

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20445**

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

To: Office of the Secretary

COMMENTS OF GRAY TELEVISION LICENSEE, INC.

Gray Television Licensee, Inc. ("Gray Television"), by its counsel, hereby submits these late-filed comments in the above-referenced proceeding.¹ Gray Television requests a change in the channel allotted to KOLO-TV, Reno, Nevada (Facility ID No. 63331) ("KOLO" or the "Station") for post-transition DTV operations from Channel 9 to Channel 8. This revision serves the public interest, allowing KOLO to provide the "best possible service to the public, including service to [its] local community."²

Currently, KOLO operates on NTSC Channel 8 and DTV Channel 9. The station has been granted a license for its digital facility and is operating within the parameters specified in that license (BMLCDT-20031106AFM). Since KOLO began digital operations in late 2003, it has employed a "common" antenna for both its digital Channel 9 and analog Channel 8 operations. This antenna is more than 45 years old and located at

¹ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MB Docket No. 87-268, *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 (rel. Oct. 20, 2006) ("FNPRM").

² *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 03-15, Report and Order, 19 FCC Rcd 18279, 18307 (2004) ("*Second DTV Periodic Report and Order*").

a mountaintop tower site in the Toiyable National Forest, which is administered by the U.S. Forest Service.

Due to the fact that KOLO's antenna is tuned for Channel 8 operations and this antenna was not designed to cover multiple channels, the antenna's bandwidth for Channel 9 operations is not uniform. It has become apparent that this lack of uniformity reduces the ability of television receivers to correct for propagation effects such as multipath interference or receiver antenna misalignments. Therefore, if KOLO stays on Channel 9 for post-transition DTV operations, its antenna must be retuned or replaced to provide for better quality service to the public.

Based upon its consultations with equipment engineers, the Station believes that attempts to adjust the antenna's tuning rods (which have not been moved in 45 years) may result in one or more of these rods becoming stuck in an undesired configuration. Any problems encountered while adjusting these rods would only worsen the antenna's performance for Channel 9 operations.

KOLO has investigated the option of replacing the existing antenna with a new Channel 9 antenna. However, this option also carries a significant risk of compromising service to the public because of the long delay inherent in the process by which KOLO must obtain approval from the U.S. Forest Service to make any modifications to its tower. Thus, KOLO determined that operating in digital on Channel 8 after the DTV transition is its best option for ensuring uninterrupted high-quality digital service to the public.

As demonstrated by the attached Exhibit 1, Engineering Statement of Joseph M. Davis, P.E., KOLO's use of Channel 8 for its post-transition digital operations would

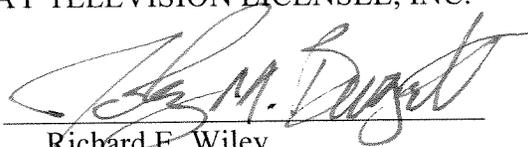
comply with the 0.1% interference limit employed by the Commission during both the channel election process and this proceeding.³

Therefore, in order to ensure that KOLO can continue to provide uninterrupted digital service to the public, Gray Television respectfully requests that these late-filed comments be accepted and the proposed DTV Table of Allotments be revised to specify Channel 8 as KOLO's post-transition digital operations.

Respectfully submitted,

GRAY TELEVISION LICENSEE, INC.

By:



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Its Attorneys

June 18, 2007

³ FNPRM at ¶26.

EXHIBIT 1

Engineering Statement
in support of
COMMENTS IN MB DOCKET 87-268
prepared for
Gray Television Licensee, Inc.
KOLO-TV Reno, Nevada
Facility ID 63331

This engineering statement has been prepared on behalf of *Gray Television Licensee, Inc.* (“Gray”), licensee of KOLO-TV (Facility ID 63331, Reno, NV) in support of late-filed *Comments* in the Seventh Further Notice of Proposed Rulemaking (“FNPRM”), Media Bureau Docket 87-268.¹ 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. *Gray* requests an alternative channel assignment for KOLO-TV.

The licensed KOLO-TV analog facility is on Channel 8 (BLCT-1667) and its digital operation is licensed on Channel 9 (BMLCDT-20041012AIN) using a common antenna system originally designed for Channel 8 operations only. Channel 9 was established as KOLO-TV’s TCD in the first round of channel elections.² As discussed in *Gray*’s comments to which this statement is attached, the KOLO-TV common antenna is better suited for operation on Channel 8. Therefore, *Gray* seeks to change the KOLO-TV TCD to Channel 8 with no change in site location, effective radiated power, or antenna height.

The results of an engineering interference analysis per OET Bulletin 69³ are supplied in **Table 1**, and demonstrate that new interference to any other station’s TCD does not exceed the 0.1 percent limit in compliance with the FNPRM.

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

²*Public Notice, DTV Tentative Channel Designations for 1,554 Stations Participating in the First Round of DTV Channel Elections*, DA 05-1743, released June 23, 2005.

³FCC 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.

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, *Gray* will accept interference from any other TCD already approved. The service and interference statistics for the present and proposed KOLO-TV TCD are summarized below.

	Ch. 9 Present TCD	Ch. 8 Proposed TCD
Service Area (sq. km)	38,673.7	39,676.5
Service Population (2000 census)	660,528	667,560
Interference	3.13 %	2.59 %

Class A Station Protection

The proposed TCD Channel 8 does not involve prohibited contour overlap to any authorized Class A station, except for KBTB-LP (BLTVL-20010504AAU, Ch. 8, Sacramento, CA, 161.1 km distant). An OET Bulletin 69 analysis⁴ per §73.623(c), summarized in **Table 2**, shows that no interference would be caused to KBTB-LP.

Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission’s implementation of OET-69 show excellent correlation.

⁴Consistent with Commission policy, 1990 census data was utilized for Class A station interference evaluation. A cell size of 1.0 km was employed.

Engineering Statement
KOLO-TV Reno, NV
Gray Television Licensee, Inc.
(page 3 of 3)



Conclusion

The KOLO-TV TCD is proposed to be changed from Channel 9 to Channel 8, its current analog channel. Interference to other stations 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.

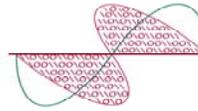
Joseph M. Davis, P.E.
June 18, 2007

Chesapeake RF Consultants, LLC
11993 Kahns Road
Manassas, VA 20112
703-650-9600

List of Attachments

Table 1	Interference Analysis Results Summary
Table 2	Class A Station Interference Analysis

Table 1
Interference Analysis Results Summary
Proposed KOLO-TV DTV Channel 8 Parameters
Gray Television Licensee, Inc.



Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Ch	Call Sign Service	State/City File Number	Fac. ID	Power HAAT	Latitude Longitude	Dist (km) Bear (°T)	Baseline Population	New Interference Population	Percent
7	KRNV DT	NV RENO BLCDT-20040622ABF	60307	16.1 879	39 18 57 119 53 2	0.3 349.1	676,855	0	0.00%
8	KSBW DT	CA SALINAS BFRCT-20050815ACD	19653	19.2 736	36 45 23 121 30 5	317.4 207.0	2,760,785	0	0.00%
8	KUNO-TV DT	CA FORT BRAGG BPCDT-19991019ABW	8378	44.866 733	39 41 38 123 34 43	320.6 278.8	140,427	145	0.10%
9	KVIE DT	CA SACRAMENTO BDTV	35855	19.182 567	38 16 18 121 30 18	182.3 231.0	7,291,224	0	0.00%

Table 2
Class A Television Station Interference Analysis
Proposed KOLO-TV DTV Channel 8 Parameters
Gray Television Licensee, Inc.



KOLO-D8 USERRECORD-01 RENO NV US
 Channel 08 ERP 15.6 kW HAAT 897. m RCMSL 02974 m
 Latitude 039-18-49 Longitude 0119-53-00
 Status APP Zone 2 Border

Cell Size for Service Analysis 1.0 km/side
 Distance Increments for Longley-Rice Analysis 1.00 km

Evaluation toward Class A Stations

Contour overlap to Class A station
 KBTW-LP 8 SACRAMENTO CA BLTVL 20010504AAU

Class A Evaluation Complete

%%%

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
08	KBTW-LP	SACRAMENTO CA	BLTVL -20010504AAU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
07	KGO-TV	SAN FRANCISCO CA	123.8	LIC	BLCT -2339
08	KUNO-TV	FORT BRAGG CA	220.1	LIC	BMLCT -20031205APM
08	K08EE	POTTER VALLEY CA	151.1	LIC	BLTTV -4091
08	KSBW	SALINAS CA	201.2	LIC	BLCT -20020424AAN
08	KOLO-TV	RENO NV	161.1	LIC	BLCT -1667
09	KQED	SAN FRANCISCO CA	123.9	LIC	BLET -356
08	KOLO-D8	RENO NV	161.1	APP	USERRECORD-01

Proposal causes no interference