

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

In the Matter of)
)
Advanced Television Systems and) MB Docket No. 87-268
their Impact Upon the Existing)
Television Broadcast Service)
)

**PETITION FOR RECONSIDERATION
OF TWIN CITIES PUBLIC TELEVISION, INC.**

Twin Cities Public Television, Inc. ("TPT"), licensee of noncommercial educational television Station KTCI-TV/DT, St. Paul, Minnesota, by its undersigned counsel, hereby requests the Commission to (a) reconsider its decision in the above-captioned proceeding denying TPT's Petition for Reconsideration of the *Seventh Report and Order*¹ and (b) amend the DTV Table of Allotments to specify Station KTCI-DT's pre-transition Channel 16 DTV facilities as its post-transition DTV facilities.²

In its Petition for Reconsideration, TPT urged the Commission to modify the DTV Table of Allotments to specify the antenna TPT planned to use post-transition for Station KTCI-DT and to authorize Station KTCI-DT to operate on its selected Channel 26 with an ERP of 63.1 kW

¹ *In re Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, MB Docket No. 87-268, FCC 08-72, ¶¶ 116-21 (rel. Mar. 6, 2008) ("*Reconsideration Decision*") (denying reconsideration of *In re Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order and Eighth Further Notice of Proposed Rule Making, MB Docket No. 87-268, FCC 07-138, ¶¶ 83-88 (rel. Aug. 6, 2007) ("*Seventh Report and Order*").

² Station KTCI-DT is currently licensed to operate on DTV Channel 16 with an ERP of 50 kw, from HAAT of 392.9 meters using an elliptically polarized Andrew antenna, model ATW30H4-DSC3-17S. (See FCC File No. BMLEDT-20050322AGB, gtd. June 28, 2005).

or such other power as would permit it to provide a reliable signal to Minneapolis-St. Paul, Minnesota.³ TPT argued that grant of that relief would serve the public interest because, between the filing freeze and the difference in the antenna pattern of its proposed antenna and the antenna pattern specified in Exhibit B to the *Seventh Report and Order*, Station KTCI-DT would be forced to operate on Channel 26 with an ERP of only approximately 12.7 kW. TPT maintained that that ERP was insufficient power to provide reliable service to the Minneapolis-St. Paul area, did not permit the station to replicate its existing DTV service area, and thus would deprive some 92,000 existing DTV viewers of the array of Station KTCI-DT's broadcast services.

In its *Reconsideration Order*, the Commission recognized TPT would have to operate Station KTCI-DT on Channel 26 with reduced power due to the differences in the antenna patterns, but nonetheless denied the Petition and advised TPT to file an application for Channel 26 seeking the maximum power allowed under its new DTV rules.⁴ Since operation of Station KTCI-DT on Channel 26 will preclude TPT from replicating Station KTCI-DT's current DTV service area and adversely affect the ability of the relatively large percentage of residents who rely on off-the-air reception in the market from receiving its signal, TPT would prefer to remain on Station KTCI-DT's current, licensed pre-transition Channel 16 with its current DTV facilities. Indeed, had TPT known when it selected Channel 26 as its post-transition channel that it would be constrained in the manner required under the rules adopted since it made that election, TPT would never have requested that channel but would have elected to remain on Channel 16. Hence, TPT would prefer to remain on Channel 16 as its permanent DTV facility.

³ See *Petition for Reconsideration of Twin Cities Public Television, Inc.* in MB Docket No. 87-268 at 10 (filed Oct. 26, 2007).

⁴ *Reconsideration Order*, ¶ 120.

Grant of this request will serve the public interest. As demonstrated in the attached Engineering Statement of Kessler & Gehman Associates, TPT's Consulting Engineers, operation with Station KCTI-DT's current DTV facilities post-transition will not cause harmful interference to any other post-transition DTV allocation. Thus, operating with those facilities is consistent with the Commission's DTV allocation rules and will permit Station KTCI-DT to continue serving its current DTV viewers post-transition.

Accordingly, for the reasons set forth above, TPT hereby requests that the Commission reconsider its *Reconsideration Order* and modify the DTV Table of Allotments to specify Station KTCI-DT's current licensed Channel 16 facilities as its post-transition facilities.

Respectfully submitted,



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April 21, 2008

Certificate Of Service

I, Diane E. Burnett, hereby certify that I have on this 21th day of April 2008, caused to be served the attached Petition For Reconsideration Of Twin Cities Public Television, Inc. on the following by U.S. first class mail, postage prepaid:

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Diane E. Burnett



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 SUPPORT OF A PETITION FOR RECONSIDERATION ON BEHALF OF TWIN CITIES PUBLIC TELEVISION'S FINAL POST-TRANSITION DIGITAL TELEVISION BROADCAST FACILITY, KTCI-DT.

Exhibit 1 is a Longley-Rice interference study that was computed using a Sun Microsystems SPARC 5 computer work station loaded with the FCC's DTV analysis software. The interference percentages are exactly the same as the FCC calculations since the studies were performed using the same type computers and the same interference analysis software.

Exhibit was prepared using the licensed KTCI-DT Channel 16 parameters: 1) 50 kW ERP; 2) 393 m HAAT; 3) 673 m HAMSLS; and antenna ID 17580. Referring to Exhibit 1, it can be seen that the proposed KTCI-DT Channel 16 post-transition DTV facility, which is the licensed pre-transition KTCI-DT facility, is predicted to cause no (0.0%) interference to other post-transition DTV stations; including Class A stations. The proposed facility is already coordinated with Canada and meets the following requirements: 1) FCC Monitoring Stations; 2) West Virginia Quiet Zone; 3) Table Mountain; and 4) AM broadcast station separations. Accordingly, the KTCI-DT post-transition digital television broadcast facility can operate on Channel 16 without causing interference to other post-transition DTV stations.

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



Kessler and Gehman Associates, Inc.

Telecommunications Consulting Engineers

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.

A handwritten signature in cursive script that reads "William T. Godfrey, Jr." is written over a horizontal line.

WILLIAM T. GODFREY, JR.
Telecommunications Technical Consultant

21 April, 2008

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-18-2008 Time: 12:44:37

Record Selected for Analysis

KTCI-D16 USERRECORD-01 ST. PAUL MN US
Channel 16 ERP 50. kW HAAT 393. m RCAMSL 00673 m
Latitude 045-03-30 Longitude 0093-07-27
Status APP Zone 2 Border
Dir Antenna Make usr Model USRPAT01 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

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) | 41.0 dBu F(50,90) (km) |
|------------------|-------------|-------------|---------------------------|
| 0.0 | 6.845 | 394.1 | 69.2 |
| 45.0 | 12.500 | 386.3 | 72.5 |
| 90.0 | 6.845 | 377.8 | 68.2 |
| 135.0 | 23.461 | 386.6 | 76.7 |
| 180.0 | 43.245 | 406.6 | 82.1 |
| 225.0 | 50.000 | 397.7 | 82.5 |
| 270.0 | 43.245 | 400.4 | 81.7 |
| 315.0 | 23.461 | 392.7 | 77.1 |

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

No spacing violations found to other full service stations

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is within the Canadian coordination distance
Distance to border = 353.7km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

| Channel | Proposed Station Call | City/State | ARN |
|---------|-----------------------|-------------|--------------|
| 16 | KTCI-D16 | ST. PAUL MN | USERRECORD01 |

Stations Potentially Affected by Proposed Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|----------------|----------|--------|-------------|--------------|
| 15 | WQOW-TV | EAU CLAIRE WI | 133.6 | CP MOD | BMPCDT | -20041001AOM |
| 16 | KDSM-TV | DES MOINES IA | 361.0 | CP | BPCDT | -19991028ACE |
| 16 | KCGE-DT | CROOKSTON MN | 419.6 | LIC | BLEDT | -20031024AAC |
| 16 | WJFW-TV | RHINELANDER WI | 313.2 | CP | BPCDT | -19991021ACD |
| 17 | KQDS-TV | DULUTH MN | 208.0 | CP | BPCDT | -19991028ABI |
| 17 | WLAX | LA CROSSE WI | 196.9 | CP | BPCDT | -19991027ABS |

Analysis of Interference to Affected Station 1

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|---------------|-------------|--------------|
| 15 | WQOW-TV | EAU CLAIRE WI | BMPCDT | -20041001AOM |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|----------------|----------|--------|---------------|--------------|
| 14 | WXOW-TV | LA CROSSE WI | 110.7 | CP MOD | BMPCDT | -20041001AOG |
| 15 | KYOU-TV | OTTUMWA IA | 402.7 | CP | BDSTA | -20031016ACO |
| 15 | KSMN | WORTHINGTON MN | 370.0 | CP | BPEDT | -20000501AII |
| 16 | WJFW-TV | RHINELANDER WI | 201.3 | CP | BPCDT | -19991021ACD |
| 16 | KTCI-D16 | ST. PAUL MN | 133.6 | APP | USERRECORD-01 | |

Proposal causes no interference

#####

Analysis of Interference to Affected Station 2

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|---------------|-------------|--------------|
| 16 | KDSM-TV | DES MOINES IA | BPCDT | -19991028ACE |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|-------------|----------|--------|---------------|--------------|
| 15 | KYOU-TV | OTTUMWA IA | 155.2 | CP | BDSTA | -20031016ACO |
| 16 | WTVO | ROCKFORD IL | 370.3 | LIC | BLCDT | -20021024AAS |
| 17 | KYNE-TV | OMAHA NE | 209.0 | LIC | BLEDT | -20030409AAV |
| 16 | KTCI-D16 | ST. PAUL MN | 361.0 | APP | USERRECORD-01 | |

Proposal causes no interference

#####

Analysis of Interference to Affected Station 3

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|--------------|-------------|--------------|
| 16 | KCGE-DT | CROOKSTON MN | BLEDT | -20031024AAC |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|----------------|----------|--------|---------------|--------------|
| 15 | KGFE | GRAND FORKS ND | 104.7 | CP | BPEDT | -20000419ABA |
| 16 | KBMY | BISMARCK ND | 352.3 | CP MOD | BMPCDT | -20041029AIK |
| 16 | KTCI-D16 | ST. PAUL MN | 419.6 | APP | USERRECORD-01 | |

Proposal causes no interference

#####

Analysis of Interference to Affected Station 4

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|----------------|-------------|--------------|
| 16 | WJFW-TV | RHINELANDER WI | BPCDT | -19991021ACD |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|---------------|----------|--------|---------------|--------------|
| 15 | WQOW-TV | EAU CLAIRE WI | 201.3 | CP MOD | BMPCDT | -20041001AOM |
| 16 | WTVO | ROCKFORD IL | 375.7 | LIC | BLCDT | -20021024AAS |
| 16 | KTCI-D16 | ST. PAUL MN | 313.2 | APP | USERRECORD-01 | |

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|------------|-------------|--------------|
| 17 | KQDS-TV | DULUTH MN | BPCDT | -19991028ABI |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|--------------|----------|--------|---------------|--------------|
| 17 | WLAX | LA CROSSE WI | 337.3 | CP | BPCDT | -19991027ABS |
| 16 | KTCI-D16 | ST. PAUL MN | 208.0 | APP | USERRECORD-01 | |

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|------|--------------|-------------|--------------|
| 17 | WLAX | LA CROSSE WI | BPCDT | -19991027ABS |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|----------|---------------|----------|--------|---------------|--------------|
| 17 | WYIN | GARY IN | 424.3 | LIC | BLEDT | -20040206AAA |
| 17 | KQDS-TV | DULUTH MN | 337.3 | CP | BPCDT | -19991028ABI |
| 18 | KYIN | MASON CITY IA | 127.0 | CP | BPEDT | -20000427ACI |
| 16 | KTCI-D16 | ST. PAUL MN | 196.9 | APP | USERRECORD-01 | |

Proposal causes no interference

#####

Analysis of Interference to Affected Station 7

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|----------|-------------|---------------|----------|
| 16 | KTCI-D16 | ST. PAUL MN | USERRECORD-01 | |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|----------------|----------|--------|-------------|--------------|
| 15 | WQOW-TV | EAU CLAIRE WI | 133.6 | CP MOD | BMPCDT | -20041001AOM |
| 16 | KDSM-TV | DES MOINES IA | 361.0 | CP | BPCDT | -19991028ACE |
| 16 | KCGE-DT | CROOKSTON MN | 419.6 | LIC | BLEDT | -20031024AAC |
| 16 | WJFW-TV | RHINELANDER WI | 313.2 | CP | BPCDT | -19991021ACD |
| 17 | KQDS-TV | DULUTH MN | 208.0 | CP | BPCDT | -19991028ABI |
| 17 | WLAX | LA CROSSE WI | 196.9 | CP | BPCDT | -19991027ABS |

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 7
 Before Analysis

