

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Third Periodic Review of the)
Commission’s Rules and Policies) MB Docket No. 07-91
Affecting the Conversion)
To Digital Television)
)

COMMENTS OF TWIN CITIES PUBLIC TELEVISION, INC.

Twin Cities Public Television, Inc. (“TPT”), licensee of noncommercial educational television Stations KTCA-TV/DT and KTCI-TV/DT, St. Paul, Minnesota, hereby submits these Comments in response to the Commission’s *Notice of Proposed Rulemaking* (the “*Notice*”).¹ For the reasons set forth below, TPT urges the Commission to modify the rules proposed in its *Notice* and allow stations with different pre- and post-transition DTV channels to replicate their pre-transition DTV service areas or operate with an ERP of at least 50 kW, even if the noise limited contour of the post-transition facilities would extend beyond the noise limited contour of the pre-transition facilities, provided no more than 0.1% additional interference is created for other DTV stations. TPT also supports the Commission’s proposal to allow stations to remain temporarily on their in-core pre-transition DTV channels in order to facilitate a smooth transition.

¹ *In re Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70 (rel. May 18, 2007) (“*Notice*”).

I. BACKGROUND

Station KTCI-DT is currently operating on Channel 16 and has received the tentative post-transition designation of Channel 26. As TPT explained in comments filed in response to the *Seventh Further Notice of Proposed Rulemaking*,² TPT has entered into an agreement with Fox Television Stations, Inc., licensee of Station KMSP-DT, Minneapolis, MN, which is currently operating on DTV Channel 26, to use Station KMSP-DT's antenna for Station KTCI-DT's Channel 26 operations after the transition. That antenna has a materially different antenna pattern from Station KTCI-DT's Channel 16 pre-transition antenna, and TPT requested that the Commission correct the final DTV Table of Allotments to specify the appropriate power levels and the correct HAAT using Station KMSP-DT's antenna to replicate Station KTCI-DT's service area on Channel 26.

In the *Seventh Report and Order*,³ the Commission rejected KTCI's proposed changes to the final DTV Table of Allotments, concluding that these proposed changes were either "speculative future events or could best be accomplished through the upcoming application process."⁴ The Commission explained:

Stations KTCI-DT [and six other stations] will use a different channel from their current DTV channel for post-transition operations. These stations, and others that seek to use their analog channel or a new channel for post-transition operations, may not file an application to construct their post-transition facilities until the final post-transition rules and procedures are established by the Report and Order in the Third DTV Periodic Review proceeding. We recognize that these stations may need to request different

² *In re Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Further Notice of Proposed Rulemaking, 21 FCC Rcd. 12100 (2006).

³ *In re Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, MB Docket No. 87-268, FCC 07-138 (rel. Aug. 6, 2007) ("*Seventh Report and Order*").

⁴ *Id.* ¶ 83.

parameters from those specified in the post-transition DTV Table Appendix B, even though these stations are not seeking to change the coverage area of their post-transition channel. These stations should address this situation in their applications for their post-transition channels. If a station that is moving to a different channel for post-transition use determines that the parameters necessary to serve the coverage area specified in the post-transition DTV Table Appendix B differ from those specified in the post-transition DTV Table Appendix B, it should apply for those changes in its application. The Commission will evaluate those applications using the interference standard and other processing standards adopted in the Third DTV Periodic Report and Order.⁵

Given the Commission's refusal to correct Station KTCI-DT's parameters in the final DTV Table of Allotments and its clear indication that Station KTCI-DT's ability to replicate its service area on Channel 26 would be governed by the processing standards established in this proceeding, TPT urges the Commission to fashion a narrow exception to the current television application freeze⁶ to enable stations changing channels to replicate their existing DTV service area where the station's planned use of facilities on the new channel would cause the station to exceed the protected service contour of their current DTV facilities and to authorize those stations to operate with sufficient power to provide competitive and reliable DTV service to their community.

II. ARGUMENT

- A. The Commission Should Allow Stations Changing Channels to Replicate Their Existing DTV Service Area and Should Allow UHF DTV Stations to Operate With A Minimum ERP of 50 kW.

In the *Notice*, the Commission proposed, subject to certain exceptions, to maintain the current freeze on television applications, thereby limiting the ability of stations to expand their

⁵ *Id.* ¶ 87.

⁶ *See* "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," Public Notice, 19 FCC Rcd. 14810 (MB 2004).

coverage areas beyond that authorized by a license, construction permit or special temporary authorization.⁷ While it recognized that “stations may want ... to expand their facilities to serve a larger area than defined in the new DTV Table Appendix B ...,”⁸ the Commission concluded that it “must first ensure that all stations can at least provide digital service to their analog viewers by the transition date before considering new maximization applications.”⁹ The Commission sought comment on this approach and also invited comment on “ways in which stations could seek expanded facilities at this time without delaying the transition or overburdening the scarce resources needed by other stations to transition.”¹⁰

In discussing the proposed filing requirements for post-transition facilities, the Commission further sought input “from any stations that may be unable to build precisely the facilities specified in the new DTV Table Appendix B (for example, if an antenna producing the exact antenna pattern described in Appendix B is not available).”¹¹ The Commission posed questions directed at stations that may have to reduce their facilities in order to build the facilities specified in the final DTV Table:

“If such stations are prohibited from expanding beyond their DTV Table Appendix B facilities . . . , will they instead be required to reduce their facilities so significantly that they will be unable to provide adequate service? If so, should we allow stations that fall into this situation to expand beyond their DTV Table Appendix B

⁷ *Notice* ¶¶ 97-99. In paragraph 94 of the *Notice*, the Commission indicates that stations which apply for post-transition facilities that do not deviate more than five percent from the facilities specified in the new DTV Table with respect to predicted population will be eligible for expedited processing. This exception would appear to constitute a limited waiver of the freeze.

⁸ *Id.* ¶ 98.

⁹ *Id.* ¶ 99. In the proposed revised Forms 301 and 340 appended to the *Notice*, the Commission proposed that applicants explain whether the station “will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond” the new DTV Table. *Id.*, App. B.

¹⁰ *Id.* ¶ 99.

¹¹ *Id.* ¶ 93.

facilities to the extent necessary to address the difference between the theoretical facilities specified in the new DTV Table Appendix B and the actual facilities which they are able to build?¹²

TPT recognizes the importance of assuring that all stations can provide DTV service to their analog service areas and supports the Commission's desire to achieve that goal. However, applying the television application freeze to all stations that are changing channels will undermine that goal because it will preclude some stations from replicating their current DTV service areas. When the Commission required licensees to elect the channel on which they would operate permanently, it did not request information as to the facilities the stations might employ with respect to those channels and, indeed, implied that, regardless of the channel selected, the station would be able to replicate its existing DTV service area.¹³ As a result, TPT, and it assumes other licensees, selected post-transition channels without concern for the antenna pattern of the post-transition channel they selected. In TPT's case, it selected DTV Channel 26 at the request of Fox Television, the tower owner, in order to eliminate the complex and historically unreliable tower-mounted combining/separating system that currently allows KTCI-DT Channel 16 and KMSP Channel 9 to share a single transmission line on Fox's heavily loaded tower. Selecting Channel 26 allows KTCI-DT to use the current Channel 26/34 combining equipment located in TPT's transmitter building. Moreover, TPT assumed the change in antenna pattern and channel would result in less interference to other stations because it would be

¹² *Id.* ¶ 93.

¹³ *See In re Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, 19 FCC Rcd. 18279, ¶ 37 (2004) (stating Commission goal in evaluating channel elections to "preserve the service areas of those stations that constructed and are operating in accordance with the DTV buildout schedules"); *id.* ¶ 31 (stating Commission goal in the channel election process to "recognize industry expectations by protecting existing service and respecting investments already made" and to "ensure to the extent possible that final channel allotments accommodate replicated and maximized service areas").

operating KMSP-DT's Channel 26 antenna with an ERP of only 50 kW compared with KMSP-DT's current ERP of 691 kW, a reduction of 11.4 dB.

However, in selecting Channel 26, TPT did not contemplate that it would be restricted to the noise limited contour of its pre-transition Channel 16 antenna, which has a very different antenna pattern than that of the Channel 26 antenna it plans to employ.¹⁴ As explained in the attached Engineering Statement of Kessler and Gehman Associates, Inc., given the differences in antenna patterns, restricting the noise limited contour of Station KTCI-DT on Channel 26 will preclude TPT from effectively replicating the service area of its current pre-transition DTV facilities, particularly given the prospect of multipath interference resulting from the larger buildings in the Minneapolis-St. Paul area.¹⁵ Indeed, TPT is concerned that the Commission's proposal will deprive viewers in its principal cities of the ability to receive Station KTCI-DT's signal off-the-air. It is estimated that approximately 92,000 people living in twenty local communities around the Twin Cities area that currently receive Station KTCI-DT will lose the Station KTCI-DT signal on Channel 26.¹⁶ However, this estimation does not include the number of homes that will not be able to receive a reliable signal as a result of severe multipath conditions due to the terrestrial buildup around the metropolitan areas.¹⁷

As indicated in the attached Declaration of Glenn Fischer, Station KTCI-DT currently offers a series of multicast programs, providing unique programming for children, programming designed to serve the needs of various underserved communities in the Twin Cities, instructional

¹⁴ Copies of the two antenna patterns are included in the Kessler and Gehman Engineering Statement.

¹⁵ *See* Kessler and Gehman Engineering Statement.

¹⁶ *See id.*

¹⁷ *See id.*

programming and weather services.¹⁸ TPT plans to take full advantage of its digital spectrum after the transition to provide a diverse programming lineup to serve the needs and interests of viewers throughout the Twin Cities area. Contracting the service area of Station KTCI-DT by requiring it to comply with the television application freeze will deny these 92,000 viewers as well as viewers that may be affected by multipath interference of this diversity of programming, programming not otherwise available in the Twin Cities.

Thus, while designed to avoid efforts by stations to maximize before all stations could provide DTV service to their current viewers, the Commission's proposal will, if adopted, have a far broader preclusive effect, and undermine the Commission's goal in adopting the limitation. In order to avoid that untoward result, TPT urges the Commission to allow stations changing their DTV channels to serve the same area as their pre-transition channel as long as they do not increase the interference currently received by other DTV stations by more than 0.1%. Adopting this approach, rather than applying the freeze to these stations, would preserve the status quo for DTV viewers and advance the Commission's goal of assuring that viewers are not deprived of the DTV service they are currently receiving.

TPT also urges the Commission to allow all UHF DTV stations to operate with an ERP of at least 50 kW. When the Commission adopted the initial DTV Table of Allotments in 1997,

¹⁸ Station KTCI-DT offers five programming streams: (1) a simulcast of Station KTCI-TV's analog programming, which is primarily the National Weather Service during the day and PBS's national programming service and other distributors' programs during primetime; (2) "TPT MN", which is a full-time program service made up of programs produced by TPT, TPT partners, public television stations in the upper-Midwest, and other independent producers; (3) "TPT Kids", which is a full-time television service for children from pre-school through early elementary school; (4) "Create TV", which is a full-time instructional program service on cooking, arts and crafts, gardening, home improvement and travel; and (5) "TPT Weather", which is the full-time National Weather service programming. *See* Declaration of Glenn Fisher.

and set forth the policies for the development of a DTV service,¹⁹ it stated that it was “important to adopt an approach that provides for a high degree of service replication by all stations, while at the same time ensuring that all stations are able to provide DTV service competitively within their respective markets.”²⁰ Accordingly, the Commission developed the DTV Table of Allotments based on a minimum power level of 50 kW for UHF stations.²¹ The Commission concluded that “a 50 kW minimum power level will ensure that stations have a sufficient service area to compete effectively in the provision of DTV services.”²²

The same rationale should apply in the post-transition world. The limitations of a UHF DTV station operating at less than 50 kW remain the same today as they were when the Commission adopted a 50 kW minimum ERP for UHF DTV in 1997. Thus, the Commission should adopt a narrow exception to the current freeze and allow UHF DTV stations to operate with a minimum ERP of at least 50 kW. As the Commission and many commenters recognized in the 1997 DTV proceeding, UHF stations that operate at a power level below 50 kW will be at a competitive disadvantage because of their weak signal strength and small service area.²³

¹⁹ *In re Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Sixth Report and Order, 12 FCC Rcd. 14588 (1997).

²⁰ *Id.* ¶ 30.

²¹ *Id.*

²² *Id.*

²³ If the Commission does not allow this narrow exception to the filing freeze, at a minimum, the Commission should grant interference protection to UHF stations moving to a different channel and using a different antenna that are forced to apply for reduced facilities. The Commission should ensure that, after the Commission lifts its filing freeze after February 17, 2009, such stations have interference protection to apply for expanded facilities with a minimum ERP of at least 50 kW.

B. The Commission Should Allow Temporary Use of In-Core Pre-Transition DTV Channels

In the *Notice*, the Commission proposed to allow stations moving to a new channel for post-transition operations to temporarily remain on their in-core pre-transition DTV channel if: (1) “they serve at least the same area and population that receives their current . . . DTV service so that over-the-air viewers will not lose TV service;” and (2) “they do not cause impermissible interference to other stations or prevent other stations from making their transition.”²⁴

TPT supports this proposal and urges the Commission to adopt it. KTCI will be moving to a post-transition DTV channel that is presently being used by another station for pre-transition DTV operations. Allowing stations the flexibility to remain on their pre-transition channels for a reasonable period of time after the transition will ease the final phase of the DTV transition. If this proposal is adopted, the Commission should allow stations to remain on their in-core pre-transition channel until the Commission addresses maximization proposals submitted after the freeze is lifted. By allowing stations to continue operating on the pre-transition in-core channels until the Commission processes initial requests to maximize, the Commission will minimize the changes in channels by stations seeking to improve their DTV facilities, thereby reducing the costs of maximization and the uncertainty and disruption which continual changes to the DTV Table of Allotments will produce. Since the ability to stay on the pre-transition channel is conditioned on a station not causing additional interference to others, a station that stays on its pre-transition channel will not harm other DTV stations or deprive viewers of the range of programming they are accustomed to receiving. Further, it will not delay the ability of other stations to select a new DTV channel since all licensees will know that the allocation is

²⁴ *Notice* ¶ 90. The Commission proposed to apply a 0.5 percent interference standard to such proposals.

temporary. Indeed, as a general matter, TPT urges the Commission to provide DTV stations with the maximum flexibility to modify and improve their DTV facilities in the post-transition period so that they can adapt to the new realities of the digital-only world and maximize the service provided to viewers.

III. CONCLUSION

For the foregoing reasons, TPT urges the Commission to modify its proposed rules and allow stations with different pre- and post-transition channels to replicate fully their pre-transition DTV service area, notwithstanding the freeze on the filing of television applications, that would extend the service contour of authorized facilities provided no more than 0.1% additional interference is caused to any DTV station. Giving stations this flexibility will promote rather than hinder the Commission's goal of assuring that all DTV stations continue serving their current populations. In addition, TPT urges the Commission to allow UHF DTV stations to operate with a minimum ERP of 50 kW and encourages the Commission to adopt policies that afford regulatory flexibility to stations at this critical juncture in the transition, including the Commission's proposal to allow stations to remain temporarily on their pre-transition DTV channels.

Respectfully submitted,

/s/ Theodore D. Frank
Theodore D. Frank
Maureen R. Jeffreys
Arnold & Porter LLP
555 Twelfth Street, N.W.
Washington, DC 20004
Counsel for Twin Cities Public Television, Inc.

August 15, 2007



Kessler and Gehman Associates, Inc.

Telecommunications Consulting Engineers

ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR. OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS CONSULTING ENGINEERS IN CONNECTION WITH FILING COMMENTS ON THE PROCEDURES AND RULE CHANGES ADOPTED IN THE THIRD PERIODIC REVIEW OF THE COMMISSION'S RULES AND POLICIES AFFECTING THE CONVERSION TO DIGITAL TELEVISION WITH RESPECT TO THE TWIN CITIES PUBLIC TELEVISION (TPT) POST-TRANSITION DIGITAL BROADCAST FACILITY, KTCI-DT CHANNEL 26, ST. PAUL, MINNESOTA.

The firm Kessler and Gehman Associates, Inc. has been retained by Twin Cities Public Television (TPT), licensee of digital broadcast facility KTCI-DT Channel 26, to prepare an engineering analysis with respect to the Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television (Third DTV Periodic NPRM).

Discussion

As stated in the Third DTV Periodic NPRM, the purpose of this periodic review is to assess the progress of the transition and make any necessary adjustments to the Commission's rules and policies to facilitate the introduction of DTV service. The Third DTV Periodic NPRM states that the DTV Table is based on the Tentative Channel Designations (TCD) announced for stations, as well as the Commission's efforts to promote overall spectrum efficiency and ensure that broadcasters provide the best possible service to the public, including service to local communities. The purpose of this engineering statement is to respectfully make the Commission aware that TPT's post-transition broadcast facility, KTCI-DT Channel 26, as depicted in the Final DTV Table of Allotments (TOA) will fall well short of replicating its pre-transition DTV facilities if the Commission imposes the current filing freeze on KTCI-DT.

TPT filed comments in January 2007 notifying the Commission that the proposed DTV TOA, as depicted in the Seventh Further Notice of Proposed Rule Making, specified an incorrect



antenna ID. The Final DTV TOA, as depicted in the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making, demonstrated that the Commission did not correct the antenna ID. The Commission stated that the antenna change should be applied for in an application and that the application would be subject to the ongoing filing freeze and other final post-transition rules and procedures established in this proceeding.

TPT leases space on the FOX tower in the vicinity of Shoreview, MN (ASRN: 1022899) and was advised that it should move from its licensed Channel 16 DTV side-mount antenna to the existing KMSP-DT Channel 26 pre-transition top-mount antenna because KMSP is abandoning Channel 26 and moving to digital Channel 9 for its post-transition operation. This move would eliminate the existing Channel 16 side-mount antenna which is desired by the tower owner for support structure configuration purposes. Exhibit 1 depicts the KTCI-DT Channel 16 antenna azimuth pattern specified in the Final DTV TOA (Antenna ID: 74396) and the Exhibit 2 depicts the proposed digital Channel 26 antenna azimuth pattern (Antenna ID: 29226). Both patterns are directional cardioids; however, the patterns are not identical. Due to tower constraints, TPT is contractually obligated to transition from its Channel 16 antenna to the KMSP antenna for post-transition operation. Accordingly TPT asked the FCC to adjust the DTV TOA to reflect the new antenna ID and antenna height. The antenna height adjustment is the result of a side-mount (CH 16) to top-mount (CH 26) change.

Exhibit 3 pictorially demonstrates the hardship that will be placed upon the general public if TPT is prevented from replicating its current pre-transition DTV facilities on Channel 26 because of different antenna patterns. Without being able to adjust the antenna ID and height, it is predicted that over 92,000 people will lose the public broadcasting service that they currently enjoy and rely on from KTCI-DT Channel 26. Referring to Exhibit 3, it can be seen that twenty cities on the outskirts of St. Paul, MN would be predicted to lose service due to the well documented “cliff effect” that goes hand in hand with digital television transmissions as well as multipath conditions. The black contour depicted in Exhibit 3 is the KTCI-DT Channel 16 F(50,90) 40.0 dBuV/m protected noise limited contour based on the parameters depicted in the Final DTV TOA. The



filing freeze currently in effect prohibits stations from increasing coverage in any azimuthal direction. Therefore, the KTCI-DT Channel 26 F(50,90) 40.0 dBuV/m contour (red) cannot exceed the KTCI-DT Channel 16 TOA contour (black) in any direction. It was determined that the maximum ERP allowable, using the Channel 26 antenna, without exceeding the KTCI-DT Channel 16 TOA contour would be only 12 kW. An ERP greater than 12 kW would violate the freeze due to increased coverage along the 90-100 degree radials (see “limiting factor” in Exhibit 3). Dropping the ERP to 12 kW would result in a 51.1 kW decrease which equates to a 7.2 dB reduction to an ERP that is already considered very low for a UHF full-service digital facility. Not to mention, an ERP of only 12 kW would not be sufficient to overcome severe multipath conditions which would clearly be an issue due to the terrestrial buildup in and around the principal community of St. Paul, MN. The red shaded area depicted in Exhibit 3 demonstrates the area that would be lost simply because the antenna patterns are slightly different. Again, over 92,000 people living in twenty cities encompassing over nine counties around the St. Paul, MN area that currently receive KTCI-DT programming would be predicted to lose the KTCI-DT signal.

Paragraph 93 of the Third DTV Periodic NPRM states that the Commission is seeking input from any stations that may be unable to build precisely the facilities specified in the new DTV Table Appendix B. The Commission goes on to ask if such stations are prohibited from expanding beyond their DTV Table Appendix B facilities will they instead be required to reduce their facilities so significantly that they will be unable to provide adequate service? It also asked for comments on whether the FCC should allow stations that fall into this situation to expand beyond their DTV Table Appendix B facilities to the extent necessary to address the difference between the theoretical facilities specified in the new DTV Table Appendix B and the actual facilities which they are able to build? In response, TPT respectfully requests that stations be permitted to expand beyond their DTV Table Appendix B facilities when minor changes to antenna patterns are required to permit the station to replicate its current DTV facilities. In the case for TPT, the public interest would clearly be served by changing the antenna ID from 74396 to 29226 and the antenna height radiation center above average terrain from 392.9 m to 411.1 m.



Kessler and Gehman Associates, Inc.

Telecommunications Consulting Engineers

Certification

This technical statement was prepared by William T. Godfrey, Telecommunications Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.



KESSLER AND GEHMAN ASSOCIATES, INC.


WILLIAM T. GODFREY, JR.
Telecommunications Technical Consultant

15 August, 2007

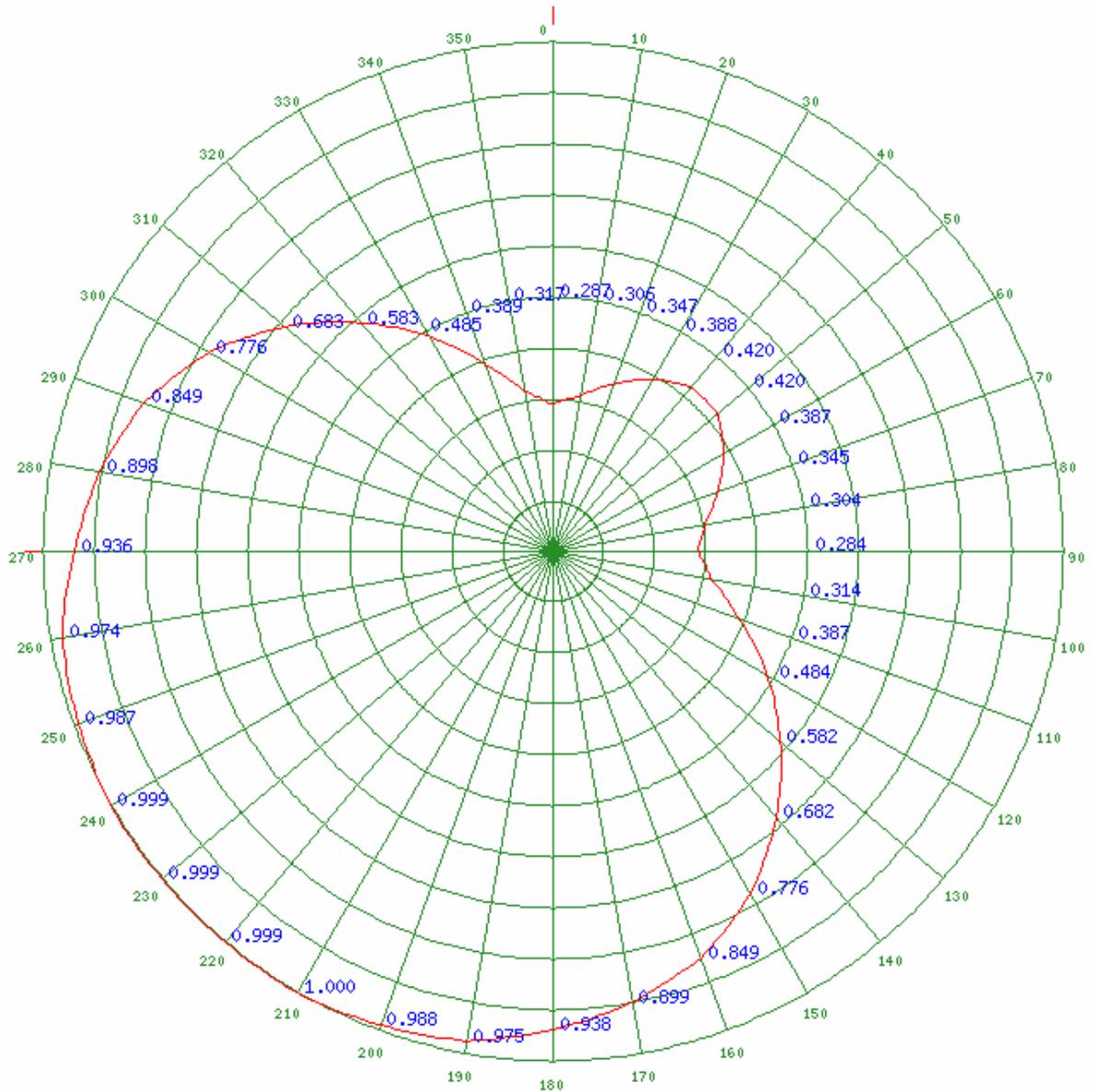
Antenna Make	Model	Service	Antenna Id
D16	MNST_PAUL_26	DT	74396

Antenna relative field values:

0°	0.287	10°	0.306	20°	0.347	30°	0.388	40°	0.42	50°	0.42
60°	0.387	70°	0.345	80°	0.304	90°	0.284	100°	0.314	110°	0.387
120°	0.484	130°	0.582	140°	0.682	150°	0.776	160°	0.849	170°	0.899
180°	0.938	190°	0.975	200°	0.988	210°	1	220°	0.999	230°	0.999
240°	0.999	250°	0.987	260°	0.974	270°	0.936	280°	0.898	290°	0.849
300°	0.776	310°	0.683	320°	0.583	330°	0.485	340°	0.389	350°	0.317

Additional Azimuths:

Relative Field Polar Plot



Antenna Make	Model	Service	Antenna Id
DIE	TUP-SP4-12S-1	DT	29226

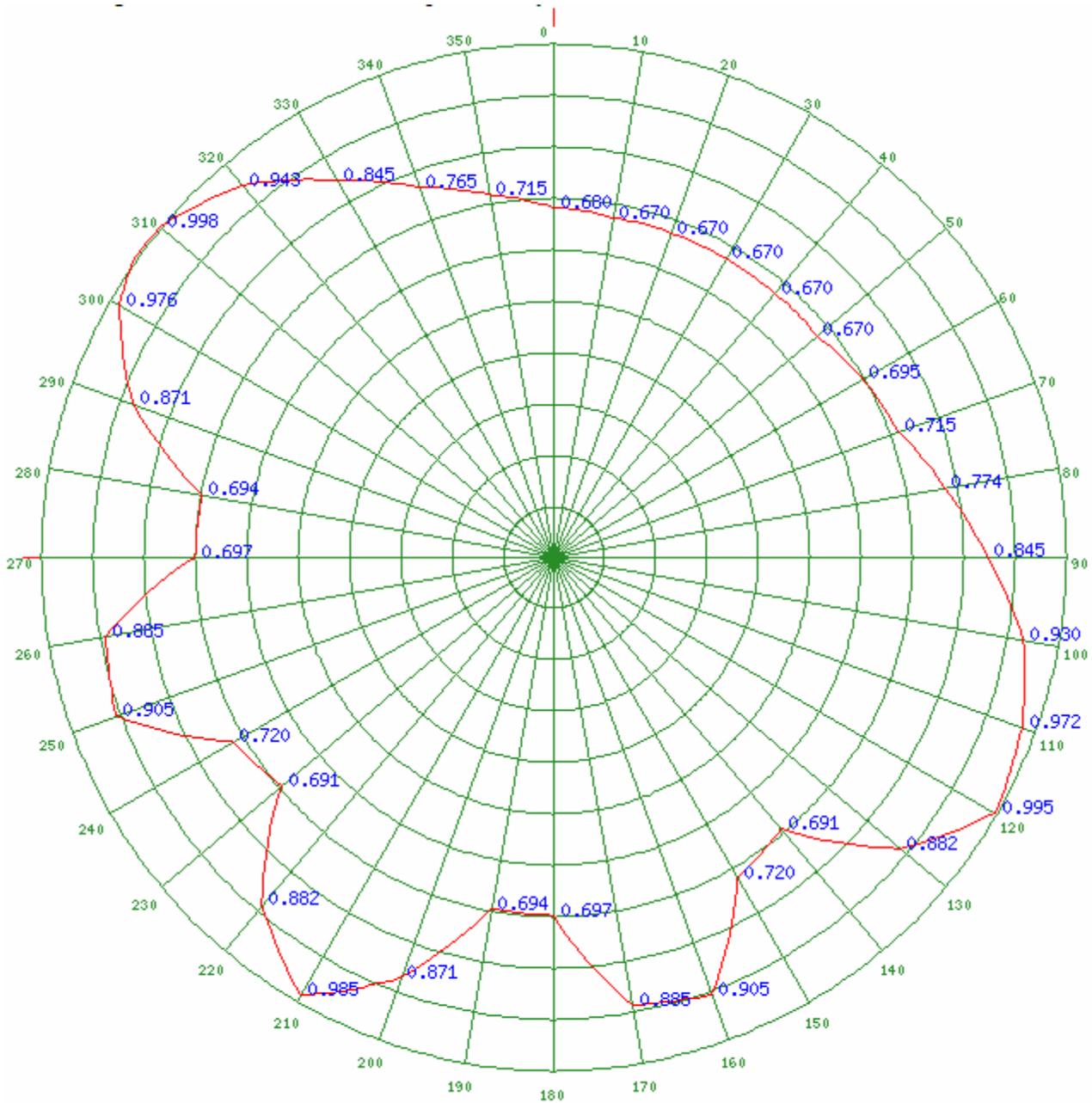
Antenna relative field values:

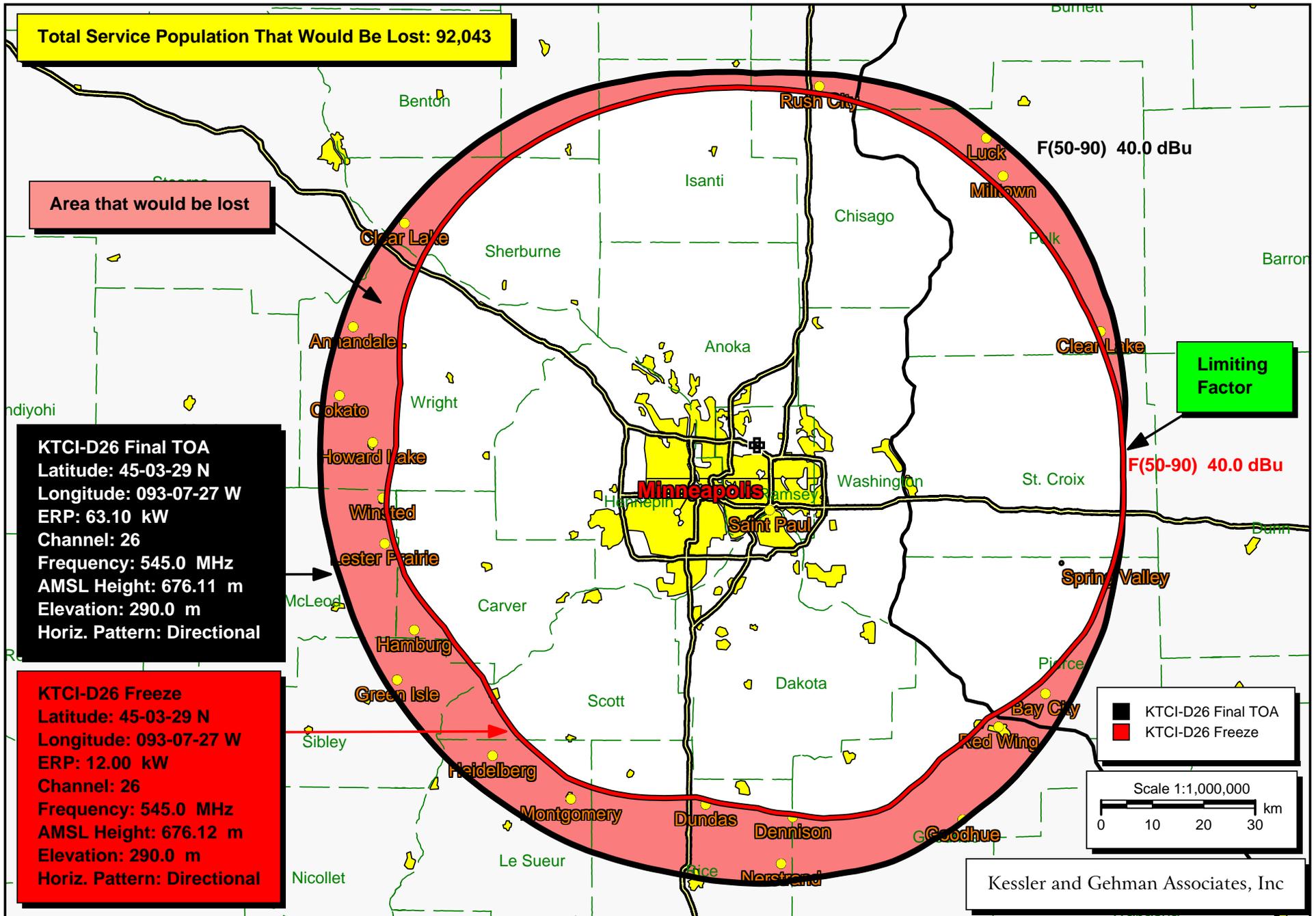
0°	0.68	10°	0.67	20°	0.67	30°	0.67	40°	0.67	50°	0.67
60°	0.695	70°	0.715	80°	0.774	90°	0.845	100°	0.93	110°	0.972
120°	0.995	130°	0.882	140°	0.691	150°	0.72	160°	0.905	170°	0.885
180°	0.697	190°	0.694	200°	0.871	210°	0.985	220°	0.882	230°	0.691
240°	0.72	250°	0.905	260°	0.885	270°	0.697	280°	0.694	290°	0.871
300°	0.976	310°	0.998	320°	0.943	330°	0.845	340°	0.765	350°	0.715

Additional Azimuths:

305°	1
------	---

Relative Field Polar Plot





KTCI-D26 Final DTV TOA (black contour) & KTCI-D26 Freeze (red contour)

DECLARATION OF GLENN FISHER

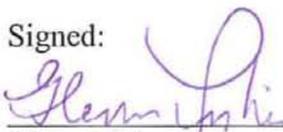
1. My name is Glenn Fisher. I am Vice President of Broadcast Services for Twin Cities Public Television, Inc. ("TPT").
2. TPT is the licensee of two public television stations licensed to the Minneapolis-St. Paul, MN area, Station KTCA-TV/DT and Station KTCI-TV/DT. TPT uses the two stations to provide distinct services to its service area, and has taken advantage of the programming diversity made possible for digital technology to expand on its current analog services. Currently, Station KTCA-DT and Station KTCI-DT provide multicast programming streams that offer unique content for each station. After the digital transition is complete, TPT plans to continue to offer diverse program lineups on the two stations, to explore new ways to take full advantage of our digital spectrum, and to pursue new programming options that serve the needs and interests of viewers in the Twin Cities area.
3. Station KTCA-DT has two programming streams. The first channel is a simulcast of Station KTCA-TV's analog programming. This features primarily PBS Kids and PBS's national programming service. The second channel features "TPT HD", which is a full-time service devoted to sharing the best that Public Television has to offer in the High Definition format. TPT HD includes history, nature, documentary, lifestyle and children's programs that significantly enhance the viewing and learning experience through greater picture depth and clarity. Additionally, TPT HD brings a more realistic sound experience through 5.1 surround sound.
4. Station KTCI-DT offers five programming streams: analog Station KTCI programming, "TPT MN," "TPT Kids," "Create TV" and "TPT Weather."
5. The first of KTCI-DT's channels simulcasts Station KTCI-TV's analog programming, which is primarily the National Weather Service during the day and PBS's national programming service and other distributors' programs during primetime.
6. The second channel, TPT MN, is a full-time programming service designed to specifically serve our local community in ways no other media can. From very narrowly focused programs that are created by and for non-English speaking communities to programs created in partnership with other community non-profit organizations and government agencies to regionally focused programs from Minnesota's neighboring public television stations, TPT MN explores issues, celebrates our diversity and shares our cultures.
7. Station KTCI-DT's third channel, TPT Kids, is a full-time television service that features PBS's award-winning children's programs and educational interstitial material. Designed for children from pre-school through early elementary school age children, TPT Kids provides

the highest quality non-commercial content and learning environment available. Programs are scheduled at age-appropriate times and with our diverse audience in mind.

8. Create TV, Station KTCI-DT's fourth channel, is an instructional programming channel that provides expert advice on cooking, arts and crafts, gardening, home improvement and travel. Designed to inspire and encourage viewers to explore and live more fully, Create is a full-time channel that features many of television's most popular how-to, cooking and travel programs.
9. Station KTCI-DT's fifth channel, TPT Weather, features the full-time National Weather service programming.
10. I hereby declare under penalty of perjury that the facts in the attached Comments regarding the programming offered on Station KTCA-DT and Station KTCI-DT are true and correct to the best of my knowledge and belief.

Executed on August 15, 2007.

Signed:



Glenn Fisher
Vice President, Broadcast Services
Twin Cities Public Television, Inc.