

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

ORIGINAL

In re)
)
Gray Television Licensee, LLC) MB Docket No. _____
)
Petition for Rulemaking to Amend) Rulemaking No. _____
the DTV Table of Allotments for)
Station KKTV, Colorado Springs, Colorado)

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

FILED/ACCEPTED
JUN 19 2009
Federal Communications Commission
Office of the Secretary

PETITION FOR RULEMAKING

Gray Television Licensee, LLC (“Gray”), licensee of Station KKTV(TV) (“KKTV”), Colorado Springs, Colorado, by counsel hereby requests that the post-transition DTV Table of Allotments (the “DTV Table”)¹ be amended to change KKTV’s digital allotment from VHF Channel 10 to UHF Channel 49 with the technical parameters as set forth in the attached Engineering Statement. This channel substitution serves the public interest by, i) resolving significant reception problems in certain areas of KKTV’s predicted service area, ii) providing a stronger, interference-free signal to almost a million additional viewers, iii) improving the possibility for service to viewers using hand-held and mobile devices. KKTV requests expedited action on this request so that it can begin to operate with a more robust digital signal as soon as possible.

KKTV’s current digital allotment, VHF Channel 10, receives interference to 54 percent of its population and therefore serves a population of only 959,551. Channel 49, at the parameters proposed herein, is predicted to be interference-free and serve a population of 1,922,413. Attached is an Engineering Statement of Chesapeake RF

¹ 47 C.F.R. §73.622(i).

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Consultants, LLC, which sets forth in detail the proposed KKTV Channel 49 DTV Table specifications. This proposal is in compliance with all relevant technical requirements for amendment of the post-transition DTV Table, including the interference protection requirements of 47 C.F.R. §73.616 and the 0.5% de minimis interference standard with respect to all allotments and assignments, existing and proposed. As further reflected in the Engineering Statement, the proposed Channel 49 facility will provide full principal community coverage to Colorado Springs, Colorado and will substantially increase KKTV's service area and population.

In addition to the almost 1 million new viewers that will be served, the proposed facility will provide a stronger signal to existing KKTV viewers. As viewers in the Colorado Springs market increased their efforts to prepare for the digital transition over the last few months, KKTV began receiving a steady stream of calls from viewers and reports from walk-in centers of consumers who could receive all the other Colorado Springs stations, but could not tune in KKTV's digital signal. These viewers primarily are located in pockets deep within KKTV's predicted service area. KKTV staff has worked directly with these viewers to try to resolve their reception problems; however, it is now clear that many of the reception issues are related to problems inherent with high VHF digital channels. The real world experience of the digital transition has shown that, overall, UHF channels are received better by indoor antennas. Moreover, UHF channels provide better coverage for hand-held and mobile devices. Accordingly, KKTV requests that it be authorized to operate on Channel 49, a UHF channel not subject to any interference from other stations.

Finally, KKTV's current Channel 10 digital facility operates using a fifty-year old antenna previously shared with KKTV's analog Channel 11 operations. Although, KKTV's pre-channel election inspection of the antenna indicated it would work well for digital operation on Channel 10, the station now believes it could enhance coverage by replacing this equipment. The Commission should note, however, that the type of reception problems experienced by viewers cannot be explained solely by equipment issues. While replacing the existing antenna with a new Channel 10 antenna may resolve some problems, it will not resolve the problems plaguing the high VHF band. Therefore, in order to maximize the benefit of any future capital expenditure, KKTV is requesting the substitution of Channel 49 for Channel 10. The investment in new equipment to construct a Channel 49 facility will allow KKTV to bring interference-free service to almost 1 million additional viewers.

For the foregoing reasons, the proposed amendment to the DTV Table of Allotments will clearly serve the public interest. Gray therefore respectfully requests that the DTV Table be amended in accordance with the specifications set forth in the attached Engineering Statement.

Respectfully submitted,

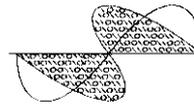
GRAY TELEVISION LICENSEE, LLC



John M. Burgett
Joan Stewart

Wiley Rein LLP
1776 K Street NW
Washington DC 20006
202.719.7000
Its Attorneys

Dated: June 19, 2009



Engineering Statement
Post Transition Digital Channel Change

prepared for

Gray Television Licensee, LLC

KKTV-DT Colorado Springs, CO

Facility ID 35037

Ch. 49 550 kW 725 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC* ("*Gray*"), licensee of KKTV(TV) (Facility ID 35037, Colorado Springs, CO) in support of a *Petition for Rulemaking* to change the KKTV digital television post-transition channel assignment. KKTV's pre-transition operations are on analog Channel 11 and digital Channel 10. KKTV-DT will remain on its present digital Channel 10 for operation in the post-transition period using its licensed digital facility, as established in Appendix B of the Seventh Report and Order in MB Docket 87-268. *Gray* herein requests a channel substitution for the post-transition KKTV-DT.

Gray proposes herein to substitute digital Channel 49 in lieu of the current digital Channel 10 allotment. The licensed KKTV-DT digital Channel 10 facility employs a shared antenna with KKTV's analog Channel 11. This antenna has been in service for over 50 years, and *Gray* representatives have determined that the antenna requires replacement. Further, *Gray* believes that changing to a UHF channel, in lieu of the current high-band VHF channel, will result in better reception for mobile/handheld devices and improve indoor reception in general. According to the FCC's method, the proposed alternate Channel 49 is not subject to any incoming interference from other post-transition stations, while the current Appendix B Channel 10 assignment will experience interference affecting 54 percent of its otherwise non-terrain blocked service population.

The proposal specifies use of the licensed KKTV site location¹ and antenna height, as summarized in the following.

Present Channel 10 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
35037	CO COLORADO SPRINGS	11	10	20.1	725	20589	384441	1045141	29268	959	54

Antenna C/R AMSL: 2976 meters

Proposed Channel 49 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
35037	CO COLORADO SPRINGS	11	49	550	725	Fig-1	384442	1045143	33908	1922	0.0

Antenna C/R AMSL: 2976 meters

The proposed Channel 49 directional antenna pattern data is provided in **Figure 1**.

A map is supplied as **Figure 2**, which depicts the standard predicted coverage contours. This map includes the boundaries of Colorado Springs, CO, KKTV-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 licensed digital and analog operations. The proposed KKTV-DT allotment's predicted service population provides a 200.4 percent match of the current Appendix B facility, as detailed in the following table.

Post-Transition Population Summary

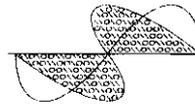
Population Summary (2000 Census) OET Bulletin 69 method	Appendix B	Proposed
Within Noise Limited Contour	2,359,352	2,418,194
Not affected by terrain losses	2,087,712	1,922,413
Lost to all interference	1,128,161	0
Net DTV Service	959,551	1,922,413
Match of Appendix B	---	200.35%

¹Updated geographic coordinates (one-second change in Latitude, two-second change in Longitude) are specified in order to conform to the KKTV tower's Antenna Structure Registration data (#1024861).

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 550 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 725 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 KKTU-DT 41 dBμ contour is 40,204 square kilometers, which does not exceed the 40,257 square kilometers within the post-transition Construction Permit for station KTSC-DT (Ch. 8, Pueblo, CO, BMPEDT-20090223ABD). 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.

A handwritten signature in black ink, appearing to read 'Joseph M. Davis', written in a cursive style.

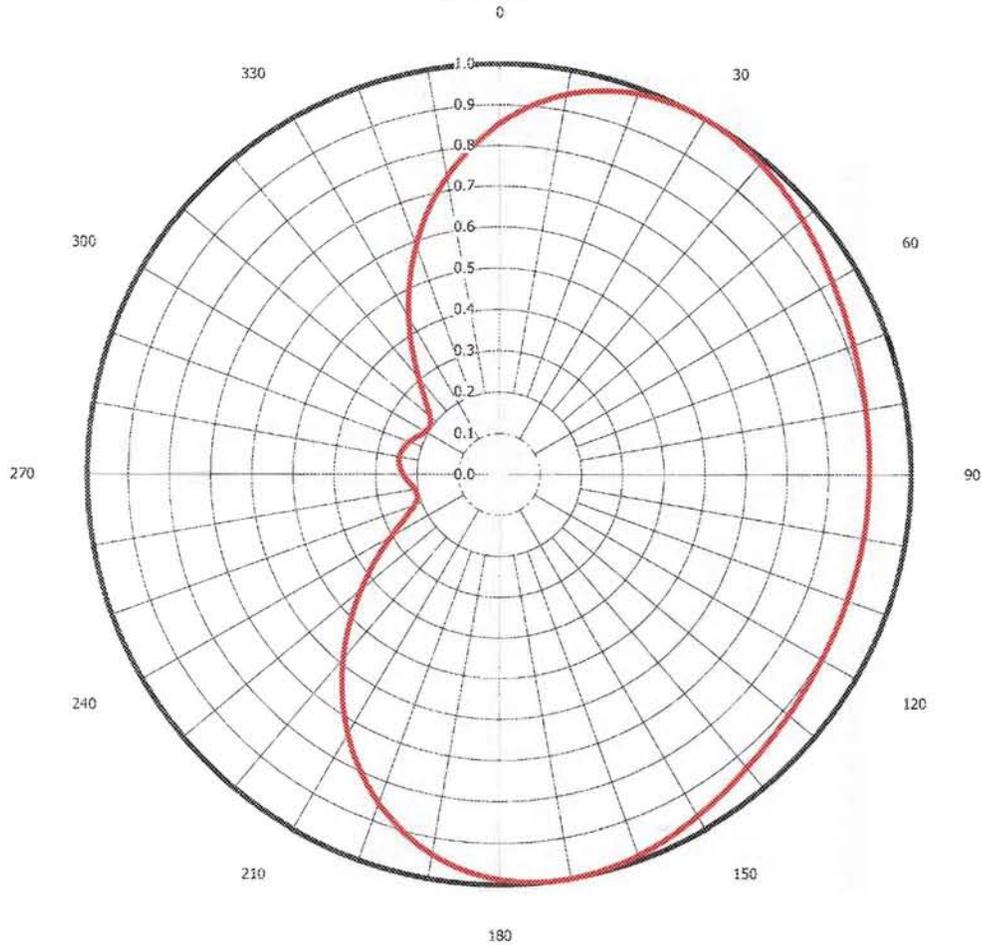
Joseph M. Davis, P.E.
May 19, 2009

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

List of Attachments

- | | |
|----------|------------------------------------|
| Figure 1 | Antenna Horizontal Plane Pattern |
| Figure 2 | Proposed Coverage Contours |
| Figure 3 | Coverage Contour Comparison |
| Figure 4 | Maximum ERP per §73.622(f) |
| Table 1 | OET Bulletin 69 Interference Study |

**Azimuth Pattern - Relative Field
(True North)**



Azimuth (°T)	Relative Field	Azimuth (°T)	Relative Field	Azimuth (°T)	Relative Field	Azimuth (°T)	Relative Field
0	0.854	90	0.900	180	0.987	270	0.232
10	0.940	100	0.899	190	0.940	280	0.245
20	0.987	110	0.900	200	0.854	290	0.232
30	1.000	120	0.905	210	0.733	300	0.207
40	0.988	130	0.917	220	0.588	310	0.218
50	0.963	140	0.936	230	0.437	320	0.302
60	0.936	150	0.963	240	0.302	330	0.437
70	0.917	160	0.988	250	0.218	340	0.588
80	0.905	170	1.000	260	0.207	350	0.733



Figure 1
Antenna Horizontal Plane Pattern
KKTU-DT Colorado Springs, CO
Facility ID 35037
Ch. 49 550 kW 725 m

prepared for
Gray Television Licensee, LLC

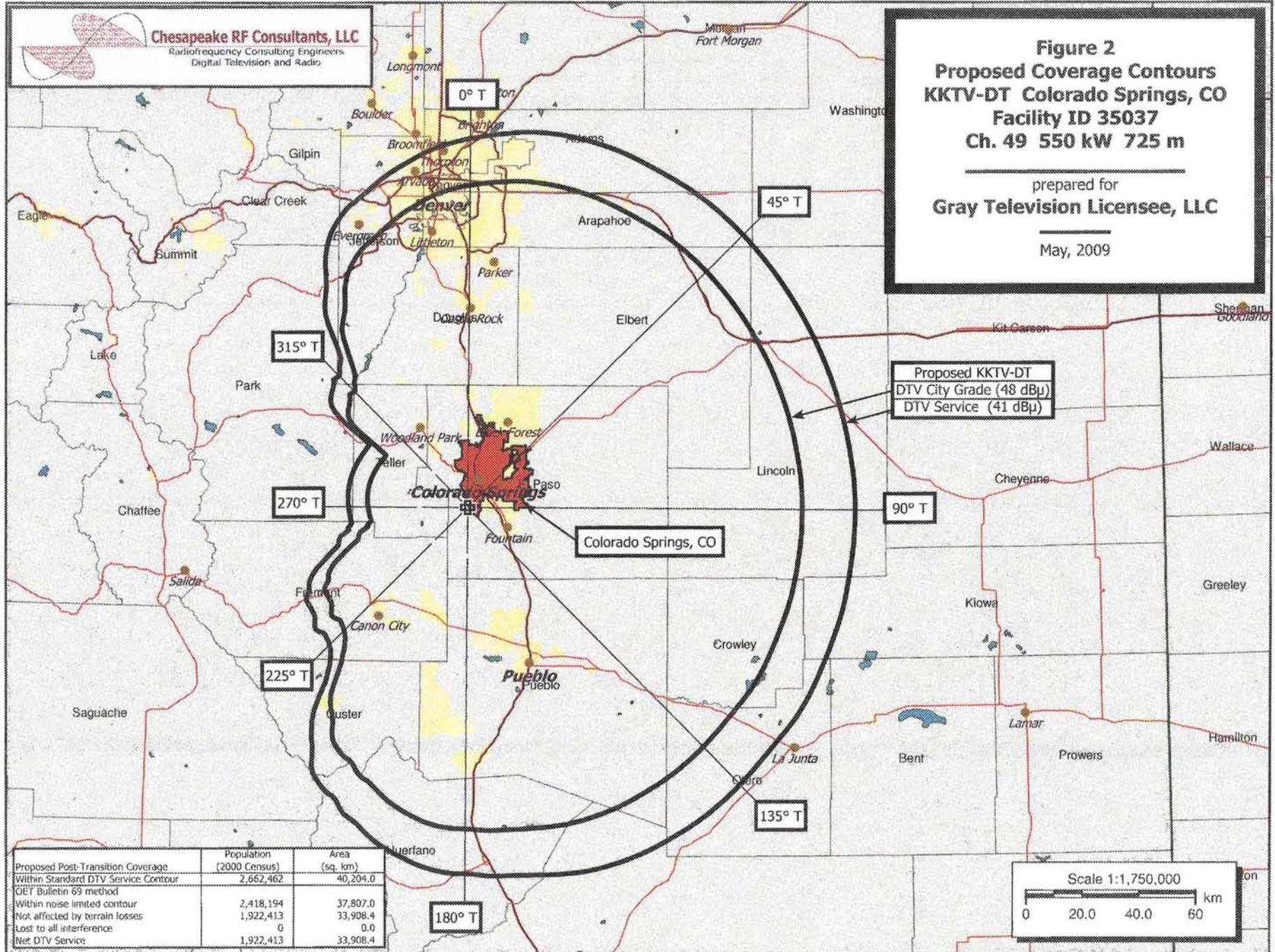
May, 2009



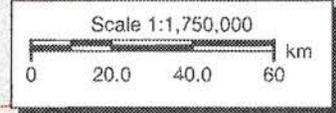
Figure 2
Proposed Coverage Contours
KKTV-DT Colorado Springs, CO
Facility ID 35037
Ch. 49 550 kW 725 m

prepared for
Gray Television Licensee, LLC

May, 2009



	Population (2000 Census)	Area (sq. km)
Proposed Post-Transition Coverage		
Within Standard DTV Service Contour	2,662,462	40,204.0
CET Bulletin 69 method		
Within noise limited contour	2,418,194	37,807.0
Not affected by terrain losses	1,922,413	33,908.4
Lost to all interference	0	0.0
Net DTV Service	1,922,413	33,908.4



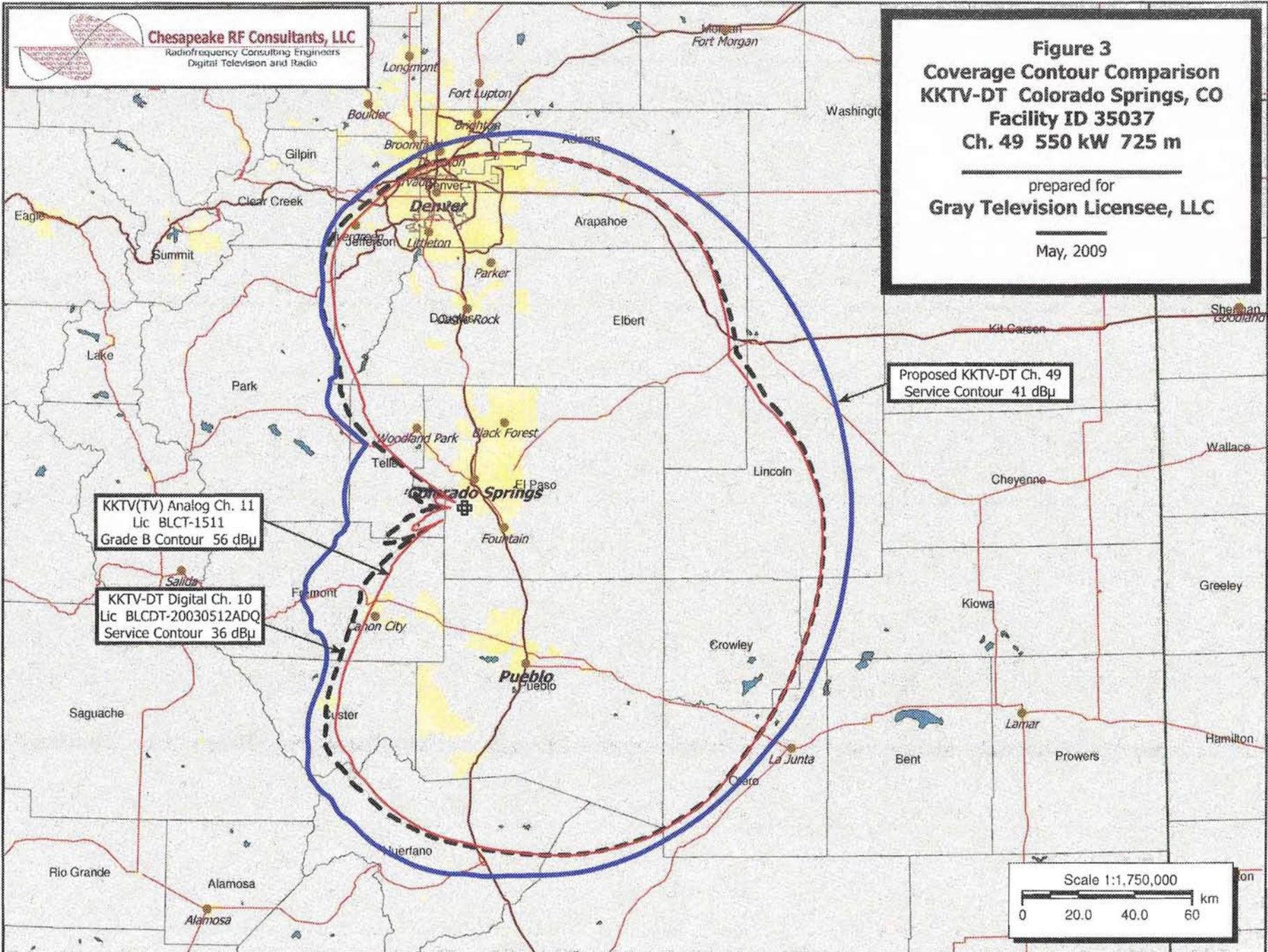


Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Figure 3
Coverage Contour Comparison
KKTV-DT Colorado Springs, CO
Facility ID 35037
Ch. 49 550 kW 725 m

prepared for
Gray Television Licensee, LLC

May, 2009



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

Figure 4
Maximum ERP per §73.622(f)
KKTV-DT Colorado Springs, CO
Facility ID 35037
Ch. 49 550 kW 725 m

prepared for
Gray Television Licensee, LLC

May, 2009

KTSC-DT Ch. 8 Pueblo, CO
 BMPEDT-20090223ABD
 36 dBu F(50,90)
 Area: 40,257 sq. km

Proposed KKTV-DT Ch. 49
 Area: 40,204 sq. km
 Service Contour 41 dBu

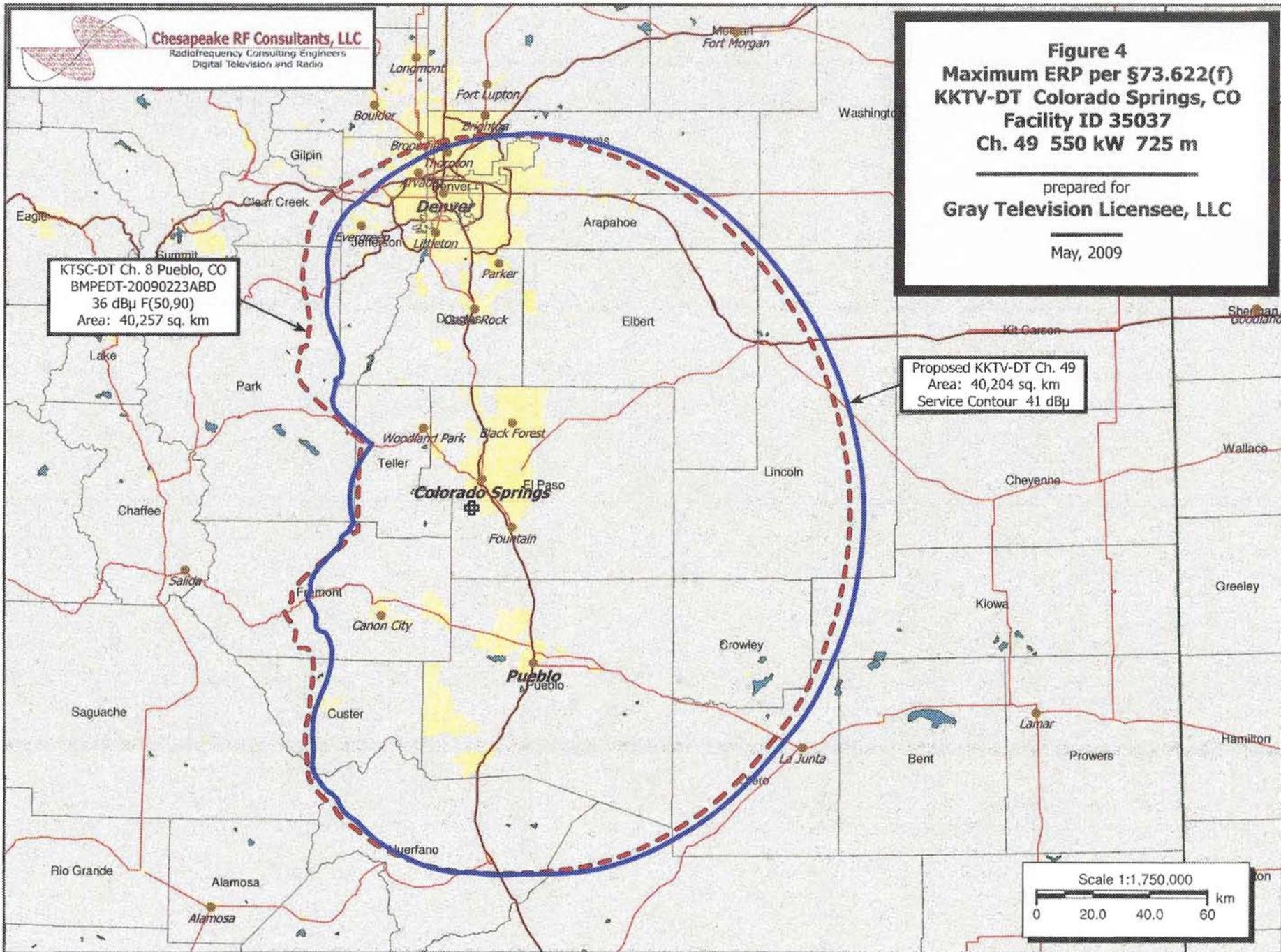
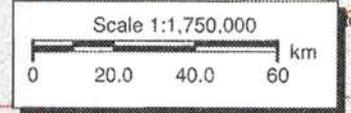


Table 1 KKTV-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 1 of 6)

1W Census data selected 2000
Post Transition Data Base (A) - red sparc1aofwarc0dba.gp_jrjdw011f

TV INTERFERENCE and SPALING ANALYSIS PROGRAM

Date: 05-11-2009 Time: 10:01:14

Record Selected for Analysis

KKTV-DT USERRECORD-01 COLORADO SPRINGS CO US
Channel 49 ERP 500.0 kW HAAT 730.0 KRWANAL 01475 m
Latitude 039-44-47 Longitude 010-51-43
Status APP Zone 2 Border
Dir Antenna Make Jax Mode DIF_C 00 Beam tilt N Ref Azimuth 100
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Tongley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 49 ERP = 500.00 HAAT = 730.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dbu F (50,90) (km)
0.0	382.309	1053.4	128.0
45.0	493.567	1133.5	134.9
90.0	416.100	1199.7	137.3
135.0	441.764	1186.8	135.0
180.0	719.170	134.7	128.1
225.0	144.461	153.4	68.7
270.0	29.000	33.0	43.0
315.0	37.180	167.0	64.8

Evaluation toward Class A Stations

No spaling violations or contour overlap to Class A stations

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Marie Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Table 1 KKTV-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 2 of 6)

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	City/State	ARN
49	KKTV-DT	COLORADO SPRINGS CO	USERRECORD-01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
47	KSBS-TV	DENVER CO	72.9	LIC	BLTTA	-20040514AL1
47	KSBS-TV	DENVER CO	72.9	CP	BPTTA	-20080111AFY
48	KVSN	PUEBLO CO	9.1	FN	DIVFLN	-DTVT 701
48	KVSN	PUEBLO CO	9.1	CP MOD	BMCDDT	-20080225AAQ

Analysis of Interference to Affected Station

Channel	Call	City/State	Application	Ref. No.
47	KSBS-TV	DENVER CO	BLTTA	-20040524ALC

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Chanus	Application	Ref. No.
40	KRRT	DENVER CO	27.8	LIC	BLEDT	-20061221ACX
40	KRRT	DENVER CO	27.8	FN	DIVPLN	-DTVT1426
40	KRRT	DENVER CO	27.8	CP	BLEDT	-20080619AAH
42	KFXC-TV	DENVER CO	30.4	CP MOD	BMCDDT	-20080314ABY
42	KFXC-TV	DENVER CO	30.2	FN	DIVPLN	-DTVT1730
43	KVSN-TV	DENVER CO	25.7	APP	BMCDDT	-20070104AGH
46	KRFD-TV	CASTLE ROCK CO	34.1	APP	BPRM	-20080619AEZ
46	KRFD	CASTLE ROCK CO	34.1	FN	DIVPLN	-DTVT1604
46	KRFD	CASTLE ROCK CO	34.1	CP	BRCDDT	-20081027AAQ
46	K110-LP	COLORADO SPRINGS CO	72.8	CP	BDISTTL	-20080910ACC
47	K4HIF	BOULDER CO	1.2	LIC	BLTT	-20030527ATV
47	K4HIF	ESTES PARK CO	115.2	LIC	BLTT	-19940306L1
47	K4HIF	MANTICHO SPRINGS CO	39.1	LIC	BLTT	-19981318JN
47	K2KCS	SARGENTS CO	14.8	CP	BDISTTT	-20090210AFF
47	K2KAS	SILT, ETC. CO	200.7	LIC	BLTT	-13870813LB
48	KVELA	DENVER CO	40.2	LIC	BLTT	-20021219AAB
48	KVSN	PUEBLO CO	72.9	CP	BMCDDT	-20080424AAT
48	KVSN	PUEBLO CO	72.9	FN	DIVPLN	-DTVT1701
48	NEW	PUEBLO CO	121.8	LIC	BPRM	-20000111ACR
48	KVSN	PUEBLO CO	72.9	CP MOD	BMCDDT	-20080225AAQ
51	K0BE	DENVER CO	41.9	CP MOD	BMCDDT	-20080115ATC
51	K0BC	DENVER CO	41.9	FN	DIVPLN	-DTVT1799
62	K0BFX	LAKE GEORGE, ETC. CO	54.7	LIC	BLTT	-19870706L1A
49	KKTV-DT	COLORADO SPRINGS CO	72.9	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

Table 1 KKTU-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 6)

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
47	KSBF-TV	DENVER CO	BETTA -2008011AFK

Stations Potentially Affecting This Station

Char	Call	City/State	Dist (km)	Status	Application Ref. No.
48	KSBT	DENVER CO	27.6	LIC	BLEET -20060221ACX
49	KPMT	DENVER CO	27.6	FLN	DTVPLN -DTVPL426
40	KPMT	DENVER CO	27.6	OT	BFELT -20080619AAR
41	KPXC-TV	DENVER CO	80.4	CP MOD	BMPDIT -20080317ABY
42	KPXC-TV	DENVER CO	80.4	FLN	DTVPLN -DTVPL550
43	KPXC-TV	DENVER CO	80.4	APP	BMPDIT -20080317ABY
44	KWHD-DR	CASTLE ROCK CO	34.1	APP	BFRM -20080619AAR
45	KWHD-DR	CASTLE ROCK CO	34.1	FLN	DTVPLN -DTVPL804
46	KWHD-DR	CASTLE ROCK CO	34.1	OT	BFRM -20080619AAR
47	KWHD-DR	CASTLE ROCK CO	34.1	OT	BFRM -20080619AAR
48	KTLO-TV	COLORADO SPRINGS CO	72.8	CP	BCESTL -20080919AAG
49	KATLH	BOULDER CO	71.2	LIC	BLDGT -200805127AIF
47	K4VEC	ESTES PARK CO	115.2	LIC	BLDGT -19940506TII
4	K4FTI	MANITOC SPRINGS CO	59.1	LIC	BLDGT -199803186UN
41	K5TOS	SARGENT CO	14.4	CP	BLDGT -20080210AEP
47	K4TAC	STEELE, ETC. CO	200.7	LIC	BCESTL -19870503TIB
48	K4RPM	DENVER CO	49.2	LIC	BLDGT -20021219AAB
48	KVSN	PUEBLO CO	72.9	CP	BMPDIT -20060424ADP
48	KVSN	PUEBLO CO	72.9	FLN	DTVPLN -DTVPL170
48	KVSN	PUEBLO CO	121.8	LIC	BFRM -20080619AAR
48	KVSN	PUEBLO CO	72.9	CP MOD	BMPDIT -200802255AAQ
50	KCEC	DENVER CO	41.9	APP	BSTA -20070808AAY
50	KCEC	DENVER CO	41.9	LIC	BLDGT -200301028AY
51	KCEC	DENVER CO	41.9	CP MOD	BMPDIT -200601028AY
51	KCEC	DENVER CO	41.9	FLN	DTVPLN -DTVPL170
49	K5FTI	LAFAYETTE, ETC. CO	54.1	LIC	BLDGT -19870705TIA
49	K5FTI-DT	COLORADO SPRINGS CO	72.9	APP	USERRECORD-01

Proposed station is beyond the site to nearest full evaluation distance

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
48	KVSN	PUEBLO CO	DTVPLN -DTVPL170

Stations Potentially Affecting This Station

Char	Call	City/State	Dist (km)	Status	Application Ref. No.
49	KKTU-DT	COLORADO SPRINGS CO	0.1	APP	USERRECORD-01

Total scenarios = 1

Result key:
Scenario = 1 Affected station = 2
Before Analysis

Table 1 KKTU-DT OET Bulletin 69 Interference Study
(worst-case scenarios shown page 4 of 6)

Result key: 49A CO PUEBLO DTVPLN DTVPL170 FLN

HAAT	995.0 m, ATW ERP	50.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour			1241484	23802.0
not affected by terrain losses			914187	21120.5
lost to NTSC TX			0	0.0
lost to additional IX by ATW			0	0.0
lost to AT-IX only			0	0.0
lost to all IX			0	0.0

Potential Interfering Stations Included in Above Scenario 1

After Analysis

Result key: 49A CO PUEBLO DTVPLN DTVPL170 FLN

HAAT	995.0 m, ATW ERP	50.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour			1241484	23802.0
not affected by terrain losses			914187	21120.5
lost to NTSC TX			0	0.0
lost to additional IX by ATW			1825	204.5
lost to AT-IX only			1825	204.5
lost to all IX			1825	204.5

Potential Interfering Stations Included in Above Scenario 1

49A CO COLORADO SPRINGS USERRECORD01 APP

Percent new IX = 0.1996

Worst case new IX = 0.1996 Scenario 1

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
48	KVSN	PUEBLO CO	BMPDIT -20060424ADP

Stations Potentially Affecting This Station

Char	Call	City/State	Dist (km)	Status	Application Ref. No.
49	KKTU-DT	COLORADO SPRINGS CO	0.1	APP	USERRECORD-01

Total scenarios = 1

Result key:
Scenario = 1 Affected station = 4
Before Analysis

Result key: 49A CO PUEBLO BMPDIT DTVPL170

HAAT	995.0 m, ATW ERP	50.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour			23513.5	34373.8
not affected by terrain losses			1806287	30844.1
lost to NTSC TX			0	0.0
lost to additional IX by ATW			0	0.0

Table 1 KKTV-DT OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 5 of 6)

lost to ATV IX only 0.0
 lost to all IX 0.0
 Potential interfering stations included in above scenario 1

After Analysis

Request for 49A CO COLORADO SPRINGS BMECOT 20090225AAQ 03
 HAAT 690.0 M, ATV ERP 150.0 kW
 POPULATION AREA (sq km)
 within Noise Limited Contour 2351313 34374.8
 not affected by terrain losses 1898286 36431.1
 lost to NTSC IX 0 0.0
 lost to additional IX by ATV 68 112.7
 lost to ATV IX only 768 112.7
 lost to all IX 768 112.7

Potential interfering stations included in above scenario 1
 49A CO COLORADO SPRINGS USFRRECORD1 APP
 Percent new IX = 1.0225
 Worst case new IX = 1.0225 scenario 1

Analysis of Interference to Affected Station

Analysis of current record
 Channel Call City/State App. Station Ref. No.
 48 KKTV-DT COLORADO SPRINGS USFRRECORD1

Station Potentially Affected by This Station

Chan	Call	City/State	Dist (km)	Class	App. Station Ref. No.
48	KVSN	PUEBLO CO	0.1	DTN	USFR21701
48	KVSN	PUEBLO CO	0.1	CF-MDL	20090225AAQ

Total Channels = 2

Result Key: 1 Affected station
 Overall 1 Affected station
 Before Analysis

Request for 49A CO COLORADO SPRINGS USFRRECORD1 APP
 HAAT 700.0 M, ATV ERP 150.0 kW
 POPULATION AREA (sq km)
 within Noise Limited Contour 2418194 37803.6
 not affected by terrain losses 1922413 33906.4
 lost to NTSC IX 0 0.0
 lost to additional IX by ATV 0 0.0
 lost to ATV IX only 0 0.0
 lost to all IX 0 0.0

Potential interfering stations included in above scenario 1

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

 FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED