

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RECONSIDERATION
IN MB DOCKET NO. 87-268 ADVANCED TELEVISION SYSTEMS
AND THEIR IMPACT UPON THE
EXISTING TELEVISION BROADCAST SERVICE
TELEVISION STATION KFVS
CAPE GIRARDEAU, MISSOURI

Technical Narrative

This technical exhibit was prepared in support of the *Petition for Reconsideration* for Television Station KFVS. KFVS operates on Channel 57 DTV, Channel 12 Analog at Cape Girardeau, Missouri. KFVS has been ordered back to its analog Channel 12 for post-transition operation. KFVS intends to operate with its existing analog antenna for post-transition operation. As KFVS's analog antenna is non-directional and its allotted Channel 12 digital allotment has a directional antenna, there is an antenna pattern mismatch.

Therefore, for station KFVS to serve as much of the area encompassed by its licensed digital operation and use its analog non-directional antenna and radiation center, it must operate with 4 kilowatts/610 meters. Such operation would not cause impermissible interference, compared to its present DTV Allotment, to any other post-transition allotment.

Attached, as Figure 1 is a coverage map showing the herein proposed post-transition facility does not have a noise-limited contour extending beyond its licensed digital noise-limited contour.

Proposed Channel 12 Table of Allotment Parameters

It is requested that the Commission modify the proposed Appendix B DTV Table of Allotment specifications to the following:

Fac. ID	City & State	DTV									
		NTSC Ch.	Ch.	ERP (kW)	HAAT (m)	Ant. ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sqkm)	Population (thousand)	Percent IX Received
592	Cape Girardeau, MO	12	12	4	610	N/D	372546	0893014	33613	7074	1.1

Certification

KFVS certified on its FCC Form 381, Pre-Election Certification Form¹, that it will operate its post-transition DTV station pursuant to its licensed DTV facility.² The current DTV allotment for KFVS serves 694,589 persons over an area of 32,716.9 km². These values compare to the herein proposed post-transition facility, which serves 707,403 persons over an area of 33,613.0 km².

It is furthermore noted that the proposed Channel 12 post-transition allotment does not create interference in excess of 0.5% to other post-transition stations based upon the 2000 Census. Figure 2 is a tabulation of the allocation study performed for the Channel 12 post-transition facility.

Jonathan N. Edwards

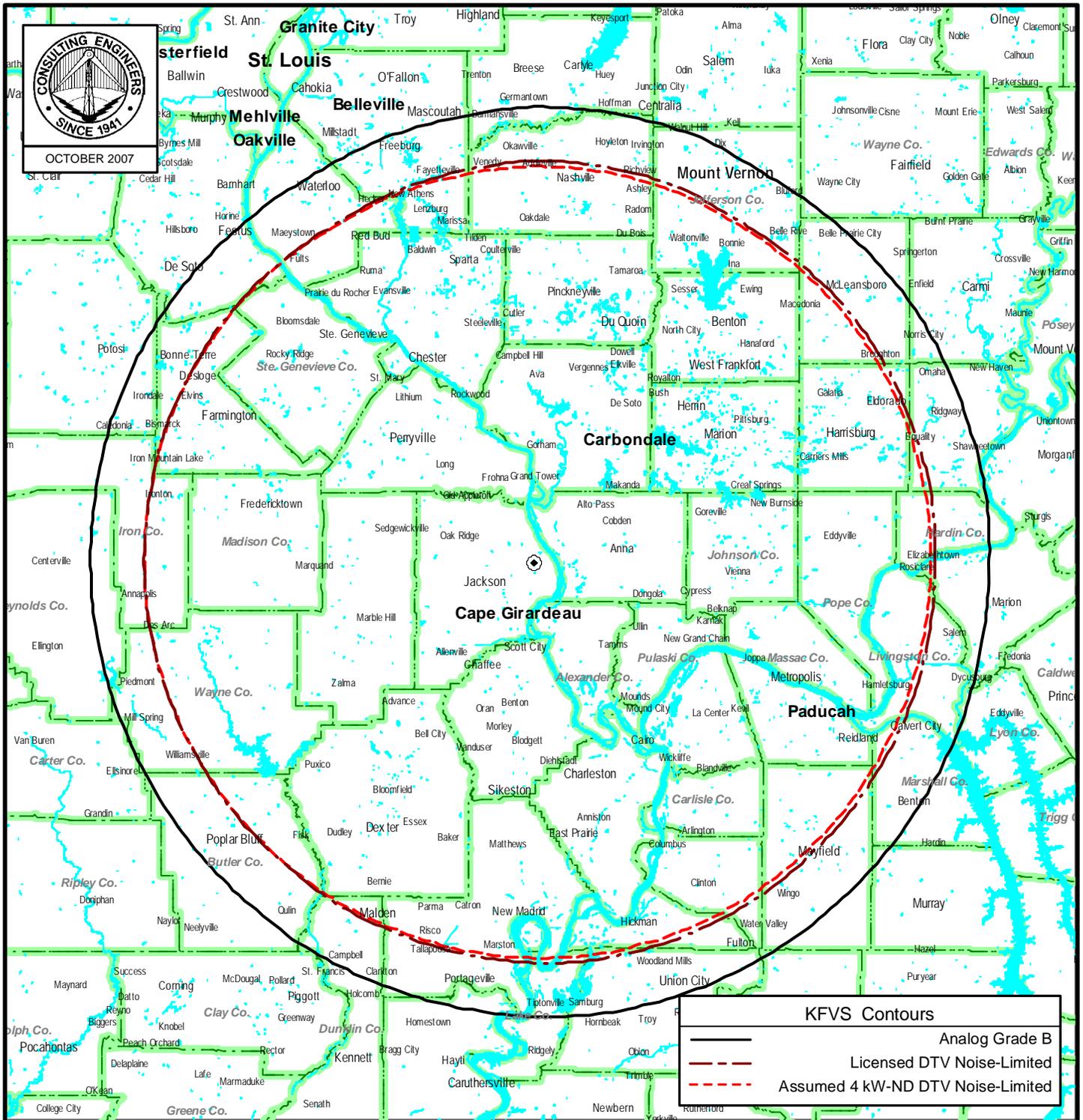
du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

October 26, 2007

¹ See FCC File Number: BCERCT-20041103AFH

² See FCC File Number: BLCDT-20020423AAA

Figure 1



PREDICTED COVERAGE CONTOURS
STATION KFVS
CAPE GIRARDEAU, MISSOURI
du Treil, Lundin & Rackley, Inc Sarasota, Florida

Figure 2
Sheet 1 of 7

Census data selected 2000

Post Transition Data Base Selected

/export/home/cdbs/tvdb.sff_G

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-22-2007 Time: 13:24:44

Record Selected for Analysis

KFVS USERRECORD-01 JNE MO US
Channel 12 ERP 4. kW HAAT 609. m RCAMSL 00745 m
Latitude 037-25-46 Longitude 0089-30-14
Status APP Zone 2 Border

Cell Size for Service Analysis 2.0 km/side
Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	36.0 dBu F(50,90) (km)
0.0	4.000	629.0	105.6
45.0	4.000	615.5	105.2
90.0	4.000	622.3	105.4
135.0	4.000	632.5	105.8
180.0	4.000	619.9	105.4
225.0	4.000	582.9	104.0
270.0	4.000	578.6	103.8
315.0	4.000	587.8	104.2

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations
Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quite zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	City/State	ARN
12	KFVS	JNE MO	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	KTHV	LITTLE ROCK AR	397.2	CP	BPCDT	-19991020ABU
12	KFVS-TV	CAPE GIRARDEAU MO	0.0	LIC	BLCDT	-20020423AAA
12	KRCG	JEFFERSON CITY MO	266.7	LIC	BLCDT	-20030709ABP
12	WMAE-TV	BOONEVILLE MS	314.4	CP	BPEDT	-20000501AHZ

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	KTHV	LITTLE ROCK AR	BPCDT	-19991020ABU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	KFVS-TV	CAPE GIRARDEAU MO	397.2	LIC	BLCDT	-20020423AAA

Figure 2
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12	WMAE-TV	BOONEVILLE MS	342.7	CP	BPEDT	-20000501AHZ
12	WJTV	JACKSON MS	344.3	CP	BPCDT	-19991025AEF
12	KXII	SHERMAN TX	403.4	CP	BDTV	-00000098
13	KETG	ARCADELPHIA AR	114.0	LIC	BLEDT	-20040608AAX
13	KEMV	MOUNTAIN VIEW AR	114.3	CP	BDSTA	-20040414ADU
12	KFVS	JNE MO	397.2	APP	USERRECORD-01	

Total scenarios = 2

Result key: 1
Scenario 1 Affected station 1
Before Analysis

Results for: 12A AR LITTLE ROCK BPCDT 19991020ABU CP

HAAT 519.0 m, ATV ERP 55.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1171680	48017.4
not affected by terrain losses	1138021	44862.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9338	1764.3
lost to ATV IX only	9338	1764.3
lost to all IX	9338	1764.3

Potential Interfering Stations Included in above Scenario 1

12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS BOONEVILLE	BPEDT	20000501AHZ	CP
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TX SHERMAN	BDTV	00000098	CP
13A AR ARCADELPHIA	BLEDT	20040608AAX	LIC
13A AR MOUNTAIN VIEW	BDSTA	20040414ADU	CP

After Analysis

Results for: 12A AR LITTLE ROCK BPCDT 19991020ABU CP

HAAT 519.0 m, ATV ERP 55.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1171680	48017.4
not affected by terrain losses	1138021	44862.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9338	1764.3
lost to ATV IX only	9338	1764.3
lost to all IX	9338	1764.3

Potential Interfering Stations Included in above Scenario 1

12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS BOONEVILLE	BPEDT	20000501AHZ	CP
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TX SHERMAN	BDTV	00000098	CP
13A AR ARCADELPHIA	BLEDT	20040608AAX	LIC
13A AR MOUNTAIN VIEW	BDSTA	20040414ADU	CP
12A MO JNE	USERRECORD01		APP

Percent new IX = 0.0000%

Result key: 2
Scenario 2 Affected station 1
Before Analysis

Results for: 12A AR LITTLE ROCK BPCDT 19991020ABU CP

HAAT 519.0 m, ATV ERP 55.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1171680	48017.4
not affected by terrain losses	1138021	44862.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9338	1764.3

Figure 2
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lost to ATV IX only 9338 1764.3
lost to all IX 9338 1764.3

Potential Interfering Stations Included in above Scenario 2

12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS BOONEVILLE	BPEDT	20000501AHZ	CP
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TX SHERMAN	BDTV	00000098	CP
13A AR ARKADELPHIA	BLEDT	20040608AAX	LIC
13A AR MOUNTAIN VIEW	BDSTA	20040414ADU	CP

After Analysis

Results for: 12A AR LITTLE ROCK BPCDT 19991020ABU CP
HAAT 519.0 m, ATV ERP 55.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1171680	48017.4
not affected by terrain losses	1138021	44862.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9338	1764.3
lost to ATV IX only	9338	1764.3
lost to all IX	9338	1764.3

Potential Interfering Stations Included in above Scenario 2

12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS BOONEVILLE	BPEDT	20000501AHZ	CP
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TX SHERMAN	BDTV	00000098	CP
13A AR ARKADELPHIA	BLEDT	20040608AAX	LIC
13A AR MOUNTAIN VIEW	BDSTA	20040414ADU	CP
12A MO JNE	USERRECORD01		APP

Percent new IX = 0.0000%
Worst case new IX 0.0000% Scenario 1

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
12	KRCG	JEFFERSON CITY MO	BLCDT -20030709ABP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
12	KIIN	IOWA CITY IA	342.7	CP	BDTV -00000107
12	NEW	TOPEKA KS	320.1	CP	BNPCT -20060424ADV
12	KFVS-TV	CAPE GIRARDEAU MO	266.7	LIC	BLCDT -20020423AAA
12	KFVS	JNE MO	266.7	APP	USERRECORD-01

Total scenarios = 2

Result key: 5
Scenario 1 Affected station 3
Before Analysis

Results for: 12A MO JEFFERSON CITY BLCDT 20030709ABP LIC
HAAT 308.0 m, ATV ERP 15.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	617588	29240.8
not affected by terrain losses	594620	27980.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	3955	100.4
lost to ATV IX only	3955	100.4
lost to all IX	3955	100.4

Figure 2
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Potential Interfering Stations Included in above Scenario 1

12A IA IOWA CITY	BDTV	00000107	CP
12A KS TOPEKA	BNPCT	20060424ADV	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC

After Analysis

Results for: 12A MO JEFFERSON CITY BLCDT 20030709ABP LIC
HAAT 308.0 m, ATV ERP 15.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	617588	29240.8
not affected by terrain losses	594620	27980.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	4095	104.4
lost to ATV IX only	4095	104.4
lost to all IX	4095	104.4

Potential Interfering Stations Included in above Scenario 1

12A IA IOWA CITY	BDTV	00000107	CP
12A KS TOPEKA	BNPCT	20060424ADV	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MO JNE	USERRECORD01		APP

Percent new IX = 0.0237%

Result key: 6
Scenario 2 Affected station 3
Before Analysis

Results for: 12A MO JEFFERSON CITY BLCDT 20030709ABP LIC
HAAT 308.0 m, ATV ERP 15.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	617588	29240.8
not affected by terrain losses	594620	27980.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	3955	100.4
lost to ATV IX only	3955	100.4
lost to all IX	3955	100.4

Potential Interfering Stations Included in above Scenario 2

12A IA IOWA CITY	BDTV	00000107	CP
12A KS TOPEKA	BNPCT	20060424ADV	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC

After Analysis

Results for: 12A MO JEFFERSON CITY BLCDT 20030709ABP LIC
HAAT 308.0 m, ATV ERP 15.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	617588	29240.8
not affected by terrain losses	594620	27980.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	4095	104.4
lost to ATV IX only	4095	104.4
lost to all IX	4095	104.4

Potential Interfering Stations Included in above Scenario 2

12A IA IOWA CITY	BDTV	00000107	CP
12A KS TOPEKA	BNPCT	20060424ADV	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MO JNE	USERRECORD01		APP

Figure 2
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Percent new IX = 0.0237%
Worst case new IX 0.0237% Scenario 1

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	WMAE-TV	BOONEVILLE MS	BPEDT	-20000501AHZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	WSFA	MONTGOMERY AL	383.9	CP MOD	BMPCDT	-20040519ADX
12	KTHV	LITTLE ROCK AR	342.7	CP	BPCDT	-19991020ABU
12	KFVS-TV	CAPE GIRARDEAU MO	314.4	LIC	BLCDT	-20020423AAA
12	WJTV	JACKSON MS	310.2	CP	BPCDT	-19991025AEF
12	WDEF-TV	CHATTANOOGA TN	316.8	CP	BPCDT	-19991025ACX
13	WVTM-TV	BIRMINGHAM AL	222.4	CP	BDTV	-00000128
13	WHBQ-TV	MEMPHIS TN	114.5	CP	BDTV	-00000129
12	KFVS	JNE MO	314.4	APP	USERRECORD-01	

Total scenarios = 2

Result key: 7
Scenario 1 Affected station 4
Before Analysis

Results for: 12A MS BOONEVILLE BPEDT 20000501AHZ CP

HAAT 227.0 m, ATV ERP 5.9 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	446056	22087.2
not affected by terrain losses	430923	21104.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	12312	656.3
lost to ATV IX only	12312	656.3
lost to all IX	12312	656.3

Potential Interfering Stations Included in above Scenario 1

12A AR LITTLE ROCK	BPCDT	19991020ABU	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TN CHATTANOOGA	BPCDT	19991025ACX	CP
13A TN MEMPHIS	BDTV	00000129	CP

After Analysis

Results for: 12A MS BOONEVILLE BPEDT 20000501AHZ CP

HAAT 227.0 m, ATV ERP 5.9 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	446056	22087.2
not affected by terrain losses	430923	21104.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	12312	656.3
lost to ATV IX only	12312	656.3
lost to all IX	12312	656.3

Potential Interfering Stations Included in above Scenario 1

12A AR LITTLE ROCK	BPCDT	19991020ABU	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TN CHATTANOOGA	BPCDT	19991025ACX	CP
13A TN MEMPHIS	BDTV	00000129	CP
12A MO JNE	USERRECORD01		APP

Percent new IX = 0.0000%

Figure 2
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Result key: 8
Scenario 2 Affected station 4
Before Analysis

Results for: 12A MS BOONEVILLE BPEDT 20000501AHZ CP

HAAT 227.0 m, ATV ERP 5.9 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	446056	22087.2
not affected by terrain losses	430923	21104.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	12312	656.3
lost to ATV IX only	12312	656.3
lost to all IX	12312	656.3

Potential Interfering Stations Included in above Scenario 2

12A AR LITTLE ROCK	BPCDT	19991020ABU	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TN CHATTANOOGA	BPCDT	19991025ACX	CP
13A TN MEMPHIS	BDTV	00000129	CP

After Analysis

Results for: 12A MS BOONEVILLE BPEDT 20000501AHZ CP

HAAT 227.0 m, ATV ERP 5.9 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	446056	22087.2
not affected by terrain losses	430923	21104.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	12312	656.3
lost to ATV IX only	12312	656.3
lost to all IX	12312	656.3

Potential Interfering Stations Included in above Scenario 2

12A AR LITTLE ROCK	BPCDT	19991020ABU	CP
12A MO CAPE GIRARDEAU	BLCDT	20020423AAA	LIC
12A MS JACKSON	BPCDT	19991025AEF	CP
12A TN CHATTANOOGA	BPCDT	19991025ACX	CP
13A TN MEMPHIS	BDTV	00000129	CP
12A MO JNE	USERRECORD01		APP

Percent new IX = 0.0000%
Worst case new IX 0.0000% Scenario 1

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	KFVS	CAPE GIRARDEAU MO	USERRECORD-01	

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
12	KTHV	LITTLE ROCK AR	397.2	CP	BPCDT	-19991020ABU
12	KRCG	JEFFERSON CITY MO	266.7	LIC	BLCDT	-20030709ABP
12	WMAE-TV	BOONEVILLE MS	314.4	CP	BPEDT	-20000501AHZ

Total scenarios = 1

Result key: 9
Scenario 1 Affected station 5
Before Analysis

Figure 2
Sheet 7 of 7

Results for: 12A MO CAPE GIRARDEAU USERRECORD01 APP

HAAT 609.0 m, ATV ERP 4.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	733191	34569.2
not affected by terrain losses	715496	33834.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	8093	221.9
lost to ATV IX only	8093	221.9
lost to all IX	8093	221.9

Potential Interfering Stations Included in above Scenario 1

12A MO JEFFERSON CITY	BLCDT	20030709ABP	LIC
12A MS BOONEVILLE	BPEDT	20000501AHZ	CP

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