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September 3, 2008

FILED/ACCEPTED
SEP - 3 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 a Supplement 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,

Vincent J. Curtis, Jr.
Anne Goodwin Crump
Counsel for KM Television of Flagstaff, L.L.C.

Enclosures

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

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ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

FILED/ACCEPTED
SEP - 3 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)	)	

SUPPLEMENT TO 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 supplements 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 following information.

1. KCFG(TV) currently operates on analog Channel 9, and KCFG-DT's current, pre-transition digital channel is Channel 32. As set forth in the Petition for Rule Making, KM now seeks to return to Channel 9 as the final, post-transition channel for KCFG-DT. The attached, revised Engineering Statement indicates that this change will allow the population to be served by KCFG-DT to increase by 2,294,770 people, from 261,555 to 2,556,325. This increase of well over two million people, which represents almost a ten-fold increase in the population within the KCFG-DT service area, clearly would serve the public interest. This more efficient use of the spectrum would be a clear benefit to the public in the area.

2. In addition, other public interest factors support the proposed change in post-transition DTV channels. One such benefit inherent in the change from Channel 32 to Channel 9 is the

reduction in the amount of energy that would be required to operate the station. As is commonly known, operation of UHF channels requires significantly greater use of electric power in order to achieve the same coverage area as would be required for operation of a VHF channel. The significant reduction in the amount of energy required to be consumed would benefit the environment as a whole. Furthermore, in this time of rapidly rising energy costs, the substantial cost savings that also would result could be applied by the licensee in other areas to enhance the station's service to the public.

3. There also are significant technical advantages to the use of Channel 9 as opposed to Channel 32 which would enhance the area viewers' DTV experience. As set forth in the attached Engineering Statement, one of these advantages is better signal propagation, which improves viewers' ability to receive the signal over the air. Such advantages are of particular importance at the time of DTV transition, as viewers are expecting benefits to offset the costs and inconvenience inherent in the transition.

4. Further, it should be noted that KCFG(TV) is one of the few minority-owned, full-power television stations in the country. As reflected in the Commission's "Report and Order and Third Further Notice of Proposed Rule Making," *Promotion of Diversification of Ownership in the Broadcasting Services*, FCC 07-217, released March 5, 2008, the Commission has recognized an historic under-representation of minorities in broadcast ownership, and it is seeking to expand the diversity of ownership. In this case, allowing the change of channel would promote the same goals by allowing a minority-owned station to reach a vastly greater audience. This expansion not only would help to ensure the successful operation of this minority-owned station, but also would bring the advantages of a diverse voice with independent programming to

a much larger number of people. That programming includes some minority-oriented programming, directed primarily to Hispanic viewers. As shown in the attached Engineering Statement, the proposed change in channel also will result in an increase in Hispanic viewers from 30,000 to 635,754. Thus, the number of persons able to benefit particularly from this programming will increase by a factor of approximately 20.

5. All of these public interest benefits could be achieved without any significant countervailing public interest detriments. While there would be some loss of service to current viewers, that loss would be very small. As stated in the attached Engineering Statement, only approximately 5,920 people would lose service. Obviously, that number is dwarfed by the 2,294,770 viewers that would gain new service, representing almost a ten-fold increase over the current population served. Moreover, the relatively small number of viewers that would no longer be served by KCFG(TV) will receive service from at least two other stations, as depicted in the Engineering Statement attached. While one of these stations, KNAZ-TV, has sought to change from its previously selected post-transition DTV channel (Channel 2) to remain on its pre-transition channel (Channel 22), it is clear that operation on the proposed new channel would encompass virtually all of the loss area proposed herein. Furthermore, there would be absolutely no loss of network service, as KCFG(TV) operates as an independent station. Finally, the change in allotments can be made in accordance with the Commission's technical rules and policies.

WHEREFORE, in light of the significant public interest benefits that would be gained, 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

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KCFG - Flagstaff, AZ

ENGINEERING STATEMENT

This Engineering Statement is given in response to certain questions posed by the FCC Staff in connection with a Petition for Rule Making filed by KM Television of Flagstaff, LLC, licensee of KCFG, Flagstaff, AZ to change the digital channel of KCFG from channel 32 to channel 9, the current analog channel.

The Staff requested answers to the following:

1. Provide a color map showing the before and after signal contours depicted so the loss area may be seen. A map as requested is provided in Exhibit I. It clearly shows the loss area, the gain area and the common area. The KNAZ contour depicted herein is the same for the channel 2 analog contour and the proposed channel 22 digital contour at 283 kW.

2. A depiction of the other stations that will serve the loss area. Exhibit I also furnishes a reply to this question.

3. As shown in Exhibit II, the population in the loss area is 5920 people who will continue to receive service from KNAZ and KFPH as shown in Exhibit I. The number 5920 is obtained by subtracting the population within the overlap area from the total population within the channel 32 area of KCFG.

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 5920 people will not be had.

ENGINEERING STATEMENT (Cont'd)

4. The use of high band VHF channel 9 for digital television is a better choice over UHF channel 32. Now that there are numerous already built facilities, ample data has been collected to adequately support this claim. VHF channel 9 was the original analog channel of KCFG and should have been used for the digital channel as well. The use of channel 9 for digital television provides certain advantages over UHF. Some of the advantages are better propagation of the signal at the VHF frequency. This better propagation makes for easier over the air reception for viewers using antennas.

Additionally, the use of VHF as a transmission medium allows the use of a less power-consuming transmitter. The power saving alone during the course of one year could make the difference between a profit or loss in this small market.

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 and associated tabulated data are included here to eliminate any ambiguity about the rotation of the pattern. A discussion was had with the Staff about the confusion and for the purpose of clarifying the matter, the pattern as depicted herein is not rotated. In use the pattern would be rotated so the null at N 0° E would appear at N 280° E. This non-rotated pattern is shown as Exhibit III-A. The tabulated data depicted in Exhibit III-B has the data listed in the rotated mode.

Employing a directional antenna reduces the caused-to-interference to KGUN from the instant proposed to 0.1%. Thus

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ENGINEERING STATEMENT (Cont'd)

the combined interference to KGUN from all sources is under 0.5%

The foregoing and attached exhibits were either prepared by me or under my direct supervision and is given under penalty of perjury.

Aug 31, 2008
Date

Melvyn Lieberman
Melvyn Lieberman

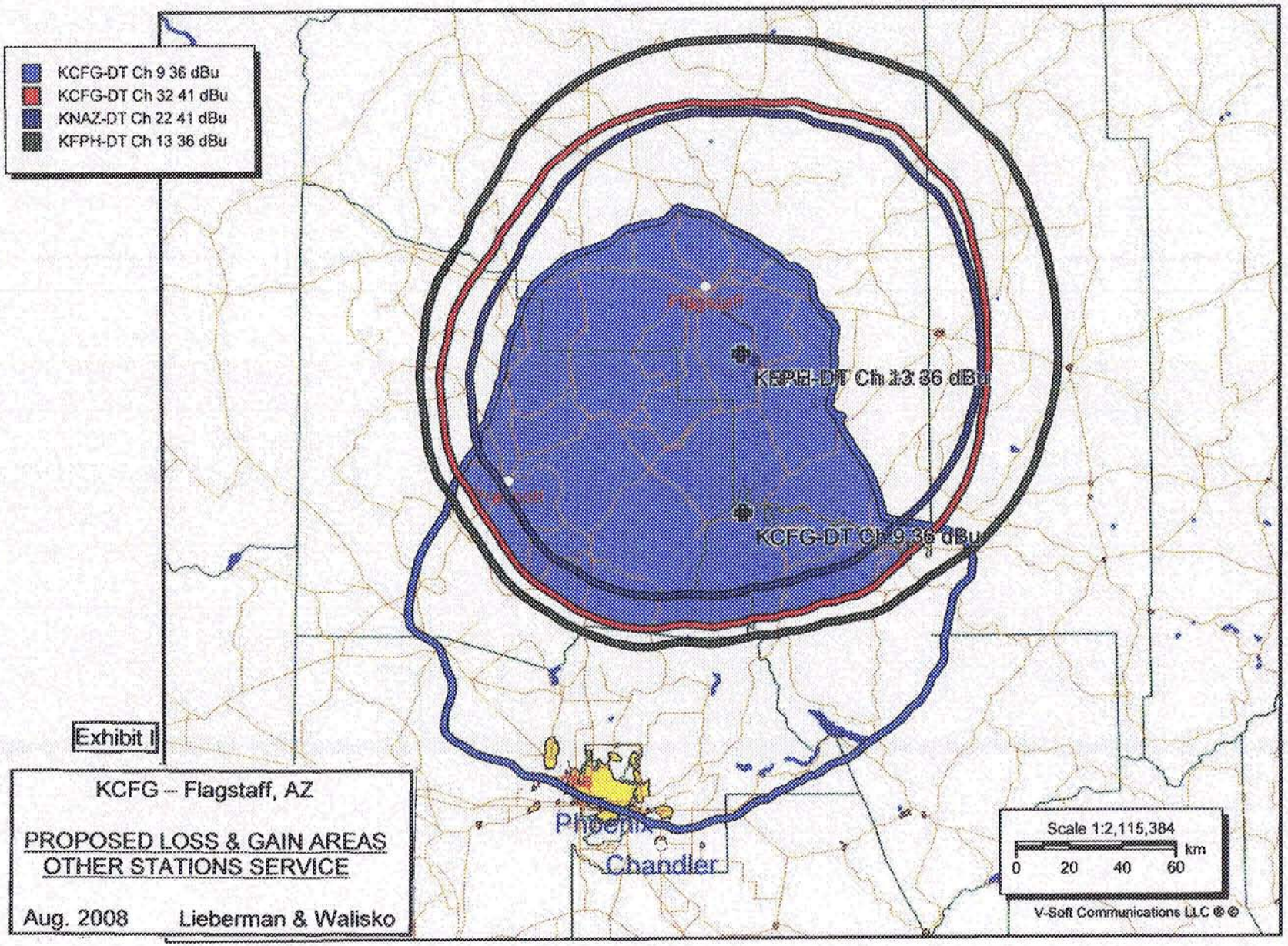

Exhibit I

KCFG – Flagstaff, AZ

PROPOSED LOSS & GAIN AREAS
OTHER STATIONS SERVICE

Aug. 2008 Lieberman & Walisko

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KCFG - Flagstaff, AZ

Exhibit II

Population Report - Channel 32 vs Channel 9

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KCFG-DT Ch 9
File Number: 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. Antenna Pattern: Directional
Vert. Elevation Pattern: Yes
Electrical Beam Tilt: 0.0
Propagation Model: Longley/Rice
Climate: Continental temperate
Conductivity: 0.0050
Dielectric Constant: 15.0
Refractivity: 311.0
Receiver Height AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 90.0%
Situation Variability: 50.0%
ITM Mode: Broadcast

Population report for KCFG-DT Ch 9. Field strength above 36.00 db uV/m.

Total Population: 2,556,325 Total Housing Units: 1,033,297

Breakdown:

White:	1,690,794	(66.1%)
Black:	90,761	(3.6%)
Hispanic:	635,754	(24.9%)
Native American:	42,279	(1.7%)
Asian:	51,630	(2.0%)
Pacific Islander:	3,081	(0.1%)
Mixed Race:	39,249	(1.5%)
Other:	2,777	(0.1%)

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KCFG - Flagstaff, AZ

Exhibit II

Population Report - Channel 32 vs Channel 9 (Cont'd

Transmitter Information:

Call Letters: KCFG-DT Ch 32
File Number: BLCDT20071115AEG
Latitude: 34-58-06 N
Longitude: 111-30-29 W
ERP: 1000.00 kW
Channel: 32
Frequency: 581.0 MHz
AMSL Height: 2608.6 m
Elevation: 2576.0 m
Horiz. Antenna Pattern: Directional
Vert. Elevation Pattern: Yes
Electrical Beam Tilt: 0.75
Propagation Model: Longley/Rice
Climate: Continental temperate
Conductivity: 0.0050
Dielectric Constant: 15.0
Refractivity: 311.0
Receiver Height AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 90.0%
Situation Variability: 50.0%
ITM Mode: Broadcast

Population report for KCFG-DT Ch 32. Field strength above 40.51 db uV/m.

Total Population: 261,555 Total Housing Units: 125,502

Breakdown:

White:	185,291	(70.8%)
Black:	2,747	(1.1%)
Hispanic:	30,000	(11.5%)
Native American:	37,708	(14.4%)
Asian:	1,689	(0.6%)
Pacific Islander:	185	(0.1%)
Mixed Race:	3,709	(1.4%)
Other:	226	(0.1%)

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KCFG - Flagstaff, AZ

Exhibit II

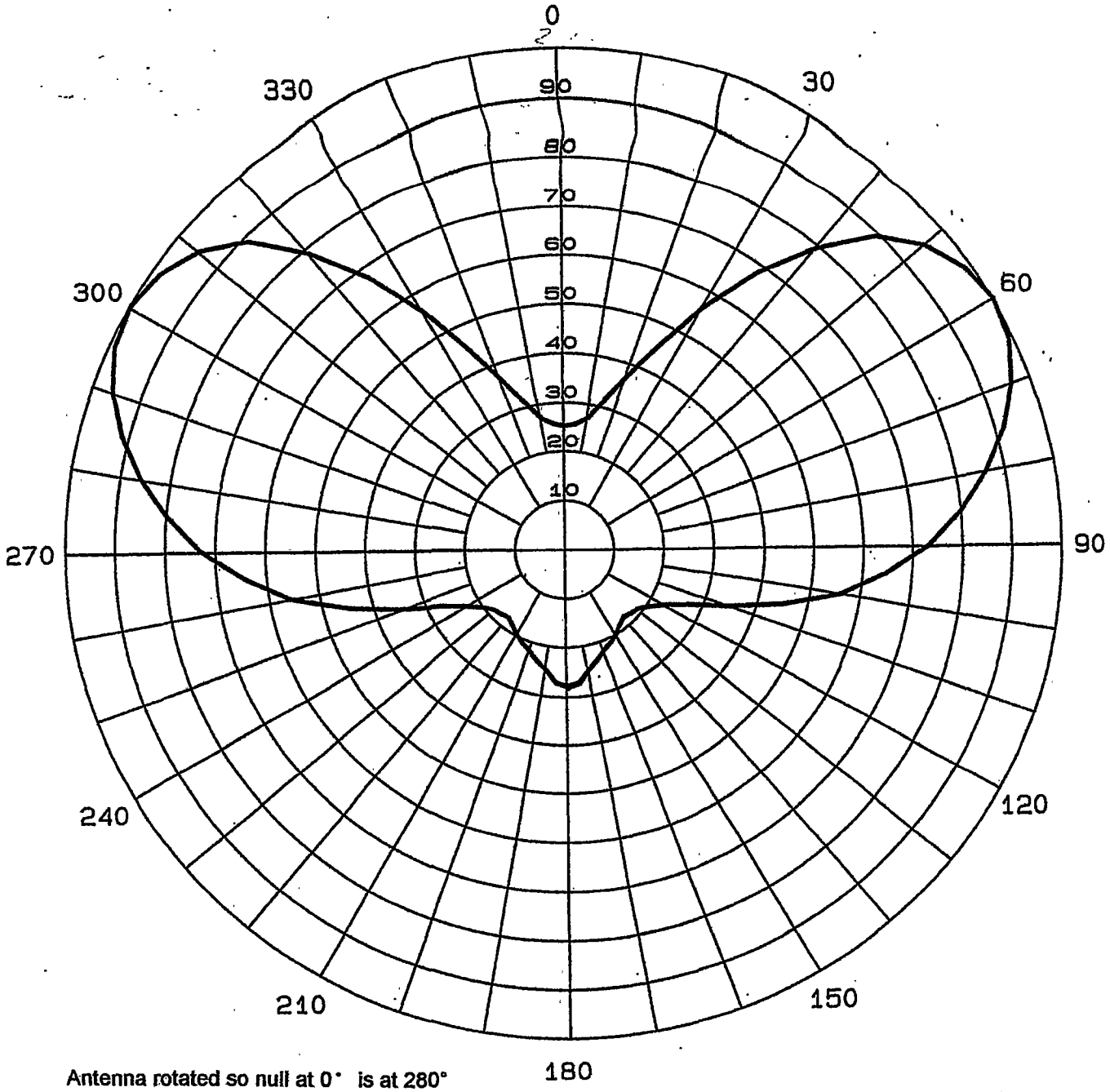
Population Report - Channel 32 vs Channel 9 (Cont'd

KCFG-DT Ch 9 / KCFG-DT Ch 32

This overlap region consists of the intersection of the following contours:
KCFG-DT Ch 9: FCC F(50-90) 36.00 dBu
KCFG-DT Ch 32: FCC F(50-90) 40.51 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 255,635
Total Housing Units Within Overlap Region: 128,277
Total Area Within Overlap Region: 18479.87 sq. km



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

Exhibit III-A

KCFG-DT – Flagstaff, AZ

LIEBERMAN & WALISKO

August 2008

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KCFG-TV - Flagstaff, AZ

Exhibit III-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