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FILED/ACCEPTED

SEP 26 2008

Federal Communications Commission  
Office of the Secretary

September 26, 2008

**BY MESSENGER**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, D.C. 20002

Re: Television Station KTVG(TV), Grand Island, Nebraska  
(Facility I.D. No. 27220); Petition for Rulemaking to Amend  
Post Transitional Digital Television Table of Allotment

Dear Ms. Dortch:

Pursuant to Section 73.623 of the Commission's Rules, and on behalf of our client Hill Broadcasting Company, Inc. ("Hill"), the licensee of commercial television broadcasting station KTVG (TV), Grand Island, Nebraska (Facility I.D. No. 27220), I respectfully submit for filing an original and four (4) copies of a Petition for Rulemaking to Amend Post-Transitional Digital Television Table of Allotment. Also enclosed is a copy to stamp and return for our files.

In the event the Commission or its staff should have any questions concerning this matter, kindly direct them to Hill's undersigned counsel.

Sincerely,

  
William H. Crispin

Enclosures

No. of Copies rec'd 044  
List ABCDE  
MB 08-101

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

ORIGINAL

In the Matter of:

HILL BROADCASTING  
COMPANY, INC.

To Amend the Post-Transition  
Digital Television Table of Allotment  
for Station KTVG, Grand Island, NE

MB Docket No.: \_\_\_\_\_

RM- \_\_\_\_\_

FILED/ACCEPTED

SEP 26 2008

Federal Communications Commission  
Office of the Secretary

To: The Secretary  
Attn: Chief, Video Division  
Media Bureau

PETITION FOR RULEMAKING

Hill Broadcasting Company, Inc. ("Petitioner"), by and through its attorneys, and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. § 73.623 (2007), hereby submits this Petition for Rulemaking to change the post-transition digital television ("DTV") channel allotment of Station KTVG-DT, Grand Island, Nebraska (the "Station") to Channel 16, and to make related technical changes to the Station's technical parameters. This Petition is submitted pursuant to the Public Notice, dated May 30, 2008, lifting the freeze on the submission of DTV "maximization" applications and petitions for digital channel substitutions.<sup>1</sup>

The Station's current analog facility is authorized to operate on NTSC Channel 17, and its current digital allotment is Channel 19.<sup>2</sup> As set forth in the Engineering Statement, attached hereto as Exhibit A, Petitioner has determined that the requested change in the post-transition DTV allotment of the Station to Channel 16 complies with the Commission's technical rules,

<sup>1</sup> *Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, DA 08-1213 (May 30, 2008).

<sup>2</sup> *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order, Appendix B, 22 FCC Rcd 15,581 (2007) ("DTV Order"). The post-transition parameters for DTV facilities specified in Appendix B will be codified at 47 C.F.R. § 73.622(i). *Id.*, nt. 2.

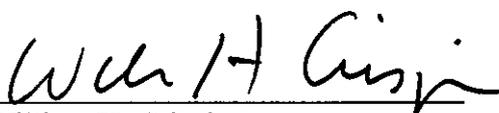
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List ABCDE  
08-101 MB

would result in a more efficient use of the spectrum, as it will permit the Petitioner to further maximize the Station's facilities, and would permit the Petitioner to save financial resources by using its current analog antenna. Finally, the proposed facility complies with the Commission's processing guidelines established in the DTV Order regarding the permissible change in a post-transition DTV facility.

Therefore, Petitioner respectfully requests that the post-transition DTV Table of Allotments be amended for the Station to specify the technical parameters set forth herein. The requested changes comply with all applicable legal and technical requirements and would serve the public interest.

Respectfully submitted,

**HILL BROADCASTING COMPANY, INC.**

By:   
William H. Crispin

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Its Attorneys

September 26, 2008

ENGINEERING STATEMENT  
IN SUPPORT OF A PETITION FOR RULEMAKING  
TO SUBSTITUTE TV CHANNEL 16 FOR CHANNEL 19  
FOR THE DIGITAL TV OPERATION OF  
KTVG-DT, GRAND ISLAND, NEBRASKA

SEPTEMBER 2008

This engineering statement has been prepared on behalf of Hill Broadcasting Company, Inc. (“Hill”), licensee of TV station KTVG, Grand Island, Nebraska, in support of a Rulemaking Petition (“RM”) to substitute TV Channel 16 for the allotted TV Channel 19 for the station’s digital (DTV) operation.

At present KTVG, Facility ID Number 27220, operates its analog TV facilities on Channel 17 (488-494 MHz) with 3890 kW effective radiated power (ERP) and 186 meters antenna height above average terrain (HAAT) using a directional TV antenna. The Commission has allotted TV Channel 19 (500-506 MHz) for the DTV operation of KTVG-DT with 1000 kW ERP, 186 meters HAAT and a directional TV antenna.

Hill desires to use its current Channel 17 analog TV antenna for its DTV facility to swiftly implement the full DTV operation and provide the largest coverage possible. However, according to the antenna manufacturer the current Channel 17 analog TV antenna cannot be used for Channel 19; however, it can be used for Channel 17 or any other lower UHF TV channel including DTV Channel 16 (482-488 MHz). An electromagnetic interference study conducted according to OET Bulletin 69 indicates a DTV operation on Channel 17 would result in impermissible interference to other DTV stations if KTVG-DT operates with an equivalent ERP to replicate Appendix B facilities. Therefore, Hill plans to file a rule-making petition to operate its post-transition digital TV facility on Channel 16.

KTVG-DT’s move to TV Channel 16 would permit the station to use its current analog Channel 17 TV antenna to swiftly implement the DTV operation and provide expanded coverage. Therefore, Hill believes substitution of TV Channel 16 for the

allotted Channel 19 is in the public interest. Hill requests the Commission to amend Section 73.622, Digital Television Table of Allotments, to allot TV Channel 16 for KTVG-DT, Grand Island, Nebraska. The allotted facilities are for an operation on DTV Channel 16 with 1000 kW ERP, 186 meters HAAT and a directional TV antenna.

The following information provides pertinent data for the proposed KTVG-DT operation.

Name of the Licensee:	Hill Broadcasting Company, Inc.			
Station Location:	NE-Grand Island			
Channel:	16			
Hours of Operation:	Unlimited			
Transmitter:	Type Accepted			
Antenna Type:	ERI, Model ALP24M3-HSH, Directional			
Beam Tilt:	0.75 deg			
Antenna Coordinates:	North Latitude:	40 deg	43 min	44 sec
	West Longitude:	98 deg	34 min	13 sec
Transmitter output power:	As required to achieve authorized ERP			
Maximum effective radiated power (Average):	1000 kW 30.0 dBk			
Elevation of the site above mean sea level:	616.9 meters			
Overall height of the tower above ground:	190.5 meters			
Height of radiation center above ground (meters):	174 meters			
Height of radiation center above mean sea level (meters):	791 meters			
Height of radiation center above average terrain (meters):	186 meters			
Antenna Structure Registration Number:	1023336			

**Response to questions listed on the FCC Form 301, Section III-D-DTV**

**Engineering**

**Question 1. (a)**

KTVG-DT is currently allotted TV Channel 19 for its DTV operation. KTVG-DT is proposing to substitute TV Channel 16 for Channel 19 and is filing this Petition for Rulemaking to allot DTV Channel 16 in the Table of Allotments, Section 73.622 of the Commission's rules.

**Question 1. (d)**

An interference study conducted (see attached Table I) according to the FCC OET Bulletin 69 indicates the proposed KTVG-DT operation on Channel 16 with 1000 kW ERP, 338 meters HAAT and a directional TV antenna would not cause any interference to other DTV stations exceeding the Commission's guidelines.

**Question 1. (e)**

The proposed DTV operation on Channel 16 would serve 196,621 people within the noise limited service area as compared to 195,000 predicted population defined in the new DTV Table in Appendix B for Channel 19. As such, the proposed DTV Channel 16 operation would serve 1,621 more people than listed in the new DTV Table in Appendix B for Channel 19.

**Question 2.**

The attached environmental statement demonstrates that there will not be any significant environmental impact from the proposed DTV operation in accordance with 47 C.F.R. Section 73.1307.

**Question 3.**

The attached map (Figure 1) shows the proposed KTVG-DT 48 dBu contour will encompass the allotted principal community of Grand Island, Nebraska.

**Question 4.**

The proposed KTVG-DT facility complies with Section 73.1030 of the Commission's rules; therefore, notification to radio astronomy installations, radio receiving installations and FCC monitoring stations is not required.

**Question 5.**

KTVG-DT would be operating from the existing tower which is registered (ASR No. 1023336) by the Commission and no changes are proposed to require a change in the registration.

**Reasons for the substitution of TV Channel 16 for Channel 19**

As indicated earlier the proposed DTV Channel 16 is superior to the allotted DTV Channel 19 for the following reasons.

1. The proposed DTV operation on Channel 16 would replicate the coverage provided with Appendix B facilities on Channel 19. As a matter of fact the proposed Channel 16 operation would allow KTVG-DT to serve 1,621 more people than on Channel 19.
2. It would enable KTVG-DT to utilize the current analog TV Channel 17 antenna resulting in faster construction and implementation of its DTV operation

# KTVG-DT CH 16 Antenna Pattern

Pre-Rotation Antenna Pattern....

Azimuth (deg)	Effective Field
0.0	0.248
10.0	0.258
20.0	0.324
30.0	0.451
40.0	0.622
50.0	0.781
60.0	0.897
70.0	0.974
80.0	1.000
90.0	0.967
100.0	0.889
110.0	0.764
120.0	0.600
130.0	0.432
140.0	0.302
150.0	0.242
160.0	0.237
170.0	0.242
180.0	0.248
190.0	0.242
200.0	0.302
210.0	0.432
220.0	0.600
230.0	0.764
240.0	0.889
250.0	0.967
260.0	1.000
270.0	0.974
280.0	0.897
290.0	0.781
300.0	0.622
310.0	0.451
320.0	0.324
330.0	0.258
340.0	0.248
350.0	0.256

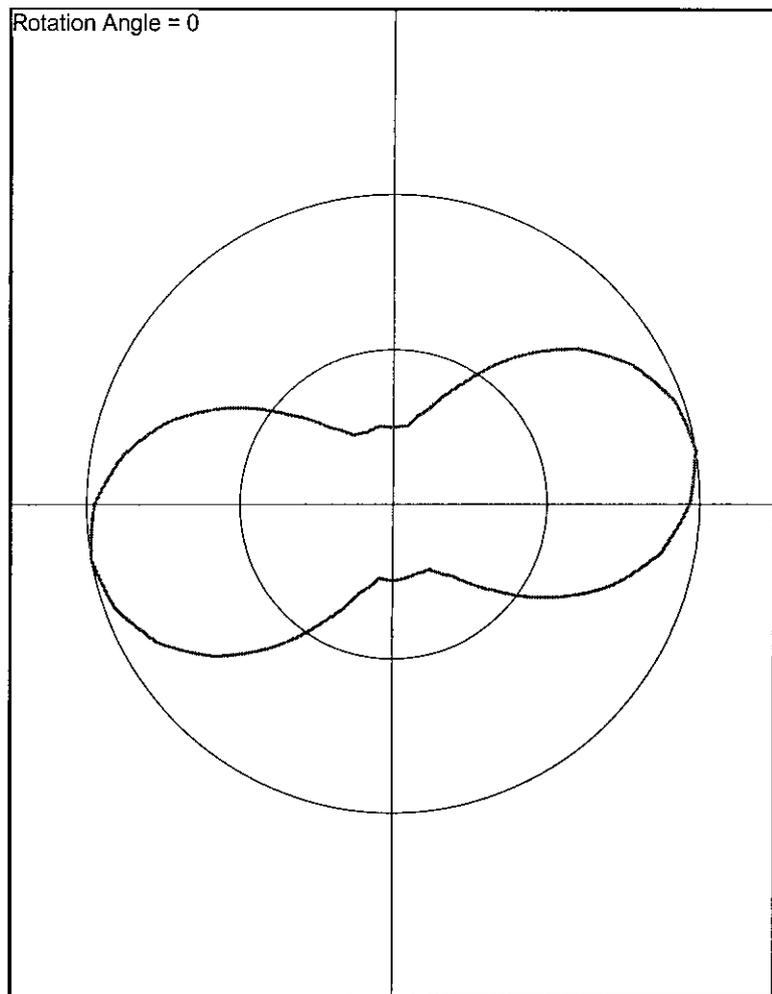


TABLE I

TW Census data selected 2000  
 Post Transition Data Base Selected /space/software/cdbs/pt\_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 09-24-2008 Time: 11:22:48

Record Selected for Analysis

KTVG USERRECORD-01 GRAND ISLAND NE US  
 Channel 16 ERF 1000. kW HAAT 186. m RCAMSL 00791 m  
 Latitude 040-43-44 Longitude 0098-34-13  
 Status APP Zone 2 Border  
 Dir Antenna Make usr Model VIC\_KTVG2 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	61.504	195.9	67.9
45.0	492.102	202.2	79.2
90.0	935.089	191.9	82.3
135.0	134.689	185.9	71.1
180.0	61.504	174.4	66.4
225.0	465.124	170.1	76.4
270.0	948.676	181.9	81.5
315.0	150.156	185.2	71.6

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KTVG 16 GRAND ISLAND NE USERRECORD01

and station

SHORT TO: KOOE 16 HAYS KS BLEDT 20030423ABE  
 038-46-16 0098-44-16  
 Req. separation 223.7 Actual separation 217.8 Short 5.9 km

SHORT TO: KOOE 16 HAYS KS DTVPLN DTVP0567  
 38 -46-16 98 -44-16  
 Req. separation 223.7 Actual separation 217.8 Short 5.9 km

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SHORT TO: KTVG 17 GRAND ISLAND NE BMPCT 19960724KF  
 040-56-54 0098-48-42  
 Req. separation => 12.0 <= 106.0 Actual separation 31.8 Short 74.2( 19.8) km

SHORT TO: NEW 20 KEARNEY NE BPRM 19960725AAG  
 040-41-54 0099-05- 0  
 Req. separation => 24.1 <= 96.6 Actual separation 43.5 Short 53.1( 19.4) km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility is 24.6km from FCC Monitoring station at  
 Grand Island NE  
 Bearing: 29.0 degrees ERP: 191.83 kW HAAT: 200.2 m  
 Field = 17.6 mV/m

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

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	KTVG GRAND ISLAND NE	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	KXVO	OMAHA NE	200.6	PLN	DTVPLN	-DTVP0539
16	KOOD	HAYS KS	218.1	LIC	BLEDT	-20030423ABE
16	KOOD	HAYS KS	218.1	PLN	DTVPLN	-DTVP0567
17	KAAS-TV	SALINA KS	206.8	LIC	BLCDT	-20021120AAP
17	KAAS-TV	SALINA KS	206.8	PLN	DTVPLN	-DTVP0599
17	KYNE-TV	OMAHA NE	222.8	LIC	BLEDT	-20030409AAV
17	KYNE-TV	OMAHA NE	222.8	PLN	DTVPLN	-DTVP0608

\*\*\*\*\*

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
15	KXVC	OMAHA NE	DTVPLN	-DTVP0539

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	KYOU-TV	OTTUMWA IA	357.8	PLN	DTVPLN	-DTVP0527
15	KYOU-TV	OTTUMWA IA	357.8	APP	BMPCDT	-20080620AIS
15	KYOU-TV	OTTUMWA IA	357.8	CP	BPCDT	-20080506AAJ
15	KSMN	WORTHINGTON MN	315.0	APP	BPEDT	-20080620ALP
15	KSMN	WORTHINGTON MN	315.0	PLN	DTVPLN	-DTVP0533
15	KSMN	WORTHINGTON MN	315.0	LIC	BLEDT	-20051219AGX



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lost to NTSC IX	0	0.0
lost to additional IX by ATV	423	124.2
lost to ATV IX only	423	124.2
lost to all IX	423	124.2

Potential Interfering Stations Included in above Scenario 2

17A KS SALINA	DTVPLN	DTVP0599	PLN
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After Analysis

Results for: 16A KS HAYS BLEDT 20030423ABE LIC  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	550	308.6
lost to ATV IX only	550	308.6
lost to all IX	550	308.6

Potential Interfering Stations Included in above Scenario 2

17A KS SALINA	DTVPLN	DTVP0599	PLN
16A NE GRAND ISLAND	USERRECORD01		APP

Percent new IX = 0.1090%

Result key: 3  
 Scenario 3 Affected station 2  
 Before Analysis

Results for: 16A KS HAYS BLEDT 20030423ABE LIC  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	423	124.2
lost to ATV IX only	423	124.2
lost to all IX	423	124.2

Potential Interfering Stations Included in above Scenario 3

17A KS SALINA	BLCDT	20021120AAP	LIC
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After Analysis

Results for: 16A KS HAYS BLEDT 20030423ABE LIC  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	550	308.6
lost to ATV IX only	550	308.6
lost to all IX	550	308.6

Potential Interfering Stations Included in above Scenario 3

17A KS SALINA	BLCDT	20021120AAP	LIC
16A NE GRAND ISLAND	USERRECORD01		APP

Percent new IX = 0.1090%

Result key: 4  
 Scenario 4 Affected station 2  
 Before Analysis

Results for: 16A KS HAYS BLEDT 20030423ABE LIC  
 HAAT 304.0 m, ATV ERP 496.0 kW

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	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	423	124.2
lost to ATV IX only	423	124.2
lost to all IX	423	124.2

Potential Interfering Stations Included in above Scenario 4

17A KS SALINA                    DTVPLN    DTVP0599    PLN

After Analysis

Results for: 16A KS HAYS                    BLEDT    20030423ABE   LIC  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	550	308.6
lost to ATV IX only	550	308.6
lost to all IX	550	308.6

Potential Interfering Stations Included in above Scenario 4

17A KS SALINA                    DTVPLN    DTVP0599    PLN  
 16A NE GRAND ISLAND            USERRECORD01    APP

Percent new IX = 0.1090%

Worst case new IX 0.1090% Scenario 1

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
16	KOOD	HAYS KS	DTVPLN -DTVP0567

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
17	KAAS-TV	SALINA KS	122.5	LIC	BLCDT -20021120AAP
17	KAAS-TV	SALINA KS	122.5	PLN	DTVPLN -DTVP0599
16	KTVG	GRAND ISLAND NE	218.1	APP	USERRECORD-01

Total scenarios = 4

Result key: 5  
 Scenario 1 Affected station 3  
 Before Analysis

Results for: 16A KS HAYS                    DTVPLN    DTVP0567    PLN  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	423	124.2
lost to ATV IX only	423	124.2
lost to all IX	423	124.2

Potential Interfering Stations Included in above Scenario 1

17A KS SALINA                    BLCDT    20021120AAP   LIC



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17A KS SALINA                      BLCDT        20021120AAP    LIC

After Analysis

Results for: 16A KS HAYS                      DTVPLN        DTVP0567        PLN  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	550	308.6
lost to ATV IX only	550	308.6
lost to all IX	550	308.6

Potential Interfering Stations Included in above Scenario        3

17A KS SALINA                      BLCDT        20021120AAP    LIC  
 16A NE GRAND ISLAND              USERRECORD01        APP

Percent new IX =    0.1090%

Result key:                      8  
 Scenario                      4    Affected station                      3  
 Before Analysis

Results for: 16A KS HAYS                      DTVPLN        DTVP0567        PLN  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	423	124.2
lost to ATV IX only	423	124.2
lost to all IX	423	124.2

Potential Interfering Stations Included in above Scenario        4

17A KS SALINA                      DTVPLN        DTVP0599        PLN

After Analysis

Results for: 16A KS HAYS                      DTVPLN        DTVP0567        PLN  
 HAAT 304.0 m, ATV ERP 496.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	117053	26455.3
not affected by terrain losses	116964	26367.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	550	308.6
lost to ATV IX only	550	308.6
lost to all IX	550	308.6

Potential Interfering Stations Included in above Scenario        4

17A KS SALINA                      DTVPLN        DTVP0599        PLN  
 16A NE GRAND ISLAND              USERRECORD01        APP

Percent new IX =    0.1090%

Worst case new IX    0.1090% Scenario                      1

#####

Analysis of Interference to Affected Station        4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	KAAS-TV	SALINA KS	BLCDT        -20021120AAP

KHANNA & GULL, Inc. - Consulting Engineers

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	KOOD	HAYS KS	122.5	LIC	BLEDT	-20030423ABE
16	KOOD	HAYS KS	122.5	PLN	DTVPLN	-DTVP0567
17	KLBY	COLBY KS	342.0	CP MOD	BMPCDT	-20080603ACE
17	KLBY	COLBY KS	342.0	PLN	DTVPLN	-DTVP0598
17	KMIZ	COLUMBIA MO	419.2	PLN	DTVPLN	-DTVP0604
17	KMIZ	COLUMBIA MO	419.2	CP MOD	BMPCDT	-20080618ACV
17	KYNE-TV	OMAHA NE	266.4	LIC	BLEDT	-20030409AAV
17	KYNE-TV	OMAHA NE	266.4	PLN	DTVPLN	-DTVP0608
17	KDOR-TV	BARTLESVILLE OK	320.8	CP	BPCDT	-20080616AEE
17	KDOR-TV	BARTLESVILLE OK	320.8	PLN	DTVPLN	-DTVP0614
16	KTVG	GRAND ISLAND NE	206.8	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
17	KAAS-TV	SALINA KS	DTVPLN	-DTVP0599

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	KOOD	HAYS KS	122.5	LIC	BLEDT	-20030423ABE
16	KOOD	HAYS KS	122.5	PLN	DTVPLN	-DTVP0567
17	KLBY	COLBY KS	342.0	CP MOD	BMPCDT	-20080603ACE
17	KLBY	COLBY KS	342.0	PLN	DTVPLN	-DTVP0598
17	KMIZ	COLUMBIA MO	419.2	PLN	DTVPLN	-DTVP0604
17	KMIZ	COLUMBIA MO	419.2	CP MOD	BMPCDT	-20080618ACV
17	KYNE-TV	OMAHA NE	266.4	LIC	BLEDT	-20030409AAV
17	KYNE-TV	OMAHA NE	266.4	PLN	DTVPLN	-DTVP0608
17	KDOR-TV	BARTLESVILLE OK	320.8	CP	BPCDT	-20080616AEE
17	KDOR-TV	BARTLESVILLE OK	320.8	PLN	DTVPLN	-DTVP0614
16	KTVG	GRAND ISLAND NE	206.8	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
17	KYNE-TV	OMAHA NE	BLEDT	-20030409AAV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	KDSM-TV	DES MOINES IA	209.0	LIC	BLCDT	-20041118ABZ
16	KDSM-TV	DES MOINES IA	209.0	PLN	DTVPLN	-DTVP0564
17	KAAS-TV	SALINA KS	266.4	LIC	BLCDT	-20021120AAP
17	KAAS-TV	SALINA KS	266.4	PLN	DTVPLN	-DTVP0599
17	KMIZ	COLUMBIA MO	403.1	PLN	DTVPLN	-DTVP0604
17	KMIZ	COLUMBIA MO	403.1	CP MOD	BMPCDT	-20080618ACV
16	KTVG	GRAND ISLAND NE	222.8	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

KHANNA & GULL, Inc. - Consulting Engineers

Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	KYNE-TV	OMAHA NE	DTVPLN -DTVP0608

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
16	KDSM-TV	DES MOINES IA	209.0	LIC	BLCDDT -20041118ABZ
16	KDSM-TV	DES MOINES IA	209.0	PLN	DTVPLN -DTVP0564
17	KAAS-TV	SALINA KS	266.4	LIC	BLCDDT -20021120AAP
17	KAAS-TV	SALINA KS	266.4	PLN	DTVPLN -DTVP0599
17	KMIZ	COLUMBIA MO	403.1	PLN	DTVPLN -DTVP0604
17	KMIZ	COLUMBIA MO	403.1	CP MOD	BMPCDT -20080618ACV
16	KTVG	GRAND ISLAND NE	222.8	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
16	KTVG	GRAND ISLAND NE	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
15	KXVO	OMAHA NE	200.6	PLN	DTVPLN -DTVP0539
16	KOOD	HAYS KS	218.1	LIC	BLEDDT -20030423ABE
16	KOOD	HAYS KS	218.1	PLN	DTVPLN -DTVP0567
17	KAAS-TV	SALINA KS	206.8	LIC	BLCDDT -20021120AAP
17	KAAS-TV	SALINA KS	206.8	PLN	DTVPLN -DTVP0599
17	KYNE-TV	OMAHA NE	222.8	LIC	BLEDDT -20030409AAV
17	KYNE-TV	OMAHA NE	222.8	PLN	DTVPLN -DTVP0608

Total scenarios = 2

Result key: 9  
 Scenario 1 Affected station 8  
 Before Analysis

Results for: 16A NE GRAND ISLAND USERRECORD01 APP  
 HAAT 186.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	196952	18884.4
not affected by terrain losses	196951	18880.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	330	339.2
lost to ATV IX only	330	339.2
lost to all IX	330	339.2

Potential Interfering Stations Included in above Scenario 1

16A KS HAYS BLEDDT 20030423ABE LIC

Result key: 10  
 Scenario 2 Affected station 8  
 Before Analysis

Results for: 16A NE GRAND ISLAND USERRECORD01 APP  
 HAAT 186.0 m, ATV ERP 1000.0 kW

KHANNA & GULL, Inc. -- Consulting Engineers

	POPULATION	AREA (sq km)
within Noise Limited Contour	196952	18884.4
not affected by terrain losses	196951	18880.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	330	339.2
lost to ATV IX only	330	339.2
lost to all IX	330	339.2

Potential Interfering Stations Included in above Scenario 2

16A KS HAYS DTVPLN DTVP0567 PLN

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

## ENVIRONMENTAL PROTECTION ACT

Since KTVG-DT will be using its currently licensed analog TV antenna, located on tower (ASR No. 1023336), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 1000 kW and a radiation center of 174 meters above ground level, the proposed Channel 16 DTV operation would have less than 46 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.2 in the downward direction.

The Commission's guidelines for the Channel 16 TV are  $1607 \mu\text{W}/\text{cm}^2$  for the occupational/controlled, and  $321 \mu\text{W}/\text{cm}^2$  for the general population/uncontrolled environment.

The above analysis indicates that members of the public and personnel working around the KTVG-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, KTVG-DT will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.



Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 301</b></p>	Approved by OMB 3060-0027 (January 2008)  FOR FCC USE ONLY
<p><b>APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION</b></p> <p>Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. -

**Section I - General Information**

1.	Legal Name of the Applicant HILL BROADCASTING COMPANY, INC.		
	Mailing Address P.O. BOX 131206		
	City BIRMINGHAM	State or Country (if foreign address) AL	ZIP Code 35253 -
	Telephone Number (include area code) 2053055944	E-Mail Address (if available) ROBDHILLJR@AOL.COM	
	FCC Registration Number: Call Sign KTVG-DT	Facility ID Number 27220	
2.	Contact Representative (if other than Applicant) WILLIAM H. CRISPIN		
	Firm or Company Name CRISPIN & GREENBERG PLLC		
	Mailing Address 555 13TH STREET NW SUITE 420 WEST		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20004 -
	Telephone Number (include area code) 2028280153	E-Mail Address (if available) WCRISPIN@CRISPINLAW.COM	
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
4.	<b>Application Purpose</b> <input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input checked="" type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application <input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Change in licensed facility <input type="radio"/> Minor Amendment to pending application (a) File number of original construction permit: BPCDT-19991015ABA <input type="checkbox"/> NA (b) Service Type: <input type="radio"/> AM <input type="radio"/> FM <input type="radio"/> TV <input checked="" type="radio"/> DTV (c) DTV Type: <input type="radio"/> Pre-Transition <input checked="" type="radio"/> Post-Transition <input type="radio"/> Both (d) Community of License: City: GRAND ISLAND State: NE (e) Facility Type: <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary		

If an amendment, **submit as an Exhibit** a listing by Section and Question Number the portions of the pending application that are being revised. [Exhibit 1]

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

**Section II - Legal**

<b>1.</b>	<p><b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<input type="radio"/> Yes <input type="radio"/> No
<b>2.</b>	<p><b>Parties to the Application.</b></p> <p>a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.</p> </div> <div style="width: 45%;"> <p>(2) Citizenship.</p> <p>(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's <b>equity/debt plus</b> standard, etc.</p> <p>(4) Percentage of votes.</p> <p>(5) Percentage of total assets (equity plus debt).</p> </div> </div> <p>[Enter Parties/Owners Information]</p> <hr/> <p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 2]
<b>3.</b>	<p><b>Other Authorizations.</b> List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p>	<input checked="" type="checkbox"/> N/A [Exhibit 3]
<b>4.</b>	<p><b>Multiple Ownership.</b></p> <p>a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?</p> <p style="text-align: right;">[Exhibit 4]</p> <p>If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p> <p>b. Applicant certifies that the proposed facility complies with the Commission's multiple</p>	<input type="radio"/> Yes <input type="radio"/> No  <input type="radio"/> Yes <input type="radio"/> No

	<p>ownership rules and cross-ownership rules.</p> <p>Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p> <p>All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p> <p>c. Applicant certifies that the proposed facility:</p> <ol style="list-style-type: none"> <li>1. does not present an issue under the Commission's policies relating to media interests of immediate family members;</li> <li>2. complies with the Commission's policies relating to future ownership interests; and</li> <li>3. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.</li> </ol>	<p>[Exhibit 5]</p> <p><input type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]</p>
5.	<p><b>Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <ol style="list-style-type: none"> <li>a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or</li> <li>b. any pending broadcast application in which character issues have been raised.</li> </ol>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]</p>
6.	<p><b>Adverse Findings.</b> Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]</p>
7.	<p><b>Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 9]</p>
8.	<p><b>Program Service Certification.</b> Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
9.	<p><b>Local Public Notice.</b> Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
10.	<p><b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p> <p><b>An exhibit is required unless this question is inapplicable.</b></p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 10]</p>
11.	<p><b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
12.	<p><b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>
13.	<p><b>Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.</b> If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>

certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.	
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I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing Signature	Typed or Printed Title of Person Signing Date
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WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

<b>SECTION III-D - DTV Engineering</b>
<b>Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.</b>
<p><b>Pre-Transition Certification Checklist:</b> An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p><b>Post-Transition Expedited Processing.</b> An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>

<b>1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:</b>	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input checked="" type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV	<input checked="" type="radio"/> Yes <input type="radio"/> No

Table Appendix B.	<input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

<b>SECTION III-D - DTV Engineering</b>	
<b>TECHNICAL SPECIFICATIONS</b> Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
<b>TECH BOX</b>	
1.	Channel Number: DTV 16 Analog TV, if any 17
2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 40 Minutes 43 Seconds 44 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 98 Minutes 34 Seconds 13 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1023336 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 617 meters
6.	Overall Tower Height Above Ground Level: 191 meters
7.	Height of Radiation Center Above Ground Level: 174 meters
8.	Height of Radiation Center Above Average Terrain : 186 meters
9.	Maximum Effective Radiated Power (average power): 1000 kW
10.	Antenna Specifications: a. Manufacturer AND Model ALP24M3-HSH b. Electrical Beam Tilt: 0.75 degrees <input type="checkbox"/> Not Applicable



will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

**PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.**

**SECTION III - PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name S. K. KHANNA		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 9/25/2008	
Mailing Address KHANNA & GUILL, INC. 8405-A RICHMOND HIGHWAY			
City ALEXANDRIA	State or Country (if foreign address) VA	Zip Code 22309 -2425	
Telephone Number (include area code) 7037782550	E-Mail Address (if available) SID@KGICONSULTING.COM		

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**Exhibits**

**Exhibit 44**

**Description:** ENGINEERING STATEMENT

**Attachment 44**

Description
EXHIBIT 44 - ENGINEERING STATEMENT

**Exhibit 46**

**Description:** REFERENCED EXHIBIT

PLEASE SEE EXHIBIT 44

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**Attachment 46**

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