

DOCKET FILE COPY ORIGINAL

**ORIGINAL**

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

In the Matter of: )  
)  
Amendment of Section 73.622(i), )  
DTV Table of Allotments for )  
Television Broadcast Station )  
KXGN-TV, Glendive, Montana )  
(Facility Id. No. 24287) )  
)

MB Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

To: The Commission, Office of the Secretary  
Attn: Chief, Video Division

**FILED/ACCEPTED**  
**JUN 20 2008**  
Federal Communications Commission  
Office of the Secretary

**PETITION FOR EXPEDITED RULE MAKING**

Glendive Broadcasting Corp. ("Glendive"), licensee of television station KXGN-TV, Glendive, Montana, by its undersigned attorneys and pursuant to Section 1.401 and Section 73.623 of the Commission's Rules,<sup>1</sup> hereby petitions the Commission to amend the DTV Table of Allotments, Section 73.622(i) of the Commission's Rules, to expeditiously substitute Channel 5 for KXGN-TV's currently allocated DTV channel, Channel 10, for the station's post-transition operations. As detailed below and in the attached Engineering Statement, this channel change would serve the public interest as it would allow KXGN-TV to complete the transition to digital in a timely and cost-effective manner in order to ensure that the only television station in the Glendive, Montana, the smallest television market in the country, is able to provide DTV service on February 18, 2009. For the reasons discussed below, Glendive respectfully requests that the Commission make this channel substitution expeditiously so that KXGN-TV can flash-cut to digital operations on Channel 5 by the DTV transition date.

No. of Copies rec'd 0+4  
List ABOVE  
08-67 MB

## BACKGROUND

KXGN-TV is located in the Glendive, Montana television market, which, according to Nielsen Media Research, is the smallest television market in the country, ranked by Nielsen as market number 210 out of 210. KXGN-TV is the only television station in the market, and is the only television station East of Billings, Montana that originates its own programming. The station's programming is rebroadcast on a network of television translators that cover a large portion of Western Montana. Based on the 2000 Census Bureau data, the city of Glendive itself has a population of merely 4,729 people,<sup>2</sup> and KXGN-TV, along with the network of translators, is estimated to reach approximately 10,000 television households in the market. The extremely small population of the Glendive market, and its position as the 210<sup>th</sup> market, puts KXGN-TV in a unique and tenuous financial position, one which, among other things, previously has forced the station to seek waivers of the Commission's DTV construction deadlines based on financial hardship as discussed herein.

Initially, KXGN-TV was assigned DTV Channel 15 as its paired digital channel in the DTV Table of Allotments. At Glendive's request, the Commission subsequently amended the DTV Table to substitute Channel 10 for Channel 15.<sup>3</sup> Thereafter, KXGN-TV received its initial DTV construction permit for Channel 10 on December 8, 2005 (FCC File No. BPCDT-20041230ABJ). At the time that channel elections were made, the collective wisdom held by broadcast engineers and the television industry was that low-VHF channels were to be avoided

---

Footnote continued from previous page

<sup>1</sup> 47 C.F.R. § 1.401; §73.623 (2007).

<sup>2</sup> See <http://www.census.gov/> last visited June 20, 2008.

<sup>3</sup> See *Amendment of Section 73.622(6), Table of Allotments, Digital Television Broadcast Stations, (Glendive, Montana)*, Report and Order, 19 FCC Rcd 19455 (Video Div. 2004).

for DTV operations. Accordingly, most stations avoided electing post-transition operations on low-VHF channels unless there was no other choice, and KXGN-TV followed suit by electing Channel 10 for its post-transition DTV operations. Now, after several years of real world operations, it appears that broadcasting in DTV on low-VHF channels in uncongested areas – such as Montana – is not problematic. Thus, flash-cutting on Channel 5 is now a viable option for KXGN-TV, where it was once thought to be unthinkable.

In light of continuing financial hardship facing the station, KXGN-TV has been unable to build and simultaneously operate its paired full-power DTV facility on Channel 10, and to date it has not yet commenced digital operations. As a result of the station's financial hardship, KXGN-TV has previously obtained extensions of the DTV construction period, the most recent of which will expire on August 18, 2008 (FCC File No. BEPCDT- 20071116ABQ), as well as related extensions of the "use-it or lose-it" interference protection deadlines. KXGN-TV remains unable to construct its full, paired DTV facility on Channel 10 at this time due to financial constraints beyond its control. Glendive continues to satisfy the Commission's revised extension criteria governing financial hardship situations,<sup>4</sup> and has recently sought a further extension of time to construct its digital facilities as a result of financial constraints beyond the licensee's control. *See* FCC File No. BEPCDT-20080618ALG.<sup>5</sup> As discussed before, although

---

<sup>4</sup> By its recent *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, Report and Order, FCC 07-228, released December 31, 2007 ("*Third Periodic Order*"), the Commission revised its guidelines for seeking an extension of time to construct digital facilities based on a showing of financial hardship. Specifically, in order to qualify for an extension of time as a result of financial hardship a station must either: 1.) be the subject of a bankruptcy or receivership proceeding, or 2.) be experiencing severe financial hardship, as defined by negative cash flow for the past three years. *Third Periodic Order* at ¶ 62.

<sup>5</sup> Related to its request for extension of time, Glendive has submitted its financial documentation demonstrating the company's financial situation directly to Barbara Kreisman, Chief, Video Division, Media Bureau under separate cover pursuant to a request for confidentiality under Section 0.459 of the Commission's Rules. 47 C.F.R. § 0.459.

the cost of building the full-power DTV facility on Channel 10 has been prohibitive thus far, KXGN-TV is acutely aware of the need to transition to digital operations and believes that flash-cutting to digital on Channel 5 can be done for a fraction of the cost and before the February 2009 deadline.

**DISCUSSION**

By its recent Public Notice, the Commission lifted the freeze on the filing petitions for rule making, which had previously prevented television licensees from seeking to change their allotted DTV channels.<sup>6</sup> KXGN-TV, as the only television station in the smallest market in the country, presents an extraordinary circumstance that warrants special consideration by the Commission.<sup>7</sup> The proposed substitution of DTV Channel 5 for KXGN-TV is in the public interest as it will allow the station to complete the digital transition and ensure continuity of service to the community. Therefore, Glendive requests that the DTV Table of Allotments be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Glendive, Montana	10	--
Glendive Montana	--	5

In support of this channel substitution, Glendive offers the following:

**I. The Substitution of Channel 5 Will Enable KXGN-TV to Successfully Transition to Digital Television in an Expeditious and Cost-Effective Manner**

---

<sup>6</sup> Public Notice, “*Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately*”, DA 08-1213, rel. May 30, 2008.

<sup>7</sup> As the Commission noted in its Third Periodic Order, small market stations and noncommercial stations need additional flexibility in the DTV transition. *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, Report and Order, FCC 07-228 (rel. Dec. 31, 2007) at ¶ 97.

Glendive previously researched the cost of building the full digital facility on DTV Channel 10 authorized by its current digital construction permit, and given the station's financial situation, the cost of constructing the Channel 10 digital facility at this time exceeds the station's financial resources. In Glendive's previous requests for extension of the DTV construction period (*see, e.g.*, FCC File No. BEPCDT-20061208ABA), it provided an itemized estimate prepared by broadcast equipment manufacturer, Axcera, detailing the estimated costs for the purchase and installation of the transmitter and related equipment for KXGN-TV's full-power Channel 10 DTV facility. As detailed therein, just the cost of the transmitter alone for that facility was estimated to be at least \$328,673, well beyond Glendive's present financial reach. That estimate did not include the additional costs for the Channel 10 build-out, including the purchase of a new antenna for Channel 10, and the hiring of a tower crew to install the Channel 10 antenna on the tower. Nor did it include air conditioning equipment, electrical work, or duct work necessary for the transmitter, meaning the final price of the Channel 10 DTV build out would be significantly higher. KXGN-TV is also concerned about the ability of its current tower to support the addition of the proposed Channel 10 antenna, and whether additional structural reinforcement would be required, adding additional time and money. Furthermore, KXGN-TV's tower is located in a state park, which further complicates the ability to perform significant tower work or add a new antenna to the tower.

Although the station continues to face significant financial hardship, it believes that it will be able to successfully transition to digital if it is able to flash-cut on its current analog channel, Channel 5. Flash-cutting on Channel 5, rather than building on the presently allotted Channel 10, would substantially reduce the cost, effort, and time involved in transitioning KXGN-TV to digital. Earlier this year, Glendive had the current analog antenna and related

equipment “swept” by a consulting engineer to confirm that it will be able to operate in DTV. That engineering study confirmed that KXGN-TV would be able to utilize the existing antenna and related equipment for DTV operations on Channel 5. Simply the cost savings and time savings achieved by avoiding the need to purchase and install a new antenna for Channel 10 alone would justify remaining on Channel 5. Furthermore, the size of the transmitter needed to replicate the station’s analog service area in digital on Channel 5 is significantly smaller than that contemplated for the digital facilities on Channel 10, and thus the cost of a transmitter to flash-cut to digital on Channel 5 is estimated to be less than half of the cost of the transmitter anticipated for the digital facility on Channel 10. In fact, although Glendive is still in the process of gathering firm quotes and estimates for transmitters for digital operations on Channel 5, based on preliminary estimates, the cost of a transmitter to replicate on Channel 5 could be as little as \$53,000 – a significant cost-savings from what was projected for the Channel 10 DTV facilities. With fewer steps involved, no need to obtain and install a new antenna, no additional tower work, and the ability to utilize the existing antenna and related equipment, flash-cutting to digital on Channel 5 presents the best option for KXGN-TV to successfully complete the DTV transition in a cost-effective manner and ensure that the station is able to continue to serve the Glendive market.

## **II. The Substitution of Channel 5 Will Comply with the Commission’s Technical Rules**

The requested substitution of Channel 5 for Channel 10 at Glendive, Montana complies with the Commission’s technical rules with respect to the applicable interference protections, replication of the analog coverage area, and principal community contour coverage. Attached hereto is a Engineering Statement prepared by the consulting engineering firm of D.L. Markley & Associates, Inc. on behalf of Glendive. *See Exhibit 1.* As demonstrated therein, the proposed

KXGN-DT facilities on Channel 5 will comply with the Commission's allocation and interference rules, including the 0.5 percent interference standard adopted by the Commission for post-transition DTV operations. Furthermore, in light of the fact that Channel 5 is currently occupied by KXGN-TV's analog facilities, and has been for some time, the channel has long been coordinated and protected for television operations.

**III. Allowing KXGN-TV to Replicate its Analog Coverage and to Flash-Cut to Digital is in the Public Interest**

In light of the fact that KXGN-TV has obtained waivers of the deadlines for building its paired facility on Channel 10, it has not yet commenced DTV service to the market. Thus, allowing the station to flash-cut to digital on its present analog channel, Channel 5, will not result in the termination or reduction of any existing digital service. Rather, it will hopefully allow the station to successfully transition to digital and ensure continuity of service to this small market. Similarly, while the outstanding construction permit for Channel 10 contemplates an expansion of the station's signal, *i.e.* a "maximization", that facility is not operational and is beyond the station's ability to construct by the end of the transition. Thus, KXGN-TV's proposal to simply replicate its current analog contour in digital on Channel 5, rather than "maximize" on Channel 5, is similarly not a reduction of existing service to any viewers. Given that the DTV transition is almost complete, the notion of building and operating a paired DTV facility in tandem with the analog facility is now obsolete. KXGN-TV was never able to achieve such paired operation, and instead, the goal has shifted to simply ensuring that the station is able to broadcast in digital to its current viewers by the time analog television broadcasting is terminated. Given the extremely unique conditions facing the only television station in the smallest market in the country, KXGN-TV respectfully requests the flexibility to flash-cut on its current analog channel, and the

ability to simply replicate its current analog coverage, rather than increase its contour as contemplated by the outstanding construction permit for Channel 10.<sup>8</sup>

## CONCLUSION

Previously, Glendive submitted comments in response to the Commission's *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket 07-91, FCC 07-70 (May 18, 2007), suggesting that stations facing financial hardship in smaller markets should be granted greater flexibility and an extension of time until the end of the DTV transition in which to complete their digital build-out. As detailed in those comments, stations struggling in the smallest markets need assistance in order to successfully complete the digital transition before the beginning of 2009 and ensure that the small television markets are not left behind in the DTV transition. Stations such as KXGN-TV attempting to complete the transition to digital in small markets face greater financial and logistical difficulties than stations in larger markets, or stations with access to greater financial and technical resources. Allowing these stations additional time and flexibility to complete the transition increases the likelihood of a successful digital transition and thus, is in the public interest.

It is clear from Glendive's finances that the cost of building the currently authorized, full-power DTV facility on Channel 10 exceeds the company's financial resources, and would put the station and the licensee in grave financial difficulty. Glendive submits that the substitution of

---

<sup>8</sup> If the financial health of the station and the applicable interference protections allow for the expansion of the station's contour in the future, KXGN-TV would certainly be interested in exploring the possibility of increasing the coverage area of DTV Channel 5 in the future in order to improve the station's service.

Channel 5 for the current Channel 10 for KXGN-TV's post-transition DTV operations, and allowing the station to replicate its current analog service area is in the public interest and will allow the station to successfully transition to digital consistent with the deadline set by Congress.

If KXGN-TV is afforded the flexibility to flash-cut to DTV on its present Channel 5, it believes that it can achieve significant cost savings and time savings, such that it would be able to complete the DTV transition by February 17, 2009. Accordingly, for these reasons, Glendive respectfully requests that the Commission expeditiously initiate the rule making requested herein to amend Section 73.622(i) of the Commission's Rules, the DTV Table of Allotments for Broadcast Television Stations, to substitute DTV Channel 5 at Glendive, Montana for the presently allotted DTV Channel 10 for station KXGN- TV.

Respectfully submitted,

**GLENDIVE BROADCASTING CORP.**

By: 

David D. Oxenford  
Brendan Holland

Its Attorneys

DAVIS WRIGHT TREMAINE LLP  
1919 Pennsylvania Avenue, NW  
Suite 200  
Washington, DC 20006  
(202) 973-4200

Dated: June 19, 2008

**CERTIFICATE OF SERVICE**

I, Brendan Holland, an attorney with the law firm of Davis Wright Tremaine LLP, hereby certify that on this 20<sup>th</sup> day of June, 2008, a copy of the foregoing “**PETITION FOR RULE MAKING**” was sent via electronic mail, to the following:

Ron Graser  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 2-A665  
Washington, D.C. 20554

Joyce Bernstein  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 2-A847  
Washington, D.C. 20554



---

Brendan Holland

**EXHIBIT 1**

**Engineering Statement**

The following engineering statement and attached exhibits have been prepared for **Glendive Broadcasting Corp.** ("Glendive"), licensee of television station KXGN-TV at Glendive, Montana, and are in support of their Petition for Rulemaking to amend the digital television table of allotments.<sup>1</sup>

Under the Appendix B Table of Allotments in the Memorandum and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order in MB Docket 87-268 adopted on March 3, 2008, Glendive was channel 10 for post transition use. Under the KXGN-TV entry a maximum effective radiated power of 30 kW at a center of radiation of 152 meters was allocated. The allotment specified a blank antenna ID, thus a non-directional antenna was allocated.

Glendive seeks to modify the relevant entry in the Digital Television Table of Allotments in Appendix B as follows:

<b>Current:</b>	Glendive, MT	10
<b>Proposed:</b>	Glendive, MT	5

This proposed change to the table of allotments will permit KXGN-TV to flash-cut to digital operations on its current NTSC channel utilizing the existing analog antenna and transmission line at the conclusion of NTSC full-power operations in 2009. Due to the economic and demographic considerations within the Glendive, MT DMA, it is not economically viable for Glendive to replace

---

<sup>1</sup> The facility ID for KXGN-TV is 24287.

the antenna, transmission line, transmitter, and other associated equipment simultaneously.<sup>2</sup>

Flash-cutting to channel 5 will therefore serve the public interest by ensuring that KXGN-TV, which is the only local television station serving Glendive, Montana, and is the only television station serving the Glendive DMA can remain economically viable and continue to serve the residents of the community of license.

In addition to the proposed change in the channel, Glendive proposes a change in the geographic coordinates for the allotment. This change will bring the allotment into consistency with the tower utilized by KXGN-TV, which is identified by the ASRN 1002861. No change in the center of radiation above average terrain is proposed.<sup>3</sup> A maximum effective radiated power of 1.0 kW utilizing a non-directional antenna (blank antenna ID) is proposed.

The proposed changes to the allotment would not result in any loss of service currently provided by KXGN-TV. Exhibit E-1 illustrates the NTSC Grade B service contour based on the licensed data, the NTSC grade B service contour based on the actual parameters of the facility, and the noise limited service contour resulting from the proposed changes to the Appendix B allocation. As Exhibit E-1 demonstrates, there would be no reduction in the footprint of KXGN-TV based on contours. Rather, as this map illustrates, the combination of proposed parameters would actually *increase* the radius of the noise limited service contour. Exhibit E-2 tabulates the distances to the actual grade B contour and proposed noise limited contour.

---

<sup>2</sup> KXGN-TV is the only station within the Glendive, MT DMA. This DMA is the smallest within the United States and is ranked 210<sup>th</sup> in size. Current Nielsen information estimates the DMA population at 3,890 households for 2008, which is 0.0035 percent of the total estimated 112,798,170 U.S. households.

<sup>3</sup> Center of radiation would be at 152.4 meters above average terrain, which corresponds to 860.3 meters AMSL. Average terrain based on sampling of 3-second linearly interpolated terrain database with 360 radials.

The proposed parameters, which will be summarized at the end of this text, would not result in impermissible interference to any other allocated, proposed, or existing facility. Exhibits E-3 and E-4 provide the outgoing interference study for the proposed facility. As these exhibits demonstrate, the proposed facility complies with Commission Rules and international agreements.

Exhibits E-5 and E-6 illustrate and tabulate the DTV service area of the proposed facility. As these exhibits demonstrate, the service area of the proposed DTV facility is 14,008 residents. This represents an increase over the resident population within the actual NTSC grade B service contour of 13,863 residents by the 2000 Census.

The proposed facilities would provide the requisite coverage over the community of license. Exhibit E-7 illustrates the predicted 28 and 35 dBu F(50,90) service contours. In addition to the FCC method contours, the signal level predicted by Longley-Rice is also depicted. The map demonstrates that Glendive lies within the 35 dBu service contour and within the area predicted to receive a signal of at least 35 dBu.

The summary of the proposed technical parameters to the KXGN-DT allocation is as follows:

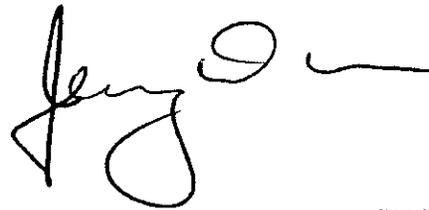
Channel of Operation:	5
Latitude:	47-02-39 North <sup>4</sup>
Longitude:	104-40-52.5 West <sup>5</sup>
DTV ERP (kw):	1.0 kW
DTV HAAT (m):	152.4 meters
Antenna ID:	<i>blank</i>

---

<sup>4</sup> Coordinates based on NAD27 datum.

<sup>5</sup> Coordinates based on NAD27 datum.

The preceding statement and attached exhibits has been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2009

**Jeremy D. Ruck, PE**  
**June 20, 2008**

**KXGNTV.LIC**  
 BLCT1359  
 Latitude: 47-03-15 N  
 Longitude: 104-40-45 W  
 ERP: 14.80 kW  
 Channel: 05+  
 Frequency: 79.5 MHz  
 AMSL Height: 850.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: FCC Method

**KXGNTV.ACT**  
 ACTUAL NTSC  
 Latitude: 47-02-39 N  
 Longitude: 104-40-52.50 W  
 ERP: 14.80 kW  
 Channel: 05+  
 Frequency: 79.5 MHz  
 AMSL Height: 860.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: FCC Method

**KXGN-DT.PRO**  
 PROPOSED DTV  
 Latitude: 47-02-39 N  
 Longitude: 104-40-52.50 W  
 ERP: 1.00 kW  
 Channel: 5  
 Frequency: 79.0 MHz  
 AMSL Height: 860.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: FCC Method

Exhibit E-1  
 Service Contour Comparison  
 KXGN-TV - Glendive, Montana  
 Glendive Broadcasting Corporation  
 June, 2008

**D.L. Markley & Associates, Inc.**

- KXGN-TV Grade B Contour by FCC Data
- Actual KXGN-TV Grade B Contour
- Proposed DTV Noise Limited Contour

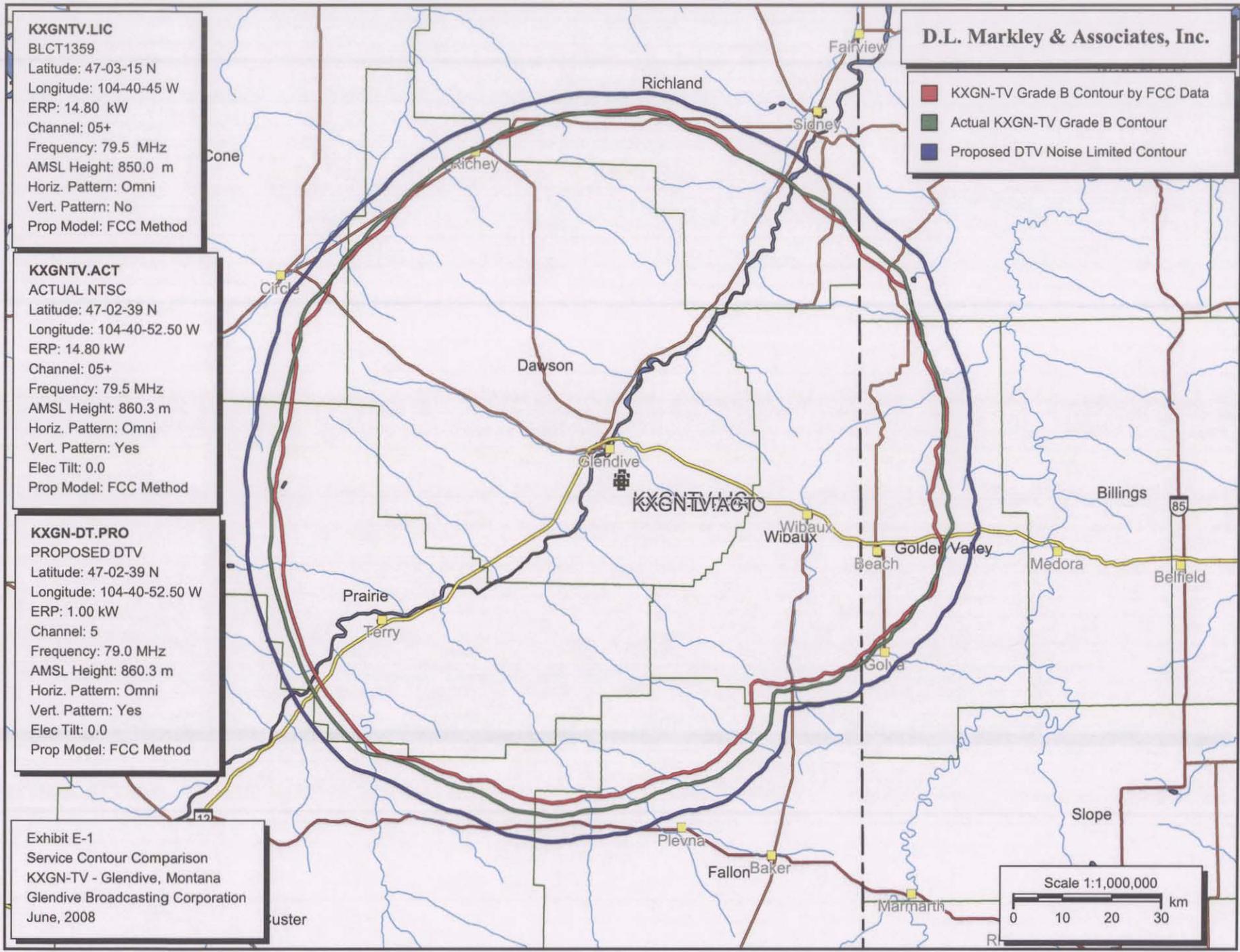


Exhibit E-2 - Comparison of Actual Grade B and Proposed Noise Limited Service Contours

Azimuth	HAAT in meters	Actual Grade B Distance in kilometers	Proposed NL Contour Distance in kilometers	Contour Distance Difference	
				kilometers	miles
0	198.1	74.2	78.4	4.20	2.61
10	183.8	72.9	77.4	4.50	2.80
20	158.1	70.1	75.1	5.00	3.11
30	151.7	69.3	74.4	5.10	3.17
40	153.4	69.5	74.6	5.10	3.17
50	154.4	69.6	74.7	5.10	3.17
60	142.9	68.1	73.4	5.30	3.29
70	135.8	67.0	72.4	5.40	3.36
80	128.4	65.9	71.4	5.50	3.42
90	123.3	65.1	70.5	5.40	3.36
100	132.1	66.5	71.9	5.40	3.36
110	127.5	65.8	71.2	5.40	3.36
120	110.0	62.7	68.1	5.40	3.36
130	91.0	58.8	63.6	4.80	2.98
140	70.5	54.2	58.5	4.30	2.67
150	89.5	58.5	63.3	4.80	2.98
160	105.3	61.8	67.1	5.30	3.29
170	108.0	62.3	67.7	5.40	3.36
180	125.0	65.4	70.8	5.40	3.36
190	144.5	68.3	73.6	5.30	3.29
200	151.8	69.3	74.4	5.10	3.17
210	157.9	70.1	75.1	5.00	3.11
220	179.1	72.4	77.0	4.60	2.86
230	208.7	75.2	79.2	4.00	2.49
240	200.1	74.4	78.6	4.20	2.61
250	185.3	73.0	77.5	4.50	2.80
260	173.7	71.9	76.6	4.70	2.92
270	164.4	70.8	75.7	4.90	3.04
280	153.4	69.5	74.6	5.10	3.17
290	161.2	70.5	75.4	4.90	3.04
300	179.4	72.4	77.0	4.60	2.86
310	173.0	71.8	76.5	4.70	2.92
320	169.3	71.4	76.2	4.80	2.98
330	186.1	73.1	77.5	4.40	2.73
340	196.8	74.1	78.3	4.20	2.61
350	203.6	74.8	78.8	4.00	2.49

NEW-DT.A

D.L. Markley & Associates, Inc.

**KXGN-DT.PRO**  
 PROPOSED  
 Latitude: 47-02-39 N  
 Longitude: 104-40-52.50 W  
 ERP: 1.00 kW  
 Channel: 5  
 Frequency: 79.0 MHz  
 AMSL Height: 860.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 10.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

- ⊠ KXGN-DT.PRO
- K05IZ
- K05KK
- K05MC--D.C
- K06FE
- K06FE-D.C
- K06KY
- KIVV-D
- KIVV-D.C
- KXLF-D
- KXLF-D.C
- NEW-DT.A

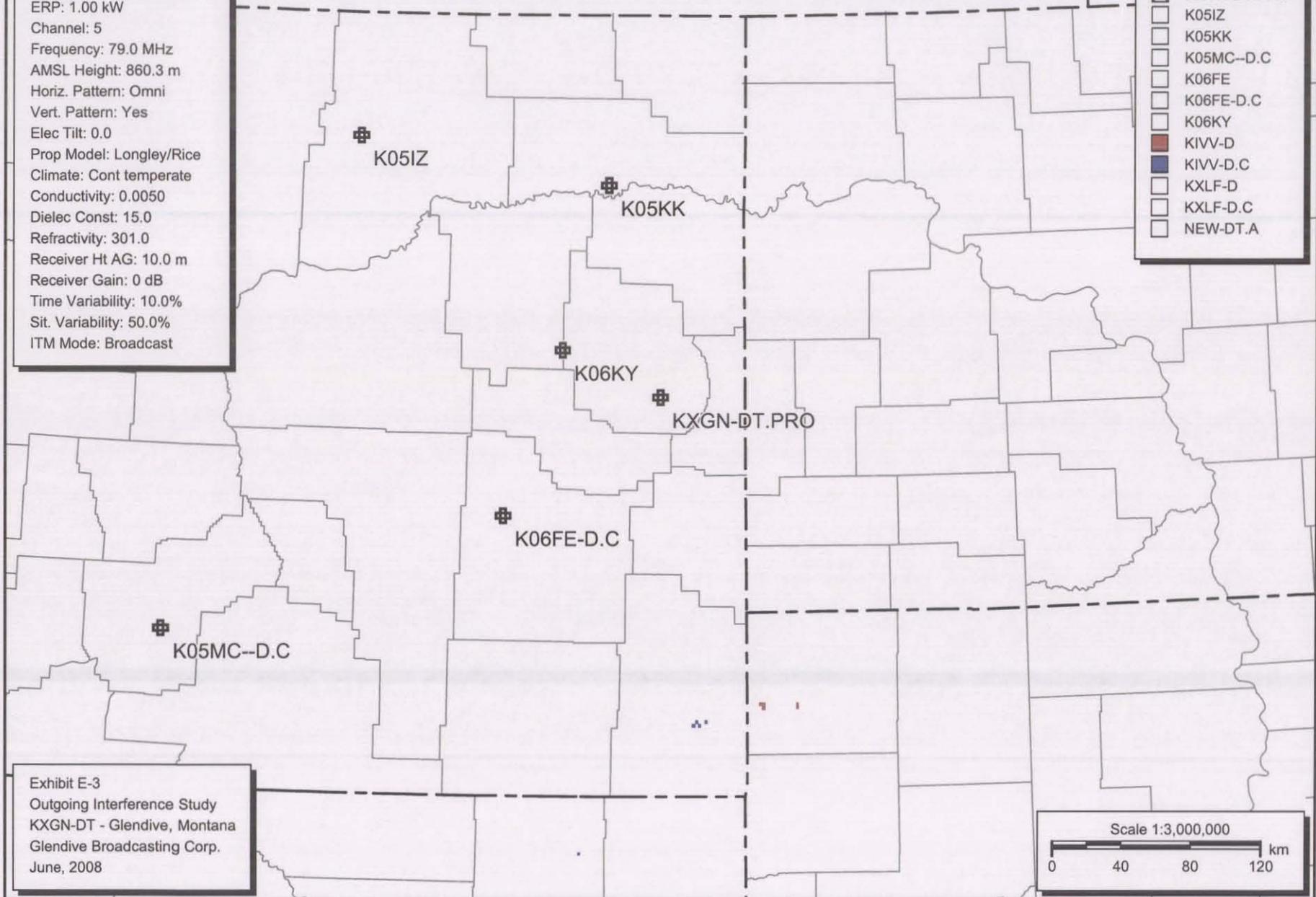


Exhibit E-3  
 Outgoing Interference Study  
 KXGN-DT - Glendive, Montana  
 Glendive Broadcasting Corp.  
 June, 2008

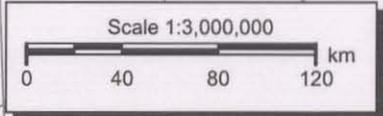


Exhibit E-4  
 Outgoing Interference Population Report  
 Based on Proposed RM Facilities for KXGN-DT.

KXGN-DT.PRO (5) Glendive, MT - PROPOSED  
 Broadcast Type: Digital Service: V  
 Lat: 47-02-39 N Lng: 104-40-52.50 W ERP: 1.0 kW AMSL: 860.3 m  
 TV Outgoing Interference Study  
 Signal Resolution: 2.0 km  
 Consider NTSC Taboo: Yes  
 KWX error points are considered to  
     be interference free coverage.  
 Default # of radials computed for contours: 72  
 Contours calculated using 8 radial HAAT.  
 LR Profile Spacing Increment: 1.0 km  
 Masked interference points are being  
     counted as interference.  
 Pop Centroid DB: 2000 US Census (SF1)

Study Date: 6/20/2008  
 TV Database Date: 6/20/2008

Primary Terrain: V-Soft 3 Second US Terrain  
 Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

-----  
 Stations Considered:

Call Letters	City	State	Dist	Bear
K05IZ (05N)	Hinsdale	MT	226.3	311.3
K05KK (05N)	Poplar	MT	124.0	346.4
K05MC--D.C (05)	Billings	MT	313.0	245.3
K06FE (06N)	Miles City	MT	112.0	233.1
K06FE-D.C (06)	Miles City	MT	112.0	233.1
K06KY (06N)	Circle, Etc.	MT	61.7	295.8
KIVV-D (5)	LEAD	SD	309.3	167.4
KIVV-D.C (05)	Lead	SD	309.3	167.4
KXLF-D (5)	BUTTE	MT	606.0	261.9
KXLF-D.C (05)	Butte	MT	606.0	261.9
NEW-DT.A (05Z)	Weyburn	SA	298.0	11.6

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
K05IZ (05N)	0.0	0	16	0	0	0.0
K05KK (05N)	0.0	0	1,031	0	0	0.0
K05MC--D.C (05)	0.0	0	121,546	0	0	0.0
K06FE (06N)	0.0	0	7,659	0	0	0.0
K06FE-D.C (06)	0.0	0	10,840	0	0	0.0

K06KY (06N)	0.0	0	34	0	0	0.0
KIVV-D (5)	17.2	0	167,777	0	0	0.0
KIVV-D.C (05)	31.0	0	168,939	0	0	0.0
KXLF-D (5)	0.0	0	225,455	0	0	0.0
KXLF-D.C (05)	0.0	0	224,159	0	0	0.0
NEW-DT.A (05Z)	0.0	0	0	0	0	0.0

---

	Housing Units	Population
Montana		
Carter County		
Total	811	1,360
KIVV-D.C (05)	0	0

**KXGN-DT.PRO**  
 PROPOSED  
 Latitude: 47-02-39 N  
 Longitude: 104-40-52.50 W  
 ERP: 1.00 kW  
 Channel: 5  
 Frequency: 79.0 MHz  
 AMSL Height: 860.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 90.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

- ⊠ KXGN-DT.PRO
- K05IZ
- K05KK
- K05MC-D.C
- K06AV
- K06FE
- K06FE-D.C
- K06KY
- KFVRTV
- KIVV-D
- KIVV-D.C
- KIVVTV
- NEW-DT.A

■ > 28.0 dBu

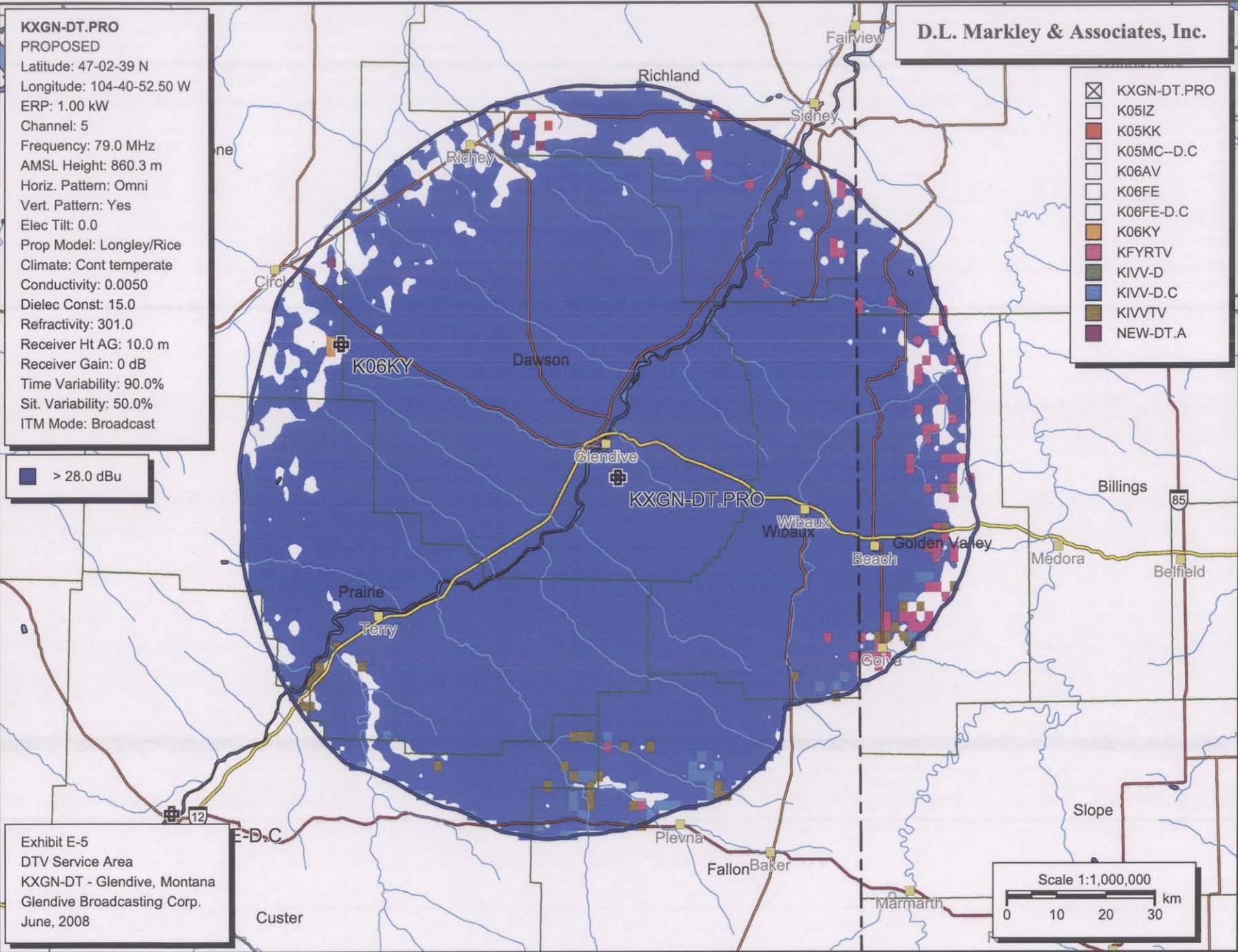


Exhibit E-5  
 DTV Service Area  
 KXGN-DT - Glendive, Montana  
 Glendive Broadcasting Corp.  
 June, 2008

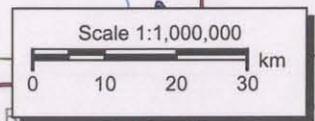


Exhibit E-6

DTV Service Area Tabulation and Summary of Population and Interference.  
Based on Peoposed KXGN-DT Facilities.

KXGN-DT.PRO (5) Glendive, MT - PROPOSED  
Broadcast Type: Digital Service: V  
Lat: 47-02-39 N Lng: 104-40-52.50 W ERP: 1.0 kW AMSL: 860.3 m  
TV Incoming Interference Study  
Interference Considered Within: FCC Contour: 28 dBu  
Signal Resolution: 2.0 km  
LR Profile Spacing Increment: 1.0 km  
Consider NTSC Taboo: Yes  
KWX error points are considered to  
be interference free coverage.  
# of radials computed for protected contour: 360  
Threshold for reception: 28.0  
Pop Centroid DB: 2000 US Census (SF1)

Study Date: 6/20/2008  
TV Database Date: 6/20/2008

Primary Terrain: V-Soft 3 Second US Terrain  
Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

Percentages calculated using a baseline population of 14,229.

Stations which cause interference:

Call Letters	H Units	Population	%	Area (sq. km)
K05KK (05N)	0	0	0.000	9.89
K06KY (06N)	0	0	0.000	6.65
KFYRTV (05Z)	75	134	0.942	280.33
KIVV-D (5)	36	79	0.555	201.79
KIVV-D.C (05)	88	169	1.188	265.68
KIVVTV (05-)	100	200	1.406	248.75
NEW-DT.A (05Z)	0	0	0.000	9.91

Masking Summary:

Call Letters	Total Interference		Unique Interference	
	Population	%	Population	%
K05KK (05N)	0	0.000	0	0.000
K06KY (06N)	0	0.000	0	0.000
KFYRTV (05Z)	134	0.942	14	0.098
KIVV-D (5)	79	0.555	0	0.000
KIVV-D.C (05)	169	1.188	5	0.035
KIVVTV (05-)	200	1.406	33	0.232
NEW-DT.A (05Z)	0	0.000	0	0.000

Stations considered which do not cause interference:

K05IZ (05N)  
 K05KK (05N)  
 K05MC--D.C (05)  
 K06AV (06N)  
 K06FE (06N)  
 K06FE-D.C (06)  
 K06KY (06N)  
 NEW-DT.A (05Z)

---

Call Letters	City	State	Dist	Bear
K05IZ (05N)	Hinsdale	MT	226.3	311.3
K05KK (05N)	Poplar	MT	124.0	346.4
K05MC--D.C (05)	Billings	MT	313.0	245.3
K06AV (06N)	Wolf Point	MT	141.1	327.7
K06FE (06N)	Miles City	MT	112.0	233.1
K06FE-D.C (06)	Miles City	MT	112.0	233.1
K06KY (06N)	Circle, Etc.	MT	61.7	295.8
KFYRTV (05Z)	Bismarck	ND	299.5	98.0
KIVV-D (5)	LEAD	SD	309.3	167.4
KIVV-D.C (05)	Lead	SD	309.3	167.4
KIVVTV (05-)	Lead	SD	309.3	167.4
NEW-DT.A (05Z)	Weyburn	SA	298.0	11.6

---

Totals for KXGN-DT.PRO (5)

Calculation Area Population:	14,501	( 17038.8 sq. km )
Not Affected by Terrain Loss:	14,229	( 16117.9 sq. km )
Total NTSC Interference:	214	( 445.0 sq. km )
DTV Only Interference:	7	( 70.6 sq. km )
Total DTV Interference:	169	( 275.6 sq. km )
Interfered Population:	221	( 515.6 sq. km )
Interference Free:	14,008	( 15602.3 sq. km )
Percent Interference:	1.55	
Terrain Blocked Population:	272	( 920.9 sq. km )
Contour Area Population:	14,518	

---

Interference Free Breakdown:

White:	13,604	( 97.1% )
Black:	25	( 0.2% )
Hispanic:	134	( 1.0% )
Native American:	133	( 0.9% )
Asian:	18	( 0.1% )
Pacific Islander:	1	( 0.0% )

Mixed Race:	90	( 0.6% )
Other:	3	( 0.0% )
Total:	14,008	

	Housing Units	Population	% of County
-----			
-----			
Montana			
Custer County			
County Pop	5,360	11,696	
KXGN-DT.PRO (5)	27	64	
KIVV-D (5)	10	27	42.19
KIVV-D.C (05)	11	29	45.31
KIVVTV (05-)	11	29	45.31
Ix Free	16	35	54.69
Dawson County			
County Pop	4,168	9,059	
KXGN-DT.PRO (5)	4,135	8,987	
Ix Free	4,135	8,987	100.00
Fallon County			
County Pop	1,410	2,837	
KXGN-DT.PRO (5)	69	164	
KFYRTV (05Z)	0	0	0.00
KIVV-D (5)	2	4	2.44
KIVV-D.C (05)	5	11	6.71
KIVVTV (05-)	3	10	6.10
Ix Free	63	147	89.63
McCone County			
County Pop	1,087	1,977	
KXGN-DT.PRO (5)	41	86	
Ix Free	41	86	100.00
Prairie County			
County Pop	718	1,199	
KXGN-DT.PRO (5)	680	1,143	
KIVV-D (5)	0	0	0.00
KIVV-D.C (05)	0	0	0.00
KIVVTV (05-)	12	27	2.36
Ix Free	668	1,116	97.64
Richland County			
County Pop	4,557	9,667	
KXGN-DT.PRO (5)	499	1,135	
K05KK (05N)	0	0	0.00
KFYRTV (05Z)	0	0	0.00
NEW-DT.A (05Z)	0	0	0.00
Ix Free	499	1,135	100.00
Wibaux County			
County Pop	587	1,068	
KXGN-DT.PRO (5)	587	1,068	
KFYRTV (05Z)	0	0	0.00
Ix Free	587	1,068	100.00

	Housing Units	Population	% of County
North Dakota			
Golden Valley County			
County Pop	973	1,924	
KXGN-DT.PRO (5)	775	1,561	
KFYRTV (05Z)	75	134	8.58
KIVV-D (5)	24	48	3.07
KIVV-D.C (05)	72	129	8.26
KIVVTV (05-)	74	134	8.58
Ix Free	695	1,413	90.52
McKenzie County			
County Pop	2,719	5,737	
KXGN-DT.PRO (5)	18	21	
KFYRTV (05Z)	0	0	0.00
Ix Free	18	21	100.00

**KXGN-DT.PRO**  
**PROPOSED**  
 Latitude: 47-02-39 N  
 Longitude: 104-40-52.50 W  
 ERP: 1.00 kW  
 Channel: 5  
 Frequency: 79.0 MHz  
 AMSL Height: 860.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 90.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

City of License  
 Glendive, Montana

**D.L. Markley & Associates, Inc.**

■ > 35.0 dBu  
 ■ 28.0 - 35.0

Exhibit E-7  
 City of License Coverage  
 KXGN-DT - Glendive, Montana  
 Glendive Broadcasting Corp.  
 June, 2008

