



**ERRATA AND SUPPLEMENTAL ENGINEERING  
IN SUPPORT OF A PETITION FOR  
RECONSIDERATION OF THE  
SEVENTH REPORT AND ORDER  
KWWL TELEVISION, INC  
KWWL CHANNEL 7 WATERLOO, IA**

**INTRODUCTION**

KWWL Television, Inc., licensee of television broadcast station KWWL Waterloo, Iowa, has pending before the Commission a petition for reconsideration of the Seventh Report and Order, ("7th R&O"), citing limitations placed on the post-transition digital operation of KWWL, based on technical parameters proposed for KWWL in Appendix B of the order. The engineering statement and exhibits supplied with the petition describe the inability of KWWL to bring noise-limited DTV service to it's established analog service area as a result of the limited facilities specified for post-transition digital operation in the aforementioned Appendix B. KWWL has requested the necessary relief in its petition that will enable the station to operate its designated post-transition assignment on Channel 7 based on the allotted replication parameters originally determined for digital operation during the transition period on out-of-core Channel 55 by the Commission in the Sixth Report and Order ("6<sup>th</sup> R&O"), adopted February 17, 1998.

The petition filed on behalf of KWWL Television, Inc. on October 26<sup>th</sup> discussed the loss of television service and NBC network programming that is predicted to result in connection with the non-replicating technical parameters designated for KWWL in Appendix B of the 7<sup>th</sup> R&O. Specifically, the difference in noise-limited coverage between the Appendix B facilities and the proposed replication facilities was graphically shown but without the shading and statistical data to accentuate the significance of the theoretical loss

in service.

## **POPULATION AND AREA DATA**

This statement and the attached exhibits correct and supplement information in regard to the petition by KWWL Television, Inc. that requests reconsideration of the technical parameters designated for KWWL in Appendix B of the 7<sup>th</sup> R&O. Attached to this statement are revised versions of Figures 1 and 3 that were previously submitted with the original petition for reconsideration.

Figure 1 is a map that was prepared by the undersigned to provide a comparison of the 36 dBu noise-limited service contours calculated for post-transition digital operation on Channel 7 based on the parameters that are described in this statement as the Appendix B facilities and the proposed replication facilities. The estimated service populations and areas within the two contours have been determined and are now displayed in the tabulation appearing on the revised Figure 1 map. It was indicated in the petition that KWWL is a NBC network affiliate station. Figure 3 is a map that depicts the same two contours plotted in Figure 1 as they relate to the noise-limited service contours of the other NBC affiliated stations. The corrected Figure 3 map, in fact, more clearly demonstrates that there is a substantial area where KWWL provides the only NBC service and identifies all areas that will not receive network programming in the post-transition era as a result of the Appendix B facilities. The revised Figure 3 map evidences that if KWWL is limited to its Appendix B facilities there will be a significant number of viewers residing within the loss areas that will lose their only NBC service. See the population and area totals for the combined loss areas on the revised map.

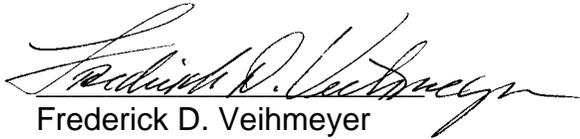
Calculations related to the service coverage data reflected on both map attachments were based on the terrain-dependent Longley-Rice point-to-point propagation model that was reportedly used by the Commission to predict the geographic areas and populations in the absence of interference for the stations listed in Appendix B of 7<sup>th</sup> R&O. Accordingly, interference to the proposed replication facility resulting from co-channel and first adjacent channel relationships was evaluated pursuant to the interference criteria for DTV allotments specified in 47 C.F.R. Section 73.623 (c) and OET Bulletin No. 69. In addition, the analysis parameters used in this process are the same as those used by the Commission to evaluate service coverage and interference for the new DTV Table (i.e. a cell size of two kilometers on a side, a terrain retrieval increment of one kilometer and 2000 Census).

## **CONCLUSION**

The population data shown on the corrections to Figures 1 and 3 clearly demonstrate that the Appendix B facilities established for KWWL in the 7<sup>th</sup> R&O will severely limit KWWL's ability to maintain television service and deliver NBC network programming to a large number of viewers after the transition period ends. The potential loss in service coverage for the station is substantial, affecting 186,620 people over a broad area of 11,910 square kilometers as demonstrated in the revised Figure 1 attachment. It is further projected that 45,640 of those affected viewers residing within an area of 3,153 square kilometers will not receive post-transition NBC network service as geographically depicted on the revised Figure 3 map. In view of the significant loss in service coverage that will occur at the end of the transition period as a result of the non-replicating facilities that have been assigned in Appendix B for post-transition digital operation on Channel 7 in Waterloo, IA, and considering that KWWL is the only over-the-air source of NBC network programming to many of the viewers that will lose service, the situation warrants the

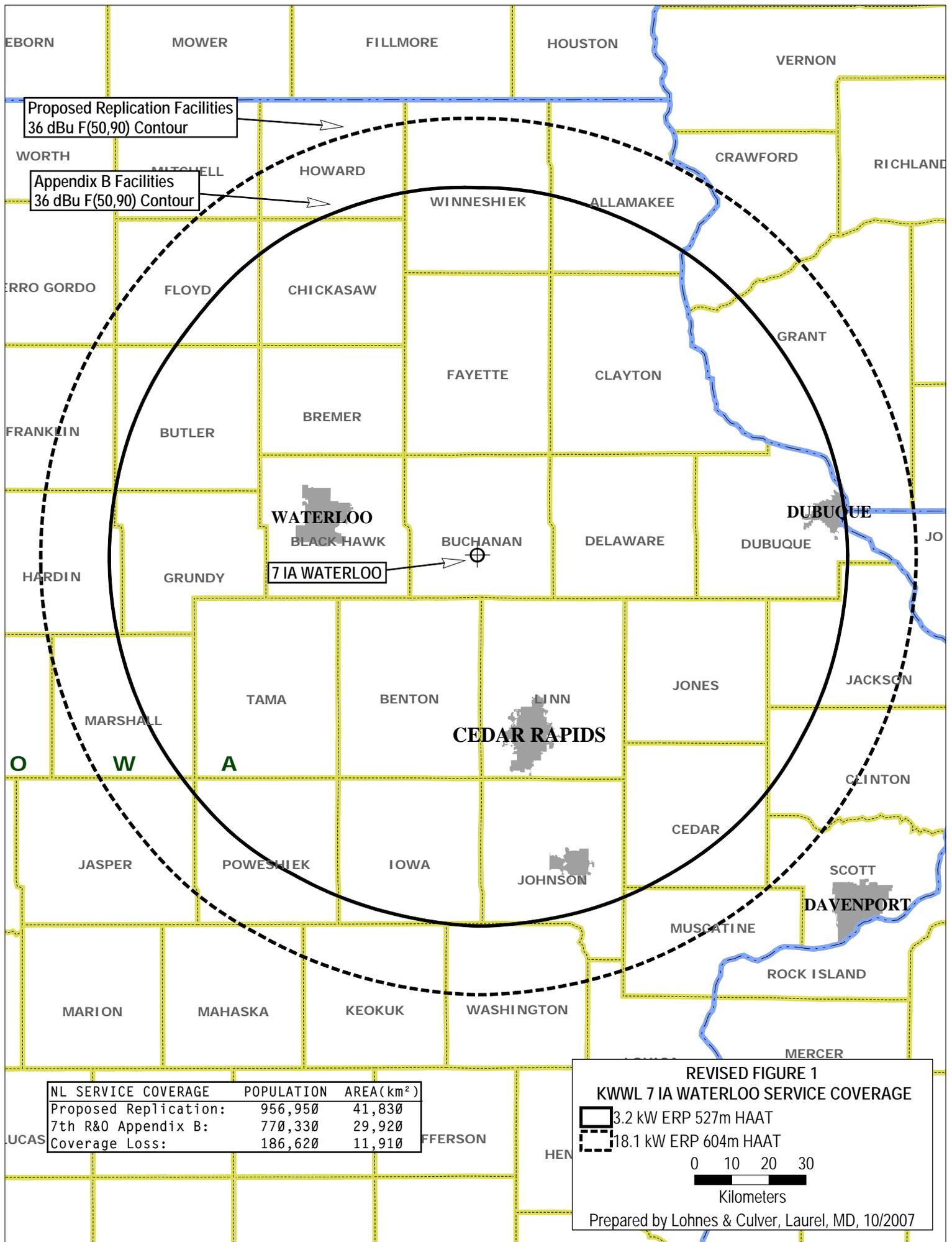
Commission to reconsider the 7<sup>th</sup> R&O and substitute facilities for post-transition operation on Channel 7 that are equivalent to the allotted replication parameters initially determined in the 6<sup>th</sup> R&O.

Respectfully Submitted,  
**LOHNES AND CULVER**



Frederick D. Veihmeyer

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Proposed Replication Facilities  
36 dBu F(50,90) Contour

Appendix B Facilities  
36 dBu F(50,90) Contour

WATERLOO  
BLACK HAWK  
7 IA WATERLOO

NL SERVICE COVERAGE	POPULATION	AREA(km <sup>2</sup> )
Proposed Replication:	956,950	41,830
7th R&O Appendix B:	770,330	29,920
Coverage Loss:	186,620	11,910

**REVISED FIGURE 1**  
**KWWL 7 IA WATERLOO SERVICE COVERAGE**

3.2 kW ERP 527m HAAT  
 18.1 kW ERP 604m HAAT

0 10 20 30  
Kilometers

Prepared by Lohnes & Culver, Laurel, MD, 10/2007

