

November 6, 2008

VIA COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

Attention: Video Division
Media Bureau

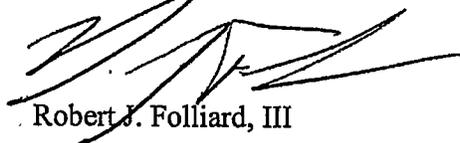
Re: KWKT-DT, Waco, Texas
Facility I.D. No. 12522
Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Comcorp of Texas License Corp., licensee of commercial television station KWKT-DT, Waco, Texas, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 25 for Channel 44 at Waco, Texas in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,


Robert J. Folliard, III

Enclosure

cc: Ms. Joyce Bernstein (FCC; *via e-mail*)
Mr. Ron Graser (FCC; *via e-mail*)

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

In the Matter of)

)
Amendment of Section 73.622(i))
Post-Transition Table of Allotments,)
Digital Television Broadcast Stations)
(Waco, Texas))

MB Docket No. 08-233
RM- 11505

To: Office of the Secretary
Attn: Chief, Video Division
Media Bureau

PETITION FOR RULE MAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,¹ Comcorp of Texas License Corp. ("Licensee"), licensee of KWKT-DT, Waco, Texas (the "Station"), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(i), the Post-Transition DTV Table of Allotments, by substituting Channel 25 as the Station's post-transition DTV channel in lieu of Channel 44.

Specifically, the Post-Transition DTV Table of Allotments would be amended as follows:

	<u>Present</u>	<u>Proposed</u>
Waco, TX	10, 20, 26, <u>44</u>	10, 20, <u>25</u> , 26

¹ 47 C.F.R. §§ 1.401, 73.616, 73.622(a) as amended by Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 23 FCC Rcd 2994, ¶ 128 (rel. Dec. 31, 2007).

Licensee is seeking the channel substitution because operation on Channel 25 would allow the Station to expand service beyond that allowed on Channel 44. As the attached Engineering Statement demonstrates, the proposed facility complies with the Commission's rules for post-transition DTV operation. The Station's proposed service area encompasses its community of license, and the proposed parameters comply with the Commission's interference standards.² The proposed facility would serve all of the viewers currently receiving analog service and would reach approximately 192% of the currently allotted post-transition DTV service population.³

For the convenience of the Commission, we hereby provide the present and proposed "Appendix B" parameters:

Present:

Facility ID	State and City		NTSC		DTV				
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
12522	TX	WACO	44	44	160	552	74667	311852	971937

Proposed:

12522	TX	WACO	44	25	1000	558	TBA	311853	971936
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(RCAMSL = 762 meters)

² See Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions Effective Immediately, *Public Notice*, DA 08-1213 at 2 (rel. May 30, 2008); 47 C.F.R. §§ 73.616(b),(e), 73.623(d), 73.625(a).

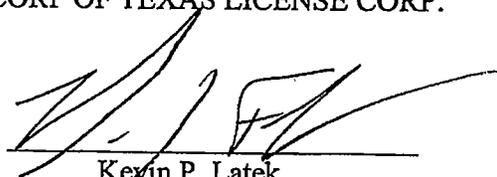
³ See Attachment A, Engineering Statement at 2, Fig 3.

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition DTV Table of Allotments as proposed. Adoption would serve the public interest by providing television service to an additional seven hundred thousand people.

Respectfully submitted,

COMCORP OF TEXAS LICENSE CORP.

By:



Kevin P. Latek
Robert J. Folliard, III

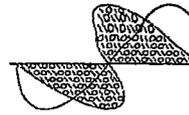
Its Attorneys

Dow Lohnes PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
(202) 776-2000

Dated: November 6, 2008

ATTACHMENT A

Engineering Statement



Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Engineering Statement

prepared for
Comcorp of Texas License Corp.
KWKT-DT Waco, TX
Facility ID 12522
Ch. 25 1000 kW 558 m

This engineering statement has been prepared on behalf of *Comcorp of Texas License Corp.* ("*Comcorp*"), licensee of KWKT(TV) (Facility ID 12522, Waco, TX) in support of a *Petition for Rulemaking* to change the KWKT digital television ("DTV") post-transition channel assignment and related technical parameters. KWKT is licensed on analog Channel 44 and digital Channel 57, and will use its analog Channel 44 for digital operation in the post-transition period, as established in Appendix B of the Seventh Report and Order in MB Docket 87-278. *Comcorp* requests an alternative channel assignment and related parameters.

Comcorp proposes herein to substitute digital Channel 25 in lieu of the current digital Channel 44 allotment. A larger service area can be achieved with the proposed change, as the current KWKT-DT Channel 44 facility cannot be appreciably "maximized" for the post-transition period due to protection requirements to other stations. The KWKT-DT post-transition Construction Permit ("CP," BPCDT-20080519ABE) authorizes an effective radiated power ("ERP") of 100 kW at 558 meters antenna height above average terrain ("HAAT"). Maximization studies show that the KWKT-DT ERP can be increased to only 190 kW using the current analog antenna before exceeding the 0.5 percent interference limit to KEYE-DT (Ch. 43, Austin, TX). Further, the KWKT-DT Channel 44 CP facility would suffer from 5.89 percent incoming interference. The Appendix B parameters for KWKT-DT show 10.0 percent incoming interference.

As proposed herein, KWKT-DT could achieve 1000 kW ERP on Channel 25. Continued use of a "peanut" directional antenna pattern is specified, however a replacement antenna is required and the specific antenna pattern is adjusted slightly to relax the amount of suppression along the sides of the pattern. The proposed directional antenna relative field values are provided in the attached

Figure 1. The proposal specifies use of the present KWKT site¹ and antenna height, as summarized below.

Present Channel 44 Parameters (Appendix B)

Facility ID	State and City		NTSC		DTV							
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
12522	TX	WACO	44	44	160	552	74667	311852	971937	22371	743	10.0

Antenna C/R AMSL: 761 meters

Proposed Channel 25 Parameters

Facility ID	State and City		NTSC		DTV							
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
12522	TX	WACO	44	25	1000	558	See Fig-1	311853	971936	38600	1431	0.0

Antenna C/R AMSL: 762 meters

A map is supplied as **Figure 2**, which depicts the standard predicted coverage contours. This map includes the boundaries of Waco, KWKT-DT's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 48 dBμ contour.

Figure 3 provides a coverage contour comparison, demonstrating that the channel substitution would not result in any loss area from the current Channel 44 allotment or analog Channel 44 Grade B contour area. The proposed KWKT-DT's predicted service population provides a 192.3 percent match of the current Appendix B facility, as detailed in the following table. Incoming interference is 0.04 percent.

Post-Transition Population Summary

Population Summary (2000 Census) OET Bulletin 69 method	Channel 44 Appendix B	Channel 25 Proposed
Within Noise Limited Contour	827,184	1,451,749
Not affected by terrain losses	827,020	1,431,043
Lost to all interference	83,095	514
Net DTV Service	743,925	1,430,529
Match of Appendix B	---	192.29%

¹One-second changes in latitude and longitude are specified in order to conform to the KWKT tower's Antenna Structure Registration data (#1059337). The antenna height is adjusted to match that as currently authorized in the digital Channel 44 CP.

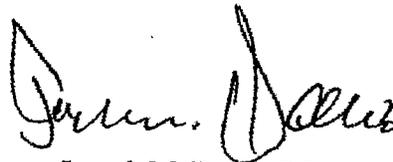
A detailed interference study per OET Bulletin 69² shows that the proposal complies with the 0.5 percent limit of new interference caused to the Appendix B facilities and current post-transition authorizations of pertinent nearby stations. The interference study output report is provided as **Table 1**. Protection requirements towards authorized Class A stations are also satisfied.

The proposed 1000 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 558 meters currently permitted by §73.622(f)(8)(i). Section 73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the largest station within the same market. The total area within the proposed KWKT-DT 41 dBμ contour is 37,421 square kilometers, which does not exceed the post-transition coverage contour areas of KWTX-DT (43,852 sq. km, BMPCDT-20080606ADI, Ch. 10, Waco, TX) or KCEN-DT (39,946 sq. km, BLCDT-20021010AAB, Ch. 9, Temple, TX). A coverage contour comparison map is provided as **Figure 4**. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

²FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.



Joseph M. Davis, P.E.
October 27, 2008

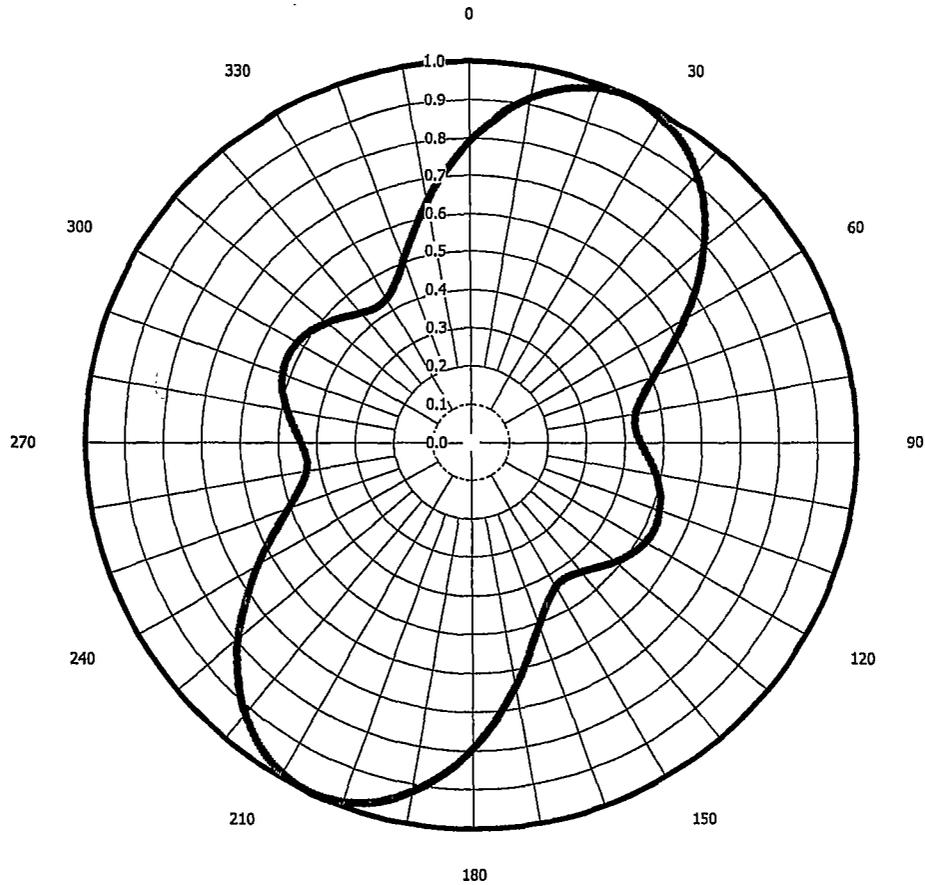
Chesapeake RF Consultants, LLC
11993 Kahns Road
Manassas, VA 20112
703-650-9600

List of Attachments

- | | |
|----------|------------------------------------|
| Figure 1 | Directional Antenna Data |
| Figure 2 | Proposed Coverage Contours |
| Figure 3 | Coverage Contour Comparison |
| Figure 4 | Largest Station in Market |
| Table 1 | OET Bulletin 69 Interference Study |

Azimuth Relative Field Pattern

True North



Azimuth	Rel Field	Azimuth	Rel Field	Azimuth	Rel Field	Azimuth	Rel Field
0	0.793	90	0.441	190	0.919	280	0.485
10	0.919	100	0.486	200	0.990	290	0.520
20	0.990	110	0.520	205	1.000	300	0.520
25	1.000	120	0.520	210	0.990	310	0.486
30	0.990	130	0.486	220	0.919	320	0.441
40	0.919	140	0.441	230	0.794	330	0.434
50	0.794	150	0.434	240	0.641	340	0.506
60	0.642	160	0.506	250	0.506	350	0.641
70	0.506	170	0.641	260	0.434		
80	0.434	180	0.793	270	0.441		



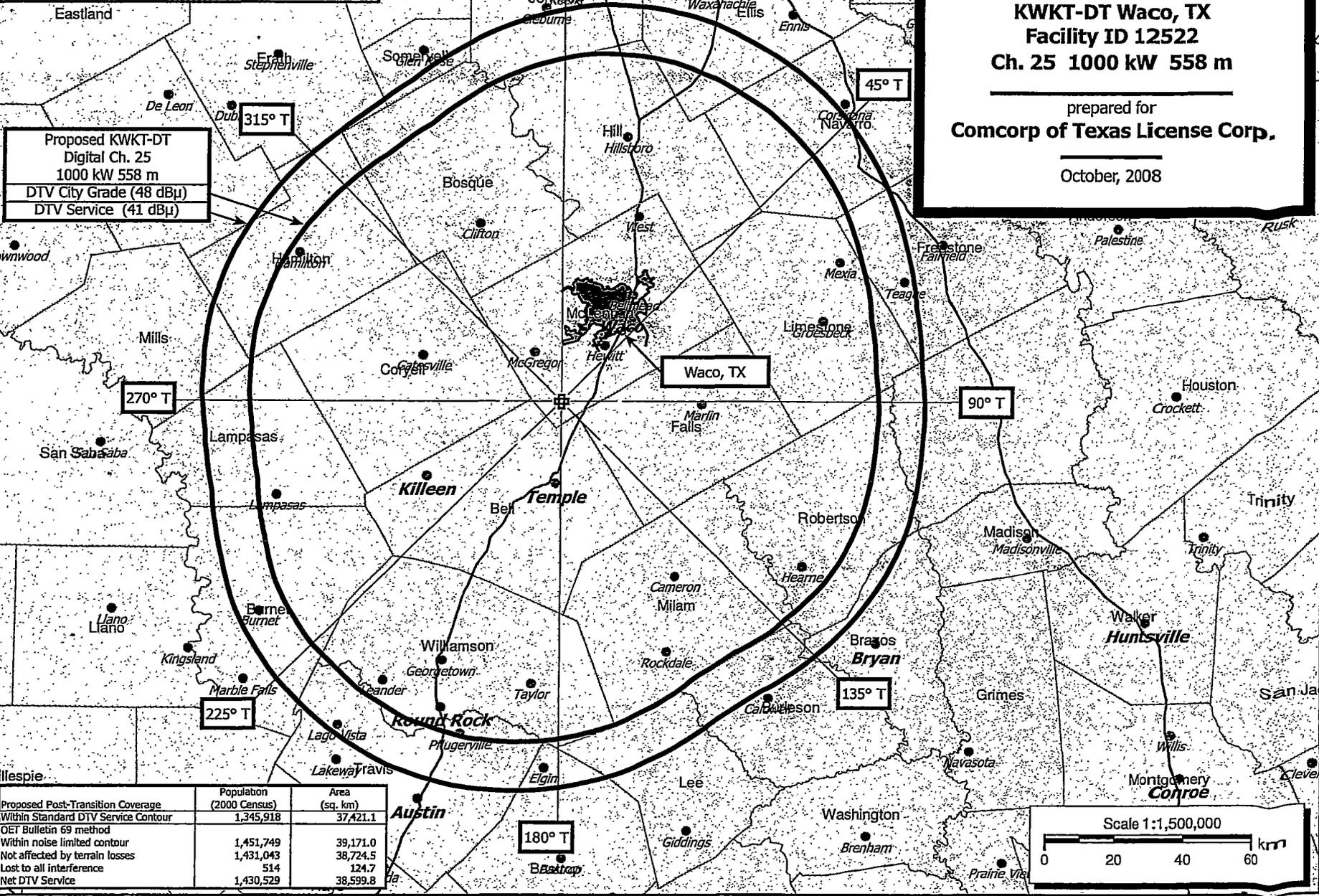
Figure 1
Directional Antenna Data
KWKT-DT Waco, TX
Facility ID 12522
Ch. 25 1000 kW 558 m

prepared for
Comcorp of Texas License Corp.

October, 2008



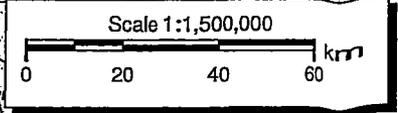
Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio



Proposed KWKT-DT
 Digital Ch. 25
 1000 kW 558 m
 DTV City Grade (48 dBμ)
 DTV Service (41 dBμ)

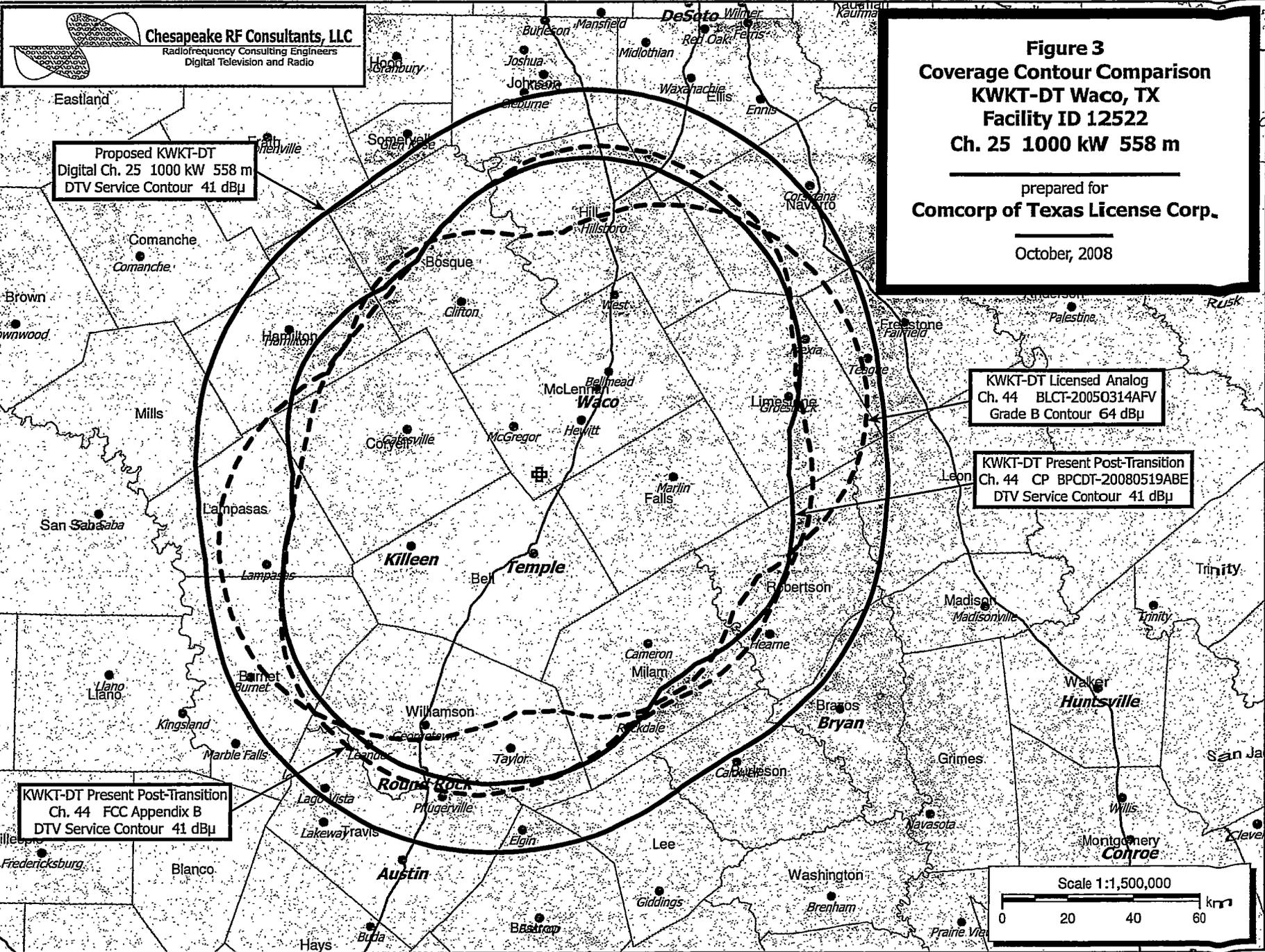
Figure 2
Proposed Coverage Contours
KWKT-DT Waco, TX
Facility ID 12522
Ch. 25 1000 kW 558 m
 prepared for
Comcorp of Texas License Corp.
 October, 2008

	Population (2000 Census)	Area (sq. km)
Proposed Post-Transition Coverage		
Within Standard DTV Service Contour	1,345,918	37,421.1
OET Bulletin 69 method		
Within noise limited contour	1,451,749	39,171.0
Not affected by terrain losses	1,431,043	38,724.5
Lost to all interference	514	124.7
Net DTV Service	1,430,529	38,599.8





Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio



Proposed KWKT-DT
Digital Ch. 25 1000 kW 558 m
DTV Service Contour 41 dB μ

KWKT-DT Present Post-Transition
Ch. 44 FCC Appendix B
DTV Service Contour 41 dB μ

Figure 3
Coverage Contour Comparison
KWKT-DT Waco, TX
Facility ID 12522
Ch. 25 1000 kW 558 m

prepared for
Comcorp of Texas License Corp.

October, 2008

KWKT-DT Licensed Analog
Ch. 44 BLCT-20050314AFV
Grade B Contour 64 dB μ

KWKT-DT Present Post-Transition
Ch. 44 CP BPCDT-20080519ABE
DTV Service Contour 41 dB μ

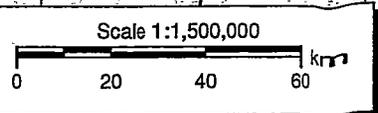




Figure 4
Largest Station in Market
KWKT-DT Waco, TX
Facility ID 12522
Ch. 25 1000 kW 558 m

prepared for
Comcorp of Texas License Corp.

October, 2008

KWTX-DT Ch. 10 Waco, TX
 BMPCDT-20080606ADI
 36 dBμ F(50,90)
 Area: 43,852 sq. km

Proposed KWKT-DT
 41 dBμ F(50,90)
 Area: 37,421 sq. km

KCEN-DT Ch. 9 Temple, TX
 BLCDDT-20021010AAB
 36 dBμ F(50,90)
 Area: 39,946 sq. km

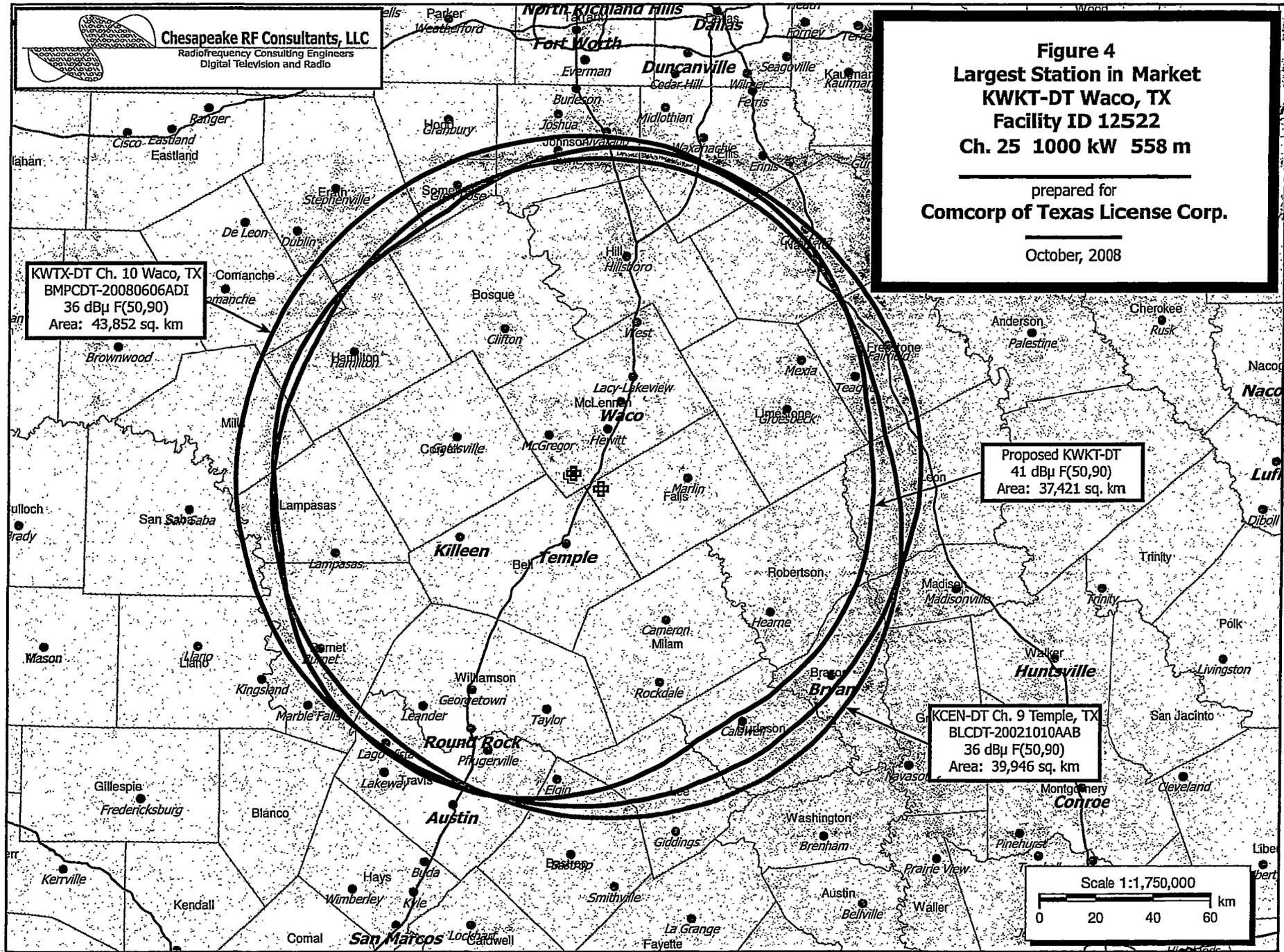
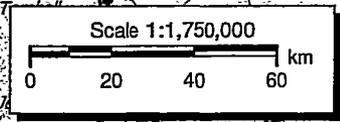


Table 1 KWKT-DT OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 1 of 10)

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

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-27-2008 Time: 11:26:22

Record Selected for Analysis

KWKT-DT USERRECORD-01 WACO TX US
 Channel 25 ERP 1000. kW HAAT 558. m RCAMSL 00762 m
 Latitude 031-18-53 Longitude 0097-19-36
 Status APP Zone 2 Border
 Dir Antenna Make usr Model KWKT-DT25 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 does not meet maximum height/power limits
 Channel 25 ERP = 1000.00 HAAT = 558.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	628.849	561.3	114.1
45.0	733.592	569.8	116.0
90.0	194.481	592.6	105.4
135.0	214.832	569.1	105.0
180.0	628.849	541.2	112.9
225.0	733.592	546.4	114.6
270.0	194.481	551.5	103.0
315.0	214.832	530.4	102.4

Evaluation toward Class A Stations

Contour overlap to Class A station
 KEVI-LP 25 SAN ANTONIO TX BLTTL 19950103JA

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations

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

Table 1 KWKT-DT OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 2 of 10)

Proposed station is OK toward AM broadcast stations

 Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
25	KWKT-DT	WACO TX	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
25	KLTS-TV	SHREVEPORT LA	354.5	LIC	BLEDT	-20020826AAY
25	KLTS-TV	SHREVEPORT LA	354.5	PLN	DTVPLN	-DTVP0926
25	KLTS-TV	SHREVEPORT LA	354.5	CP	BPEDT	-20080314ABY
25	KEVI-LP	SAN ANTONIO TX	213.7	LIC	BLTTL	-19950103JA
26	KXXV	WACO TX	3.0	LIC	BLCDT	-20050630AFE
26	KXXV	WACO TX	3.0	PLN	DTVPLN	-DTVP0981
28	KHPX-CA	GEORGETOWN TX	85.4	LIC	BLTTA	-20020408AAP
32	KGBS-CA	AUSTIN TX	119.6	CP	BPPTA	-20060403AOU
32	KGBS-CA	AUSTIN TX	119.6	APP	BSTA	-20060803AGH
32	KGBS-CA	AUSTIN TX	119.6	LIC	BLTTA	-20040217ACL

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
25	KLTS-TV	SHREVEPORT LA	BLEDT	-20020826AAY

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
24	KLTS-DR	SHREVEPORT LA	0.1	APP	BPRM	-20080620AOC
25	WLPB-TV	BATON ROUGE LA	363.5	CP	BPEDT	-20080619AGF
25	WLPB-TV	BATON ROUGE LA	363.5	PLN	DTVPLN	-DTVP0925
25	WLPB-TV	BATON ROUGE LA	363.5	APP	BPEDT	-20081008ADB
25	WLPB-TV	BATON ROUGE LA	363.5	LIC	BLEDT	-20041020ADE
25	WMAO-TV	GREENWOOD MS	324.8	CP MOD	BPEDT	-20080619AGI
25	WMAO-TV	GREENWOOD MS	324.8	PLN	DTVPLN	-DTVP0928
26	KVTH	HOT SPRINGS AR	205.2	PLN	DTVPLN	-DTVP0946
26	KVTH	HOT SPRINGS AR	205.2	CP	BPEDT	-20080331APY
26	KLPA-TV	ALEXANDRIA LA	179.3	LIC	BLEDT	-20031212ABA
26	KLPA-TV	ALEXANDRIA LA	179.3	PLN	DTVPLN	-DTVP0956
25	KWKT-DT	WACO TX	354.5	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
25	KLTS-TV	SHREVEPORT LA	DTVPLN	-DTVP0926

Stations Potentially Affecting This Station

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 10)

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	KLTS-DR	SHREVEPORT LA	0.1	APP	BPRM -20080620AOC
25	WLBP-TV	BATON ROUGE LA	363.5	CP	BPEDT -20080619AGF
25	WLBP-TV	BATON ROUGE LA	363.5	PLN	DTVPLN -DTVP0925
25	WLBP-TV	BATON ROUGE LA	363.5	APP	BMPEDT -20081008ADB
25	WLBP-TV	BATON ROUGE LA	363.5	LIC	BLEDT -20041020ADE
25	WMAO-TV	GREENWOOD MS	324.8	CP MOD	BMPEDT -20080619AGI
25	WMAO-TV	GREENWOOD MS	324.8	PLN	DTVPLN -DTVP0928
26	KVTH	HOT SPRINGS AR	205.2	PLN	DTVPLN -DTVP0946
26	KVTH	HOT SPRINGS AR	205.2	CP	BPCDT -20080331APY
26	KLPA-TV	ALEXANDRIA LA	179.3	LIC	BLEDT -20031212ABA
26	KLPA-TV	ALEXANDRIA LA	179.3	PLN	DTVPLN -DTVP0956
25	KWKT-DT	WACO TX	354.5	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
25	KLTS-TV	SHREVEPORT LA	BPEDT -20080314ABY

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	KLTS-DR	SHREVEPORT LA	0.1	APP	BPRM -20080620AOC
25	WLBP-TV	BATON ROUGE LA	363.5	CP	BPEDT -20080619AGF
25	WLBP-TV	BATON ROUGE LA	363.5	PLN	DTVPLN -DTVP0925
25	WLBP-TV	BATON ROUGE LA	363.5	APP	BMPEDT -20081008ADB
25	WLBP-TV	BATON ROUGE LA	363.5	LIC	BLEDT -20041020ADE
25	WMAO-TV	GREENWOOD MS	324.8	CP MOD	BMPEDT -20080619AGI
25	WMAO-TV	GREENWOOD MS	324.8	PLN	DTVPLN -DTVP0928
26	KVTH	HOT SPRINGS AR	205.2	PLN	DTVPLN -DTVP0946
26	KVTH	HOT SPRINGS AR	205.2	CP	BPCDT -20080331APY
26	KLPA-TV	ALEXANDRIA LA	179.3	LIC	BLEDT -20031212ABA
26	KLPA-TV	ALEXANDRIA LA	179.3	PLN	DTVPLN -DTVP0956
25	KWKT-DT	WACO TX	354.5	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
25	KEVI-LP	SAN ANTONIO TX	BLTTL -19950103JA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
18	KLRU	AUSTIN TX	95.8	LIC	BLET -19790424KG
18	KLRU	AUSTIN TX	96.1	APP	BPET -20020429ABA
18	KNIC-TV	BLANCO TX	15.4	APP	BPCDT -20080402ADA
18	KNIC-TV	BLANCO TX	15.4	PLN	DTVPLN -DTVP0652
21	KXAN-TV	AUSTIN TX	96.3	LIC	BLCDT -20050630AAG
21	KXAN-TV	AUSTIN TX	96.3	PLN	DTVPLN -DTVP0785

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 4 of 10)

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
22	KLRU	AUSTIN TX	95.8	LIC	BLEDT -20040305ACK
22	KLRU	AUSTIN TX	95.8	PLN	DTVPLN -DTVP0825
24	KVUE	AUSTIN TX	95.8	LIC	BLCT -20050113ACX
25	NEW	INGRAM TX	125.0	APP	BNPTTL -20000831AXT
25	NEW	SAN SABA TX	169.5	APP	BNPTTL -20000831CCG
25	KAVU-TV	VICTORIA TX	149.1	LIC	BLCT -20050311AEC
25	KXKV	WACO TX	216.7	LIC	BLCT -20050715ABA
26	KPXL	UVALDE TX	64.6	APP	BSTA -20080314AAW
26	KPXL	UVALDE TX	64.6	PLN	DTVPLN -DTVP0980
26	KPXL	UVALDE TX	64.6	CP	BPCDT -20070501AEW
26	KPXL	UVALDE TX	64.6	LIC	BLCT -19990303KE
27	KXAM-TV	LLANO TX	118.8	CP	BPCDT -19991018AAV
27	KXAM-TV	LLANO TX	118.8	PLN	DTVPLN -DTVP1020
32	KMYS	KERRVILLE TX	49.5	LIC	BLCDT -20060608ACW
32	KMYS	KERRVILLE TX	49.5	PLN	DTVPLN -DTVP1199
33	KVUE	AUSTIN TX	95.8	LIC	BLCDT -20050624AAI
33	KVUE	AUSTIN TX	95.8	PLN	DTVPLN -DTVP1230
39	KENS-TV	SAN ANTONIO TX	40.5	CP	BPCDT -20080303ALJ
39	KENS-TV	SAN ANTONIO TX	40.6	PLN	DTVPLN -DTVP1421
40	KISA-LP	SAN ANTONIO TX	23.3	LIC	BLTTL -20050323AGF
25	KWKT-DT	WACO TX	213.7	APP	USERRECORD-01

Proposal causes no interference

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
26	KXKV	WACO TX	BLCDT -20050630AFE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
26	KTEN	ADA OK	343.1	CP	BPCDT -19991007AAW
26	KTEN	ADA OK	343.1	PLN	DTVPLN -DTVP0972
26	KRIV	HOUSTON TX	262.1	PLN	DTVPLN -DTVP0978
26	KRIV	HOUSTON TX	262.1	CP MOD	BMPEDT -20080620AKF
26	KPXL	UVALDE TX	253.4	PLN	DTVPLN -DTVP0980
26	KPXL	UVALDE TX	253.4	CP	BPCDT -20070501AEW
27	KXAM-TV	LLANO TX	140.4	CP	BPCDT -19991018AAV
27	KXAM-TV	LLANO TX	140.4	PLN	DTVPLN -DTVP1020
25	KWKT-DT	WACO TX	3.0	APP	USERRECORD-01

Total scenarios = 16

Result key: 7

Scenario 7 Affected station 5

Before Analysis

Results for: 26A TX WACO BLCDT 20050630AFE LIC
HAAT 561.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1399195	39128.2
not affected by terrain losses	1374143	38814.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	37975	723.9
lost to ATV IX only	37975	723.9
lost to all IX	37975	723.9

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 5 of 10)

Potential Interfering Stations Included in above Scenario 7

26A OK ADA	BPCDT	19991007AAW	CP
26A TX HOUSTON	BMPCDT	20080620AKF	CP
26A TX UVALDE	BPCDT	20070501AEW	CP
27A TX LLANO	BPCDT	19991018AAV	CP

After Analysis

Results for: 26A TX WACO BLCDT 20050630AFE LIC
HAAT 561.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1399195	39128.2
not affected by terrain losses	1374143	38814.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	38977	800.3
lost to ATV IX only	38977	800.3
lost to all IX	38977	800.3

Potential Interfering Stations Included in above Scenario 7

26A OK ADA	BPCDT	19991007AAW	CP
26A TX HOUSTON	BMPCDT	20080620AKF	CP
26A TX UVALDE	BPCDT	20070501AEW	CP
27A TX LLANO	BPCDT	19991018AAV	CP
25A TX WACO	USERRECORD01		APP

Percent new IX = 0.0750%

Worst case new IX 0.0750% Scenario 7

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
26	KXXV	WACO TX	DTVPLN -DTVP0981

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
26	KTEN	ADA OK	343.1	CP	BPCDT -19991007AAW
26	KTEN	ADA OK	343.1	PLN	DTVPLN -DTVP0972
26	KRIV	HOUSTON TX	262.1	PLN	DTVPLN -DTVP0978
26	KRIV	HOUSTON TX	262.1	CP MOD	BMPCDT -20080620AKF
26	KEXL	UVALDE TX	253.4	PLN	DTVPLN -DTVP0980
26	KEXL	UVALDE TX	253.4	CP	BPCDT -20070501AEW
27	KXAM-TV	LLANO TX	140.4	CP	BPCDT -19991018AAV
27	KXAM-TV	LLANO TX	140.4	PLN	DTVPLN -DTVP1020
25	KWKT-DT	WACO TX	3.0	APP	USERRECORD-01

Total scenarios = 16

Result key: 23
Scenario 7 Affected station 6
Before Analysis

Results for: 26A TX WACO DTVPLN DTVP0981 PLN

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 6 of 10)

HAAT 561.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1399195	39128.2
not affected by terrain losses	1374143	38814.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	37975	723.9
lost to ATV IX only	37975	723.9
lost to all IX	37975	723.9

Potential Interfering Stations Included in above Scenario 7

26A OK ADA	BPCDT	19991007AAW	CP
26A TX HOUSTON	BMPCDT	20080620AKF	CP
26A TX UVALDE	BPCDT	20070501AEW	CP
27A TX LLANO	BPCDT	19991018AAV	CP

After Analysis

Results for: 26A TX WACO DTVPLN DTVP0981 PLN
HAAT 561.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1399195	39128.2
not affected by terrain losses	1374143	38814.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	38977	800.3
lost to ATV IX only	38977	800.3
lost to all IX	38977	800.3

Potential Interfering Stations Included in above Scenario 7

26A OK ADA	BPCDT	19991007AAW	CP
26A TX HOUSTON	BMPCDT	20080620AKF	CP
26A TX UVALDE	BPCDT	20070501AEW	CP
27A TX LLANO	BPCDT	19991018AAV	CP
25A TX WACO	USERRECORD01		APP

Percent new IX = 0.0750%

Worst case new IX 0.0750% Scenario 7

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
28	KHPX-CA	GEORGETOWN TX	BLTTA -20020408AAP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
20	KWBU-TV	WACO TX	85.5	LIC	BLEDT -20060622AAS
20	KWBU-TV	WACO TX	85.5	PLN	DTVPLN -DTVP0743
21	KXAN-TV	AUSTIN TX	33.4	LIC	BLCDT -20050630AAG
21	KXAN-TV	AUSTIN TX	33.4	PLN	DTVPLN -DTVP0785
26	KXXV	WACO TX	88.4	LIC	BLCDT -20050630AFE
26	KXXV	WACO TX	88.4	PLN	DTVPLN -DTVP0981
27	KXAM-TV	LLANO TX	87.1	CP	BPCDT -19991018AAV
27	KXAM-TV	LLANO TX	87.1	PLN	DTVPLN -DTVP1020
28	KYLE	BRYAN TX	118.3	CP MOD	BMPCDT -20080620AKH

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 7 of 10)

28	KYLE	BRYAN TX	118.3	PLN	DTVPLN	-DTVP1058
28	KYLE	BRYAN TX	118.3	LIC	BLCT	-19970219KG
28	KORO	CORPUS CHRISTI TX	321.6	LIC	BLCT	-20021230ABP
28	KTRG	DEL RIO TX	253.0	APP	BMPCDT	-20080618ACC
28	KTRG	DEL RIO TX	338.4	PLN	DTVPLN	-DTVP1059
28	KTRG	DEL RIO TX	338.4	CP	BPCDT	-19991101AEN
28	KHMV-CA	HOUSTON TX	236.3	LIC	BLTTA	-20061214ABD
28	KHMV-CA	HOUSTON TX	236.3	APP	BSTA	-20060227ACL
28	KFDX-TV	WICHITA FALLS TX	375.2	CP MOD	BMPCDT	-20070621ABP
28	KFDX-TV	WICHITA FALLS TX	375.2	PLN	DTVPLN	-DTVP1060
42	KEYE-TV	AUSTIN TX	34.0	LIC	BLCT	-20031014ACM
43	KEYE-TV	AUSTIN TX	34.0	LIC	BLCDT	-20031001BGN
43	KEYE-TV	AUSTIN TX	34.0	PLN	DTVPLN	-DTVP1556
25	KWKT-DT	WACO TX	85.4	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.
32	KGBS-CA	AUSTIN TX	BPTTA -20060403AOU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
25	KXXV	WACO TX	122.5	LIC	BLCT -20050715ABA
28	KYLE	BRYAN TX	137.9	CP MOD	BMPCDT -20080620AKH
28	KYLE	BRYAN TX	137.9	PLN	DTVPLN -DTVP1058
29	KABB	SAN ANTONIO TX	122.9	LIC	BLCT -19880210KF
30	KABB	SAN ANTONIO TX	122.9	APP	BMPCDT -20080620AKE
30	KABB	SAN ANTONIO TX	122.9	PLN	DTVPLN -DTVP1124
30	KABB	SAN ANTONIO TX	122.9	CP	BPCDT -19991028AAR
31	KTFO-CA	AUSTIN TX	0.5	LIC	BLTTL -20010403AAM
32	KTAB-TV	ABILENE TX	276.5	LIC	BLCT -19990329KF
32	KPXB	CONROE TX	235.8	CP	BPCDT -20080311ACQ
32	KPXB	CONROE TX	235.8	PLN	DTVPLN -DTVP1197
32	KPXB	CONROE TX	235.8	APP	BMPCDT -20080619AGV
32	NEW	CONVERSE TX	97.4	ADD	BPRM -19960725AAR
32	KDAF	DALLAS TX	259.8	LIC	BLCDT -20010606ABJ
32	KDAF	DALLAS TX	259.8	PLN	DTVPLN -DTVP1198
32	KDAF	DALLAS TX	259.8	CP	BPCDT -20080620AET
32	KMYS	KERRVILLE TX	131.3	LIC	BLCDT -20060608ACW
32	KMYS	KERRVILLE TX	131.3	PLN	DTVPLN -DTVP1199
33	KVUE	AUSTIN TX	0.3	LIC	BLCDT -20050624AAI
33	KVUE	AUSTIN TX	0.3	PLN	DTVPLN -DTVP1230
34	KWBU-TV	WACO TX	119.6	LIC	BLET -20020822ABU
35	KMYS	KERRVILLE TX	131.3	LIC	BLCT -20060109AAH
36	KXAN-TV	AUSTIN TX	0.7	LIC	BLCT -19971202KF
39	KENS-TV	SAN ANTONIO TX	125.0	CP	BPCDT -20080303ALJ
39	KENS-TV	SAN ANTONIO TX	125.1	PLN	DTVPLN -DTVP1421
46	KNCT	BELTON TX	75.8	CP MOD	BMPEDT -20080618AUE
46	KNCT	BELTON TX	75.8	PLN	DTVPLN -DTVP1658
46	KNCT	BELTON TX	76.0	LIC	BLCT -2369
47	KTXU-LP	WEST LAKE HILLS TX	0.5	LIC	BLTTL -20050124ADH
25	KWKT-DT	WACO TX	119.6	APP	USERRECORD-01

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 8 of 10)

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	KGBS-CA	AUSTIN TX	BSTA -20060803AGH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
25	KXXV	WACO TX	122.5	LIC	BLCT -20050715ABA
28	KYLE	BRYAN TX	137.9	CP MOD	BMPCDT -20080620AKH
28	KYLE	BRYAN TX	137.9	PLN	DTVPLN -DTVP1058
29	KABB	SAN ANTONIO TX	122.9	LIC	BLCT -19880210KF
30	KABB	SAN ANTONIO TX	122.9	APP	BMPCDT -20080620AKE
30	KABB	SAN ANTONIO TX	122.9	PLN	DTVPLN -DTVP1124
30	KABB	SAN ANTONIO TX	122.9	CP	BPCDT -19991028AAR
31	KTFO-CA	AUSTIN TX	0.5	LIC	BLTTL -20010403AAM
32	KTAB-TV	ABILENE TX	276.5	LIC	BLCT -19990329KF
32	KPXB	CONROE TX	235.8	CP	BPCDT -20080311ACQ
32	KPXB	CONROE TX	235.8	PLN	DTVPLN -DTVP1197
32	KPXB	CONROE TX	235.8	APP	BMPCDT -20080619AGV
32	NEW	CONVERSE TX	97.4	ADD	BPRM -19960725AAR
32	KDAF	DALLAS TX	259.8	LIC	BLCDT -20010606ABJ
32	KDAF	DALLAS TX	259.8	PLN	DTVPLN -DTVP1198
32	KDAF	DALLAS TX	259.8	CP	BPCDT -20080620AET
32	KMYS	KERRVILLE TX	131.3	LIC	BLCDT -20060608ACW
32	KMYS	KERRVILLE TX	131.3	PLN	DTVPLN -DTVP1199
33	KVUE	AUSTIN TX	0.3	LIC	BLCDT -20050624AAI
33	KVUE	AUSTIN TX	0.3	PLN	DTVPLN -DTVP1230
34	KWBU-TV	WACO TX	119.6	LIC	BLET -20020822ABU
35	KMYS	KERRVILLE TX	131.3	LIC	BLCT -20060109AAH
36	KXAN-TV	AUSTIN TX	0.7	LIC	BLCT -19971202KF
39	KENS-TV	SAN ANTONIO TX	125.0	CP	BPCDT -20080303ALJ
39	KENS-TV	SAN ANTONIO TX	125.1	PLN	DTVPLN -DTVP1421
46	KNCT	BELTON TX	75.8	CP MOD	BMPEDT -20080618AUE
46	KNCT	BELTON TX	75.8	PLN	DTVPLN -DTVP1658
46	KNCT	BELTON TX	76.0	LIC	BLCT -2369
47	KTXU-LP	WEST LAKE HILLS TX	0.5	LIC	BLTTL -20050124ADH
25	KWKT-DT	WACO TX	119.6	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	KGBS-CA	AUSTIN TX	BLTTA -20040217ACL

Stations Potentially Affecting This Station

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 9 of 10)

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
25	KXXV	WACO TX	122.6	LIC	BLCT	-20050715ABA
28	KYLE	BRYAN TX	137.9	CP MOD	BMPCDT	-20080620AKH
28	KYLE	BRYAN TX	137.9	PLN	DTVPLN	-DTVP1058
30	KABB	SAN ANTONIO TX	122.9	APP	BMPCDT	-20080620AKE
30	KABB	SAN ANTONIO TX	122.9	PLN	DTVPLN	-DTVP1124
30	KABB	SAN ANTONIO TX	122.9	CP	BPCDT	-19991028AAR
31	KTFO-CA	AUSTIN TX	0.5	LIC	BLTTL	-20010403AAM
32	KTAB-TV	ABILENE TX	276.5	LIC	BLCT	-19990329KF
32	KPXB	CONROE TX	235.8	CP	BPCDT	-20080311ACQ
32	KPXB	CONROE TX	235.8	PLN	DTVPLN	-DTVP1197
32	KPXB	CONROE TX	235.8	APP	BMPCDT	-20080619AGV
32	NEW	CONVERSE TX	97.4	ADD	BERM	-19960725AAR
32	KDAF	DALLAS TX	259.8	LIC	BLCT	-20010606ABJ
32	KDAF	DALLAS TX	259.8	PLN	DTVPLN	-DTVP1198
32	KDAF	DALLAS TX	259.8	CP	BPCDT	-20080620AET
32	KMYS	KERRVILLE TX	131.3	LIC	BLCT	-20060608ACW
32	KMYS	KERRVILLE TX	131.3	PLN	DTVPLN	-DTVP1199
33	KVUE	AUSTIN TX	0.3	LIC	BLCT	-20050624AAI
33	KVUE	AUSTIN TX	0.3	PLN	DTVPLN	-DTVP1230
39	KENS-TV	SAN ANTONIO TX	124.9	CP	BPCDT	-20080303ALJ
39	KENS-TV	SAN ANTONIO TX	125.0	PLN	DTVPLN	-DTVP1421
46	KNCT	BELTON TX	75.9	CP MOD	BMPEDT	-20080618AUE
46	KNCT	BELTON TX	75.9	PLN	DTVPLN	-DTVP1658
46	KNCT	BELTON TX	76.0	LIC	BLCT	-2369
47	KT XU-LP	WEST LAKE HILLS TX	0.5	LIC	BLTTL	-20050124ADH
25	KWKT-DT	WACO TX	119.6	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
25	KWKT-DT	WACO TX	USERRECORD-01	

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
25	KLTS-TV	SHREVEPORT LA	354.5	LIC	BLEDT	-20020826AAY
25	KLTS-TV	SHREVEPORT LA	354.5	PLN	DTVPLN	-DTVP0926
25	KLTS-TV	SHREVEPORT LA	354.5	CP	BFEDT	-20080314ABY
26	KXXV	WACO TX	3.0	LIC	BLCT	-20050630AFE
26	KXXV	WACO TX	3.0	PLN	DTVPLN	-DTVP0981

Total scenarios = 2

Result key: 33
Scenario 1 Affected station 11
Before Analysis

Results for: 25A TX WACO USERRECORD01 APP
HAAT 558.0 m, ATV ERP 1000.0 kW
POPULATION AREA (sq km)
within Noise Limited Contour 1451749 39171.0
not affected by terrain losses 1431043 38724.5

Table 1 KWKT-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 10 of 10)

lost to NTSC IX 0 0.0
lost to additional IX by ATV 514 124.7
lost to ATV IX only 514 124.7
lost to all IX 514 124.7

Potential Interfering Stations Included in above Scenario 1

26A TX WACO - BLCDT 20050630AFE LIC

Result key: 34
Scenario 2 Affected station 11
Before Analysis

Results for: 25A TX WACO USERRECORD01 APP
HAAT 558.0 m, ATV ERP 1000.0 kW
POPULATION AREA (sq km)
within Noise Limited Contour 1451749 39171.0
not affected by terrain losses 1431043 38724.5
lost to NTSC IX 0 0.0
lost to additional IX by ATV 514 124.7
lost to ATV IX only 514 124.7
lost to all IX 514 124.7

Potential Interfering Stations Included in above Scenario 2

26A TX WACO DTVPLN DTVP0981 PLN

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED