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HARRY F. COLE
ANNE GOODWIN CRUMP
VINCENT J. CURTIS, JR.
JOSEPH M. DI SCIPIO
PAUL J. FELDMAN
JEFFREY J. GEE
KEVIN M. GOLDBERG
FRANK R. JAZZO
M. SCOTT JOHNSON
MITCHELL LAZARUS
STEPHEN T. LOVELADY*
SUSAN A. MARSHALL
HARRY C. MARTIN
MICHELLE A. McCLURE*
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FRANCISCO R. MONTERO
PATRICK A. MURCK
LEE G. PETRO*
RAYMOND J. QUIANZON
MICHAEL W. RICHARDS*
JAMES P. RILEY
DAVINA S. SASHKIN
PETER TANNENWALD*
KATHLEEN VICTORY
HOWARD M. WEISS
RONALD P. WHITWORTH

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400

FAX: (703) 812-0486

www.fhhlaw.com

RETIRED MEMBERS
RICHARD HILDRETH
GEORGE PETRUTSAS
CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U. S. AMBASSADOR (ret.)
OF COUNSEL
ALAN C. CAMPBELL
DONALD J. EVANS
ROBERT M. GURSS*
RICHARD F. SWIFT*
WRITER'S DIRECT

703-812-0426
crump@fhhlaw.com

June 20, 2008

FILED/ACCEPTED

JUN 20 2008

Federal Communications Commission
Office of the Secretary

*NOT ADMITTED IN VIRGINIA

BY HAND DELIVERY

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Attention: Media Bureau

Re: Petition for Rule Making
Amendment of DTV Table of Allotments
KCFG-DT
Flagstaff, Arizona

Dear Ms. Dortch:

Transmitted herewith, on behalf of KM Television of Flagstaff, L.L.C., permittee of KCFG-DT, Flagstaff, Arizona, are an original and four copies of its "Petition for Rule Making" to substitute DTV channel 9 for DTV Channel 32 at Flagstaff, Arizona.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

Anne Goodwin Crump

Anne Goodwin Crump
Counsel for KM Television of Flagstaff, L.L.C.

AGC:deb

Enclosures

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ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

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

In the Matter of)
)
Amendment of Section 73.622(b);) MB Docket No. _____
Table of Allotments;) RM _____
Digital Television Broadcast Stations.)
(Flagstaff, Arizona))

PETITION FOR RULE MAKING

KM Television of Flagstaff, L.L.C. ("KM"), licensee of KCFG(TV) and permittee of KCFG-DT, Flagstaff, Arizona, by its attorneys, hereby respectfully submits its Petition for Rule Making to substitute DTV Channel 9 for DTV Channel 32 as Station KCFG-DT's final, post-transition digital channel. With respect thereto, the following is stated:

1. KCFG(TV) currently operates on analog Channel 9, and the station was allotted DTV Channel 32 as its digital companion channel.¹ In its First Round Channel Election, filed on February 10, 2005 (File No. BFRECT-20050210AFT), KM elected to continue with its allotted DTV Channel 32. In the three years that have intervened, however, there have been a number of developments in digital television, and stations have gained substantially more experience in the actual operation and technical characteristics of DTV stations.

¹ KM has constructed a full-power (1000 kW ERP) Channel 32 facility and has pending an application for license to cover construction permit for that facility (File No. BLCDF-20071115AEG) which indicates that the facility is operating pursuant to program test authority. KM recognizes that the filing of the instant Petition for Rule Making does not alter KCFG-DT's obligation to be operating with full-power DTV facilities by the DTV transition deadline of February 17, 2009.

2. KM has determined that, due to the superior technical characteristics of Channel 9, a return to the station's analog channel for its final DTV operations would allow KCFG-DT to serve a substantially greater population and area. Furthermore, as demonstrated in the attached Engineering Statement, DTV Channel 9 may be allotted in accordance with the Commission's technical rules and policies. Specifically, the substitution of DTV Channel 9 will not cause prohibited interference, and the station would provide the requisite principal community signal coverage from the transmitter site proposed herein.

3. Accordingly, the channel substitution proposed herein clearly would serve the public interest due to the massive gain in population to be served. As indicated in the Engineering Statement, the population within the KCFG-DT's service area will increase by 971,868 people, from 396,969 to 1,368,837. Thus, the population to be served by KCFG-DT on Channel 9 is more than triple the population that would be served by the station on Channel 32. Likewise, the land area within the service area also would increase substantially, as it would go from 8712.7 square kilometers to 15,645.0 square kilometers. This change of 6,932.3 square kilometers represents an increase of approximately 80 percent. At the same time, the community of Flagstaff will remain well-served by KCFG-DT, as the station will continue to provide the required signal strength for principal community coverage to Flagstaff.

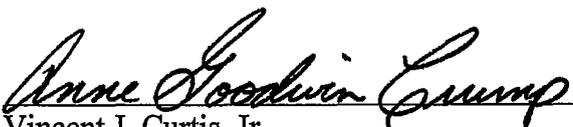
4. When these factors are taken into account, it is clear that grant of the requested channel substitution will advance the public interest. By virtue of the channel change, KCFG-DT will be able to serve more than three times as many people as would otherwise be possible, and

thus will also enhance the efficient use of the spectrum. Furthermore, the proposed channel substitution may be made in accordance with the Commission's technical rules and policies.

WHEREFORE, the premises considered, KM respectfully requests that DTV Channel 9 be substituted for DTV Channel 32 at Flagstaff, Arizona, in accordance with the parameters set forth in the attached Engineering Statement.

Respectfully submitted,

KM TELEVISION OF FLAGSTAFF, L.L.C.

By: 
Vincent J. Curtis, Jr.
Anne Goodwin Crump

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street
Eleventh Floor
Arlington, Virginia 22209
(703) 812-0400

June 20, 2008

LIEBERMAN & WALISKO
CONSULTING TELECOMMUNICATIONS ENGINEERS
701 YEATMAN PARKWAY
SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

ENGINEERING STATEMENT

This Engineering Statement and Exhibits have been prepared on behalf of KM Television of Flagstaff, LLC, (KM) licensee of television station KCFG, Flagstaff, Arizona, operation on NTSC channel 9 and DTV channel 32.

Currently, KCFG is on the air on both the digital and analog channels in conformance with Appendix B of FCC 07-138. During the DTV channel election process, established in the Commission's Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, FCC 04-192, released September 7th, 2004, KM maintained channel 9 for the NTSC transmission and elected to accept channel 32 for DTV transmission. KM now realizes this choice was not in the optimum public interest and respectfully requests the use of channel 9 as its DTV channel in lieu of the currently assigned channel 32, (File No. BFRECT-20050210AFT)

The use of channel 9 as a final digital channel for KCFG will result in serving 971,868 more people and 6932.3 additional square kilometers within the predicted Grade B than with KCFG operating on channel 32. This is demonstrated in attached Tabulation Exhibits 1 and 2 and depicted on Exhibit 3.

An allocation study indicates that channel 9 could be employed from a new site and will satisfy all of the Commission's allocation requirements. This study is attached herewith as Exhibit 4.

LIEBERMAN & WALISKO
CONSULTING TELECOMMUNICATIONS ENGINEERS
701 YEATMAN PARKWAY
SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

ENGINEERING STATEMENT (Cont'd)

Channel 9 can be substituted as a DTV channel in lieu of channel 32 and allotted to Flagstaff, Arizona in compliance with the principal community coverage requirements of 47 C.F.R. Section §73.625(a) at coordinates North Latitude 34° 25' 48", West Longitude 111° 30' 16" (NAD-27). It is possible to operate KCFG from this site at 160kW ERP and a height above average terrain of 301 meters. The proposed channel change will not exceed the allowable interference criteria and meets all spacing requirements.

The proposed facilities (ERP 160 kW, HAAT 301 meters) comply with the nominal maximum permitted pursuant to 47 C.F.R. Section §73.622(f)(8)(i).

As such, KM Television of Flagstaff, LLC respectfully requests a modification of the Table of Allotments, 47 C.F.R. Section §73.622(b), to substitute channel 9 for channel 32 as the DTV channel for KCFG in Flagstaff, AZ.

<u>City</u>	<u>Channel Number</u>	
	<u>Present</u>	<u>Proposed</u>
Flagstaff, AZ	2, 13, 18, 32	2, 9, 13, 18

The herein stated information was prepared by me or under my direct supervision and is given under penalty of perjury.

Jan 19, 2008
Date

Melvyn Lieberman
Melvyn Lieberman

LIEBERMAN & WALISKO
CONSULTING TELECOMMUNICATIONS ENGINEERS
701 YEATMAN PARKWAY
SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

TV Band Based Coverage Report - Ch 9

Exhibit 1

Population Database: 2000 US Census (SF1)

Combined Coverage Totals for All Stations:

	<u>Area</u>	<u>Housing Units</u>	<u>Population</u>
City Grade	3345.4	11,107	18,926
Grade A	4550.7	18,710	33,200
Grade B	15645.0	536,728	1,368,837

Individual Station Population Counts:

Station	City Grade	Grade A	Grade B
KCFG (9)	18,926	33,200	1,368,837

Individual Station Housing Unit Count:

Station	City Grade	Grade A	Grade B
KCFG (9)	11,107	18,710	536,728

Individual Station Area (in sq. ft):

Station	City Grade	Grade A	Grade B
KCFG (9)	3345.4	4550.7	15645.0

LIEBERMAN & WALISKO
 CONSULTING TELECOMMUNICATIONS ENGINEERS
 701 YEATMAN PARKWAY
 SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

TV Band Based Coverage Report - Ch 32

Exhibit 2

Population Database: 2000 US Census (SF1)

Combined Coverage Totals for All Stations:

	<u>Area</u>	<u>Housing Units</u>	<u>Population</u>
City Grade	3144.3	12,236	20,682
Grade A	4196.8	18,727	35,259
Grade B	8712.7	161,877	396,969

Individual Station Population Counts:

Station	City Grade	Grade A	Grade B
KCFG-32 (32)	20,682	35,259	396,969

Individual Station Housing Unit Count:

Station	City Grade	Grade A	Grade B
KCFG-32 (32)	12,236	18,727	161,877

Individual Station Area (in SQ. FT.):

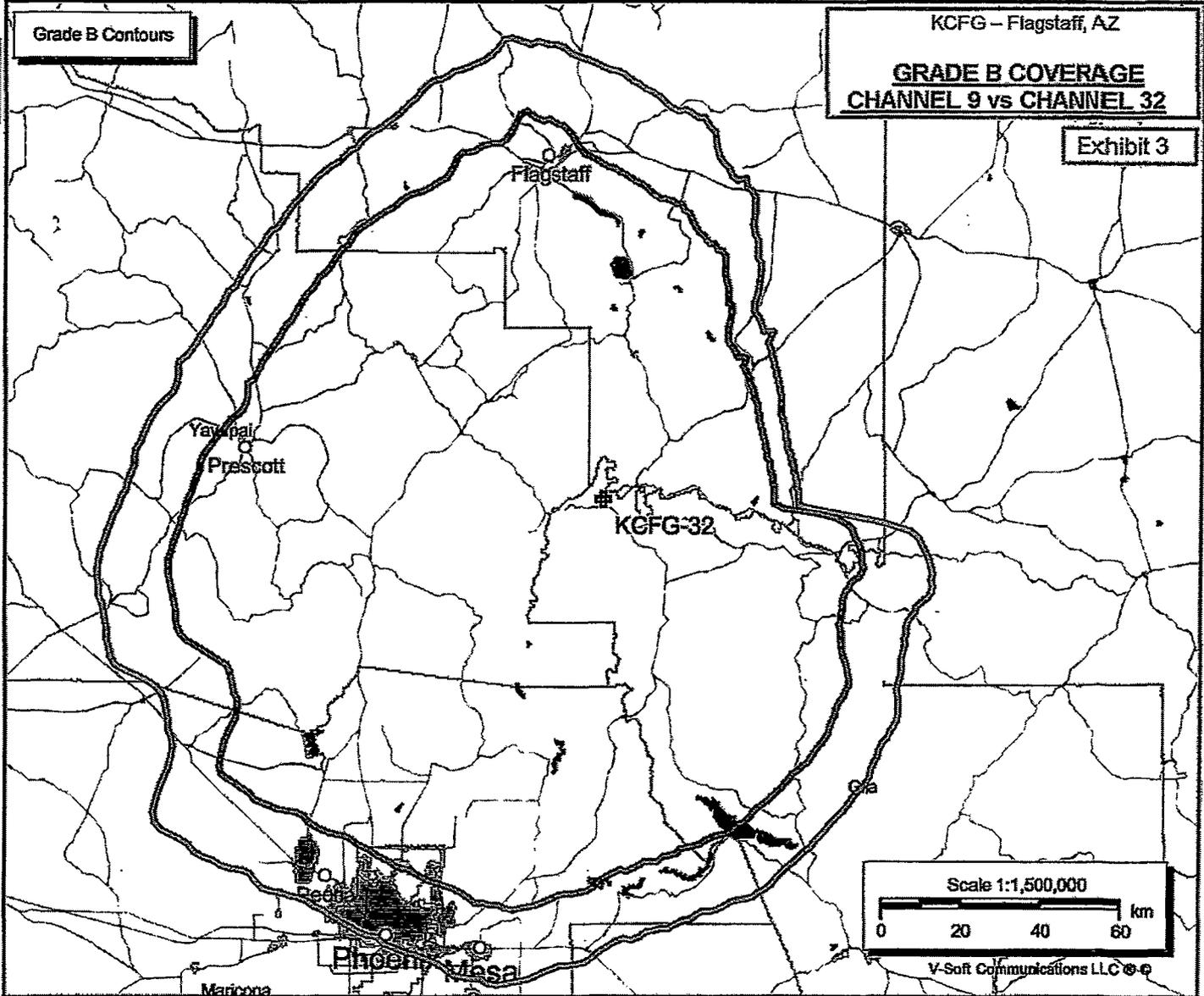
Station	City Grade	Grade A	Grade B
KCFG-32 (32)	3144.3	4196.8	8712.7

■ KCFG
■ KCFG-32

Grade B Contours

KCFG - Flagstaff, AZ
GRADE B COVERAGE
CHANNEL 9 vs CHANNEL 32

Exhibit 3



LIEBERMAN & WALISKO
June 2008

LIEBERMAN & WALISKO
CONSULTING TELECOMMUNICATIONS ENGINEERS
701 YEATMAN PARKWAY
SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

Outgoing Interference Population Report

Exhibit 4

KCFG (9) Flagstaff, AZ -BLCT20001220ACM
Broadcast Type: Digital Service: V
Lat: 34-25-48 N Lng: 111-30-16 W ERP: 160.0 kW AMSL: 2107.0 m
TV Outgoing Interference Study
Signal Resolution: 2.0 km

Consider NTSC Taboo: Yes
KWX error points are considered to be interference free coverage.
Number of radials computed for contours: 72
Contours calculated using 8 radial HAAT.
LR Profile Spacing Increment: 0.1 km
Masked interference points are being counted as interference free.
Using LPTV/translator D/U rules.
Pop Centroid DB: 1990 US Census

Study Date: 6/18/2008

TV Database Date: 5/17/2008

Primary Terrain: 3 Arc-Second US Terrain

Population Database: 2000 US Census (SF1)

Stations Considered:

<u>Call Letters</u>	<u>City</u>	<u>State</u>	<u>Dist</u>	<u>Bear</u>
NEW.A (08-)	Sedona	AZ	53.6	331.3
KAET (08+)	Phoenix	AZ	132.2	203.2
KGUN (09-)	Tucson	AZ	235.2	161.6
K09KG (09N)	Bullhead City	AZ	292.2	288.2
K09KV (09N)	Prescott	AZ	95.1	274.2
K09JZ (09N)	Winslow	AZ	70.7	49.7
K09XH (09N)	Ganado	AZ	225.2	51.5
KWSJ-L-D.C (09)	Snowflake	AZ	136.1	97.4
NEW-D.A (09)	Phoenix	AZ	132.1	203.2
KGUN-D.A (09)	Tucson	AZ	235.2	161.6
KSAZTV (10Z)	Phoenix	AZ	132.0	203.1
KSAZTV.A (10)	Phoenix	AZ	132.0	203.0
KSAZ-D.A (10)	Phoenix	AZ	132.0	203.1
KECY-D.A (09)	El Centro	CA	343.7	244.6
KECYTV (09+)	El Centro	CA	343.7	244.6
DK09IG (09N)	Cliff, Gila	NM	307.0	121.6
K09JK (09N)	Quemado	NM	269.9	91.2
K09FR (09N)	Zuni Pueblo	NM	264.5	72.5
KVVU-D.P (09)	Henderson	NV	363.7	299.8
KVVU-D (09)	Henderson	NV	363.6	299.8
KUSG-D (09)	St. George	UT	346.9	328.0
K09XX.C (09N)	Navajo Mount.Sch	UT	295.1	12.9
KUSG-D (9)	St. George	UT	346.9	328.0

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CONSULTING TELECOMMUNICATIONS ENGINEERS
701 YEATMAN PARKWAY
SILVER SPRING, MD 20902

KCFG - TV Flagstaff, AZ

Outgoing Interference Population Report (Cont'd)

Exhibit 4

KCFG (9) Flagstaff, AZ -BLCT20001220ACM
Broadcast Type: Digital Service: V
Lat: 34-25-48 N Lng: 111-30-16 W ERP: 160.0 kW AMSL: 2107.0 m
TV Outgoing Interference Study
Signal Resolution: 2.0 km

<u>Call</u>	<u>Area</u>	<u>HUnits</u>	<u>Contour</u>	<u>Masked Ix</u>	<u>Unmasked Ix</u>	<u>%</u>
NEW.A (08-)	0.0	0	5,160	0	0	0.0
KAET (08+)	32.3	0	3,247,360	2	0	0.0
KGUN (09-)	530.5	383	1,119,917	741	833	0.1
K09KG (09N)	0.0	0	1,726	0	0	0.0
K09KV (09N)	12.1	294	39,036	205	448	1.1
K09JZ (09N)	0.0	0	0	0	0	0.0
K09XH (09N)	0.0	0	1,509	0	0	0.0
KWSJ-L-D.C (09)	0.0	0	28,323	0	0	0.0
NEW-D.A (09)	256.6	24,194	3,086,649	86,466	55,685	1.8
KGUN-D.A (09)	435.6	1,084	1,122,029	0	2,857	0.3
KSAZTV (10Z)	44.4	1	3,250,340	0	2	0.0
KSAZTV.A (10)	0.0	0	3,097,649	0	0	0.0
KSAZ-D.A (10)	40.4	1	3,248,927	0	2	0.0
KECY-D.A (09)	98.4	36	328,421	0	62	0.0
KECYTV (09+)	12.3	0	326,968	0	0	0.0
DK09IG (09N)	0.0	0	174	0	0	0.0
K09JK (09N)	0.0	0	0	0	0	0.0
K09FR (09N)	0.0	0	0	0	0	0.0
KVVU-D.P (09)	0.0	0	1,447,355	0	0	0.0
KVVU-D (09)	0.0	0	1,444,971	0	0	0.0
KUSG-D (09)	0.0	0	86,498	0	0	0.0
K09XX.C (09N)	0.0	0	95	0	0	0.0
KUSG-D (9)	0.0	0	84,781	0	0	0.0