

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

FILED/ACCEPTED

In the Matter of)
)
Freedom Broadcasting of Texas Licensee,)
L.L.C., Debtor-in-Possession)
)
For a Rulemaking to Amend the Digital)
Television Table of Allotments for Station)
KFDM, Beaumont, Texas)

File No.:

RM No.:

JAN 20 2010

Federal Communications Commission
Office of the Secretary

PETITION FOR RULEMAKING

Pursuant to Section 73.623 of the Commission’s Rules, Freedom Broadcasting of Texas Licensee, L.L.C., Debtor-in-Possession (“Petitioner”), licensee of commercial digital television broadcast station KFDM, Beaumont, Texas (Facility ID 22589), by and through its attorneys, hereby submits this Petition for Rulemaking to request amendment of the DTV Table of Allotments, Section 73.622(i) of the Commission’s Rules, in order to change the digital channel assignment for KFDM from 21 to 25, with the technical parameters set forth in the attached Technical Exhibit.

I. BACKGROUND

Station KFDM was initially licensed for digital operations on channel 21 on June 5, 2003.¹ On June 18, 2008, KFDM filed an application for a construction permit to maximize the station’s facilities.² By Public Notice released April 3, 2009, the Commission granted KFDM’s maximization application subject to the condition that the mutual exclusivity between the KFDM

¹ BLCDT-20030122ADG

² BPCDT-20080618AAY

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DTV maximization application, and the DTV maximization application filed by station KLTL (channel 20) in Lake Charles, Louisiana be resolved.³ On April 30, 2009, KFDM filed an amendment to its pending DTV maximization application in order to change the proposed antenna height and effective radiated power (“ERP”), and to thereby resolve the mutual exclusivity with station KLTL.

The construction permit for the KFDM maximized facilities, as amended by the April 30 amendment, provides for a maximum directional ERP of 350 kw and an antenna height above average terrain of 274 meters. KFDM has not yet fully constructed those facilities, and currently is operating under special temporary authorization at a reduced ERP of 170 kw.⁴

II. INADEQUATE SIGNAL COVERAGE WARRANTS CHANNEL CHANGE

The Petitioner’s goal is to maximize the facilities of station KFDM to the fullest extent possible. However, because of the need to protect first adjacent channel station KLTL, station KFDM is not able to fully maximize its coverage on channel 21. In particular, due to the directional antenna, which is required to protect KLTL, KFDM is experiencing, and would continue to experience even with a 350 kw facility, significant reception problems in areas to the east of its tower site.

The Petitioner’s experience with viewer complaints regarding inadequate signal reception following KFDM’s June 12, 2009 transition to digital-only operations, and field tests subsequently performed by the Petitioner, confirm the lack of an adequate signal to the east of the tower site. Following the June 12 transition, the station received a number of calls from

³ *Commission Grants Mutually Exclusive DTV Maximization Applications*, 24 FCC Rcd 3967, released April 3, 2009, DA 09-760.

⁴ BDSTA-20090706AAB

viewers in all portions of its viewing area, most of which related to matters such as incorrect set up of digital converter boxes or failure to rescan for digital channels. As such matters were resolved, viewer complaints from most portions of KFDM's service area ceased or diminished sharply. However, complaints from a triangular-shaped area to the east of the station's tower site persisted. That area is shown on the map attached as Exhibit A hereto.

After reconfiguring the KFDM antenna and increasing ERP to 170 kw pursuant to special temporary authorization, the Petitioner conducted field tests in late August and early September of this year to determine whether signal reception had improved in the area to the east of the tower site. Those tests showed that even after the antenna reconfiguration and ERP increase, signal reception remained poor to non-existent in that area. In addition, complaints from viewers in that area have continued, and the Petitioner currently is granting approximately 200 waiver requests per week to enable viewers to receive distant signal CBS network service by direct broadcast satellite in the area in and around Lake Charles, Louisiana due to such viewers no longer being able to receive KFDM's over-the-air signal. Carriage of the station's signal has also been dropped by cable providers in that area who can no longer receive a good quality signal from KFDM over-the-air at their headends.

In short, in this area to the east of the KFDM tower site, many viewers who had received a strong analog signal from KFDM are not able to receive KFDM's digital signal. Further analysis by the Petitioner, in conjunction with its consulting engineer and antenna manufacturer, indicates that these problems will persist even at the fully authorized ERP of 350 kw so long as the station remains on channel 21. By changing to channel 25, however, the Petitioner will no longer be required to directionalize its signal to protect KLTL, and will be able to use an omni-

directional antenna mounted on the top of its tower, which should once again provide a good quality signal throughout its service area, including the eastern portion.

The Commission's grant of this petition would serve the public interest by enabling station KFDM to provide an estimated 667,000 persons with over-the-air service, an increase of more than 121,000 persons as compared to the currently authorized 350 kw directional facility.⁵ The proposed channel 25 facility would also enable the station to provide service to a number of viewers who received KFDM analog service, but lost service when the station transitioned to digital operations.

Moreover, this proposal is in compliance with all applicable legal and technical rules regarding amendment of the DTV Table of Allotments, including Sections 73.616, 73.622(f)(5), and 73.623 of the Commission's Rules, and the processing guidelines established by the Commission for changes in post-transition digital facilities.⁶

For the foregoing reasons, the Petitioner respectfully requests that the DTV Table of Allotments be amended for station KFDM to substitute channel 25 for channel 21, in accordance with the technical parameters set forth in the attached Technical Exhibit. Promptly following grant of this Petition, Petitioner intends to file an application with the Commission for authorization to operate on channel 25.

⁵ See Technical Exhibit attached as Exhibit B.

⁶ See, *Advanced Television Systems and Their Impact on the Existing Television Service*, Seventh Report and Order, Appendix B, 22 FCC Rcd 15,581 (2007)

Respectfully submitted,

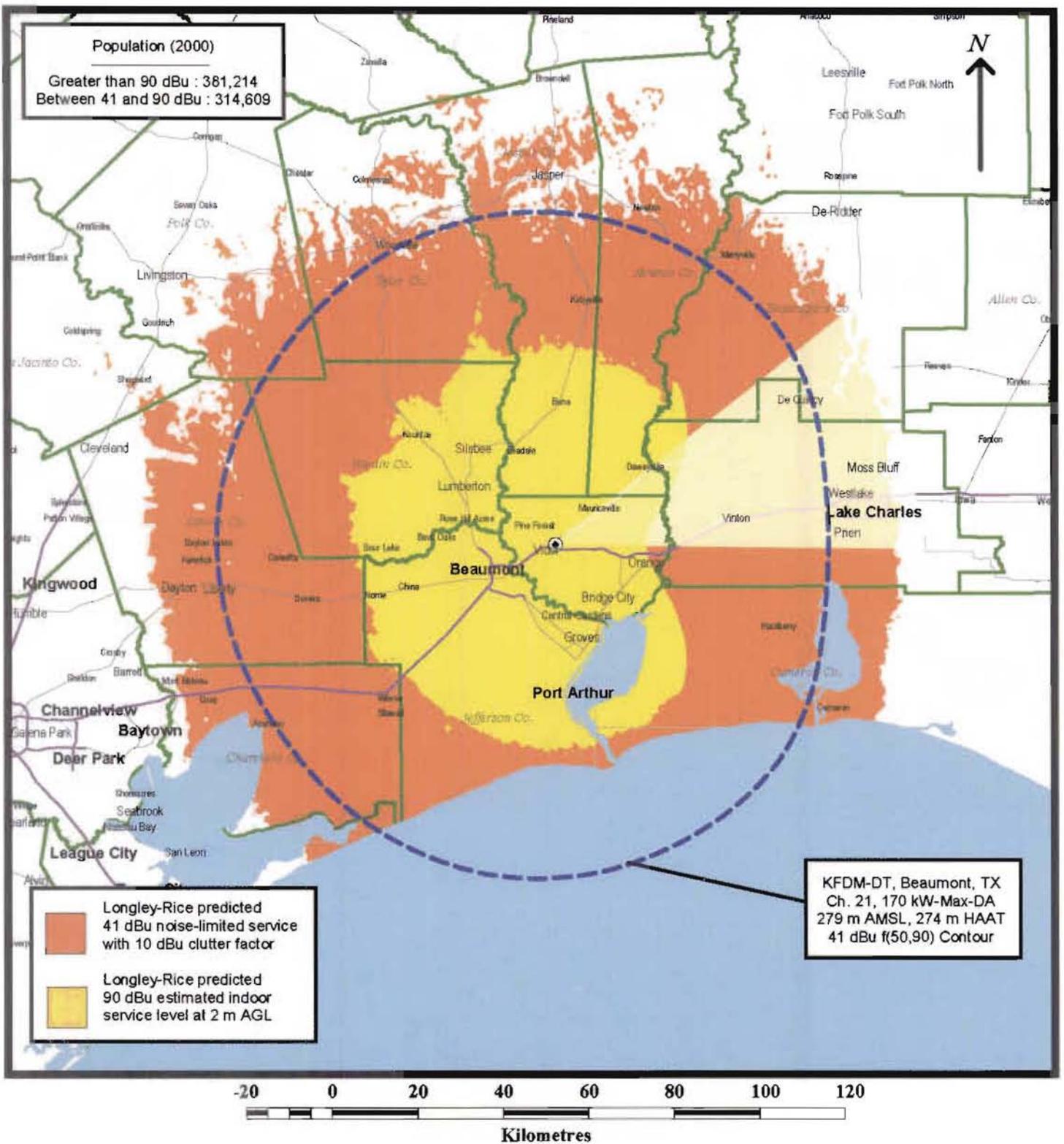
FREEDOM BROADCASTING OF TEXAS
LICENSEE, L.L.C., DEBTOR-IN-
POSSESSION

By:  _____

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January 20, 2010

EXHIBIT A



PREDICTED KFDm-DT COVERAGE BASED ON FCC CONTOUR AND LONGLEY-RICE PREDICTION

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

EXHIBIT B

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KFDM
BEAUMONT, TEXAS

September 24, 2009

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KFDM
BEAUMONT, TEXAS

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TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KFDM
BEAUMONT, TEXAS

Technical Statement

This Technical Statement was prepared on behalf of television broadcast station KFDM, Beaumont, Texas (Channel 21), in support of a Petition for Rule Making to amend Section 73.622(i) of the FCC Rules to change the KFDM post-transition digital television channel. KFDM is the CBS network affiliate in the Beaumont television market.

KFDM is authorized for operation on Channel 21 with a maximum directional ERP of 350 kW and antenna HAAT of 274 m.* KFDM wishes to maximize its coverage to the greatest extent practical. However, due to the allocation restrictions necessary to protect first-adjacent station KLTL-TV, Lake Charles, Louisiana, on Channel 20, KFDM is unable to fully maximize its coverage on Channel 21. In addition, due to the requirement to employ a directional antenna on Channel 21 to protect KLTL-TV, KFDM is currently experiencing particularly acute reception problems in areas to the east of its tower including the areas of Orange, Texas and Lake Charles, Louisiana. As a result of the protection requirement of KLTL-TV, it is not possible to install a non-directional transmitting antenna on Channel 21 that will solve these reception problems and allow for maximization of KFDM.

* See FCC File No. BPCDT-20080618AAY. It is noted that KFDM is operating pursuant to Special Temporary Authority with the same facility as authorized in BPCDT-20080618AAY, but with a reduced maximum ERP of 170 kW. See FCC File No. BDSTA-20090706AAB.

Therefore, the instant petition proposes Channel 25 in lieu of Channel 21 for KFDM's DTV channel using the same authorized reference location for KFDM. The petitioner proposes that Channel 25 be allotted with a nominal non-directional ERP of 350 kW and antenna HAAT of 274 m. It is noted that the proposed allotment reference site is not located in the Mexican border zone. The technical specifications for the proposed allotment are included herein at Figure 1.

The proposed transmitting antenna will be located with a center of radiation at an elevation of 279 m above mean sea level and 274 m HAAT. Given a maximum ERP of 350 kW, the proposed facility complies with Section 73.622(f)(8) concerning the maximum permissible ERP for UHF DTV stations located in Zone III.

As indicated in Figure 2, the proposed KFDM allotment facility on Channel 25 will provide 48 dBu, f(50,90) contour coverage over the entire community of Beaumont, Texas in compliance with Section 73.625 of the FCC Rules.

The proposed Channel 25 facility meets the requirements of Section 73.616 of the FCC Rules concerning predicted interference to other DTV allotments and assignment records. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules and FCC OET Bulletin No. 69[†]. The results of the interference analyses for the proposed facility are summarized herein at Figure 3. As indicated therein, the proposed facility will meet the 0.5% *de minimis* interference criterion outlined in the FCC Rules to all pertinent allotments and assignments.[‡]

[†] See *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, OET Bulletin 69, Federal Communications Commission (February 6, 2004).

[‡] It is also noted that the proposal is fully compliant with the spacing requirements of Section 73.623(d) of the FCC Rules, although this is not a requirement for existing stations proposing channel substitutions.

With respect to Class A TV station protection, the proposal has been evaluated according to the requirements of the FCC Rules. The analysis reveals no potentially affected Class A TV stations.

The service area and population numbers for the proposed allotment are summarized below:

State and City	DTV Chan	DTV Power (kW)	Antenna HAAT (m)	Estimated Predicted Service	
				Area (sq. km)	People (Thous)
TX BEAUMONT	25	350.0	274.0	23,102	667

As indicated above, the proposed Channel 25 DTV allotment for KFDM would provide noise-limited service to an estimated population of 667,000 within an area of 23,102 sq. km. This population is based on 2000 Census data.

The authorized KFDM directional facility on Channel 21 would provide service to an estimate 546,000 persons. Therefore, this proposal will result in an increase in noise-limited service of over 121,000 persons, which is an over 20% improvement over its present authorized service. In addition, there will be no service loss as a result of the instant proposal.



Louis R. du Treil, Jr.

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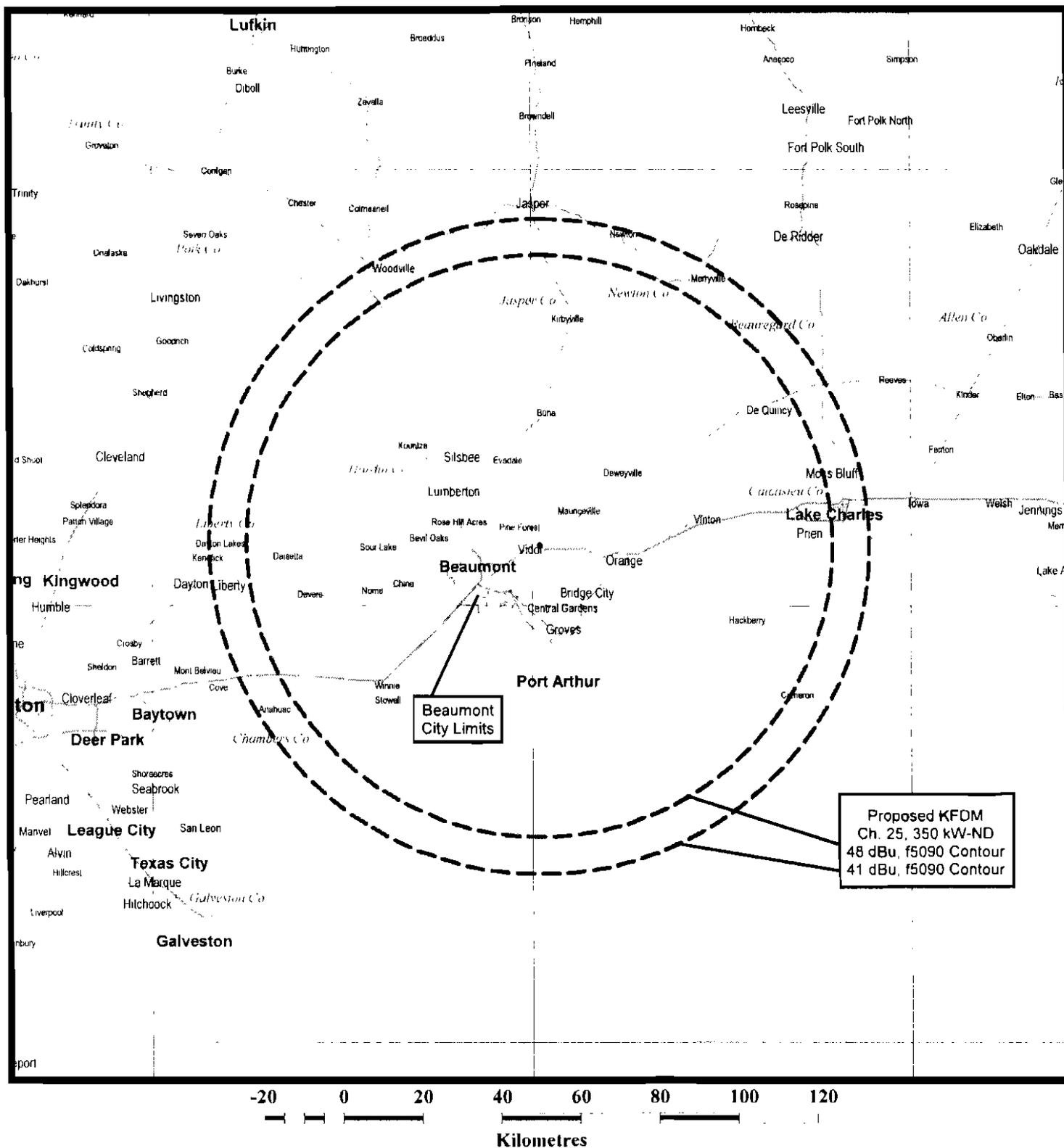
September 24, 2009

TECHNICAL EXHIBIT
 IN SUPPORT OF PETITION FOR RULE MAKING
 TELEVISION STATION KFDM
 BEAUMONT, TEXAS

Technical Specifications

Channel / Frequency Band	25 / 536-542 MHz
Zone	III
Reference Coordinates (NAD 27):	
Latitude	30°08'24" North
Longitude	93°58'44" West
Height of Radiation Center Above Mean Sea Level	279 m
Height of Radiation Center Above Ground Level	273 m
Height of Radiation Center Above Average Terrain	274 m
Effective Radiated Power	350 kW

Directional Antenna Relative Field Values					
Degrees	Value	Degrees	Value	Degrees	Value
Non-directional antenna					



PREDICTED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION KFDM
BEAUMONT, TEXAS

Interference Analysis Pursuant to
Office of Engineering and Technology Bulletin No. 69

(7 pages follow)

OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

Percent allowed new interference: 0.500
 Percent allowed new interference to Class A: 0.500
 TW Census data selected 2000
 Post Transition Data Base Selected /export/home/cdbs/pt_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 09-24-2009

Record Selected for Analysis

KFDM USERRECORD-01 BEAUMONT TX US
 Channel 25 ERP 350. kW HAAT 274. m RCAMSL 00279 m
 Latitude 030-08-24 Longitude 0093-58-44
 Status APP Zone 3 Border
 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	350.000	270.8	83.1
45.0	350.000	272.8	83.4
90.0	350.000	274.5	83.6
135.0	350.000	275.5	83.7
180.0	350.000	276.9	83.9
225.0	350.000	275.7	83.8
270.0	350.000	276.3	83.9
315.0	350.000	272.6	83.3

Evaluation toward Class A Stations

No Spacing 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 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	ARN
25	Call KFDM City/State BEAUMONT TX	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
24	KETH-TV	HOUSTON TX	160.6	CP	BPEDT	-2008000ANS
24	KETH-TV	HOUSTON TX	160.6	PLN	DTVPLN	-DTVP09
24	KETH-TV	HOUSTON TX	160.6	LIC	BLEDT	-2003127AAM
25	WLPB-TV	BATON ROUGE LA	267.6	PLN	DTVPLN	-DTVP09
25	WLPB-TV	BATON ROUGE LA	267.6	CP MOD	BMPEDT	-2008108ADB
25	WLPB-TV	BATON ROUGE LA	267.6	LIC	BLEDT	-2004100ADE
25	KWKT-DR	WACO TX	345.5	APP	BPRM	-2008116AWQ

OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

26	KLPA-TV	ALEXANDRIA LA	209.2	PLN	DTVPLN	-DTVP051
26	KLPA-TV	ALEXANDRIA LA	209.2	LIC	BLEDT	-2003122ABA
26	KRIV	HOUSTON TX	159.0	CP MOD	BMPEDT	-2008020AKF
26	KRIV	HOUSTON TX	159.0	PLN	DTVPLN	-DTVP072

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
24	KETH-TV	HOUSTON TX	BPEDT	-20080620ANS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref No.
23	KLTJ	GALVESTON TX	0.0	LIC	BLEDT	-2008037AAD
23	KLTJ	GALVESTON TX	40.2	PLN	DTVPLN	-DTVP060
23	KLTJ	GALVESTON TX	0.0	CP	BPEDT	-2008067AAD
24	KLTS-TV	SHREVEPORT LA	376.8	CP MOD	BMPEDT	-2009045AFO
24	KLTS-TV	SHREVEPORT LA	376.8	PLN	DTVPLN	-DTVP081
24	KLTS-DR	SHREVEPORT LA	376.8	LIC	BPRM	-2008020AOC
24	KVAW	EAGLE PASS TX	400.7	APP	BPCDT	-2008022AAG
25	KFDM	BEAUMONT TX	160.6	APP	USERRECORD-01	

Total scenarios = 2

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 24A TX HOUSTON BPEDT 20080620ANS CP

HAAT 580.0 m, ATV ERP 1000.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	4851942	43571.1
not affected by terrain losses	4851644	43495.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	6	881.2
lost to ATV IX only	6	881.2
lost to all IX	6	881.2

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON	DTVPLN	DTVP0860	PLN
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After Analysis

Results for: 24A TX HOUSTON BPEDT 20080620ANS CP

HAAT 580.0 m, ATV ERP 1000.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	4851942	43571.1
not affected by terrain losses	4851644	43495.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	958	1008.8
lost to ATV IX only	958	1008.8
lost to all IX	958	1008.8

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON	DTVPLN	DTVP0860	PLN
25A TX BEAUMONT	USERRECORD01		APP

Percent new IX = 0.0196%

Worst case new IX 0.0196% Scenario 1

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
24	KETH-TV	HOUSTON TX	DTVPLN	-DTVP0902

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref No.
23	KLTJ	GALVESTON TX	0.0	LIC	BLEDT	-2008037AAD
23	KLTJ	GALVESTON TX	40.2	PLN	DTVPLN	-DTVP060

OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

23	KLTJ	GALVESTON TX	0.0	CP	BPEDT	-2008067AAD
24	KLTS-TV	SHREVEPORT LA	376.8	CP MOD	BMPEDT	-2009045AFO
24	KLTS-TV	SHREVEPORT LA	376.8	PLN	DTVPLN	-DTVP081
24	KLTS-DR	SHREVEPORT LA	376.8	LIC	BPRM	-2008030AOC
24	KVAW	EAGLE PASS TX	400.7	APP	BPCDT	-2008042AAG
25	KFDM	BEAUMONT TX	160.6	APP	USERRECORD-01	

Total scenarios = 2

Result key: 3
 Scenario 1 Affected station 2
 Before Analysis

Results for: 24A TX HOUSTON DTVP0902 PLN
 HAAT 579.0 m, ATV ERP 900.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4848610	42797.6
not affected by terrain losses	4848324	42733.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	6	801.5
lost to ATV IX only	6	801.5
lost to all IX	6	801.5

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON	DTVPLN	DTVP0860	PLN
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After Analysis

Results for: 24A TX HOUSTON DTVP0902 PLN
 HAAT 579.0 m, ATV ERP 900.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4848610	42797.6
not affected by terrain losses	4848324	42733.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	743	901.2
lost to ATV IX only	743	901.2
lost to all IX	743	901.2

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON	DTVPLN	DTVP0860	PLN
25A TX BEAUMONT	USERRECORD01		APP

Percent new IX = 0.0152%

Worst case new IX 0.0152% Scenario 1

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
24	KETH-TV	HOUSTON TX	BLEDT	-20031217AAM

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
23	KLTJ	GALVESTON TX	0.0	LIC	BLEDT	-2008037AAD
23	KLTJ	GALVESTON TX	40.2	PLN	DTVPLN	-DTVP081
23	KLTJ	GALVESTON TX	0.0	CP	BPEDT	-2008067AAD
24	KLTS-TV	SHREVEPORT LA	376.8	CP MOD	BMPEDT	-2009045AFO
24	KLTS-TV	SHREVEPORT LA	376.8	PLN	DTVPLN	-DTVP081
24	KLTS-DR	SHREVEPORT LA	376.8	LIC	BPRM	-2008030AOC
24	KVAW	EAGLE PASS TX	400.7	APP	BPCDT	-2008042AAG
25	KFDM	BEAUMONT TX	160.6	APP	USERRECORD-01	

Total scenarios = 2

Result key: 5
 Scenario 1 Affected station 3
 Before Analysis

Results for: 24A TX HOUSTON BLEDT 20031217AAM LIC
 HAAT 578.0 m, ATV ERP 900.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4848706	42813.6
not affected by terrain losses	4848420	42749.8
lost to NTSC IX	0	0.0

OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

lost to additional IX by ATV 6 801.5
 lost to ATV IX only 6 801.5
 lost to all IX 6 801.5

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON DTVPLN DTVP0860 PLN

After Analysis

Results for: 24A TX HOUSTON BLEDT 20031217AAM LIC

HAAT 578.0 m, ATV ERP 900.0 kw

	POPULATION	AREA (sq km)
within Noise Limited Contour	4848706	42813.6
not affected by terrain losses	4848420	42749.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	743	901.2
lost to ATV IX only	743	901.2
lost to all IX	743	901.2

Potential Interfering Stations Included in above Scenario 1

23A TX GALVESTON DTVPLN DTVP0860 PLN
 25A TX BEAUMONT USERRECORD01 APP

Percent new IX = 0.0152%

Worst case new IX 0.0152% Scenario 1

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
25	WLPB-TV	BATON ROUGE LA	DTVPLN	-DTVP0921

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
24	WUPL	SLIDELL LA	124.1	LIC	BLCDDT	-200408AAA
24	WUPL	SLIDELL LA	124.1	PLN	DTVPLN	-DTVP082
25	WBPG	GULF SHORES AL	328.0	CP MOD	BMPCDT	-200810AIV
25	WBPG	GULF SHORES AL	345.5	PLN	DTVPLN	-DTVP089
25	WMAO-TV	GREENWOOD MS	339.6	PLN	DTVPLN	-DTVP083
25	WMAO-TV	GREENWOOD MS	339.6	CP MOD	BMPEDT	-200810AGI
26	KLPA-TV	ALEXANDRIA LA	184.3	PLN	DTVPLN	-DTVP081
26	KLPA-TV	ALEXANDRIA LA	184.3	LIC	BLEDT	-2003112ABA
26	WGNO	NEW ORLEANS LA	128.2	CP MOD	BMPCDT	-200810ACU
26	WGNO	NEW ORLEANS LA	128.7	PLN	DTVPLN	-DTVP082
25	KFDM	BEAUMONT TX	267.6	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
25	WLPB-TV	BATON ROUGE LA	BMPEDT	-20081008ADB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
24	WUPL	SLIDELL LA	124.1	LIC	BLCDDT	-200408AAA
24	WUPL	SLIDELL LA	124.1	PLN	DTVPLN	-DTVP082
25	WBPG	GULF SHORES AL	328.0	CP MOD	BMPCDT	-200810AIV
25	WBPG	GULF SHORES AL	345.5	PLN	DTVPLN	-DTVP089
25	WMAO-TV	GREENWOOD MS	339.6	PLN	DTVPLN	-DTVP083
25	WMAO-TV	GREENWOOD MS	339.6	CP MOD	BMPEDT	-200810AGI
26	KLPA-TV	ALEXANDRIA LA	184.3	PLN	DTVPLN	-DTVP081
26	KLPA-TV	ALEXANDRIA LA	184.3	LIC	BLEDT	-2003112ABA
26	WGNO	NEW ORLEANS LA	128.2	CP MOD	BMPCDT	-200810ACU
26	WGNO	NEW ORLEANS LA	128.7	PLN	DTVPLN	-DTVP082
25	KFDM	BEAUMONT TX	267.6	APP	USERRECORD-01	

Proposal causes no interference

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OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

Analysis of Interference to Affected Station 6

Analysis of current record
 Channel Call City/State Application Ref. No.
 25 WLPB-TV BATON ROUGE LA BLEDT -20041020ADE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
24	WUPL	SLIDELL LA	124.1	LIC	BLCDDT	-2004082AAA
24	WUPL	SLIDELL LA	124.1	PLN	DTVPLN	-DTVP092
25	WBPG	GULF SHORES AL	328.0	CP MOD	BMPCDDT	-2008010AIV
25	WBPG	GULF SHORES AL	345.5	PLN	DTVPLN	-DTVP099
25	WMAO-TV	GREENWOOD MS	339.6	PLN	DTVPLN	-DTVP093
25	WMAO-TV	GREENWOOD MS	339.6	CP MOD	BMPCDDT	-2008010AGI
26	KLPA-TV	ALEXANDRIA LA	184.3	PLN	DTVPLN	-DTVP091
26	KLPA-TV	ALEXANDRIA LA	184.3	LIC	BLEDT	-2003112ABA
26	WGNO	NEW ORLEANS LA	128.2	CP MOD	BMPCDDT	-2008080ACU
26	WGNO	NEW ORLEANS LA	128.7	PLN	DTVPLN	-DTVP092
25	KFDM	BEAUMONT TX	267.6	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 7

Analysis of current record
 Channel Call City/State Application Ref. No.
 25 KWKT-DR WACO TX BPRM -20081106AWQ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
26	KXXV	WACO TX	3.0	PLN	DTVPLN	-DTVP095
26	KXXV	WACO TX	3.0	LIC	BLCDDT	-2005060AFE
25	KFDM	BEAUMONT TX	345.5	APP	USERRECORD-01	

Total scenarios = 4

Result key: 7
 Scenario 1 Affected station 7
 Before Analysis

Results for: 25A TX WACO BPRM 20081106AWQ 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 1

26A TX WACO DTVPLN DTVP0975 PLN

After Analysis

Results for: 25A TX WACO BPRM 20081106AWQ 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	524	136.8
lost to ATV IX only	524	136.8
lost to all IX	524	136.8

Potential Interfering Stations Included in above Scenario 1

26A TX WACO DTVPLN DTVP0975 PLN
 25A TX BEAUMONT USERRECORD01 APP

Percent new IX = 0.0007%

Worst case new IX 0.0007% Scenario 1

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OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
26	KLPA-TV	ALEXANDRIA LA	DTVPLN	-DTVP0951

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
25	WLPB-TV	BATON ROUGE LA	184.3	PLN	DTVPLN	-DTVP091
25	WLPB-TV	BATON ROUGE LA	184.3	CP MOD	BMPEDT	-2008108ADB
25	WLPB-TV	BATON ROUGE LA	184.3	LIC	BLEDT	-2004100ADE
26	KVTH-DT	HOT SPRINGS AR	315.4	CP	BPCDT	-2008031APY
26	KVTH	HOT SPRINGS AR	315.4	PLN	DTVPLN	-DTVP091
26	WGNO	NEW ORLEANS LA	304.1	CP MOD	BMPEDT	-2008060ACU
26	WGNO	NEW ORLEANS LA	305.6	PLN	DTVPLN	-DTVP092
26	KRIV	HOUSTON TX	358.4	CP MOD	BMPEDT	-2008060AKF
26	KRIV	HOUSTON TX	358.4	PLN	DTVPLN	-DTVP092
27	KTVE	EL DORADO AR	170.8	PLN	DTVPLN	-DTVP091
27	KTVE	EL DORADO AR	170.8	LIC	BLCDT	-2007065ABH
25	KFDM	BEAUMONT TX	209.2	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
26	KLPA-TV	ALEXANDRIA LA	BLEDT	-20031212ABA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
25	WLPB-TV	BATON ROUGE LA	184.3	PLN	DTVPLN	-DTVP091
25	WLPB-TV	BATON ROUGE LA	184.3	CP MOD	BMPEDT	-2008108ADB
25	WLPB-TV	BATON ROUGE LA	184.3	LIC	BLEDT	-2004100ADE
26	KVTH-DT	HOT SPRINGS AR	315.4	CP	BPCDT	-2008031APY
26	KVTH	HOT SPRINGS AR	315.4	PLN	DTVPLN	-DTVP091
26	WGNO	NEW ORLEANS LA	304.1	CP MOD	BMPEDT	-2008060ACU
26	WGNO	NEW ORLEANS LA	305.6	PLN	DTVPLN	-DTVP092
26	KRIV	HOUSTON TX	358.4	CP MOD	BMPEDT	-2008060AKF
26	KRIV	HOUSTON TX	358.4	PLN	DTVPLN	-DTVP092
27	KTVE	EL DORADO AR	170.8	PLN	DTVPLN	-DTVP091
27	KTVE	EL DORADO AR	170.8	LIC	BLCDT	-2007065ABH
25	KFDM	BEAUMONT TX	209.2	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
26	KRIV	HOUSTON TX	BMPEDT	-20080620AKF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref No.
26	KLPA-TV	ALEXANDRIA LA	358.4	PLN	DTVPLN	-DTVP091
26	KLPA-TV	ALEXANDRIA LA	358.4	LIC	BLEDT	-2003122ABA
26	KPXL-TV	UVALDE TX	343.6	CP	BPCDT	-2007051AEW
26	KPXL	UVALDE TX	343.7	PLN	DTVPLN	-DTVP091
26	KXXV	WACO TX	262.1	PLN	DTVPLN	-DTVP095
26	KXXV	WACO TX	262.1	LIC	BLCDT	-2005060AFE
25	KFDM	BEAUMONT TX	159.0	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
26	KRIV	HOUSTON TX	DTVPLN	-DTVP0972

OET-69 Interference Analysis, KFDM, Beaumont, Texas, Channel 25 (worst-case scenarios)

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref No.
26	KLPA-TV	ALEXANDRIA LA	358.4	PLN	DTVPLN	-DTVP091
26	KLPA-TV	ALEXANDRIA LA	358.4	LIC	BLEDT	-2003112ABA
26	KPXL-TV	UVALDE TX	343.6	CP	BPCDT	-2007051AEW
26	KPXL	UVALDE TX	343.7	PLN	DTVPLN	-DTVP091
26	KXXV	WACO TX	262.1	PLN	DTVPLN	-DTVP095
26	KXXV	WACO TX	262.1	LIC	BLCDT	-2005063AFE
25	KFDM	BEAUMONT TX	159.0	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 12

Analysis of current record

Channel	Call	City/State	Application Ref. No.
25	KFDM	BEAUMONT TX	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref No.
24	KETH-TV	HOUSTON TX	160.6	CP	BPEDT	-2008060ANS
24	KETH-TV	HOUSTON TX	160.6	PLN	DTVPLN	-DTVP092
24	KETH-TV	HOUSTON TX	160.6	LIC	BLEDT	-2003112AAM
25	WLPB-TV	BATON ROUGE LA	267.6	PLN	DTVPLN	-DTVP091
25	WLPB-TV	BATON ROUGE LA	267.6	CP MOD	BMPEDT	-2008108ADB
25	WLPB-TV	BATON ROUGE LA	267.6	LIC	BLEDT	-200410DADE
25	KWKT-DR	WACO TX	345.5	APP	BFRM	-2008106AWQ
26	KLPA-TV	ALEXANDRIA LA	209.2	PLN	DTVPLN	-DTVP091
26	KLPA-TV	ALEXANDRIA LA	209.2	LIC	BLEDT	-2003112ABA
26	KRIV	HOUSTON TX	159.0	CP MOD	BMPCDT	-2008060AKF
26	KRIV	HOUSTON TX	159.0	PLN	DTVPLN	-DTVP092

Total scenarios = 1

Result key: 11
 Scenario 1 Affected station 12
 Before Analysis

Results for: 25A TX BEAUMONT USERRECORD01 APP

HAAT 274.0 m, ATV ERP 350.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	667346	23105.5
not affected by terrain losses	667295	23101.5
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

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