

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

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

To: Office of the Secretary

**ENGINEERING SUPPLEMENT TO PETITION FOR PARTIAL RECONSIDERATION  
BY ARKANSAS EDUCATIONAL TELEVISION COMMISSION**

By its attorneys, Arkansas Educational Television Commission (“AETC”), licensee of noncommercial educational stations KETS-DT (Little Rock, Arkansas), KETZ-DT (El Dorado, Arkansas), and KEMV-DT (Mountain View, Arkansas), hereby respectfully supplements its October 26, 2007 Petition for Reconsideration of the Final DTV Table of Allotments (“October 26, 2007 Petition”).<sup>4</sup> In that petition, AETC requested that the Commission reconsider certain specific parameters of the allotments for these stations as reflected in the Final DTV Table of Allotments in the *Seventh Report and Order* in the above-captioned proceeding.<sup>5</sup>

Pursuant to informal Commission staff advice and the concurrently filed Motion for Leave to File Supplement, AETC thus supplements the October 26, 2007 Petition with this document to respectfully request appropriate DTV Table of Allotments parameters for KETS-DT, KETZ-DT, and KEMV-DT. This supplement addresses each station in turn, and then

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<sup>4</sup> See In the Matter of Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service, *Petition for Reconsideration of Arkansas Educational Television Commission*, MB Docket No. 87-268 (filed Oct. 26, 2007) (“October 26, 2007 Petition”). Available at: [http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native\\_or\\_pdf=pdf&id\\_document=6519744347](http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519744347).

<sup>5</sup> In the Matter of Advanced Television Systems and Their Impact Upon Existing Television Broadcast Service, *Seventh Report and Order*, MB Docket No. 87-268, FCC 07-138 (rel. Aug. 6, 2007).

includes attached engineering statements for each station evidencing compliance with the Commission's 0.1% interference threshold.<sup>6</sup>

**KETS-DT**

As noted in the October 26, 2007 Petition, station KETS is currently operating on analog Channel 2 and interim DTV Channel 5. KETS elected to utilize digital Channel 7 post-transition. After reviewing technical data with its consulting engineer, AETC confirmed KETS-DT could operate an omnidirectional antenna with up to 26.73 Kw within the Commission's 0.1% interference standard. AETC thus supplements the October 26, 2007 Petition by including an engineering statement in Appendix A herein.

Pursuant to the supplemented petition, the DTV Table of Allotments would change from:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
2770	AR	LITTLE ROCK	2	7	8.06	548	74338	342631	921303

To:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
2770	AR	LITTLE ROCK	2	7	<b>27</b>	548	<b>Blank</b>	342631	921303

**KETZ-DT**

Station KETZ-DT is currently operating in digital-only mode on interim DTV Channel

12. As noted in the Final DTV Table of Allotments, KETZ-DT plans to operate on digital

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<sup>6</sup> See Appendix A (Engineering Statement for KETS-DT); Appendix B (Engineering Statement for KETZ-DT); Appendix C (Engineering Statement for KEMV-DT). AETC and its counsel received preliminary engineering information late in the evening on Friday, October 26, 2007 after filing the October 26, 2007 Petition. The appendices attached herein thus each include an original October 26, 2007 document from the consulting engineer with an additional November 5, 2007 engineering statement supplement. The November 5, 2007 documents from the

*Continued...*

Channel 10 after the transition. In the October 26, 2007 Petition, AETC requested the ability to use an omnidirectional antenna for KETZ-DT's post-transition operations and thus requested that the Commission remove Antenna ID 80186 from the KETZ-DT allotment. After reviewing the technical data with its consulting engineer, AETC also requests an increase in HAAT to 607 meters in order to duplicate its allotted coverage area. As described in Appendix B, AETC has confirmed that an omnidirectional antenna at the HAAT of 607 meters would meet the Commission's 0.1% interference threshold.

Pursuant to the supplemented petition, the DTV Table of Allotments would change from:

Facility ID	State and City		NTSC	DTV					
				Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
92872	AR	EL DORADO		10	6	541	80186	330441	921341

To:

Facility ID	State and City		NTSC	DTV					
				Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
92872	AR	EL DORADO		10	6	<b>607</b>	<b>Blank</b>	330441	921341

**KEMV-DT**

As described in the October 26, 2007 Petition, station KEMV is currently operating on analog Channel 6 and interim DTV Channel 13. KEMV-DT will continue to operate on digital Channel 13 post-transition. In the October 26, 2007 Petition, KEMV requested the ability to operate with an omnidirectional antenna with an ERP of 6.9 kW. After reviewing technical data with its consulting engineer, AETC confirmed KEMV-DT could operate an omnidirectional antenna with up to 6.9 Kw within the Commission's 0.1% interference standard. AETC thus

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consulting engineer each include a full interference analysis showing compliance with the Commission's 0.1% interference standard.

supplements the October 26, 2007 Petition by including an engineering statement in Appendix C herein.

Pursuant to this supplemented petition, the DTV Table of Allotments would change from:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
2777	AR	MOUNTAIN VIEW	6	13	4.05	407	66439	354847	921724

To:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
2777	AR	MOUNTAIN VIEW	6	13	<u>7</u>	407	<b>Blank</b>	354847	921724

**Conclusion**

For these reasons, AETC supplements its petition for changes in the KETS-DT, KETZ-DT, and KEMV-DT allotments as described above. AETC believes these changes are in the public interest.<sup>7</sup>

Respectfully submitted,  
 ARKANSAS EDUCATIONAL TELEVISION COMMISSION

By \_\_\_\_\_/s/  
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<sup>7</sup> See 47 C.F.R. § 1.429(b)(3).