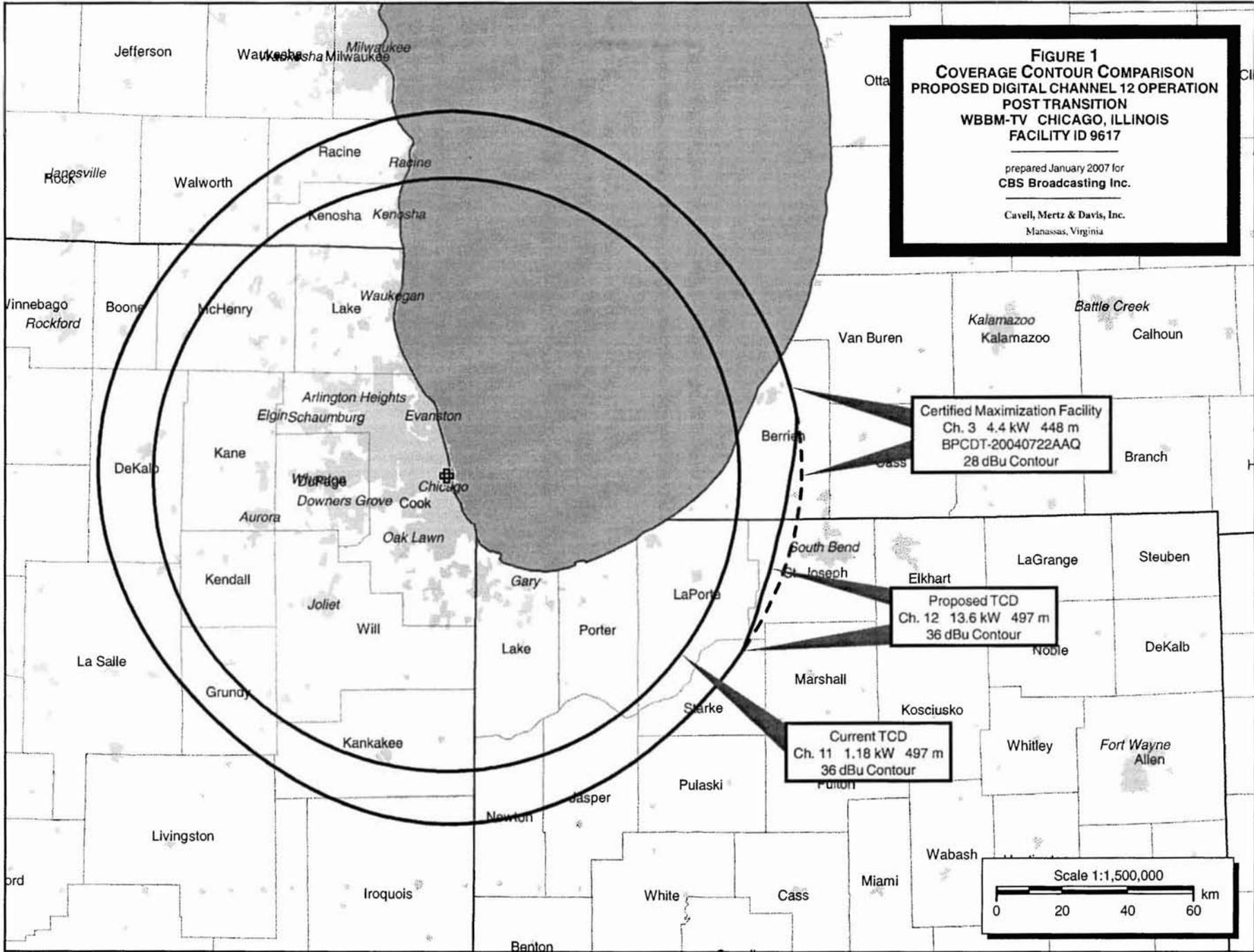
**List of Attachments**

Figure 1	Coverage Contour Comparison
Schedule B	Proposed TCD Facility Technical Parameters
Table 1	Interference Analysis Results Summary
Table 2	Class A Television Station Interference Analysis

**FIGURE 1**  
**COVERAGE CONTOUR COMPARISON**  
**PROPOSED DIGITAL CHANNEL 12 OPERATION**  
**POST TRANSITION**  
**WBBM-TV CHICAGO, ILLINOIS**  
**FACILITY ID 9617**

prepared January 2007 for  
**CBS Broadcasting Inc.**

Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia



# FCC 383

## CONFLICT DECISION FORM SCHEDULE B

### SCHEDULE FOR DTV ENGINEERING DATA

Licenses seeking to resolve an interference conflict by reducing or otherwise modifying facilities must complete this Schedule. The purpose of this Schedule is for licensees/permittees to demonstrate how they will eliminate their interference conflict(s).

#### TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.

#### TECH BOX

1. Channel Number:	<u>12</u>				
2. Zone:	<input checked="" type="checkbox"/> I <input type="checkbox"/> II <input type="checkbox"/> III				
3. Antenna Location Coordinates: (NAD 27)					
	<u>41</u> ° <u>52</u> ' <u>44</u> " <input checked="" type="checkbox"/> N <input type="checkbox"/> S Latitude				
	<u>87</u> ° <u>38</u> ' <u>08</u> " <input type="checkbox"/> E <input checked="" type="checkbox"/> W Longitude				
4. Antenna Structure Registration Number:	<u>1302960</u>				
	<input type="checkbox"/> Not applicable <input type="checkbox"/> FAA Notification Filed with FAA				
5. Antenna Location Site Elevation Above Mean Sea Level:	<u>181.4</u> meters				
6. Overall Tower Height Above Ground Level:	<u>521.1</u> meters				
7. Height of Radiation Center Above Ground Level:	<u>498.6</u> meters				
8. Height of Radiation Center Above Average Terrain:	<u>497</u> meters				
9. Maximum Effective Radiated Power (average power):	<u>13.6</u> kW				
10. Antenna Specifications:					
a.	<table border="1"><tr><td>Manufacturer</td><td>REP</td><td>Model</td><td>Replication WBBM</td></tr></table>	Manufacturer	REP	Model	Replication WBBM
Manufacturer	REP	Model	Replication WBBM		
b. Electrical Beam Tilt:	_____ degrees <input checked="" type="checkbox"/> Not Applicable				
c. Mechanical Beam Tilt:	_____ degrees toward azimuth      _____ degrees True <input checked="" type="checkbox"/> Not Applicable				
	Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. <table border="1"><tr><td>Exhibit No.</td></tr></table>	Exhibit No.			
Exhibit No.					
d. Polarization:	<input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Circular <input type="checkbox"/> Elliptical				

**TECH BOX**

e. Directional Antenna Relative Field Values:  Not applicable (Nondirectional)  
 Rotation: \_\_\_\_\_ °  No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	1.000	60	0.864	120	0.751	180	0.772	240	0.683	300	0.777
10	0.988	70	0.904	130	0.706	190	0.750	250	0.734	310	0.762
20	0.941	80	0.933	140	0.695	200	0.710	260	0.786	320	0.774
30	0.883	90	0.755	150	0.711	210	0.669	270	0.821	330	0.823
40	0.843	100	0.670	160	0.741	220	0.646	280	0.825	340	0.892
50	0.837	110	0.670	170	0.766	230	0.650	290	0.805	350	0.960
Additional Azimuths											

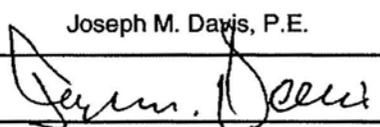
If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.682(a)(14) and 73.685 must be satisfied. **Exhibit required.**

Exhibit No. \_\_\_\_\_

**PREPARER'S CERTIFICATION MUST BE COMPLETED AND SIGNED.**

**PREPARER'S CERTIFICATION**

I certify that I have prepared Schedule B-DTV Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Joseph M. Davis, P.E.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date January 24, 2007	
Mailing Address Cavell, Mertz & Davis, Inc. 7839 Ashton Avenue			
City Manassas		State or Country (if foreign address) Virginia	ZIP Code 20109-2883
Telephone Number (include area code) (703) 392-9090		E-Mail Address (if available) jdavis@cmdconsulting.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
**PROPOSED CHANNEL 12 PARAMETERS**

prepared for  
**CBS Broadcasting Inc.**  
WBBM-TV Chicago, Illinois  
Facility ID 9617

Ch	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Baseline Population	New Interference Population	Percent
11	WLFI-TV DT	LAFAYETTE, IN BMPCDT-20030116ABG	73204	40 23 20 86 36 46	30 214	186.4 152.3	1,804,409	0	0.00%
11	WGVU-TV DT	GRAND RAPIDS, MI BMPEDT-20031024AAN	24784	42 57 35 85 53 45	50 238	186.9 49.3	1,647,055	0	0.00%
11	WMSN-TV DT	MADISON, WI BPCDT-19991101AIM	10221	43 03 21 89 32 06	15 471	203.7 310.7	1,468,470	0	0.00%
12	WINM DT	ANGOLA, IN BLCDT-20021025AAN	67787	41 27 15 84 48 10	16.5 132	240.6 100.4	869,334	907	0.10%
12	KIIN DT	IOWA CITY, IA BDTV-	29095	41 43 15 91 20 30	17.773 439	308.5 268.0	1,093,610	205	0.02%
12	WJRT-TV DT	FLINT, MI BDTV-	21735	43 13 48 84 03 35	13.713 287	329.8 61.6	2,045,175	0	0.00%
12	WKRC-TV DT	CINCINNATI, OH BDTV-	11289	39 06 58 84 30 05	15.551 305	405.8 138.2	2,997,157	0	0.00%
12	WBIJ DT	CRANDON, WI BLCT-20030812AAQ	81503	45 34 23 88 52 57	3.2 119	422.6 346.7	86,517	0	0.00%
13	WREX-TV DT	ROCKFORD, IL BDTV-	73940	42 17 50 89 14 24	5.068 216	140.7 289.9	1,091,116	346	0.03%
13	WZZM-TV DT	GRAND RAPIDS, MI BDTV-	49713	43 18 34 85 54 44	15.128 305	212.7 41.0	1,370,298	0	0.00%

Table 2  
**CLASS A TELEVISION STATIONS INTERFERENCE ANALYSIS**

prepared for  
**CBS Broadcasting Inc.**  
WBBM-TV Chicago, Illinois  
Facility ID 9617

WBBMD12 USERRECORD-01 CHICAGO IL US  
Channel 12 ERP 13.6 kW HAAT 500. m RCAMSL 00680 m  
Latitude 041-52-44 Longitude 0087-38-08  
Status APP Zone 1 Border  
Dir Antenna Make usr Model WBBM-D12notch Beam tilt N Ref Azimuth 0.

1990 Census  
Cell Size for Service Analysis 0.9 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km

Before Analysis

Results for: 13N IL CHICAGO	BLTVA	20021125AAU	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	2710652	1336.5	
not affected by terrain losses	2710652	1336.5	
lost to NTSC IX	598680	280.8	
lost to additional IX by ATV	0	0.0	
lost to all IX	598680	280.8	

Potential Interfering Stations Included in above Scenario 1

13N IL ROCKFORD	BLCT	1372	LIC
13N IN INDIANAPOLIS	BLCT	19840626KE	LIC

After Analysis

Results for: 13N IL CHICAGO	BLTVA	20021125AAU	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	2710652	1336.5	
not affected by terrain losses	2710652	1336.5	
lost to NTSC IX	598680	280.8	
lost to additional IX by ATV	13491	11.2	
lost to all IX	612171	292.0	

Potential Interfering Stations Included in above Scenario 1

13N IL ROCKFORD	BLCT	1372	LIC
13N IN INDIANAPOLIS	BLCT	19840626KE	LIC
12A IL CHICAGO	USERRECORD01		APP

Percent new IX = 0.4977%

## **Exhibit 2**

**Engineering Statement**  
in support of  
**COMMENTS in MB DOCKET 87-268**  
prepared for  
**CBS Broadcasting Inc.**  
KCBS-TV Los Angeles, California  
Facility ID 9628

This engineering statement has been prepared on behalf of *CBS Broadcasting Inc.* (“*CBS*”), licensee of KCBS-TV (Facility ID 9628, Los Angeles, CA), in support of *Comments* being filed in the Seventh Further Notice of Proposed Rulemaking (“FNPRM”), Media Bureau Docket 87-268.<sup>1</sup> The subject docket sets forth a proposed new digital television (“DTV”) allotment table for the post-transition period. A Tentative Channel Designation (“TCD”) is listed in Appendix B of the FNPRM for each eligible television station. *CBS* requests herein that alternative technical parameters be employed for the KCBS-TV TCD.

The FNPRM (§ 28-29) allows qualifying licensees to propose a change in their certified technical parameters. *CBS* herein proposes that revised parameters which have recently been authorized be employed in place of the current technical parameters for KCBS-TV’s TCD.

**Discussion - Background**

The licensed KCBS-TV analog facility is on Channel 2 (BLCT-19980420KG) and its digital operation is licensed on Channel 60 (BLCDT-19981109KE). The present digital channel is not within the core (Ch. 2-51). *CBS* successfully obtained Channel 43 as a TCD for KCBS-TV in the first round of channel elections pursuant to a Negotiated Channel Arrangement (“NCA”, see BFRECT-20050124ADK) with commonly-owned station KCAL-TV (NTSC Ch. 9, DTV Ch. 43, Los Angeles, CA).

*CBS*’s pre-election certification on Form 381 (BCERCT-20041101AEK) specified that the post-transition KCBS-TV DTV facility should be based on its originally allotted Channel 60 replication facilities. The replication parameters on Channel 60 involved an effective radiated power (“ERP”) of 865.9 kW at 1107 meters antenna height above average terrain (“HAAT”). However, use

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<sup>1</sup>*Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 06-150, released October 20, 2006.

## Engineering Statement

(page 2 of 4)

of the replication facility parameters on Channel 43 (at 646.2 kW considering the required dipole factor adjustment) would cause 2.16 percent additional interference to the KWHY-TV's TCD Channel 42 (Los Angeles, CA). Therefore, in March 2005 *CBS* specified a facility reduction for KCBS-TV on digital Channel 43 (BFRCCCT-20050303AAH) to avoid causing over 0.1 percent new interference to KWHY-DT.

The parameters supplied in the KCBS-TV digital Channel 43 facility reduction correspond to the licensed KCAL-DT parameters, at 300 kW ERP at 947 meters HAAT (see KCAL-TV license file number BLCDDT-19991119ARO). Accordingly, the current TCD for KCBS-TV specifies Channel 43 at 300 kW ERP and 947 meters HAAT. More recently, on March 27, 2006, a Construction Permit ("CP", BPCDDT-20040730AWC) was granted for a minor modification to the KCAL-DT facility to authorize operation at 495 kW ERP and 951 meters HAAT.

### **Proposed Change in Certified Facilities**

*CBS* proposes herein to modify the KCBS-TV Channel 43 TCD parameters to correspond to the 495 kW / 951 m KCAL-DT construction permit. The attached **Figure 1** provides a contour comparison map of the current and proposed KCBS-TV TCD facilities, as well as that of the certified "replication" KCBS-TV Channel 60 facility. The proposed TCD facility contour extends beyond the current TCD contour but does not exceed the certified "replication" contour at any point. Under the instant proposal, KCBS-TV's TCD would still be based on a facility reduction from full replication, however the proposed TCD would operate with increased ERP and HAAT from the current values.

The FNPRM states that a change in certified facilities may be sought by those stations who have received authorization to extend their service beyond their certified areas (§ 28-29). Additionally, stations may seek an alternative channel assignment if that station has received a TCD that included a facility reduction to avoid causing over 0.1 percent interference (§ 25). For the case at hand, KCBS-TV's Channel 43 TCD (resulting from an NCA) was based on the licensed KCAL-DT Channel 43 facility, and KCAL-DT has subsequently received authorization to extend service beyond the area that existing when the NCA was approved. The current KCBS-TV TCD (as

## Engineering Statement

(page 3 of 4)

well as the proposed change) involves a facility reduction to avoid causing over 0.1 percent interference to KWHY-DT. Thus it is believed that KCBS-TV qualifies for the proposed change in parameters of its TCD. No change in channel is sought.

Technical parameters sought herein are summarized in the attached **Schedule B** (“Tech Box”) of FCC Form 383 (conflict decision facility data).<sup>2</sup> The proposed parameters correspond to the KCAL-DT Construction Permit facility, BPCDT-20040730AWC. The results of an engineering interference analysis per OET Bulletin 69<sup>3</sup> are supplied in **Table 1**, and demonstrate that interference does not exceed the 0.1 percent limit in compliance with the FNPRM.

The engineering analysis was conducted using the same methodology that the Commission’s staff employed to identify conflicts during the three election rounds, as described in the following text from the FNPRM (§ 21):

“New interference to post-transition DTV operations was defined as interference beyond that caused by existing analog and DTV operations, as set forth in the certification database information. . . . In performing conflict analyses, the staff applied the standard that an interference conflict exists when it was predicted that more than 0.1 percent new interference would be caused to another station.”

It is acknowledged that in seeking the modified parameters, *CBS* will accept interference from any other TCD already approved. The service and interference statistics for the present and proposed KCBS-TV Channel 43 TCD are summarized below.

	<u>Present TCD</u>	<u>Proposed TCD</u>
Service Area (sq. km)	31,477.2	30,336.9
Service Population (2000 census)	14,811,807	14,650,320
Interference	0.55 %	1.26 %

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<sup>2</sup>Detailed antenna beamtilt pattern plots and exhibits will be provided at the Construction Permit “application” stage and are identical to those contained in KCAL-DT’s Construction Permit application BPCDT-20040730AWC.

<sup>3</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**

(page 4 of 4)

**Class A Station Protection**

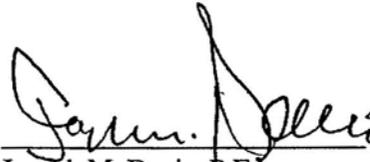
No change in interference to any authorized Class A Television station will result from this proposal, considering that the proposed parameters are identical to the currently authorized KCAL-DT Channel 43 facility.

**Conclusion**

CBS seeks herein to employ the presently authorized KCAL-DT Channel 43 facility parameters for the post-transition operation of KCBS-TV on Channel 43. The technical parameters for KCBS-TV's TCD Channel 43 are proposed to be changed to match the recently granted KCAL-DT CP facility (BPCDT-20040730AWC). Interference to any other station's TCD does not exceed 0.1 percent.

**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, R.E.

January 24, 2007

Cavell, Mertz & Davis, Inc.  
7839 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

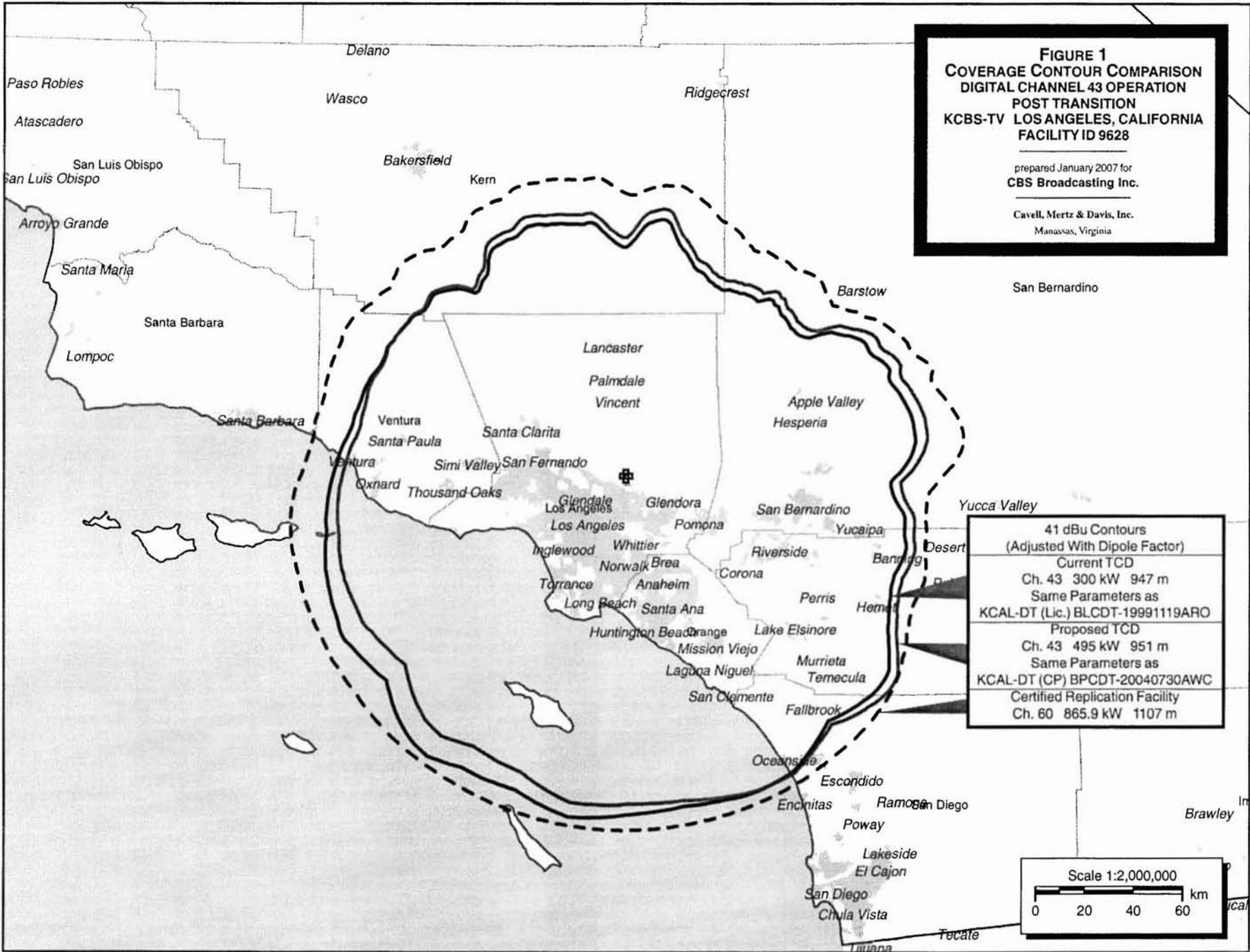
**List of Attachments**

Figure 1	Coverage Contour Comparison
Schedule B	Proposed TCD Facility Technical Parameters
Table 1	Interference Analysis Results Summary

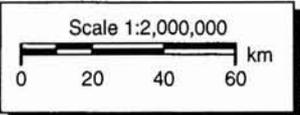
**FIGURE 1**  
**COVERAGE CONTOUR COMPARISON**  
**DIGITAL CHANNEL 43 OPERATION**  
**POST TRANSITION**  
**KCBS-TV**  
**LOS ANGELES, CALIFORNIA**  
**FACILITY ID 9628**

prepared January 2007 for  
**CBS Broadcasting Inc.**

Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia



41 dBu Contours (Adjusted With Dipole Factor)
Current TCD
Ch. 43 300 kW 947 m
Same Parameters as
KCAL-DT (Lic.) BLCDT-19991119ARO
Proposed TCD
Ch. 43 495 kW 951 m
Same Parameters as
KCAL-DT (CP) BPCDT-20040730AWC
Certified Replication Facility
Ch. 60 865.9 kW 1107 m



# FCC 383

## CONFLICT DECISION FORM SCHEDULE B

### SCHEDULE FOR DTV ENGINEERING DATA

Licenses seeking to resolve an interference conflict by reducing or otherwise modifying facilities must complete this Schedule. The purpose of this Schedule is for licensees/permittees to demonstrate how they will eliminate their interference conflict(s).

#### TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.

#### TECH BOX

1. Channel Number:	<u>43</u>				
2. Zone:	<input type="checkbox"/> I <input checked="" type="checkbox"/> II <input type="checkbox"/> III				
3. Antenna Location Coordinates: (NAD 27)					
	<u>34</u> ° <u>13</u> ' <u>38</u> " <input checked="" type="checkbox"/> N <input type="checkbox"/> S Latitude				
	<u>118</u> ° <u>04</u> ' <u>00</u> " <input type="checkbox"/> E <input checked="" type="checkbox"/> W Longitude				
4. Antenna Structure Registration Number:	<u>1007719</u>				
	<input type="checkbox"/> Not applicable <input type="checkbox"/> FAA Notification Filed with FAA				
5. Antenna Location Site Elevation Above Mean Sea Level:	<u>1741</u> meters				
6. Overall Tower Height Above Ground Level:	<u>141.4</u> meters				
7. Height of Radiation Center Above Ground Level:	<u>103</u> meters				
8. Height of Radiation Center Above Average Terrain:	<u>950.9</u> meters				
9. Maximum Effective Radiated Power (average power):	<u>495</u> kW				
10. Antenna Specifications:					
a.	<table border="1"><tr><td>Manufacturer</td><td><u>HAR</u></td><td>Model</td><td><u>TAD-16UDA-8/64</u></td></tr></table>	Manufacturer	<u>HAR</u>	Model	<u>TAD-16UDA-8/64</u>
Manufacturer	<u>HAR</u>	Model	<u>TAD-16UDA-8/64</u>		
b. Electrical Beam Tilt:	<u>1.7</u> degrees <input type="checkbox"/> Not Applicable				
c. Mechanical Beam Tilt:	<u>1.0</u> degrees toward azimuth <u>217</u> degrees True <input type="checkbox"/> Not Applicable				
	Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. <table border="1"><tr><td>Exhibit No.</td></tr></table>	Exhibit No.			
Exhibit No.					
d. Polarization:	<input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Circular <input type="checkbox"/> Elliptical				

**TECH BOX**

e. Directional Antenna Relative Field Values:  Not applicable (Nondirectional)

Rotation: \_\_\_\_\_ °  No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.822	60	0.917	120	0.770	180	0.532	240	0.453	300	0.643
10	0.946	70	0.873	130	0.854	190	0.561	250	0.497	310	0.770
20	0.767	80	0.798	140	0.568	200	0.429	260	0.486	320	0.575
30	0.829	90	0.816	150	0.728	210	0.414	270	0.532	330	0.847
40	0.945	100	0.908	160	0.650	220	0.471	280	0.614	340	0.836
50	0.667	110	0.725	170	0.554	230	0.332	290	0.562	350	0.778
Additional Azimuths		36	1.000	126	0.920	216	0.499	306	0.794		

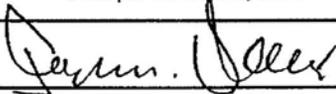
If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.682(a)(14) and 73.685 must be satisfied. **Exhibit required.**

Exhibit No. \_\_\_\_\_

**PREPARER'S CERTIFICATION MUST BE COMPLETED AND SIGNED.**

**PREPARER'S CERTIFICATION**

I certify that I have prepared Schedule B-DTV Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Joseph M. Davis, P.E.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date January 24, 2007	
Mailing Address Cavell, Mertz & Davis, Inc. 7839 Ashton Avenue			
City Manassas		State or Country (if foreign address) Virginia	ZIP Code 20109-2883
Telephone Number (include area code) (703) 392-9090		E-Mail Address (if available) jdavis@cmdconsulting.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
**PROPOSED CHANNEL 43 PARAMETERS**

prepared for  
**CBS Broadcasting Inc.**  
 KCBS-TV Los Angeles, California  
 Facility ID 9628

Ch	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Baseline Population	New Interference Population	Percent
42	KWHY-TV DT	LOS ANGELES, CA BMPCDT-20000428ABX	26231	34 12 47 118 03 41	486 892	1.6 162.9	14,399,992	0	0.00%
42	KESQ-TV DT	PALM SPRINGS, CA BSRCCT-20060321ACQ	25577	33 51 58 116 26 02	50 219	156.0 104.5	1,223,219	0	0.00%
43	KGMC DT	CLOVIS, CA BLCDT-20020507AAJ	23302	36 44 46 119 16 57	282.77 642	300.5 338.9	1,452,180	0	0.00%
44	KHIZ DT	BARSTOW, CA BPCDT-19991028ACX	63865	34 36 34 117 17 11	1000 596	83.3 59.1	1,577,338	0	0.00%

## **Exhibit 3**

**Engineering Statement**  
in support of  
**COMMENTS in MB DOCKET 87-268**  
prepared for  
**San Francisco Television Station KBCW Inc.**  
KBCW(TV) San Francisco, California  
Facility ID 69619

This engineering statement has been prepared on behalf of *San Francisco Television Station KBCW Inc. ("SFTS")*, licensee of KBCW(TV) (Facility ID 69619, San Francisco, CA, formerly KBHK-TV) in support of *Comments* being filed in the Seventh Further Notice of Proposed Rulemaking ("FNPRM"), Media Bureau Docket 87-268.<sup>1</sup> The subject docket sets forth a proposed new digital television ("DTV") allotment table for the post-transition period. A Tentative Channel Designation ("TCD") is listed in Appendix B of the FNPRM for each eligible television station. *SFTS* requests herein that alternative technical parameters be employed for the KBCW TCD.

The FNPRM (§ 28-29) allows qualifying licensees to propose a change in their certified technical parameters. *SFTS* herein proposes that maximized parameters be employed in place of replication parameters for KBCW's TCD.

**Discussion - Background**

The licensed KBCW analog facility is on Channel 44 (BLCT-19881220KG) and its digital operation is licensed on Channel 45 (BLCDT-20020709AAQ). *SFTS* successfully elected its digital Channel 45 for post-transition digital operation of KBCW in the first round of channel elections (see BFRECT-20050121AGE).

The technical parameters for the current Channel 45 TCD are based upon the pre-election certification on Form 381 (BCERCT-20041028AFT). The pre-election certification specifies that the post-transition DTV facility will be operated at replication facilities, which provide for an effective radiated power ("ERP") of 206 kW with a calculated directional antenna pattern at 491 meters height above average terrain ("HAAT"). The digital KBCW-DT facility as authorized by

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<sup>1</sup>*Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 06-150, released October 20, 2006.

## Engineering Statement

(page 2 of 4)

its license (BLC DT-20020709AAQ) operates at 400 kW and 446 meters HAAT with a directional antenna. This operation is considered a “maximized” facility as the ERP/HAAT combination (and corresponding service contours) exceeds replication values along most azimuths. The attached **Figure 1** provides a contour comparison map of the “replication” (206 kW / 491 meter) and the “maximization” (400 kW / 446 meter) facilities.

### **Proposed Change in Certified Facilities**

Upon review of the proposed TCD for KBCW, *SFTS* has concluded that its Form 381 certification of replication was made inadvertently and the certification should have indicated the licensed maximized facility. The FNPRM states that those stations that have received authorization to extend their service beyond their certified areas may seek a change in certified facilities. For the case at hand, the licensed “maximized” facility parameters extend service well beyond the area that was certified (see **Figure 1**). Thus KBCW qualifies for the change in certification facility. No change in channel is sought.

Technical parameters sought herein are those corresponding to the KBCW-DT Channel 45 license (BLC DT-20020709AAQ). The results of an engineering interference analysis per OET Bulletin 69<sup>2</sup> are supplied in **Table 1**. The analysis shows that the 0.1 percent interference limit is exceeded only with respect to the TCD associated with KQCA (Ch. 46, Stockton, CA). Interference to KQCA would be increased by 0.46 percent from that caused by the KBCW-DT replication facility. This is actually existing interference to the licensed KQCA-DT facility, as KBCW-DT’s maximized facility was achieved by complying with the more lenient 2 percent *de minimis* interference limit applied during the transition.

The licensee of KQCA has agreed to continue to accept this existing interference from the maximized, licensed KBCW-DT facility (an interference consent agreement is provided elsewhere in

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<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**  
(page 3 of 4)

*SFTS's* comments). **Table 1** shows that new interference to any other station's TCD does not exceed the 0.1 percent limit. Therefore, the proposed change in certification is in compliance with the FNPRM.

The engineering analysis was conducted using the same methodology that the Commission's staff employed to identify conflicts during the three election rounds, as described in the following text from the FNPRM (§ 21):

“New interference to post-transition DTV operations was defined as interference beyond that caused by existing analog and DTV operations, as set forth in the certification database information. . . . In performing conflict analyses, the staff applied the standard that an interference conflict exists when it was predicted that more than 0.1 percent new interference would be caused to another station.”

It is acknowledged that in seeking the modified parameters, *SFTS* will accept interference from any other TCD already approved. The service and interference statistics for the present and proposed KBCW Channel 45 TCD are summarized below. As a matter of public interest, the KBCW-DT post-transition interference-free service population will increase by 3.55 percent to 6,005,819 persons.

	<u>Present TCD</u>	<u>Proposed TCD</u>
Service Area (sq. km)	16,434.8	19,753.8
Service Population (2000 census)	5,799,707	6,005,819
Interference	2.14 %	2.86 %

**Class A Station Protection**

No new interference to any authorized Class A Television station will result from this proposal.

**Engineering Statement**

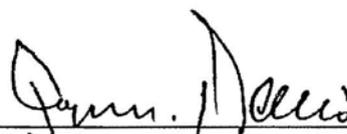
(page 4 of 4)

**Conclusion**

KBCW's current licensed "maximization" technical parameters are proposed to be substituted in lieu of "replication" parameters. Interference to other stations does not exceed 0.1 percent except to KQCA which is addressed by an interference agreement.

**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.  
January 25, 2007

Cavell, Mertz & Davis, Inc.  
7839 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

**List of Attachments**

Figure 1      Coverage Contour Comparison  
Table 1      Interference Analysis Results Summary

**FIGURE 1**  
**COVERAGE CONTOUR COMPARISON**  
**DIGITAL CHANNEL 45 OPERATION**  
**KBCW(TV) SAN FRANCISCO, CALIFORNIA**  
**FACILITY ID 69619**

prepared January 2007 for  
**San Francisco Television Station KBCW Inc.**

Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia

41.6 dBu Contours
Current TCD - Replication Ch. 45 206 kW 491 m
Proposed TCD - Maximization BLCDT-20020709AAQ Ch. 45 400 kW 446 m

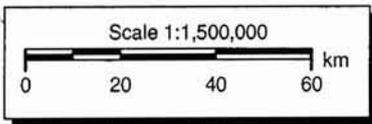
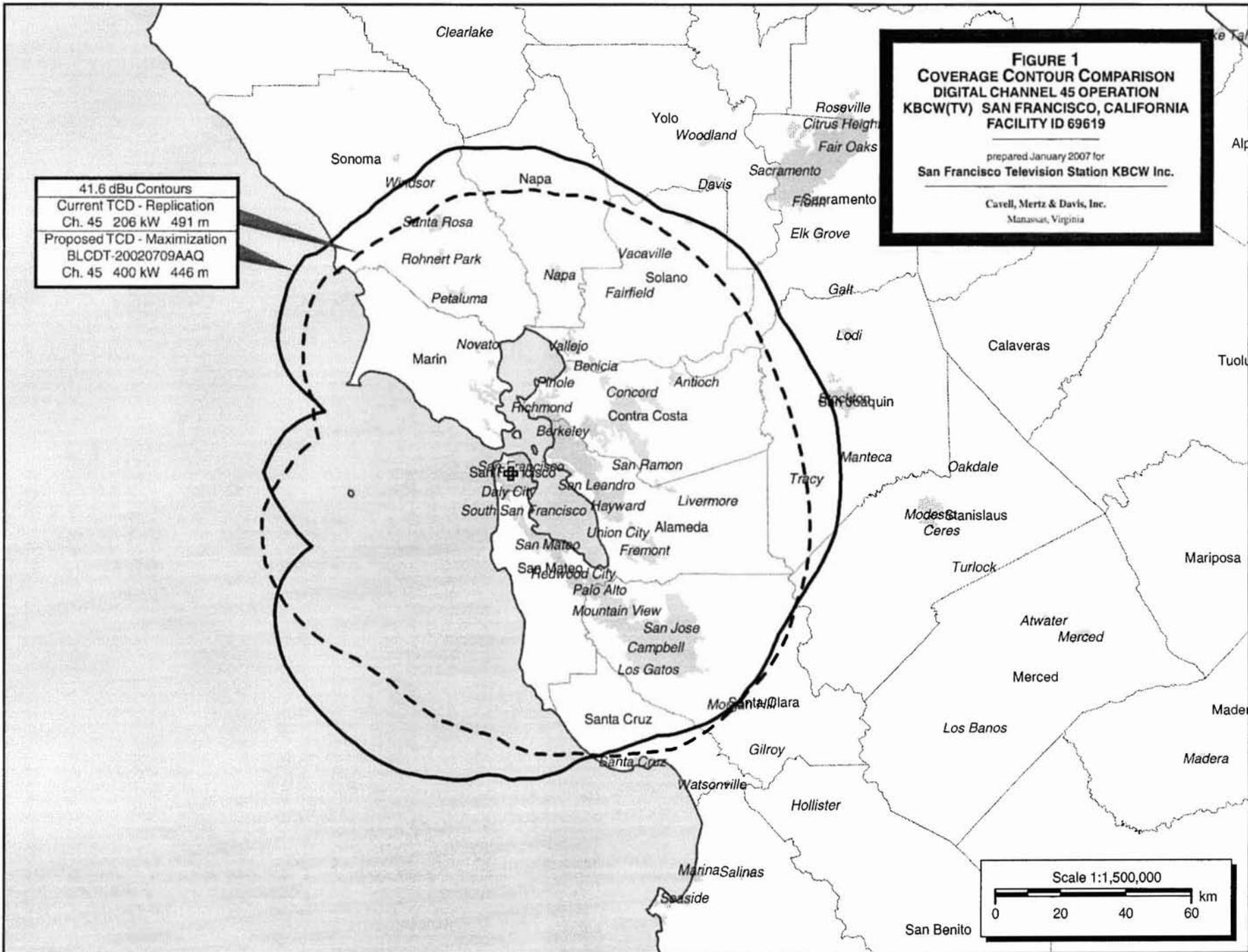


Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
**PROPOSED CHANNEL 43 PARAMETERS**

prepared for  
**San Francisco Television Station KBCW Inc.**  
 KBCW(TV) San Francisco, California  
 Facility ID 69619

Ch	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Baseline Population	New Interference Population	Percent
44	KTVU DT	OAKLAND, CA BLCDT-20040915AEI	35703	37 45 19 122 27 06	811.26 433	0.0 218.3	6,277,804	0	0.00%
45	KUVI-TV DT	BAKERSFIELD, CA BLCDT-20020906ABI	7700	35 26 20 118 44 24	210.02 387	420.0 126.8	680,403	0	0.00%
46	KQCA DT	STOCKTON, CA BMPCDT-20020626AAA	10242	38 15 54 121 29 24	600 580	101.6 55.8	4,746,130	21,912	0.46% <i>(interference agreement with KQCA)</i>

## **Exhibit 4**



CBS  
51 WEST 52 STREET  
NEW YORK, NEW YORK 10019-6188  
  
(212) 975-4099  
FAX: (212) 975-0117  
hjaeckel@cbs.com

HOWARD F. JAECKEL  
VICE PRESIDENT AND ASSOCIATE GENERAL COUNSEL

Hearst-Argyle Television Inc.  
~~888 7th Avenue 27th Floor~~ 300 West 57th St., 39th Floor  
New York, New York 10106  
10019

Ladies and Gentlemen:

January 25, 2007

The purpose of this letter is to memorialize the agreement of Hearst-Argyle Stations Inc. ("Hearst-Argyle"), a subsidiary of Hearst-Argyle Television Inc. and licensee of digital television station KQCA-DT, Stockton, California, to accept interference from the proposed revised technical parameters being requested for KBCW-DT, San Francisco, California, in the FCC's current rulemaking proceeding to consider its proposed DTV Table of Allotments (the "Proposed Table"). See, *Seventh Further Notice of Proposed Rulemaking* in MB Docket No. 87-268, *In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, 21 FCC Rcd 12100 (2006). KQCA has received a tentative channel designation ("TCD") of Channel 46 in the Proposed Table, and KBCW has received a TCD of Channel 45.

The technical parameters being sought for KBCW are revised from those specified by the FCC in the Proposed Table, but correspond to those of the currently licensed facility of KBCW-DT. (See attached.) Therefore, the proposed KBCW facilities would not increase existing interference to the post-transition digital operation KQCA, as specified in the Proposed Table. Existing interference to KQCA from KBCW-DT, determined in accordance with OET Bulletin 69, is 0.46 percent as measured by service area population, and is shown on the attached map.

We are seeking revised technical parameters for KBCW because of the inadvertent, pre-election certification (on FCC Form 381) of replication facilities for the station (i.e., those specified in the 1997 DTV Table), rather than facilities corresponding to its licensed *maximized* operation. Although the FCC considered additional interference up to two percent as being *de minimis* for the purpose of considering maximization applications, in the current process of finalizing the post-transition DTV Table, it considers new interference in excess of 0.1 percent as being impermissible.

KBCW is licensed to San Francisco Television Station KBCW Inc., a wholly-owned subsidiary of CBS Corporation.

Page Two  
January 25, 2007

By signing this letter, Hearst agrees to accept the 0.46 interference that will be caused to KQCA's post-transition digital operation on Channel 46 by the revised parameters being requested for KBCW on Channel 45.

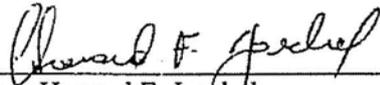
No consideration is being paid or promised by either party in connection with the above agreement.

Please indicate your acceptance of the foregoing by signing this letter, and returning the executed copy to me.

We greatly appreciate your accommodation in this regard.

Sincerely,

CBS CORPORATION

By:   
Name: Howard F. Jaekel  
Title: Assistant Secretary

ACCEPTED AND AGREED:

HEARST-ARGYLE STATIONS INC.

By:   
Name: JONATHAN C. MINTZER  
Title: VICE PRESIDENT, GENERAL COUNSEL & SECRETARY

REQUESTED TECHNICAL PARAMETERS FOR KBCW, SAN FRANCISCO,  
CALIFORNIA

KBCW Service: Commercial DT Channel: 45 Zone: 2  
SAN FRANCISCO, CA US Facility ID: 69619  
Status: License File Number: BLCDT-20020709AAQ  
Site Location: N 37-45-19 W 122-27-06 (NAD 27)  
ERP: 400 kW Max ERP: 0 kW Polarization: H  
HAAT: 446 m  
R/C AGL: 223 m Site Elevation: 254 m R/C AMSL: 477 m  
Structure Registration: 1001289 Height Overall: 298 m  
Directional Antenna DIE TUP-3-8-1C

Antenna Pattern:

Bearing Rel Field

0	0.906
10	0.831
20	0.66
30	0.605
40	0.798
*46	0.855
50	0.834
60	0.706
70	0.791
80	0.977
90	0.996
*95	1
100	0.986
110	0.815
120	0.721
130	0.842
*134	0.857
140	0.791
150	0.59
160	0.637
170	0.822
180	0.904
*188	0.94
190	0.938
200	0.856
210	0.691
220	0.578
230	0.482

240 0.301  
250 0.072  
260 0.111  
270 0.166  
280 0.109  
\*288 0.049  
290 0.067  
300 0.292  
310 0.47  
320 0.558  
330 0.672  
340 0.838  
350 0.933

DMA® is a Registered Trademark of Nielsen Media Research

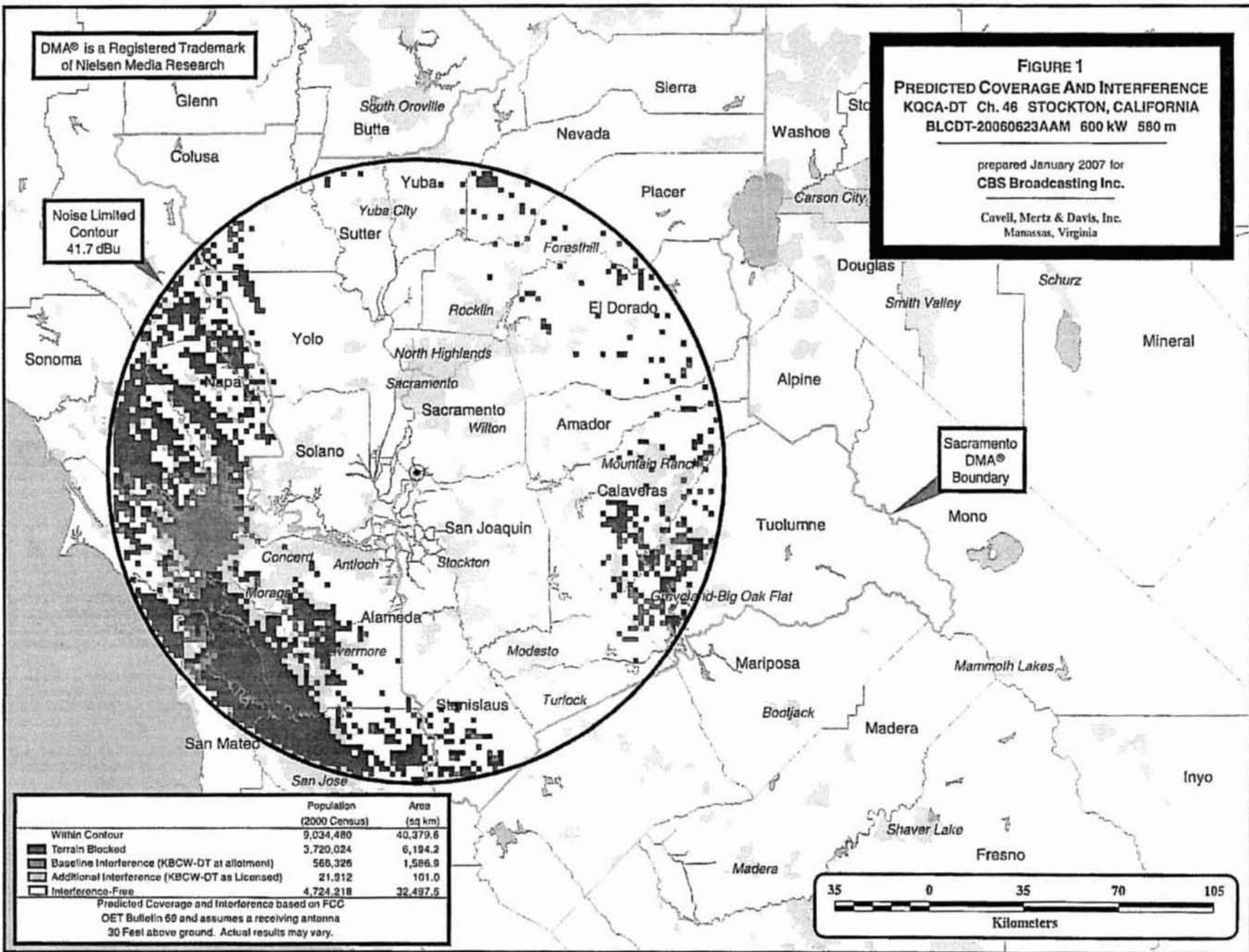
**FIGURE 1**  
**PREDICTED COVERAGE AND INTERFERENCE**  
**KQCA-DT Ch. 46 STOCKTON, CALIFORNIA**  
**BLCDT-20060623AAM 600 kW 580 m**

prepared January 2007 for  
**CBS Broadcasting Inc.**

Cavell, Mertz & Davis, Inc.  
 Manassas, Virginia

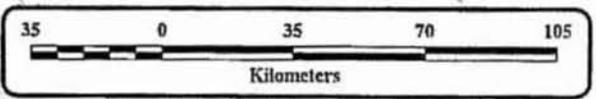
Noise Limited Contour  
 41.7 dBu

Sacramento DMA® Boundary



	Population (2000 Census)	Area (sq km)
Within Contour	9,034,480	40,379.6
Terrain Blocked	3,720,024	6,194.2
Baseline Interference (KBCW-DT at allotment)	565,326	1,586.9
Additional Interference (KBCW-DT as Licensed)	21,912	101.0
Interference-Free	4,724,218	32,497.5

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



## **Exhibit 5**

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Section 73.622(b),	)	MB Docket No. 05-52
Table of Allotments,	)	RM-10300
Digital Television Broadcast Stations.	)	
(Johnstown and Jeannette, Pennsylvania)	)	

**REPORT AND ORDER  
(Proceeding Terminated)**

**Adopted: February 7, 2006**

**Released: February 15, 2006**

By the Chief, Video Division, Media Bureau:

1. The Video Division has before it a *Notice of Proposed Rule Making*<sup>1</sup> issued in response to a petition for rule making filed by Viacom Television Stations Group of Pittsburgh, Inc. (formerly Paramount Television Stations Group of Pittsburgh, Inc.) (“Viacom”), requesting the substitution of DTV channel 49 for station WNPA-TV’s assigned DTV channel 30 at Johnstown and the reallocation of DTV channel 49 from Johnstown to Jeannette, Pennsylvania. Viacom filed comments reaffirming its intention in applying for DTV channel 49, if re-allotted to Jeannette. Larry L. Schrecongost, licensee of Class A television station WLLS, Indiana, Pennsylvania, filed comments in opposition to Viacom’s proposal. Schrecongost and Viacom filed reply comments. For the reasons discussed below, we will grant Viacom’s proposal.

**BACKGROUND**

2. The *Report and Order* in MM Docket No. 97-96, (*Johnstown and Jeannette, Pennsylvania*), 12 FCC Rcd 10300 (1997) changed the community of license for station WNPA-TV from Johnstown to Jeannette, Pennsylvania and re-allotted Channel 19+ from Johnstown to Jeannette as the community’s first local television broadcast service. The *Report and Order* was adopted pursuant to Section 1.420(i) of the Commission’s Rules which permits the modification of a station authorization to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest.<sup>2</sup> However, in that action the paired digital channel that was assigned as a part of the WNPA-TV’s license was inadvertently omitted from the Order. As a result, station WNPA-TV’s analog channel (19) was re-allotted to Jeannette, and its digital channel (30) remained at Johnstown, Pennsylvania. In 1999, Viacom filed a petition for rulemaking requesting the substitution of DTV channel 49 in lieu of DTV channel 30 and the reallocation of DTV channel 49 to Jeannette, Pennsylvania, first to correct the paired DTV channel assignment to the wrong community, and second to eliminate the potential for harmful interference to WWCP-DT, DTV channel 29 at Johnstown.

<sup>1</sup> *Johnstown and Jeannette, Pennsylvania*, 20 FCC Rcd 3456 (2005).

<sup>2</sup> See *Modification of FM and TV Authorizations to Specify a New Community of License (“Community of License”)*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990).

---

**DISCUSSION**

3. Schrecongost argues that the proposal to allot DTV channel 49 to Jeannette should be rejected as being contrary to the Community Broadcasters Protection Act of 1999 (“CBPA”)<sup>3</sup> as enacted by Congress. Schrecongost states that the proposed DTV channel 49 facility at Jeannette would completely encompass the coverage area of WLLS-CA resulting in all of the viewers of WLLS-CA losing their local television service. Schrecongost also questions the acceptance of Viacom’s petition for rule making arguing that the Commission stated in MM Docket No. 00-10<sup>4</sup>, that Class A stations were only required to protect pending applications for a new DTV station that were on file as of November 29, 1999. Schrecongost notes that while the Commission did provide for some flexibility for existing broadcasters to change their DTV channels to correct unforeseen technical problems, that situation did not apply in changing WNPA’s community of license since the adoption of the change of community proposal was premised on the fact that there would be no change in WNPA’s transmitter site.

4. We will deny Schrecongost’s objection and approve Viacom’s proposal. It is unquestionable that station WNPA-TV’s community of license was changed from Johnstown to Jeannette, Pennsylvania, through an appropriate rule making proceeding in 1997.<sup>5</sup> That proceeding is final and is not subject to review herein. It is also undisputed that in changing the community of license of station WNPA-TV from Johnstown to Jeannette, Pennsylvania, the digital table of allotments was not amended to reflect the community of license change. Since the WNPA-TV license is composed of paired analog and digital channels, this oversight was erroneous and should have been corrected by a subsequent order. Viacom’s petition does not constitute a request for a new digital allotment at Jeannette, as Schrecongost alleges, but rather represents a request to correct the Commission’s administrative error in not assigning WNPA-TV’s paired digital channel to Jeannette when the Commission changed the station’s community of license. Our action here corrects that oversight. The only question for review in this proceeding is whether WLLS-CA is entitled to protection from the operations of WNPA-DT. We conclude that WLLS-CA is not so entitled.

5. By Schrecongost’s own admission, the Commission’s Report and Order in the Establishment of a Class Service, does provide flexibility to licensees with initial paired channels to resolved technical problems or maximize their digital operations.<sup>6</sup> Thus, such proposals by initial digital licensees are not required to protect Class A facilities. WNPA-TV is currently assigned digital channel 30 at Johnstown. Operation on channel 30 in Jeannette (its appropriate community of license) would cause impermissible interference to station WWCP-DT, channel 29 in Johnstown. WNPA-TV’s proposed Jeannette site on channel 49 eliminates this interference and enables WNPA-DT to provide maximized service to Jeannette, while enabling station WWCP-DT, channel 29 to continue to provide interference-free digital service to Johnstown. Although WLLS-CA will be displaced on channel 49, it need not go off the air. Viacom has identified at least two available channels on which WWLS-CA may continue broadcasting.

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<sup>3</sup> Community Broadcasters Protection Act of 1999, Pub. L. No. 106-113, 113 Stat. Appendix I at pp. 1501A-594 – 1501A-598 (1999), *codified at* 47 U.S.C. § 336(f).

<sup>4</sup> See *Report and Order, In the Matter of Establishment of a Class A Service (“Establishment of a Class A Service”)*, 15 FCC Rcd 6355 (2000).

<sup>5</sup> See *Johnstown and Jeannette, Pennsylvania*.

<sup>6</sup> *Establishment of a Class A Service, Id.*

6. DTV channel 49 can be allotted to Jeannette in compliance with the principle community coverage requirement of Section 73.625(a) at coordinates 40-23-34 N. and 79-46-54 W. Since the community of Jeannette is located within 400 kilometers of the U.S.-Canadian border, concurrence from the Canadian government has been obtained for this allotment. In addition, we find that this channel is acceptable under the 2 percent criterion for *de minimis* impact that is applied in evaluating requests for modification of initial DTV allotments under Section 73.623(c)(2) for Station WNPA-DT with the following specifications:

<u>State &amp; City</u>	<u>DTV Channel</u>	<u>DTV power (kW)</u>	<u>Antenna HAAT (m)</u>	<u>DTV Service Pop. (thous.)</u>
PA Jeannette	49	437	301	2851

7. Accordingly, pursuant to the authority contained in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED, That effective April 3, 2006, the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, IS AMENDED, with respect to the community listed below, to read as follows:

<u>City</u>	<u>Channel No. Present</u>	<u>Amended</u>
Johnstown, Pennsylvania	29, 30, 34	29, 34
Jeannette, Pennsylvania	----	49

8. IT IS FURTHER ORDERED, That within 45 days of the effective date of this *Order*, Viacom Television Stations Group of Pittsburgh, Inc. shall submit to the Commission a minor change application for a construction permit (FCC Form 301) specifying DTV Channel 49 at Jeannette, Pennsylvania, in lieu of DTV Channel 30 at Johnstown, Pennsylvania, for station WNPA-DT.

9. Pursuant to Section 1,1104(1)(k) of the Commission's Rules, any party seeking a change in community of license of an FM or television allotment or an upgrade of an existing FM allotment, if the request is granted, must submit a rule making fee when filing the application to implement the change of community of license and/or upgrade. As a result of this proceeding, Viacom Television Stations Group of Pittsburgh, Inc. is required to submit a rule making fee in addition to the fee required for the application to effect the change in its community of license.

10. The Commission will send a copy of this *Report and Order* in a report to Congress and the Government Accountability Office pursuant to the Congressional Review Act, *see* 5 U.S.C. Section 801(a)(1)(A).

11. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

12. For further information concerning this proceeding, contact Pam Blumenthal, Media Bureau, (202) 418-1600.

FEDERAL COMMUNICATIONS COMMISSION

Barbara A. Kreisman  
Chief, Video Division  
Media Bureau

## **Exhibit 6**

DOCKET FILE COPY ORIGINAL

ORIGINAL

Before the  
Federal Communications Commission  
Washington, D.C.

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AUG 14 2001

In the Matter of )  
 )  
Amendment of Section 73.622(b) of )  
The Commission's Rules, DTV )  
Table of Allotments )  
(Johnstown and Jeannette, Pennsylvania) )

MM Docket No.  
RM No.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Chief, Allocations Branch:

AMENDED PETITION FOR RULEMAKING  
AND REQUEST FOR EXPEDITED ACTION

1. Paramount Stations Group of Pittsburgh Inc. ("Paramount") seeks to further amend its petition for rulemaking in the above captioned matter that was initially filed on August 25, 1999 ("Initial Petition"). Paramount is the licensee of television station WNPA, Jeannette, Pennsylvania, which currently operates on NTSC channel 19. Pursuant to Section 73.623 of the Commission's rules 47 C.F.R. §73.623, Paramount had requested that the Commission institute a rulemaking proceeding for the purpose of amending the Table of Allotments for the digital television ("DTV") service to change the DTV community and channel allotments for station WNPA-DT from channel 30 at Johnstown, Pennsylvania, to channel 49 at Jeannette, Pennsylvania.

2. In its Initial Petition, Paramount submitted an engineering exhibit demonstrating that, prior to the release of the DTV Table of Allotments, the community of license of WNPA (then WTWB-TV) was changed from Johnstown to Jeannette. See *Johnstown and Jeannette, Pennsylvania*, 12 FCC Rcd 10300 (1997). However, the DTV Table of Allotments was not updated to reflect the change in WNPA's community of license. Further, Paramount also set forth in great detail in its engineering exhibit that, because of the first adjacent allotment of WWCP-DT on channel 29 at Johnstown,

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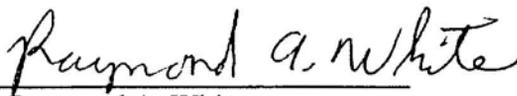
Pennsylvania, WNPA-DT is unable to relocate its facilities to improve service to Jeannette with its current allocation of channel 30.

3. Paramount submits this amended Petition to modify the proposed facilities of WNPA-DT on channel 49 at Jeannette, Pennsylvania. Specifically, Paramount specifies a new reference site, effective radiated power (ERP) and antenna height above average terrain (HAAT) for WNPA-DT's proposed operation. As set forth in greater detail in the attached engineering exhibit of Denny & Associates, the proposed substitution of channel 30 with channel 49 for WNPA-DT's operation can be made in full conformance with the Commission's rules and will result in the station's ability to provide significantly improved service to Jeannette.

4. In light of the May 1, 2002, deadline by which Paramount is required to construct WNPA-DT facilities, Paramount requests expedited action on its amended petition.

Respectfully submitted,

**Paramount Stations Group of Pittsburgh Inc.**

By:   
Raymond A. White  
Counsel

Paramount Stations Group of Pittsburgh, Inc  
c/o Viacom Television Stations Group  
600 New Hampshire Avenue, Suite 1200  
Washington, D.C. 20037  
(202) 457-4514

August 13, 2001

**ENGINEERING EXHIBIT  
IN SUPPORT OF AN AMENDED  
PETITION FOR RULE MAKING TO MODIFY  
THE DTV TABLE OF ALLOTMENTS  
PARAMOUNT STATIONS GROUP OF PITTSBURGH INC.  
STATION WNPA-DT JEANNETTE, PENNSYLVANIA  
CH 49 437 KW 301 METERS**

**ENGINEERING STATEMENT**

**INTRODUCTION**

The Engineering Exhibit, of which this statement is part, has been prepared on behalf of Paramount Stations Group of Pittsburgh Inc. (herein Paramount), licensee of television station WNPA, Jeannette, Pennsylvania, in support of a amended petition for rule making to modify the DTV Table of Allotments in Section 73.622(b) of the Federal Communications Commission (FCC) Rules. Paramount's previously filed petition for rule making proposed substitution of DTV channel 49 at Jeannette, Pennsylvania for DTV channel 30 at Johnstown, Pennsylvania. This amendment serves to specify a new reference site, effective radiated power (ERP) and antenna height above average terrain (HAAT) for the proposed DTV channel 49 allotment at Jeannette. The requested modification to the DTV Table of Allotments can be made in full conformance with the FCC Rules.

## BACKGROUND

WNPA is licensed for operation on channel 19+ with a maximum peak visual ERP of 3,020 kilowatts (kW), horizontally polarized, and antenna radiation center HAAT of 325 meters. In FCC Mass Media Docket Number 97-96, the FCC reallocated NTSC channel 19+ from Johnstown, Pennsylvania, to Jeannette, Pennsylvania as a first local television service. However, the modification of the NTSC allotment to Jeannette was made after the date of the television database used for developing DTV allotments. Hence, the *Second Memorandum Opinion And Order On Reconsideration Of The Fifth And Sixth Report And Orders (2<sup>nd</sup> MO&O)* in FCC Mass Media Docket 87-268, allots NTSC channel 19 in Johnstown, Pennsylvania, DTV channel 30. The allotment reference facilities for DTV channel 30 at Johnstown are with a maximum average ERP of 162.1 kW and antenna radiation center HAAT of 325 meters.

As indicated in Paramount's previous petition for rule making, the licensed WNPA NTSC transmitter site and channel 30 DTV allotment reference coordinates are located approximately 42 kilometers from Jeannette. In contrast, the proposed DTV channel 49 allotment site is only 15 kilometers from Jeannette. Since the existing channel 30 DTV allotment at Johnstown is

**DENNY & ASSOCIATES, P.C.**  
**CONSULTING ENGINEERS**  
**OXON HILL, MARYLAND**

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Engineering Statement  
WNPA-DT, Jeannette, Pennsylvania

Page 3

collocated with the DTV allotment for WWCP-TV on channel 29, Paramount is unable to utilize a transmitter site for the existing DTV channel 30 which is significantly closer to Jeannette without causing interference to the adjacent channel operation of WWCP-DT on channel 29. The allotment of DTV channel 49 to Jeannette will permit Paramount to utilize a transmitter site for WNPA-DT significantly closer to Jeannette and thus significantly improve service to Jeannette.

Paramount requests that the DTV Table of Allotments in Section 73.622(b) of the FCC Rules be amended to reflect the allotment of DTV channel 49 at Jeannette in lieu of the existing DTV channel 30 allotment at Johnstown, Pennsylvania. Furthermore, that the following reference facilities be employed for the DTV channel 49 allotment at Jeannette.

Latitude: 40° 23' 34"  
Longitude: 79° 46' 54" (NAD 27)  
Channel: 49  
Maximum ERP: 437 kW  
Antenna radiation center 301 meters (HAAT)/616 meters AMSL

While the requested DTV channel 49 allotment reference facilities exceed the facilities allotted to DTV channel 30 at Johnstown, they comply with the maximum power and antenna height provision of Section 73.622(f)(8)(i) of

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**CONSULTING ENGINEERS**  
**OXON HILL, MARYLAND**

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Engineering Statement  
WNPA-DT, Jeannette, Pennsylvania

Page 4

the FCC Rules. The table in this section of the FCC Rules specifies a maximum ERP of 1,000 kW for an antenna radiation center HAAT of 365 meters. The proposed allotment reference facilities of 437 kW ERP and 301 meters antenna radiation center HAAT are below both of these limits.

#### PRINCIPAL COMMUNITY COVERAGE

The proposed substitution of DTV channel 49 at Jeannette for DTV channel 30 at Johnstown, complies with the principal community coverage requirements of Section 73.625(a) of the FCC Rules. The DTV principal community contour for the proposed DTV channel 49 allotment at Jeannette, is the 48 dB $\mu$  F(50,90) contour. Figure 1 of this exhibit is a map comprising portions of the USGS Maryland, Ohio, Pennsylvania, and West Virginia, 1:1,000,000 scale maps showing that all of Jeannette, Pennsylvania, lies well within the predicted DTV channel 49 principal community coverage contour.

#### ALLOCATION CONSTRAINTS

The requested substitution of DTV channel 49 for DTV channel 30 at Johnstown, Pennsylvania, complies fully with the *de minimis* interference criteria of Section 73.623(c)(2) of the FCC Rules. An analysis of the proposed

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CONSULTING ENGINEERS  
OXON HILL, MARYLAND

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Engineering Statement  
WNPA-DT, Jeannette, Pennsylvania

Page 5

DTV channel 49 allotment with respect to existing NTSC and DTV allotments and assignments was conducted employing the methodology described in FCC Office of Engineering Technology (OET) Bulletin No. 69 (Bulletin 69), *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, and using the FCC application processing software computer program which performs Bulletin 69 calculations. While the raw output of the computer analysis is too lengthy to include herein, a summary has been included as Figure 2 of this exhibit. The raw output of the computer analysis is available upon request.

A Bulletin 69 analysis was also performed to determine the predicted population served by the proposed DTV channel 49 facility. The most conservative analysis predicts that 2,856,804 persons will receive digital television service during the transition from the proposed DTV channel 49 allotment reference facility. Appendix B from the 2<sup>nd</sup> MO&O predicts that 2,044,000 persons currently receive television service from the associated NTSC station WNPA. Therefore, the proposed DTV channel 49 allotment is predicted to provide service to an additional 812,804 persons.

CONCLUSIONS

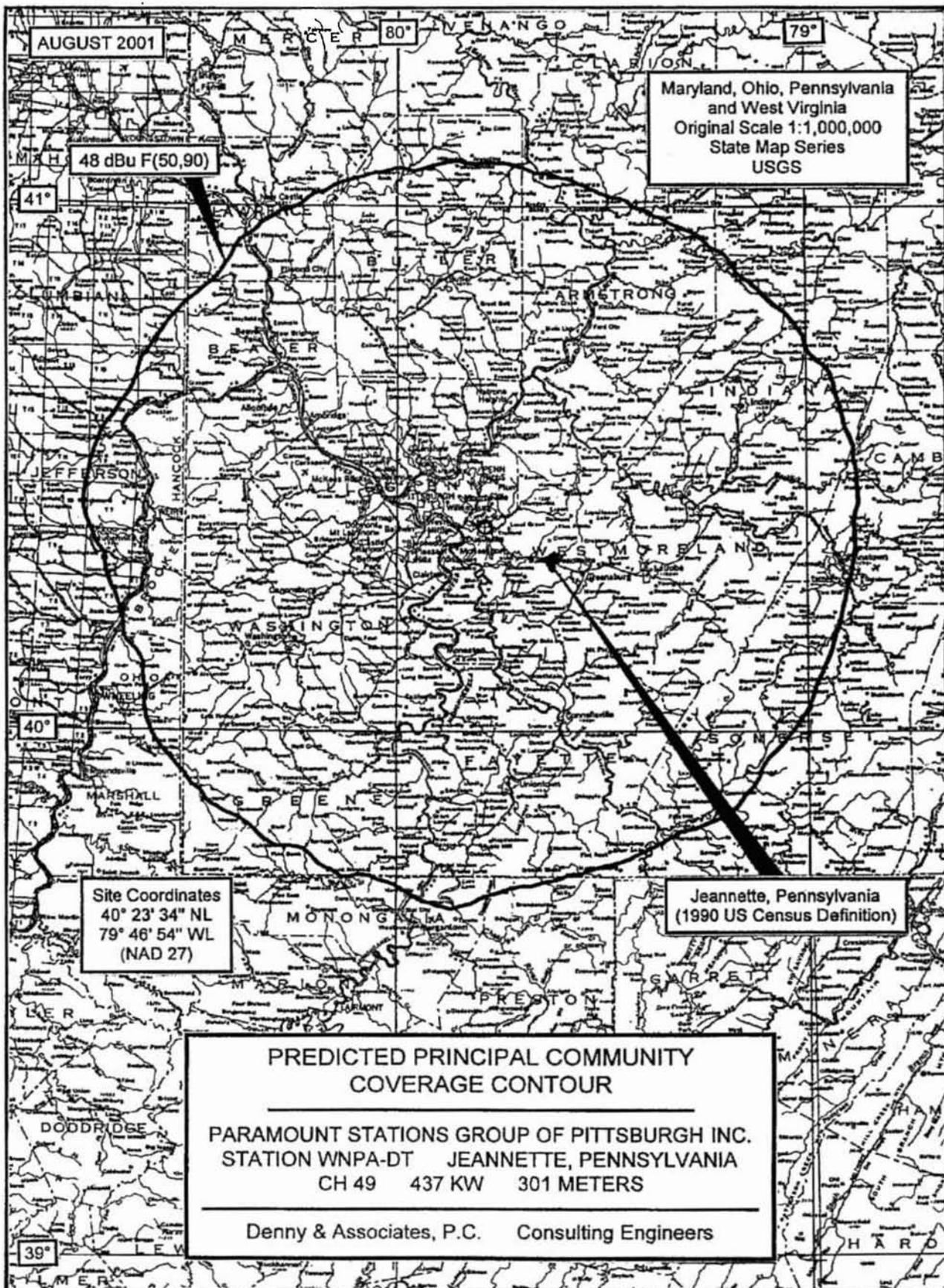
The substitution of DTV channel 49 at Jeannette, Pennsylvania, for DTV channel 30 at Johnstown, Pennsylvania, can be made in full conformance with FCC Rules. Additionally, service from the future WNPA-DT operation in Jeannette, Pennsylvania, will be improved by permitting the use of a transmitter site located significantly closer to the WNPA-DT community of license.



Alan R. Rosner, P.E.

August 10, 2001

Figure 1



**ENGINEERING EXHIBIT  
IN SUPPORT OF AN AMENDED  
PETITION FOR RULE MAKING TO MODIFY  
THE DTV TABLE OF ALLOTMENTS  
PARAMOUNT STATIONS GROUP OF PITTSBURGH INC.  
STATION WNPA-DT JEANNETTE, PENNSYLVANIA  
CH 49 437 KW 301 METERS**

SUMMARY OF DTV INTERFERENCE STUDY

<u>Channel</u>	<u>Call Sign</u>	<u>City/State</u>	<u>Distance From Proposed (km)</u>	<u>Status</u>	<u>Application Reference Number/Program Reference Number</u>	<u>Predicted New Interference</u>	<u>Percent of Baseline</u>
45	WNEO	Alliance, OH	111.0	LIC	BMLET-19891204KE	0	0.00
46	WVFX	Clarksburg, WV	130.5	LIC	BLCT-19810824KE	0	0.00
47	WKBS-TV	Altoona PA	115.1	LIC	BLCT-19850925KE	0	0.00
48	WPXI-DT	Pittsburgh, PA	20.5	Allot.	DTVPLN-DTVP1332	39,592	1.15
49	WNYO-TV	Buffalo, NY	287.5	LIC	BLCT-19870911KH	428	0.03
49	WEAO	Akron, OH	173.8	LIC	BLET-19821105KI	58,192	1.87
49	WNWO-DT	Toledo, OH	331.5	Allot.	DTVPLN-DTVP1359	0	0.00
49	WGCB-TV	Red Lion, PA	277.1	LIC	BLCT-19790419KG	0	0.00
49	WGCB-TV	Red Lion, PA	277.1	CP	BPCT-20000105AAM	0	0.00
49	WNEP-DT	Scranton, PA	340.7	CP	BPCDT-19990729KF	23	< 0.01
49	WNEP-DT	Scranton, PA	340.5	Allot.	DTVPLN-DTVP1361	22	< 0.01
49	WHSV-DT	Harrisonburg, VA	222.2	Appl.	BPCDT-19991028ADT	145	0.03
49	WHSV-DT	Harrisonburg, VA	222.2	PLN	DTVPLN-DTVP1365	104	0.03
49	WTAP-DT	Parkersburg, WV	191.3	CP	BPCDT-19991028ADE	4,399	1.57
49	WTAP-DT	Parkersburg, WV	191.3	Allot.	DTVPLN-DTVP1367	2,794	1.05
50	WEAO-DT	Akron, OH	173.8	Appl.	BPEDT-20000426ABO	0	0.00
50	WEAO-DT	Akron, OH	173.8	Allot.	DTVPLN-DTVP1386	0	0.00
50	WQLN-DT	Erie, PA	184.8	Allot.	DTVPLN-DTVP1389	0	0.00
50	WQLN-DT	Erie, PA	184.9	Appl.	BMPEDT-20000412AAR	0	0.00
50	WPCB-DT	Greensburg, PA	0.0	Appl.	BPCDT-19991026ABB	0	0.00
50	WPCB-DT	Greensburg, PA	0.1	Allot.	DTVPLN-DTVP1390	11,030	0.44
53	WPGH-TV	Pittsburgh, PA	22.0	CP	BPCT-19930708KF	0	0.00
53	WPGH-TV	Pittsburgh, PA	22.1	LIC	BMLCT-19851121KI	520	0.02
56	NEW	New Castle, PA	69.7	ADD	BPRM-20000717AFN	7,877	0.42

## **Exhibit 7**



[Help](#) | [Home](#)

**Callsign:** WPCW                      **Service:** TV                      **Community:** JEANNETTE, PA, US

**Licensee:** PITTSBURGH TELEVISION STATION WPCW INC.

**Channel:** 19    **Offset:** Plus

**Specified Channel:** 19    **Max HAAT:** 521 m

**File No.:** BLCT-20030512ABA                      **Cutoff Date:**                      **Dom. Status:** LIC

**Facility ID:** 69880                      **Application ID:** 659567                      **ASRN:** 1032552

**Latitude:**            N            40°            10'            52"  
**Longitude:**            W            79°            7'            46"

**ERP:**                    3020 kw  
**HAAT:**                    340 m  
**RCAMSL:**                936 m  
**RCAGL:**                    113 m  
**Zone:** Near Canada

**Antenna:**  
 Directional  
**Beam Tilt:** Yes                      **Electrical Deg:** 0.5

**Polarization:**                      Horizontal                      **Rotation:** 0  
**Antenna ID:** 18444                      **Make:** BOG                      **Model:** BUH-28

**Antenna Pattern for the Directional Antenna:**

Directional antenna relative field values do not include clockwise rotation, if shown above.

0°	0.94	10°	0.91	20°	0.86	30°	0.81	40°	0.76	50°	0.69
60°	0.62	70°	0.53	80°	0.42	90°	0.33	100°	0.32	110°	0.37
120°	0.43	130°	0.47	140°	0.43	150°	0.37	160°	0.32	170°	0.33
180°	0.42	190°	0.54	200°	0.62	210°	0.69	220°	0.76	230°	0.81
240°	0.86	250°	0.91	260°	0.94	270°	0.96	280°	0.97	290°	0.98
300°	1	310°	1	320°	1	330°	0.98	340°	0.97	350°	0.96

Additional Azimuths:

**Callsign:** WPCW                      **Service:** DT                      **Community:** JEANNETTE, PA, US

**Licensee:** PITTSBURGH TELEVISION STATION WPCW INC.

**Channel:** 19

**Offset:**

**Specified Channel:** 49

**Max HAAT:** 353 m

**File No.:** BPCDT-20060510AAI

**Cutoff Date:** 05/10/2006

**Dom. Status:** APP

**Facility ID:** 69880

**Application ID:** 1127172

**ASRN:** 1056234

**Latitude:** N 40° 23 ' 34 "

**Longitude:** W 79° 46 ' 54 "

**ERP:** 431 kw

**HAAT:** 302.8 m

**RCAMSL:** 617.6 m

**RCAGL:** 252.8 m

**Zone:** Near Canada

**Antenna:**

Non-DA

**Beam Tilt:**

**Electrical Deg:** 0.8

**Polarization:**

Elliptical

**Rotation:**

**Antenna ID:** 72774

**Make:** DIE

**Model:** TFU-24GTH/VP-R 06

## **Exhibit 8**

Facility ID	State and City		NTSC		DTV							
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	% Interference Received
13929	PA	ALTOONA	47	46	50	308	74915	403412	782626	13077	575	0.7
60850	PA	BETHLEHEM	60	9	3.2	284	59326	403352	752624	15841	5342	8.4
66219	PA	CLEARFIELD	3	15	810	413	59340	410720	782629	31830	862	1.4
24970	PA	ERIE	12	12	8.63	305	74599	420352	800019	24260	675	0.6
49711	PA	ERIE	35	16	200	279	30039	420215	800343	19713	636	0.6
19707	PA	ERIE	66	22	850	276	65637	420233	800356	14972	581	0
65749	PA	ERIE	24	24	523	310	70354	420225	800409	20313	702	1.1
53716	PA	ERIE	54	50	200	271	67971	420234	800356	18066	531	3.5
13924	PA	GREENSBURG	40	50	362	264	44438	402334	794654	16116	2634	2.7
72326	PA	HARRISBURG	27	10	14	346	40451	401857	765702	22372	2185	0.6
72313	PA	HARRISBURG	21	21	500	372	70325	402043	765209	22848	2357	4.6
73083	PA	HARRISBURG	33	36	50	427	74916	402045	765206	16831	1972	8.6
73375	PA	HAZLETON	56	45	546	488		411100	755210	27414	1940	16.2
69880	PA	JEANNETTE	19	49	233	325	74484	401051	790946	16394	1872	22.4
20295	PA	JOHNSTOWN	8	8	6.5	352	70335	401053	790905	20947	2534	0.8
73120	PA	JOHNSTOWN	6	34	1000	386	65822	402217	785856	24699	1984	3
53930	PA	LANCASTER	8	8	13.4	393	74678	400204	763708	23701	3313	2.5
23338	PA	LANCASTER	15	23	500	381	41227	401545	762751	25174	3340	1.1
8616	PA	PHILADELPHIA	6	6	2.55	332	75063	400239	751426	27704	9114	0.1
73879	PA	PHILADELPHIA	17	17	237	354	74615	400230	751411	24810	8188	0
25453	PA	PHILADELPHIA	3	26	770	375		400233	751433	31614	10075	1.6
12499	PA	PHILADELPHIA	57	32	250	400	44229	400230	751411	22460	7852	3.7
63153	PA	PHILADELPHIA	10	34	325	377	71122	400230	751411	27178	8934	1.6
28480	PA	PHILADELPHIA	35	35	358	377	71123	400230	751411	25390	8573	4.3
51568	PA	PHILADELPHIA	29	42	273	347	74917	400226	751420	22025	7599	8.5
41315	PA	PITTSBURGH	13	13	6.42	210	74536	402646	795751	19434	2824	0.9
25454	PA	PITTSBURGH	2	25	1000	311		402938	800109	29482	3587	0.1
41314	PA	PITTSBURGH	16	38	64.1	215	74997	402646	795751	14493	2602	0.2
73907	PA	PITTSBURGH	22	42	1000	315	43259	402943	800017	22392	3001	3.8
73875	PA	PITTSBURGH	53	43	1000	303	45946	402943	800018	23931	3093	0
73910	PA	PITTSBURGH	11	48	1000	289		402748	800016	24887	3241	0.6
65681	PA	PITTSBURGH	4	51	1000	273	40377	401649	794811	20794	2868	0.6
55305	PA	READING	51	25	900	395	67694	401952	754141	20953	5183	35.3
55350	PA	RED LION	49	30	50	177	74918	395418	763500	11549	1960	17.1

## **Exhibit 9**

12 FCC Rcd 14588, \*; 1997 FCC LEXIS 4131, \*\*;  
7 Comm. Reg. (P & F) 994

Table 1  
DTV Allotments, Assignment Pairings with Analog Stations,  
and Service Replication and Interference Evaluation

STATE AND CITY	NTSC CHAN	DTV CHAN	DTV Power (kW)	Antenna HAAT (m)	DIGITAL TELEVISION SERVICE During Transition	
					Area (Sq km)	People (thous)
PA ALTOONA	23	24	50.0	324.0	7220	350
PA ALTOONA	47	46	50.0	308.0	12792	590
PA BETHLEHEM	60	59	64.5	284.0	11078	3332
PA CLEARFIELD	3	15	1000.0	268.0	27314	684
PA ERIE	12	52	1000.0	305.0	28000	734
PA ERIE	24	58	50.0	290.0	13553	467
PA ERIE	35	16	50.0	287.0	11373	436
PA ERIE	54	50	50.0	268.0	13401	446
PA ERIE	66	22	50.0	271.0	10892	417
PA GREENSBURG	40	50	50.0	299.0	14217	2554
PA HARRISBURG	21	4	1.0	372.0	17890	1898
PA HARRISBURG	27	57	110.6	346.0	14843	1598
PA HARRISBURG	33	36	50.0	427.0	17686	1887
PA HAZLETON	56	9	3.2	329.0	11652	822
PA JOHNSTOWN	6	34	1000.0	341.0	27576	2643
PA JOHNSTOWN	8	29	633.7	368.0	21704	2586
PA JOHNSTOWN	19	30	155.2	325.0	17684	2376
PA LANCASTER	8	58	366.4	415.0	23977	3423
PA LANCASTER	15	23	50.0	415.0	17784	2101
PA PHILADELPHIA	3	26	1000.0	305.0	32197	9424
PA PHILADELPHIA	6	64	1000.0	332.0	30825	9122
PA PHILADELPHIA	10	67	757.9	354.0	26104	8148
PA PHILADELPHIA	17	54	164.6	320.0	19073	6755
PA PHILADELPHIA	29	42	261.6	347.0	22969	7506
PA PHILADELPHIA	35	34	50.0	284.0	11647	5631
PA PHILADELPHIA	57	32	103.9	353.0	16843	6507
PA PITTSBURGH	2	25	1000.0	302.0	29472	3489
PA PITTSBURGH	4	51	1000.0	293.0	28785	3237
PA PITTSBURGH	11	48	1000.0	302.0	26428	3433
PA PITTSBURGH	13	38	1000.0	210.0	23244	3084
PA PITTSBURGH	16	26	50.0	215.0	12490	2527
PA PITTSBURGH	22	42	316.6	280.0	16264	2735
PA PITTSBURGH	53	43	50.0	312.0	16622	2787
PA READING	51	25	114.9	395.0	18049	5838
PA RED LION	49	30	50.0	177.0	9806	1519
PA SCRANTON	16	49	70.4	506.0	19642	1512
PA SCRANTON	22	13	4.1	505.0	23875	1813
PA SCRANTON	38	31	50.0	385.0	15311	864

12 FCC Rcd 14588, \*; 1997 FCC LEXIS 4131, \*\*;  
7 Comm. Reg. (P & F) 994

Table 2  
DTV Allotments with Reference Coordinates

State and City	DTV Channel	N. Latitude	W. Longitude
OR EUGENE	25	44-00-07	123-06-53
OR EUGENE	26	44-00-04	123-06-22
OR EUGENE	29	44-00-06	123-06-48
OR KLAMATH FALLS	29	42-05-50	121-37-59
OR KLAMATH FALLS	33	42-05-50	121-37-59
OR KLAMATH FALLS	40	42-05-48	121-37-57
OR LA GRANDE	5	45-18-35	117-43-57
OR MEDFORD	15	42-41-49	123-13-39
OR MEDFORD	27	42-17-54	122-44-59
OR MEDFORD	35	42-04-55	122-43-07
OR MEDFORD	38	42-41-32	123-13-46
OR MEDFORD	42	42-41-32	123-13-45
OR PENDLETON	4	45-44-51	118-02-11
OR PORTLAND	27	45-31-22	122-45-07
OR PORTLAND	30	45-31-19	122-44-53
OR PORTLAND	40	45-30-58	122-43-59
OR PORTLAND	43	45-31-14	122-44-37
OR PORTLAND	45	45-30-58	122-43-59
OR PORTLAND	46	45-31-21	122-44-46
OR ROSEBURG	18	43-14-09	123-19-16
OR ROSEBURG	19	43-14-20	123-18-42
OR ROSEBURG	45	43-12-22	123-21-56
OR SALEM	20	45-00-00	122-41-37
OR SALEM	33	45-00-28	122-20-05
PA ALLENTOWN	46	40-33-54	075-26-26
PA ALLENTOWN	62	40-33-58	075-26-06
PA ALTOONA	24	40-34-06	078-26-38
PA ALTOONA	32	40-34-01	078-26-31
PA ALTOONA	46	40-34-12	078-26-26
PA BETHLEHEM	59	40-33-54	075-26-26
PA CLEARFIELD	15	41-07-21	078-26-28
PA ERIE	16	42-02-20	080-03-45
PA ERIE	22	42-02-31	080-03-57
PA ERIE	50	42-02-31	080-03-57
PA ERIE	52	42-03-52	080-00-19
PA ERIE	58	42-02-24	080-04-08
PA GREENSBURG	50	40-23-30	079-46-51
PA HARRISBURG	4	40-20-44	076-52-09
PA HARRISBURG	36	40-20-45	076-52-06
PA HARRISBURG	57	40-18-57	076-57-02
PA HAZLETON	9	41-02-13	076-05-07
PA JOHNSTOWN	29	40-10-53	079-09-05
PA JOHNSTOWN	30	40-10-51	079-09-46
PA JOHNSTOWN	34	40-22-17	078-58-58
PA LANCASTER	23	40-15-45	076-27-53
PA LANCASTER	58	40-02-04	076-37-08
PA PHILADELPHIA	26	40-02-39	075-14-26
PA PHILADELPHIA	32	40-02-21	075-14-13
PA PHILADELPHIA	34	40-02-26	075-14-20
PA PHILADELPHIA	42	40-02-26	075-14-20
PA PHILADELPHIA	54	40-02-30	075-14-24

**Exhibit 10**

1/7/2007

Stations that:

- (1) received a change in digital channel during the transition that expanded coverage beyond the original replication area;
- (2) certified "replication" on FCC Form 381 (pre-election certification);
- and (3) received TCD parameters based on the expanded coverage area corresponding to their channel change parameters

TCD	ST	City	Call	Licensee	Fac ID	ERP	HAAT
12	AK	ANCHORAGE	KIMO	SMITH TELEVISION LICENSE HOLI	13815	41	240
9	AL	ANNISTON	WJSU-TV	TV ALABAMA, INC.	56642	15.6	359 see note
21	HI	WAILUKU	KWHM	LESEA BROADCASTING CORPOR/	37105	53.1	1298
43	ME	PORTLAND	WPXT	HMW, INC.	53065	750	265
10	MT	BILLINGS	KTVQ	KTVQ COMMUNICATIONS, INC.	35694	160	165
5	MT	BUTTE	KXLF-TV	KXLF COMMUNICATIONS, INC.	35959	10.7	588
10	MT	GLENDIVE	KXGN-TV	GLENDINE BROADCASTING CORP	24287	30	152
8	MT	GREAT FALLS	KFBB-TV	MARCIA L. CRITTENDEN	34412	28.6	180
7	MT	GREAT FALLS	KRTV	KRTV COMMUNICATIONS, INC.	35567	160	180
7	NY	ALBANY	WXXA-TV	CLEAR CHANNEL BROADCASTING	11970	10	434
8	OH	LIMA	WLIO	LIMA COMMUNICATIONS CORPOF	37503	30	165
10	PA	HARRISBURG	WHTM-TV	HARRISBURG TELEVISION, INC.	72326	14	346
45	PA	HAZLETON	WOLF-TV	WOLF LICENSE CORP.	73375	546	488 see note
13	TX	CORPUS CHRISTI	KRIS-TV	KVOA COMMUNICATIONS, INC.	25559	160	291
11	TX	LUBBOCK	KCBD	LIBCO, INC.	27507	15	232
38	TX	ODESSA	KPBT-TV	ODESSA JUNIOR COLLEGE DISTR	50044	500	82
44	UT	PROVO	KBYU-TV	LAURIE TORNEY	6823	403	1257
5	WV	WESTON	WDTV	WITHERS BROADCASTING COMP,	70592	9.96	253

Note: WJSU-TV and WOLF-TV's channel changes were associated with site location changes, a similar situation to WPCW