

ORIGINAL

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

FILED/ACCEPTED

Amendment of Section 73.622(i),) MB Docket No. _____
Post-Transition DTV Table of Allotments) RPRM - 20110120ABW
El Paso, TX

FEB - 2 2011

Federal Communications Commission
Office of the Secretary

To: Secretary

Attn: Barbara Kreisman, Esq.
Chief, Video Division, MEDIA BUREAU

AMENDMENT TO
PETITION FOR RULEMAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS

NPG of Texas, LP, the licensee of KVIA-TV, El Paso, TX ("Station"), hereby submits this AMENDMENT to the Petition for Rulemaking, filed January 20, 2011, which seeks the initiation of a rulemaking and, thereafter, to amend Section 73.622(i) of the FCC's rules, in order to substitute Channel 17, in lieu of Channel 7 at El Paso, TX, as the Station's Post-Transition DTV allotment.¹

When granted, the Petition would amend the FCC's Post-Transition DTV Table of Allotments, 47 CFR § 622(i), as follows:

	<u>Present</u>	<u>Proposed</u>
El Paso, TX	7, 9, *13, 15, 18, 25, *39, 51	9 ² , *13, 15, 17 18, 25, *39, 51

¹ See 47 CFR §§ 1.401, 73.616 and 73.622.

² There is a pending Petition for Rulemaking, filed November 29, 2010, by KTSM-TV, El Paso, to substitute Ch. 16 for Ch. 9 at El Paso, TX.

PRLM/MB

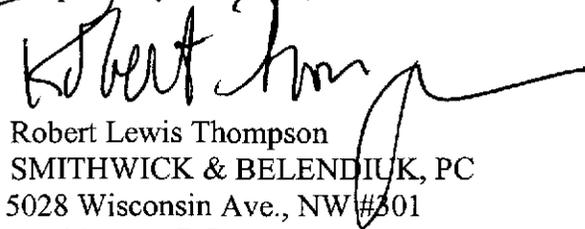
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The proposed substitution of Ch. 17 for Ch. 7 would serve the public interest by significantly improving service to the public by KVIA-TV, the ABC-TV affiliate in El Paso, a top-100 DMA and a TV market expressly recognized by the FCC as one that presents a special, post-Transition "challenge" because of its larger-than-average number of over-the-air TV viewers.

This Amendment simply revises the proposed ERP of the Channel 17 facility, from 500 KW to 263KW, following informal consultations with the Staff of the Video Division. It is anticipated that this change will expedite the Staff's approval of the technical proposal and result in a more expeditious release of a NPRM.

Accordingly, the public interest would be served and the KVIA-TV viewers in Texas and New Mexico would receive greatly improved digital TV service from the grant of this proposal, to amend the FCC's DTV Table of Allotments to substitute Ch. 17 for Ch. 7 for KVIA-TV, El Paso, TX, with the amended technical proposal attached hereto in Exhibit A.³

Respectfully submitted,



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February 2, 2011

³ Upon a "final" FCC decision, amending the DTV Table of Allotments to substitute Ch. 17 for Ch. 7 at El Paso, TX, Petitioner would not object to the Video Division's dismissal of both (a) the Station's October 26, 2009 Form 301 application for an increase in ERP for KVIA-TV's Ch. 7 facility and also (b) its January 21, 2010 Request for Extension of Engineering STA.

EXHIBIT A

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION KVIA-TV
EL PASO, TEXAS

February 1, 2011

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION KVIA-TV
EL PASO, TEXAS

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TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION KVIA-TV
EL PASO, TEXAS

Technical Statement

This Technical Statement was prepared on behalf of television broadcast station KVIA-TV, El Paso, Texas (Channel 7), in support of a Petition for Rulemaking to amend Section 73.622(i) of the FCC Rules to change the KVIA-TV post-transition digital television channel.* KVIA-TV is the ABC network affiliate in the El Paso television market.

KVIA-TV is authorized for operation on Channel 7 with a maximum directional effective radiated power (ERP) of 32.4 kW and antenna height above average terrain (HAAT) of 592 m.† Due to unresolved reception issues remaining on the high-VHF band Channel 7, KVIA-TV desires to obtain a full-service UHF channel so as to mitigate these reception issues. Specifically, KVIA-TV is proposing operation on Channel 17, its former pre-transition digital channel.‡

KVIA-TV proposes to operate on UHF channel 17 with a maximum ERP of 263 kW employing a directional antenna with an antenna HAAT of 577 meters. The

* The instant exhibit was prepared in support of an amendment of the previously filed Petition for Rulemaking for KVIA-TV (See FCC File No. BPRM-20110120ABW.)

† See FCC File No. BPCDT-20080222ADB. An application for license is pending for this facility. See FCC File No. BLCDDT-20090612AGL.

‡ It is noted that station KTSM-TV, El Paso, has proposed to change its allotment from Channel 9 to Channel 16 in a Petition for Rulemaking filed on November 29, 2010. See *Notice of Proposed Rulemaking*, MB Docket No. 11-4, DA 11-74, Released: January 19, 2011. KVIA-TV and KTSM-TV currently share an antenna for VHF operations on Channels 7 and 9. Both stations would also share an antenna for UHF operations on Channel 16 and 17.

proposal is specified with facilities identical to those previously employed for its licensed pre-transition digital facility.[§] Specifications for the proposal are included herein at Figure 1.

Coverage Compliance

The proposed KVIA-TV allotment facility complies with the coverage requirements of Section 73.625 of the FCC Rules. A map showing the predicted coverage contours is included herein at Figure 2. As indicated, the predicted 48 dBu, f(50,90) contour encompasses the entire community of El Paso as required.

Domestic Allocation Concerns

The proposed Channel 17 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.^{††}

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.

[§] See FCC File No. BLCDDT-20060207ABA.

^{**} 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.

Mexican Allocation Concerns

The KVIA-TV allotment facility herein proposed has predicted coverage that is identical to that licensed for the KVIA-TV digital pre-transition facility for Channel 17 at El Paso (See FCC File No. BLCDDT-20060207ABA). Therefore, it is understood that further coordination of the instant allotment proposal with Mexico is not required.



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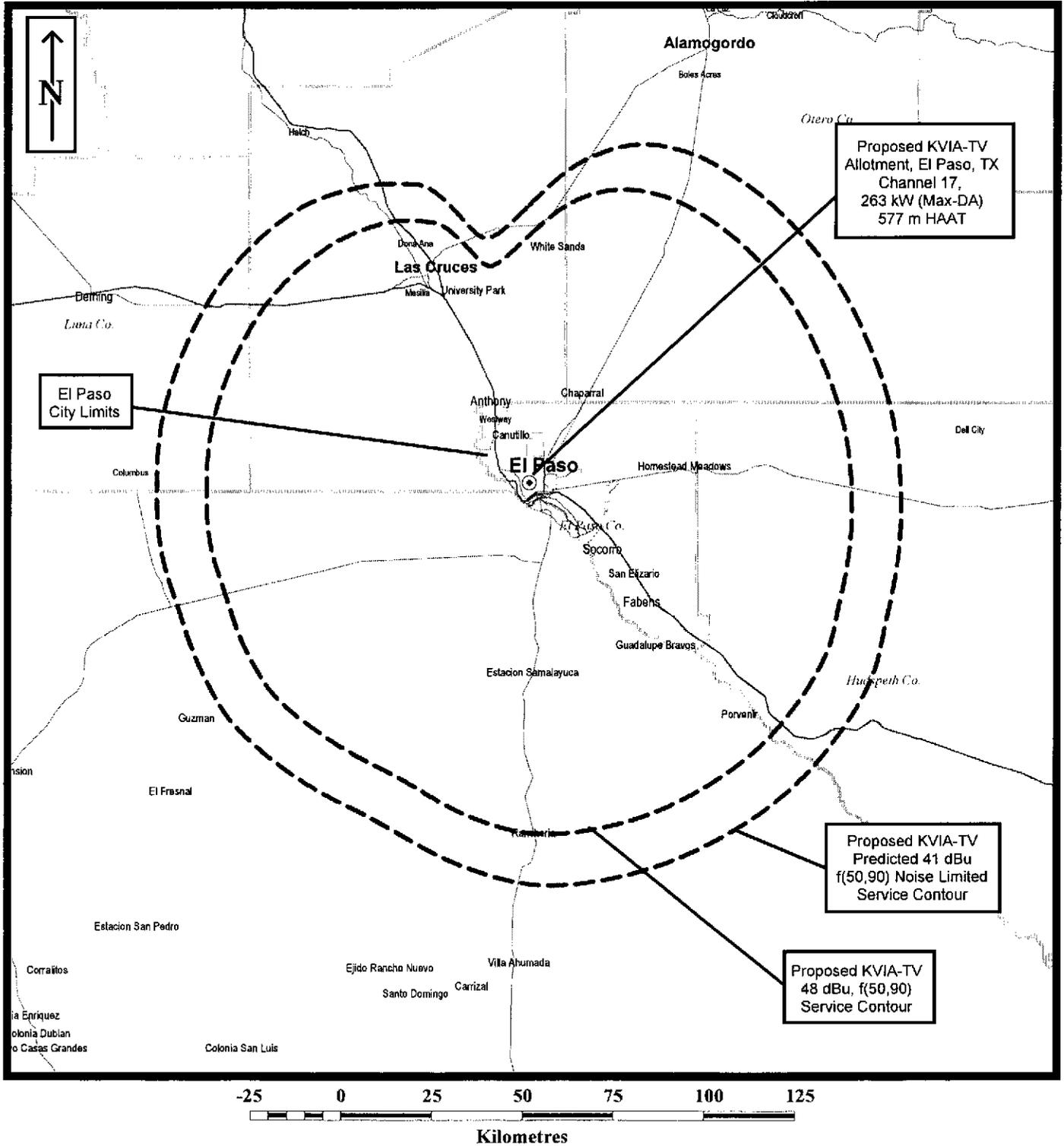
February 1, 2011

TECHNICAL EXHIBIT
 IN SUPPORT OF PETITION FOR RULEMAKING
 TELEVISION STATION KVIA-TV
 EL PASO, TEXAS

Technical Specifications

Channel / Frequency Band	17 / 488-494 MHz
Zone	II
Reference Coordinates (NAD 27):	
Latitude	31°48'19" North
Longitude	106°28'59" West
Height of Radiation Center Above Mean Sea Level	1819 m
Height of Radiation Center Above Ground Level	111 m
Height of Radiation Center Above Average Terrain	577 m
Maximum effective Radiated Power	263 kW

Directional Antenna Relative Field Values (note rotation below)					
Degrees	Value	Degrees	Value	Degrees	Value
0	1.000	120	0.600	240	0.600
10	0.990	130	0.610	250	0.600
20	0.970	140	0.630	260	0.630
30	0.950	150	0.660	270	0.660
40	0.930	160	0.690	280	0.710
50	0.880	170	0.700	290	0.760
60	0.830	180	0.710	300	0.830
70	0.760	190	0.700	310	0.880
80	0.710	200	0.690	320	0.930
90	0.660	210	0.660	330	0.950
100	0.630	220	0.630	340	0.970
110	0.600	230	0.610	350	0.990
Antenna Rotation = 180°					



PREDICTED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

OET-69 Interference Analysis (Proposed KVIA-TV, El Paso, TX, Ch. 17)

Percent allowed new interference: 0.500
 Percent allowed new interference to non Class A LPTV: 2.000
 TW Census data selected 2000
 Data Base Selected
 /export/home/cdbs/pt_tvdb.sff
 TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 02-01-2011

Record Selected for Analysis

KVIA-TV USERRECORD-01 EL PASO TX US
 Channel 17 ERP 263. kW HAAT 577. m RCAMSL 01819 m
 Latitude 031-48-19 Longitude 0106-28-59
 Status APP Zone 2 Border Site number: 01
 Dir Antenna Make CDB Model 0000000069966 Beam tilt N Ref Azimuth 180.
 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 (site # 01) meets maximum height/power limits

Site number	1			
Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)	
0.0	132.578	276.8	77.9	
45.0	101.097	620.2	101.0	
90.0	114.563	621.9	102.1	
135.0	215.404	693.1	110.6	
180.0	263.000	643.5	110.3	
225.0	215.404	551.7	103.9	
270.0	114.563	632.0	102.5	
315.0	101.097	580.6	99.2	

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

- 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 within the Mexican coordination distance
 Distance to border = 4.4km
- Proposed station is OK toward AM broadcast stations

 Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
17	KVIA-TV	EL PASO TX	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
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OET-69 Interference Analysis (Proposed KVIA-TV, El Paso, TX, Ch. 17)

16	KTSM-DR	EL PASO TX	0.0	APP	BPRM	20101129APK
17	KAZQ	ALBUQUERQUE NM	378.9	LIC	BLEDT	20051012ACK
18	KDBC-TV	EL PASO TX	1.0	CP MOD	BMPCDT	20090121ABN
18	KDBC-TV	EL PASO TX	1.0	LIC	BLCDT	20050707ACZ

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
16	KTSM-DR	EL PASO TX	BPRM	-20101129APK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	KFOX-TV	EL PASO TX	1.2	LIC	BLCDT	-20051103AAE
17	KVIA-TV	EL PASO TX	0.0	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.
17	KAZQ	ALBUQUERQUE NM	BLEDT	-20051012ACK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
17	KVIA-TV	EL PASO TX	378.9	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
18	KDBC-TV	EL PASO TX	BMPCDT	-20090121ABN

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
18	KPTF-DT	FARWELL TX	423.4	CP	BPCDT	-20080310ADJ
18	KUPB	MIDLAND TX	373.0	LIC	BLCDT	-20090615ABW
17	KVIA-TV	EL PASO TX	1.0	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
18	KDBC-TV	EL PASO TX	BLCDT	-20050707ACZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
18	KPTF-DT	FARWELL TX	423.4	CP	BPCDT	-20080310ADJ
18	KUPB	MIDLAND TX	373.0	LIC	BLCDT	-20090615ABW
17	KVIA-TV	EL PASO TX	1.0	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 4
 Before Analysis

Results for: 18A TX EL PASO BLCDT 20050707ACZ LIC
 HAAT 396.0 m, ATV ERP 363.0 kW
 within Noise Limited Contour POPULATION 854382 AREA (sq km) 26918.2

OET-69 Interference Analysis (Proposed KVIA-TV, El Paso, TX, Ch. 17)

not affected by terrain losses	849561	25489.3
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

After Analysis

Results for: 18A TX EL PASO BLCDT 20050707ACZ LIC
 HAAT 396.0 m, ATV ERP 363.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	854382	26918.2
not affected by terrain losses	849561	25489.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	75	872.6
lost to ATV IX only	75	872.6
lost to all IX	75	872.6

Potential Interfering Stations Included in above Scenario 1

17A TX EL PASO USERRECORD01 APP

Percent new IX = 0.0088%

Worst case new IX 0.0088% Scenario 1

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
17	KVIA-TV	EL PASO TX	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
16	KTSM-DR	EL PASO TX	0.0	APP	BPRM -20101129APK
17	KAZQ	ALBUQUERQUE NM	378.9	LIC	BLEDT -20051012ACK
18	KDBC-TV	EL PASO TX	1.0	CP MOD	BMPCDT -20090121ABN
18	KDBC-TV	EL PASO TX	1.0	LIC	BLCDT -20050707ACZ

Total scenarios = 1

Result key: 2
 Scenario 1 Affected station 5
 Before Analysis

Results for: 17A TX EL PASO USERRECORD01 APP
 HAAT 577.0 m, ATV ERP 263.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	855158	34941.3
not affected by terrain losses	851149	33270.4
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

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