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August 8, 2008

FILED/ACCEPTED
AUG - 8 2008
Federal Communications Commission
Office of the Secretary

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 an Amendment to 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

cc: Mr. Clay Pendarvis (with enclosure) **By E-Mail**
Ms. Nazifa Sawez (with enclosure) **By E-Mail**

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mB-Video 08-90

ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

FILED/ACCEPTED
AUG - 8 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 amends its Petition for Rule Making to substitute DTV Channel 9 for DTV Channel 32 as Station KCFG-DT's final, post-transition digital channel to include the attached Engineering Statement.

Respectfully submitted,

KM TELEVISION OF FLAGSTAFF, L.L.C.

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

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street
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August 8, 2008

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

KCFG-DT - Flagstaff, AZ

ENGINEERING STATEMENT

This Engineering Statement is given to respond to certain questions the Staff raised regarding the Petition for Rulemaking filed by KM Television of Flagstaff, LLC, to change the digital channel of KCFG, Flagstaff, Arizona from Channel 32 to Channel 9, the current analog channel.

The Staff raised an interference issue with co-channel KGUN, Tucson, AZ. That has been corrected by the judicious use of a directional antenna. That pattern is shown herewith as Figures 1-A and 1-B.

Employing a directional antenna reduces the caused to interference to KGUN from the instant proposed to 0.1%. Thus the combined interference to KGUN from all sources is under 0.5%.

The Staff also asked about the population in the loss area that will obtain as a result of the move. We have calculated the loss area and determined that 4855 persons reside in the loss area. The area in question will still continue to be served by the other two Flagstaff stations, KNAZ and KFPH. The instant station, KCFG is not a network station so a loss of network service by the 4855 people will not be had.

Also attached, as Figure 2, is a showing depicting the proposed 41 dBu contour. Figure 3 is a tabulation showing all the stations considered in our study along with the percentage of interference caused to other pertinent stations.

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SILVER SPRING, MD 20902

KCFG-DT - Flagstaff, AZ

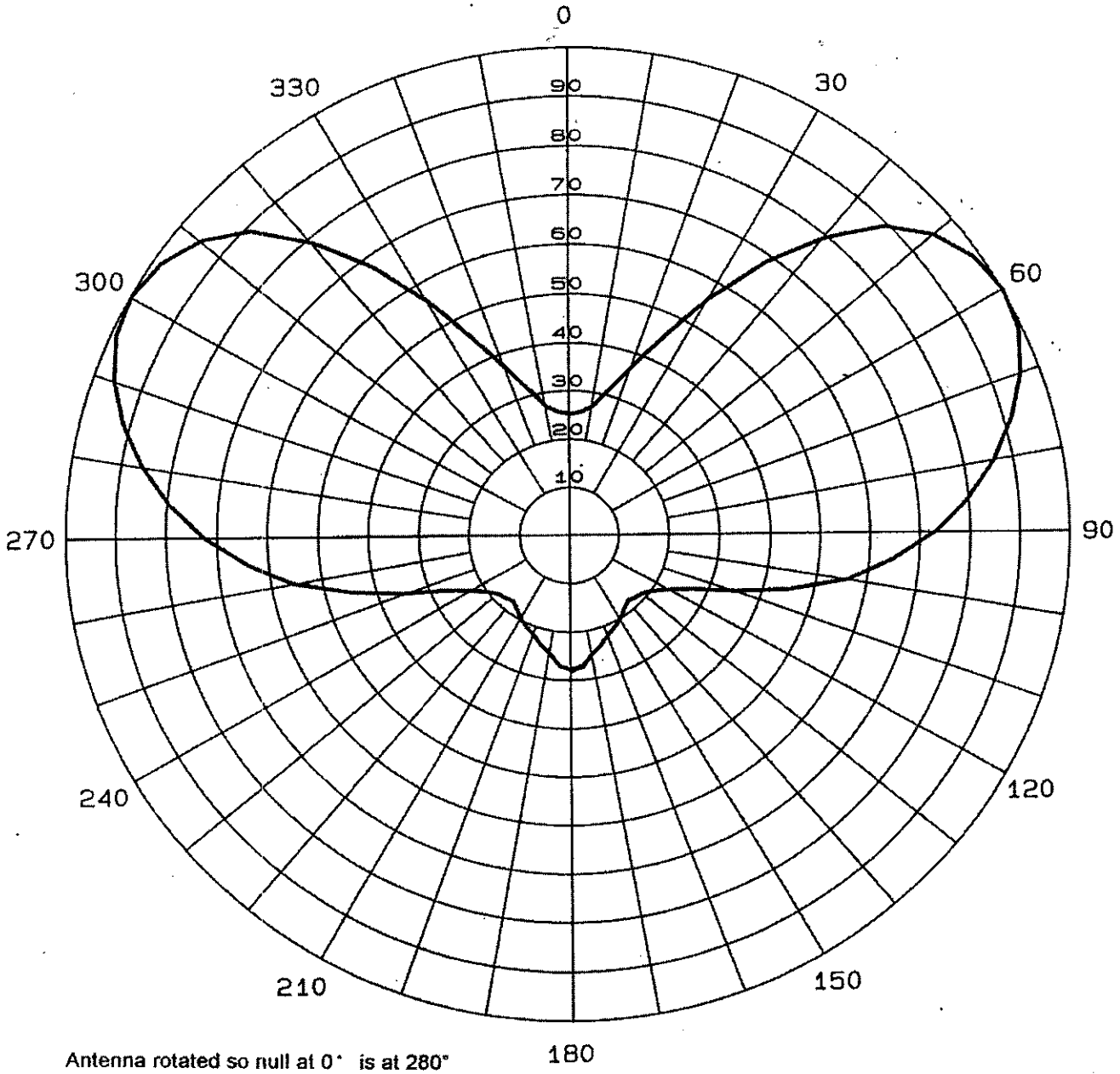
ENGINEERING STATEMENT (Cont'd)

A population count of the present 41 dbu contour for KCFG on channel 32 shows 261,555. The change of KCFG to channel 9 at the instant proposed location will serve 2,707,449 persons.

The foregoing was prepared either by me or under my supervision and is given under the penalty of perjury.

Aug 7, 2008
Date

Melvyn Lieberman
Melvyn Lieberman



Antenna rotated so null at 0° is at 280°
See tabulation in Figure 1-B

Calculated Relative Field
Azimuth Plane Pattern
Low Power UHF Slot
Antenna Type: PSILP
Pattern Type: BF
Directivity: 3.0 (4.7 dB)
Date: 7/1/97
Rev. 0

FIGURE 1-A

KCFG-DT – Flagstaff, AZ

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KCFG-TV - Flagstaff, AZ

Figure 1-B

CALCULATED RADIATION VALUES

BEAR. (DEG)	ANT. FACT.	ANT. GAIN (dB)	CALCULATED RAD. HORIZONTAL PLANE (ERP)	(dBk)	CALCULATED RAD. MAIN BEAM (ERP)	(dBk)
0	0.860	3.39	118.34	20.73	118.34	20.73
10	0.730	1.97	85.26	19.31	85.26	19.31
20	0.560	-0.34	50.18	17.00	50.18	17.00
30	0.350	-4.42	19.60	12.92	19.60	12.92
40	0.230	-8.07	8.46	9.28	8.46	9.28
50	0.190	-9.72	5.78	7.62	5.78	7.62
60	0.180	-10.19	5.18	7.15	5.18	7.15
70	0.200	-9.28	6.40	8.06	6.40	8.06
80	0.220	-8.45	7.74	8.89	7.74	8.89
90	0.250	-7.34	10.00	10.00	10.00	10.00
100	0.280	-6.36	12.54	10.98	12.54	10.98
110	0.250	-7.34	10.00	10.00	10.00	10.00
120	0.220	-8.45	7.74	8.89	7.74	8.89
130	0.200	-9.28	6.40	8.06	6.40	8.06
140	0.180	-10.19	5.18	7.15	5.18	7.15
150	0.190	-9.72	5.78	7.62	5.78	7.62
160	0.230	-8.07	8.46	9.28	8.46	9.28
170	0.350	-4.42	19.60	12.92	19.60	12.92
180	0.560	-0.34	50.18	17.00	50.18	17.00
190	0.730	1.97	85.26	19.31	85.26	19.31
200	0.860	3.39	118.34	20.73	118.34	20.73
210	0.960	4.35	147.46	21.69	147.46	21.69
220	1.000	4.70	160.00	22.04	160.00	22.04
230	0.950	4.25	144.40	21.60	144.40	21.60
240	0.790	2.65	99.86	19.99	99.86	19.99
250	0.560	-0.34	50.18	17.00	50.18	17.00
260	0.370	-3.94	21.90	13.41	21.90	13.41
270	0.270	-6.67	11.66	10.67	11.66	10.67
280	0.250	-7.34	10.00	10.00	10.00	10.00
290	0.270	-6.67	11.66	10.67	11.66	10.67
300	0.370	-3.94	21.90	13.41	21.90	13.41
310	0.560	-0.34	50.18	17.00	50.18	17.00
320	0.790	2.65	99.86	19.99	99.86	19.99
330	0.950	4.25	144.40	21.60	144.40	21.60
340	1.000	4.70	160.00	22.04	160.00	22.04
350	0.960	4.35	147.46	21.69	147.46	21.69

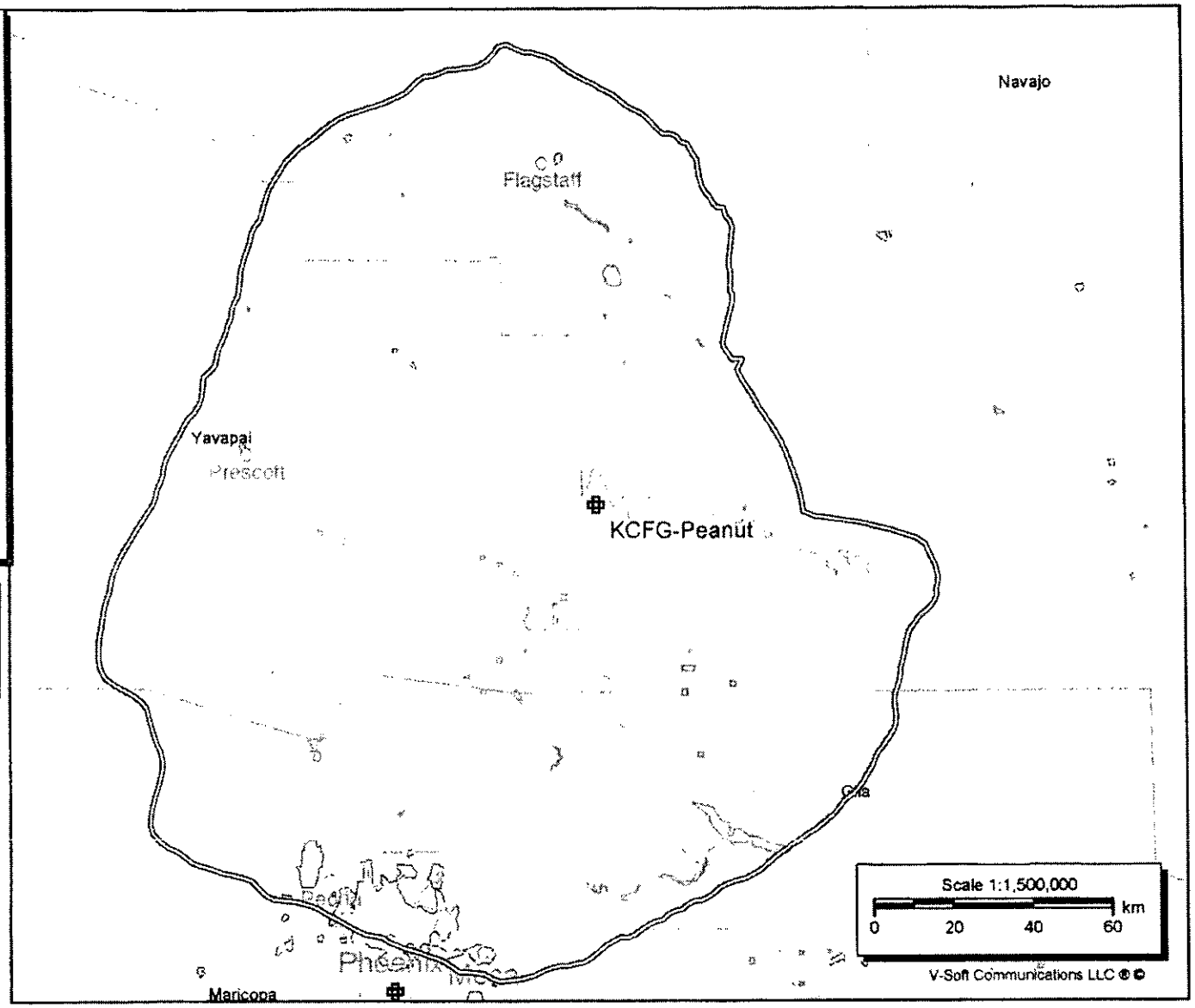
KCFG-Peanut
BPRM20080620AOF
Latitude: 34-25-48 N
Longitude: 111-30-16 W
ERP: 160.00 kW
Channel: 09
Frequency: 189.0 MHz
AMSL Height: 2107.0 m
Elevation: 2071.83 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 0.0
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec 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

KCFG-DT – Flagstaff, AZ

LIEBERMAN & WALISKO

August 2008

FIGURE 2



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KCFG - TV - Flagstaff, AZ

Figure 3

OUTGOING INTERFERENCE POPULATION REPORT

KCFG-Peanut (09) Flagstaff, AZ - BPRM20080620AOF
Broadcast Type: Digital. Service: T
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.
# 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: 8/6/2008
TV Database Date: 7/25/2008

Primary Terrain: V-Soft 3 Second US Terrain

Population Database: 2000 US Census (SF1)

Stations Considered:

Call Letters	City	State	Dist	Bear
KAET-D.C (08)	Phoenix	AZ	132.2	203.2
KAET (08+)	Phoenix	AZ	132.2	203.2
KGUN (09-)	Tucson	AZ	235.2	161.6
KGUN-D.A (09)	Tucson	AZ	235.2	161.6
KSAZTV (10Z)	Phoenix	AZ	132.0	203.1
KSAZ-D.C (10)	Phoenix	AZ	132.0	203.1
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
KVVU-D.P (09)	Henderson	NV	363.7	299.8
KVVU-D (09)	Henderson	NV	363.6	299.8
KVVU-D.A (09)	Henderson	NV	363.6	299.8
KUSG-D (09)	St. George	UT	346.9	328.0
KUSG-D (9)	ST. GEORGE	UT	346.9	328.0

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KCFG - TV - Flagstaff, AZ

Figure 3

OUTGOING INTERFERENCE POPULATION REPORT (Cont'd)

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
KAET-D.C (08)	56.6	0	3,251,641	0	0	0.0
KAET (08+)	28.3	0	3,247,360	2	0	0.0
KGUN (09-)	489.4	383	1,119,917	741	833	0.1
KGUN-D.A (09)	312.2	369	1,126,210	37	889	0.1
KSAZTV (10Z)	44.4	1	3,250,340	0	2	0.0
KSAZ-D.C (10)	36.3	1	3,248,927	0	2	0.0
KSAZ-D.A (10)	52.5	0	3,287,490	0	0	0.0
KECY-D.A (09)	249.8	10	330,806	0	5	0.0
KECYTV (09+)	20.4	0	326,968	0	0	0.0
KVVU-D.P (09)	4.0	0	1,447,355	0	0	0.0
KVVU-D (09)	0.0	0	1,444,971	0	0	0.0
KVVU-D.A (09)	4.0	0	1,469,243	0	0	0.0
KUSG-D (09)	0.0	0	86,498	0	0	0.0
KUSG-D (9)	0.0	0	84,781	0	0	0.0