

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.622(i)) RM- _____
Table of Allotments)
Digital Television Broadcast Stations)
(Cedar Rapids, Iowa))

FILED/ACCEPTED

FEB - 3 2013

Federal Communications Commission
Office of the Secretary

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

**PETITION FOR RULEMAKING
TO AMEND THE DIGITAL TELEVISION TABLE OF ALLOTMENTS**

KGAN Licensee, LLC (“KGAN Licensee”), the licensee of KGAN(TV), Channel 51, Cedar Rapids, Iowa (the “Station”) by its counsel, pursuant to Sections 1.401 and 73.622(a) of the Commission’s Rules,¹ hereby requests that the Commission initiate a rulemaking proceeding to substitute and allot DTV Channel 29 for KGAN’s assigned DTV Channel 51 at Cedar Rapids, by amending the DTV Post Transition Table of Allotments.² KGAN Licensee’s request is being made in connection with the Commission’s decision to lift the freeze on channel change petitions filed by full power television stations if such stations are seeking to vacate Channel 51 “pursuant to a voluntary relocation agreement.”³ KGAN Licensee has entered into such a voluntary relocation agreement with King Street Wireless, L.P.

The proposed rulemaking request would serve the public interest. Operation of the Station on Channel 29, instead of Channel 51, would remove any potential interference with a

¹ 47 C.F.R. §§ 1.401 and 73.622(a).

² 47 C.F.R. § 76.622(i).

³ See *General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator, and Class A Applications*, Public Notice, 26 FCC Rcd 11409 (2011) (“Channel 51 Notice”).

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wireless licensee in the Lower 700 MHz A Block located directly adjacent to Channel 51 in Cedar Rapids. The proposal is therefore consistent with Commission precedent and the Commission's announcement to lift the freeze on channel changes for parties relocating from Channel 51.⁴

As set forth in the attached Engineering Statement of John E. Hidle, P.E. of Carl T. Jones Corporation, the instant proposal to allot DTV Channel 29 to Cedar Rapids, Iowa can be accomplished in complete conformity with all Commission allocation requirements.⁵ The Station would be able to replicate its current Channel 51 service area on requested Channel 29, thereby permitting the Station to maintain local television program service to the Station's viewers.⁶ As shown in the Engineering Statement, the only modification proposed by KGAN Licensee is to change the Station's channel from Channel 51 to Channel 29.⁷ All other currently licensed parameters for the station would remain the same.⁸

CONCLUSION

For the foregoing reasons, KGAN Licensee respectfully requests the following change in the DTV Table of Allotments:

	<u>Current</u>	<u>Proposed</u>
Cedar Rapids, Iowa	9, 27, 47, 51	9, 27, 29, 47

⁴ See, e.g., *Lincoln, Nebraska*, 27 FCC Rcd 433 (2012) (the public interest is served by moving a broadcaster from Channel 51); *Jackson, Mississippi*, 26 FCC Rcd 3935 (2011) (same); see also, *Channel 51 Notice*.

⁵ See Exhibit 1, Engineering Statement of John E. Hidle, P.E. in Support of Petition.

⁶ *Id.* at 2.

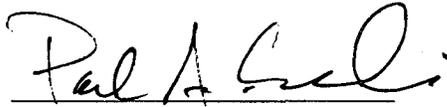
⁷ *Id.* at 3.

⁸ *Id.*

If the proposal set forth herein is adopted, KGAN Licensee will promptly file the appropriate application to specify operation of KGAN on DTV Channel 29 at Cedar Rapids, Iowa with facilities consistent with those specified in the attached Engineering Statement and, if authorized, will construct the facilities contemplated therein and place the station into operation.

Respectfully submitted,

KGAN Licensee, LLC

By: 

Clifford M. Harrington

Paul A. Cicelski

Its Attorneys

PILLSBURY WINTHROP SHAW PITTMAN LLP
2300 N Street, N.W.
Washington, D.C. 20037-1128
(202) 663-8000

Dated: July 3, 2013

EXHIBIT 1



**STATEMENT OF JOHN E. HIDLE, P.E.
 IN SUPPORT OF A PETITION TO AMEND
 THE DIGITAL TELEVISION TABLE OF ALLOTMENTS
 KGAN - CEDAR RAPIDS, IOWA
 DTV - CH. 29 - 850 kW - 585 m HAAT**

Prepared for: KGAN Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by KGAN Licensee, LLC, licensee of KGAN(TV), channel 51, licensed to Cedar Rapids, Iowa, to prepare this statement in support of a Petition to Amend the Digital Television (DTV) Post Transition Table of Allotments, §73.622(i) of the FCC Rules. The petitioner requests that §73.622(i) of the Commission's Rules be modified in the following manner:

	<u>Present</u>	<u>Proposed</u>
Cedar Rapids, Iowa	9, 27, 47, 51	9, 27, 29, 47

DTV channel 51 is the channel currently specified in the Digital Television Table of Allotments for KGAN(TV). The petitioner requests herein to substitute DTV channel 29 for DTV channel 51. The proposed arrangement of allotments is made in conjunction with a voluntary relocation agreement, as envisioned in Public Notice DA 11-1428, dated August

STATEMENT OF JOHN E. HIDLE, P.E.
KGAN - CEDAR RAPIDS, IOWA
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22, 2011, on page 3. "To facilitate the clearing of channel 51, however, we hereby lift the current freeze as applied to, and will accept, petitions for rulemaking filed by full power television stations seeking to relocate from channel 51 pursuant to a voluntary relocation agreement." KGAN Licensee, LLC has entered into a voluntary agreement to vacate channel 51, in deference to the Cedar Rapids licensee of the spectrum in Block A of the lower 700 MHz band. The requested channel change will permit the Block A licensee to fully utilize the spectrum, directly adjacent to channel 51, that was acquired in auction 73 as WY-BEA103-A, Cedar Rapids, Iowa. The requested channel change will also permit KGAN to replicate its current channel 51 service area on channel 29, thereby continuing and maintaining television program service to its current viewers.

TECHNICAL STUDY

An engineering study of all pertinent allotments, assignments, applications, construction permits and DTV licenses reveals that DTV channel 29 can be allotted to Cedar Rapids, Iowa in lieu of channel 51, and meet all of the Commission's interference criteria.

The allotment reference coordinates for DTV channel 29 at Cedar Rapids, Iowa are: 42 18' 59" N.L. and 91 51' 30" W.L.¹ The Cedar Rapids allotment reference site meets the allotment standards in §73.616(b) with respect to: the DTV geographic spacing requirements set forth in §73.623(d); the principal community coverage requirements set forth in §73.625(a); the Class A TV and digital Class A TV protection requirements set forth

¹ The channel 29 DTV allotment reference coordinates are the same as the DTV channel 51 allotment reference coordinates (as defined in Section 73.622(i) of the FCC Rules) of the petitioner's licensed KGAN, Cedar Rapids, Iowa tower site. BLCDDT-20100308ABL (See FCC tower registration number 1017602).

STATEMENT OF JOHN E. HIDLE, P.E.
KGAN - CEDAR RAPIDS, IOWA
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in §73.616(f); the land mobile requirements set forth in §73.623(e) and the FM radio protection requirement set forth in §73.623(f).

The petitioner proposes to utilize the existing non-directional panel antenna at its current centerline height above mean sea level (AMSL) of 861 meters and above average terrain (HAAT) of 585 meters. The proposed effective radiated power (ERP) is 850 kW, the same as currently licensed. The only change proposed by petitioner is to change from channel 51 to channel 29. All other station parameters are to remain unchanged.

ALLOCATION CONSIDERATIONS

Post-Transition DTV Considerations

A study was performed to determine if the instant petition to amend the post-transition Table of Allotments is predicted to cause any level of new prohibited interference to DTV stations, expansion construction permits or DTV allotments. Results of the study, utilizing the FCC's own application processing software, indicate that the instant petition is predicted to cause no unacceptable level (less than 0.5%) of new interference to the populations served by any DTV station, expansion construction permit or allotment.

The study identified three DTV stations that are predicted to be affected slightly by the proposed facility. WMAQ-TV, Chicago, IL, channel 29 is predicted to receive additional new interference of 0.0153%, WFTC, Minneapolis, MN, channel 29 is predicted to receive additional new interference of 0.1894% and WHLA-TV, La Crosse, WI, channel 30 is predicted to receive new interference of 0.0287%. These results comply with the 0.5% limit for any increase in post-transition interference set forth in §73.616(e) of the Commission's Rules.

Class A Television Allocation Considerations

As required in Section 73.616(f) of the FCC's Rules, a study was performed, using the FCC's application processing software. The study showed that there is no predicted contour overlap with, nor any predicted interference to, any Class A station.

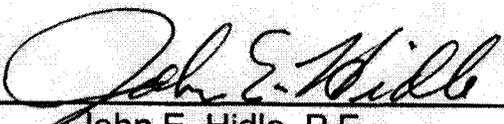
Land Mobile and FM radio Considerations

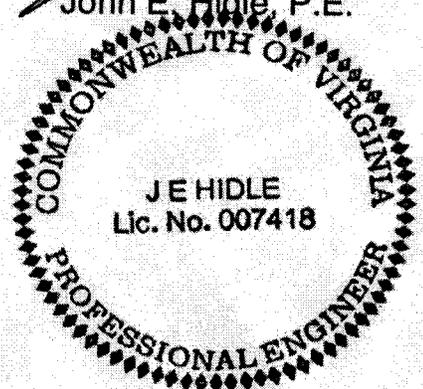
Since the Land Mobile requirements pertain only to channels 14 to 20, and the FM Radio requirements pertain only to DTV channel 6, these requirements are not pertinent to the instant Petition.

SUMMARY

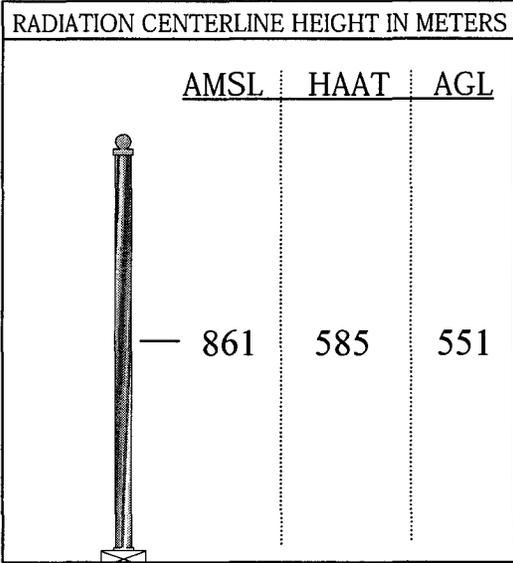
It is submitted that the instant Petition to Amend the DTV Table of Allotments to substitute DTV channel 29 for DTV channel 51 in Cedar Rapids, Iowa, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement was prepared by me, or under my direct supervision, and its contents are believed to be true and correct to the best of my knowledge and belief.

DATED: July 1, 2013

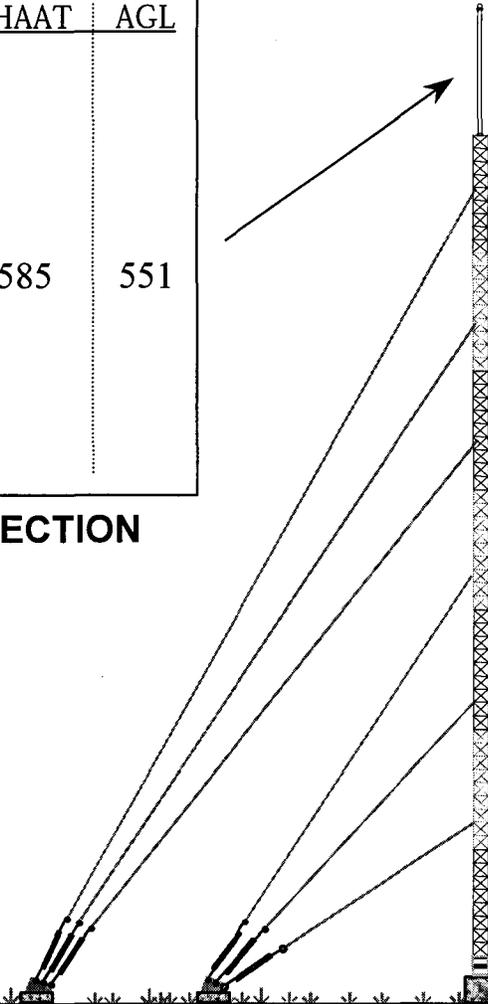


John E. Hidle, P.E.


COORDINATES NAD-27
NORTH LATITUDE: 42° 18' 59"
WEST LONGITUDE: 91° 51' 30"



EXPANDED SECTION

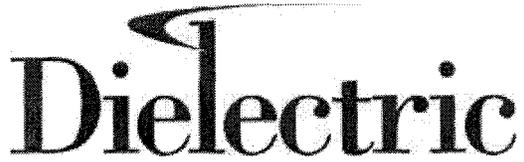


GROUND ELEVATION = 310 meters A.M.S.L. / AVERAGE TERRAIN = 276 meters A.M.S.L.

VERTICAL PLAN ANTENNA SKETCH
KGAN(TV) - CEDAR RAPIDS, IOWA
Ch. 29 - 850 kW ERP - 585.0 m HAAT
JULY, 2013

CARL T. JONES
CORPORATION

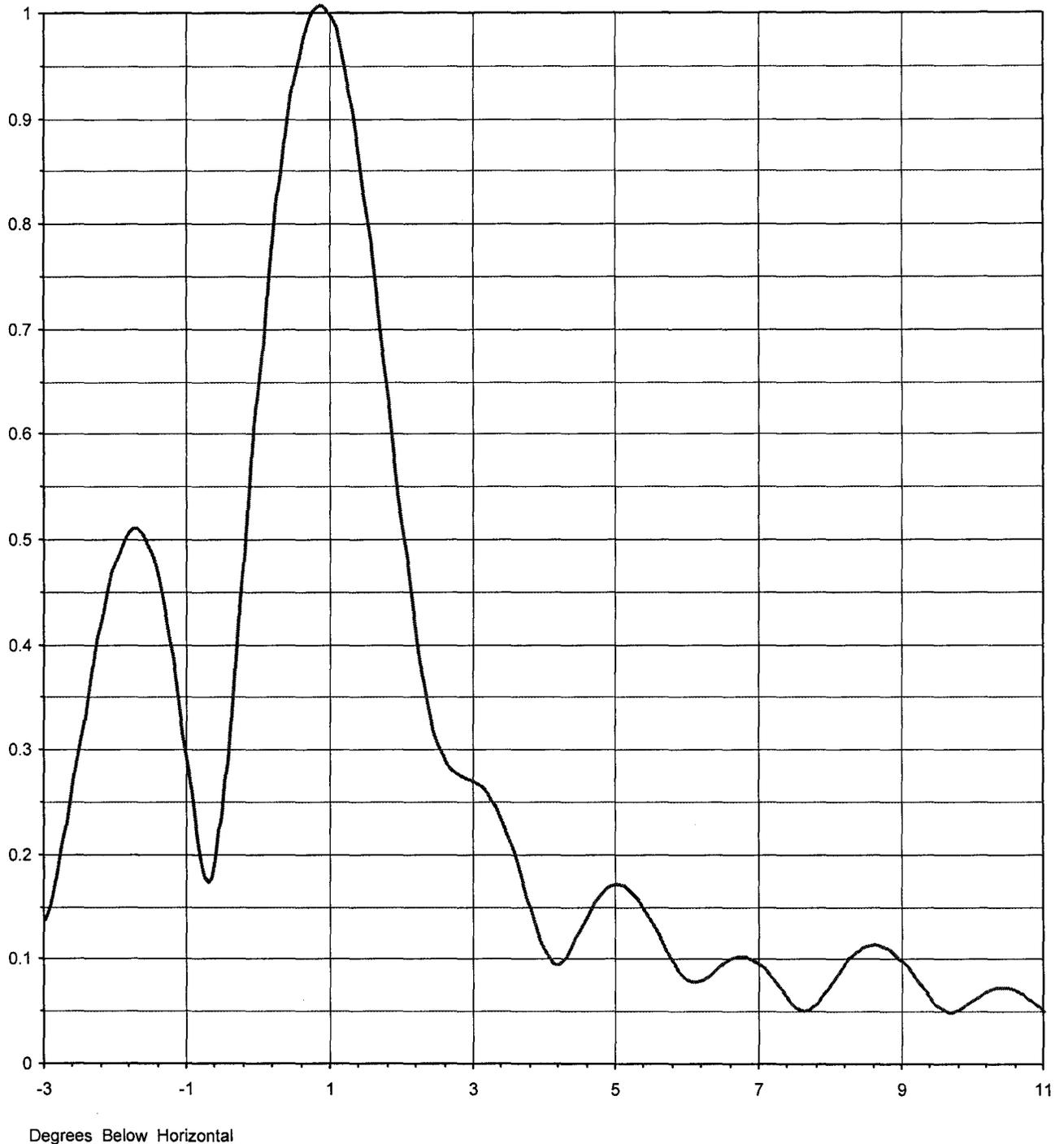
NOTE : NOT DRAWN TO SCALE



Proposal Number **DCA-8824** Revision: **3**
Date **24-May-01** Exhibit **2**
Call Letters **KGAN-DT** Channel **29**
Location **Cedar Rapids, Iowa**
Customer **KGAN Licensee, LLC**
Antenna Type **TUD-O5-12/60H-1-B**

ELEVATION PATTERN

RMS Gain at Main Lobe **25.30 (14.03 dB)** Beam Tilt **0.75 deg**
RMS Gain at Horizontal **10.50 (10.21 dB)** Frequency **695.00 MHz**
Calculated / Measured **Calculated** Drawing # **12U253075**

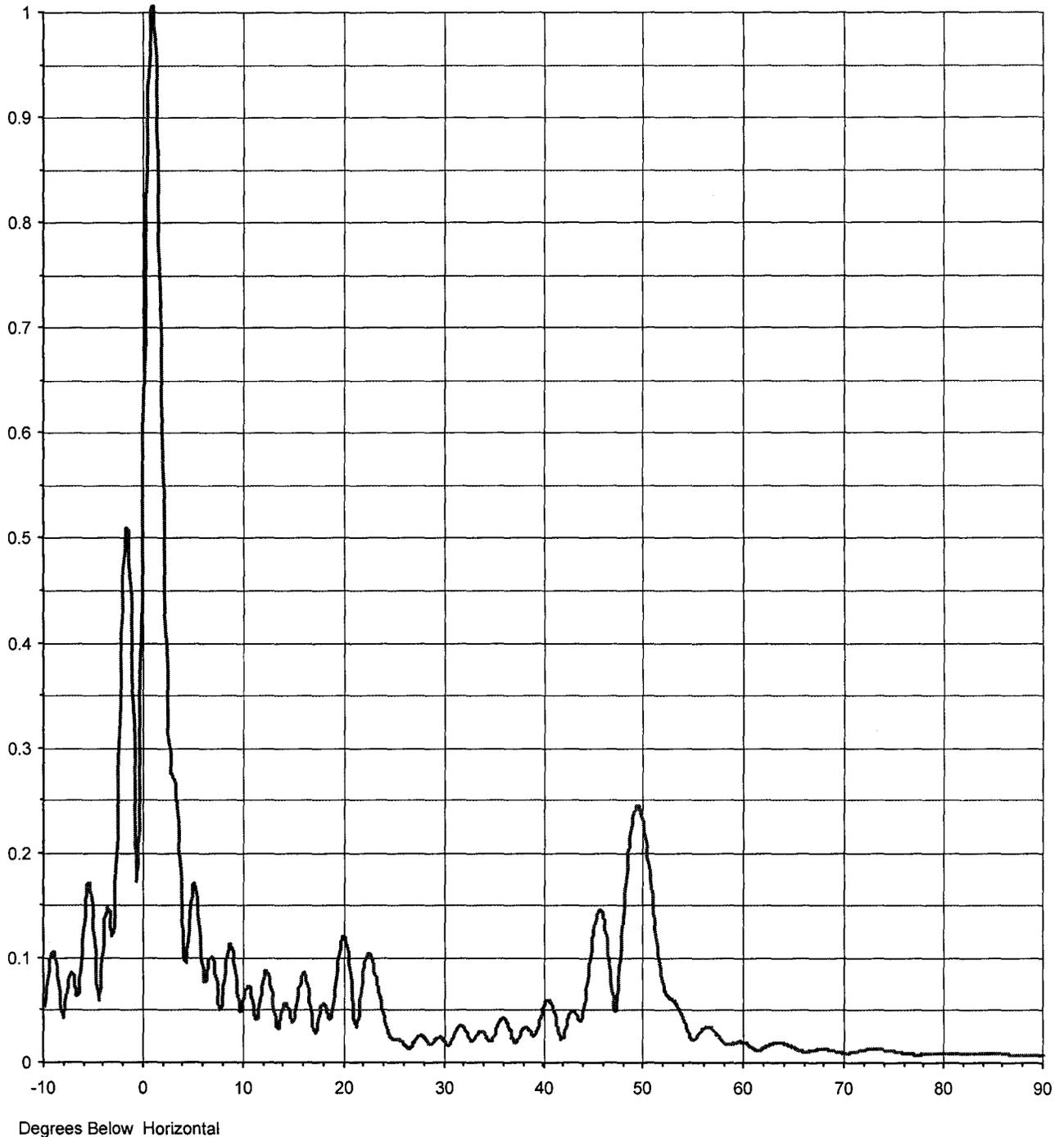




Proposal Number **DCA-8824** Revision: **3**
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Call Letters **KGAN-DT** Channel **29**
Location **Cedar Rapids, Iowa**
Customer **KGAN Licensee, LLC**
Antenna Type **TUD-O5-12/60H-1-B**

ELEVATION PATTERN

RMS Gain at Main Lobe	25.30 (14.03 dB)	Beam Tilt	0.75 deg
RMS Gain at Horizontal	10.50 (10.21 dB)	Frequency	695.00 MHz
Calculated / Measured	Calculated	Drawing #	12U253075-90



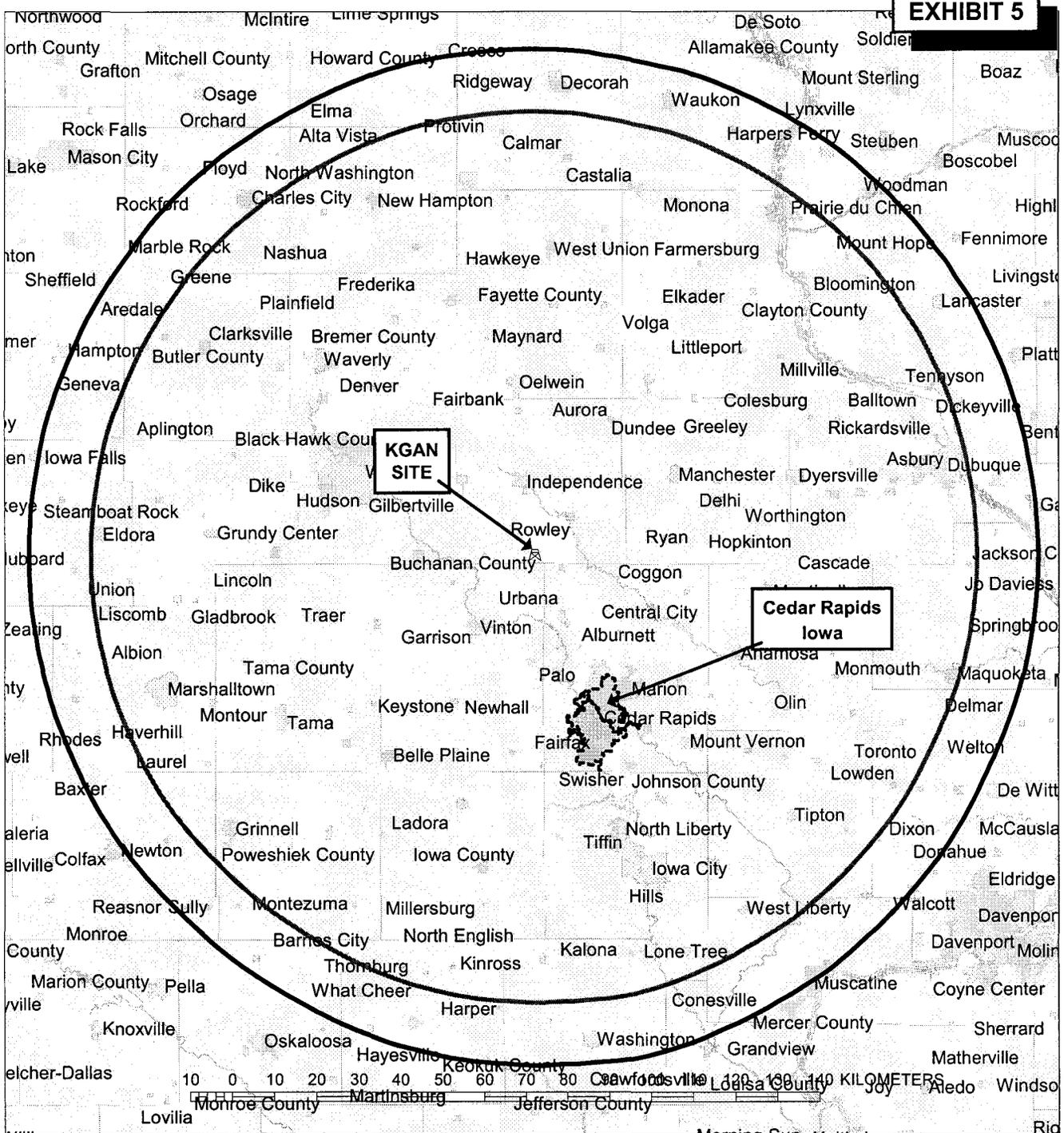


Proposal Number **DCA-8824** Revision: **3**
 Date **24-May-01** Exhibit **4**
 Call Letters **KGAN-DT** Channel **29**
 Location **Cedar Rapids, Iowa**
 Customer **KGAN Licensee, LLC**
 Antenna Type **TUD-O5-12/60H-1-B**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **12U253075-90**

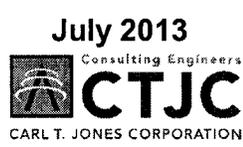
Angle	Field										
-10.0	0.048	2.4	0.322	10.6	0.067	30.5	0.011	51.0	0.140	71.5	0.006
-9.5	0.090	2.6	0.282	10.8	0.060	31.0	0.021	51.5	0.097	72.0	0.007
-9.0	0.097	2.8	0.269	11.0	0.050	31.5	0.030	52.0	0.068	72.5	0.007
-8.5	0.059	3.0	0.264	11.5	0.040	32.0	0.027	52.5	0.056	73.0	0.007
-8.0	0.044	3.2	0.251	12.0	0.073	32.5	0.018	53.0	0.053	73.5	0.007
-7.5	0.078	3.4	0.225	12.5	0.079	33.0	0.016	53.5	0.047	74.0	0.007
-7.0	0.070	3.6	0.187	13.0	0.050	33.5	0.023	54.0	0.035	74.5	0.006
-6.5	0.069	3.8	0.141	13.5	0.027	34.0	0.023	54.5	0.022	75.0	0.005
-6.0	0.135	4.0	0.101	14.0	0.048	34.5	0.015	55.0	0.016	75.5	0.004
-5.5	0.164	4.2	0.089	14.5	0.046	35.0	0.020	55.5	0.022	76.0	0.003
-5.0	0.114	4.4	0.108	15.0	0.034	35.5	0.032	56.0	0.027	76.5	0.003
-4.5	0.055	4.6	0.137	15.5	0.062	36.0	0.037	56.5	0.028	77.0	0.002
-4.0	0.126	4.8	0.157	16.0	0.080	36.5	0.029	57.0	0.025	77.5	0.002
-3.5	0.135	5.0	0.165	16.5	0.063	37.0	0.015	57.5	0.019	78.0	0.002
-3.0	0.132	5.2	0.159	17.0	0.026	37.5	0.018	58.0	0.013	78.5	0.003
-2.8	0.187	5.4	0.141	17.5	0.037	38.0	0.027	58.5	0.011	79.0	0.003
-2.6	0.264	5.6	0.116	18.0	0.050	38.5	0.026	59.0	0.013	79.5	0.003
-2.4	0.346	5.8	0.090	18.5	0.037	39.0	0.020	59.5	0.014	80.0	0.004
-2.2	0.419	6.0	0.074	19.0	0.056	39.5	0.031	60.0	0.014	80.5	0.004
-2.0	0.474	6.2	0.074	19.5	0.098	40.0	0.048	60.5	0.011	81.0	0.004
-1.8	0.502	6.4	0.085	20.0	0.114	40.5	0.054	61.0	0.008	81.5	0.004
-1.6	0.497	6.6	0.094	20.5	0.090	41.0	0.045	61.5	0.006	82.0	0.004
-1.4	0.456	6.8	0.096	21.0	0.040	41.5	0.025	62.0	0.008	82.5	0.004
-1.2	0.381	7.0	0.089	21.5	0.045	42.0	0.020	62.5	0.011	83.0	0.003
-1.0	0.281	7.2	0.074	22.0	0.085	42.5	0.037	63.0	0.013	83.5	0.003
-0.8	0.184	7.4	0.056	22.5	0.098	43.0	0.043	63.5	0.013	84.0	0.003
-0.6	0.191	7.6	0.044	23.0	0.083	43.5	0.036	64.0	0.012	84.5	0.003
-0.4	0.320	7.8	0.052	23.5	0.061	44.0	0.042	64.5	0.010	85.0	0.003
-0.2	0.482	8.0	0.071	24.0	0.037	44.5	0.078	65.0	0.008	85.5	0.002
0.0	0.643	8.2	0.090	24.5	0.021	45.0	0.116	65.5	0.005	86.0	0.002
0.2	0.784	8.4	0.103	25.0	0.017	45.5	0.138	66.0	0.005	86.5	0.002
0.4	0.895	8.6	0.107	25.5	0.017	46.0	0.134	66.5	0.006	87.0	0.002
0.6	0.968	8.8	0.103	26.0	0.012	46.5	0.101	67.0	0.007	87.5	0.002
0.8	1.000	9.0	0.091	26.5	0.008	47.0	0.053	67.5	0.007	88.0	0.002
1.0	0.989	9.2	0.074	27.0	0.014	47.5	0.064	68.0	0.007	88.5	0.002
1.2	0.938	9.4	0.056	27.5	0.020	48.0	0.130	68.5	0.006	89.0	0.002
1.4	0.853	9.6	0.045	28.0	0.018	48.5	0.190	69.0	0.005	89.5	0.002
1.6	0.745	9.8	0.044	28.5	0.012	49.0	0.228	69.5	0.004	90.0	0.002
1.8	0.624	10.0	0.050	29.0	0.015	49.5	0.238	70.0	0.004		
2.0	0.504	10.2	0.060	29.5	0.019	50.0	0.221	70.5	0.004		
2.2	0.398	10.4	0.066	30.0	0.015	50.5	0.185	71.0	0.005		



PREDICTED COVERAGE CONTOURS
KGAN - CEDAR RAPIDS, IOWA
DTV - CH 29 - 850 kW - 585 m HAAT

Predicted Principal Community Contour
F(50,90) - 48 dBu
Area = 33,830 sq km
Population = 920,504

Predicted Noise Limited Contour
F(50,90) - 41 dBu
Area = 43,975 sq km
Population = 1,049,759



July 2013



**KGAN - CEDAR RAPIDS, IOWA - APPENDIX A
 LONGLEY-RICE INTERFERENCE ANALYSIS
 JULY 2013**

Percent allowed new interference: 0.500
 Percent allowed new interference to non Class A LPTV: 2.000
 Census data selected 2000
 Data Base Selected
 /data/tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 01-29-2013 Time: 12:38:10

Record Selected for Analysis

KGAN BLCDT -20100308ABL CEDAR RAPIDS IA US
 Channel 29 ERP 850 kW HAAT 585. m RCAMSL 861.0 m
 Latitude 042-18-59 Longitude 0091-51-30
 Status LIC Zone 2 Border Site number: 01
 Last update 00000000 Cutoff date 20110630 Docket
 Comments
 Applicant KGAN LICENSEE, LLC

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits
 Channel 29 ERP = 850.00 HAAT = 585.

Site number	1	41.0 dBu F(50,90)		
Azimuth	ERP	HAAT		
(Deg)	(kW)	(m)	(km)	
0.0	850.000	577.7	117.8	
45.0	850.000	579.6	117.9	
90.0	850.000	585.7	118.2	
135.0	850.000	589.2	118.4	
180.0	850.000	596.5	118.8	
225.0	850.000	577.1	117.8	
270.0	850.000	583.3	118.1	
315.0	850.000	574.1	117.6	

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

No spacing violations found to other full service stations from site # 01

LANDMOBILE SPACING VIOLATIONS FOUND

NONE from Site # 01

KGAN - Cedar Rapids, Iowa - Appendix A

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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 beyond the Mexican coordination distance
 Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

	Proposed Station			
Channel	Call	City/State	ARN	
29	KGAN	CEDAR RAPIDS IA	BLCDT	20100308ABL

Stations Potentially Affected by Proposed Station						
Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WMAQ-TV	CHICAGO IL	351.6	LIC	BLCDT	20010531ACY
29	WFTC	MINNEAPOLIS MN	321.3	LIC	BLCDT	20100809CJF
29	KMBC-TV	KANSAS CITY MO	423.3	LIC	BLCDT	20090618ACY
30	WHLA-TV	LA CROSSE WI	170.1	LIC	BMLEDT	20041013AAL

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
29	WMAQ-TV	CHICAGO IL	BLCDT	-20010531ACY

Stations Potentially Affecting This Station						
Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
28	WYZZ-TV	BLOOMINGTON IL	188.2	LIC	BLCDT	-20060609ABE
28	WSJV	ELKHART IN	123.1	LIC	BLCDT	-20100115AAE
28	WTMJ-TV	MILWAUKEE WI	136.5	LIC	BLCDT	-20001218ACR
29	WTTK	KOKOMO IN	251.9	LIC	BLCDT	-20090930ABD
29	WXIX-TV	NEWPORT KY	402.5	LIC	BLCDT	-20000908ABI
29	WGTU	TRAVERSE CITY MI	380.5	LIC	BLCDT	-20090622AFH
29	WGTE-TV	TOLEDO OH	349.4	LIC	BLEDT	-20031110AKO
30	WMBD-TV	PEORIA IL	210.7	LIC	BLCDT	-20061019ADD
29	KGAN	CEDAR RAPIDS IA	351.6	LIC	BLCDT	-20100308ABL

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 29A IL CHICAGO BLCDT 20010531ACY LIC
 HAAT 508.0 m, ATV ERP 350.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	9540682	32513.9
not affected by terrain losses	9539142	32481.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	19211	481.6
lost to ATV IX only	19211	481.6
lost to all IX	19211	481.6

Potential Interfering Stations Included in above Scenario 1
 28A IN ELKHART BLCDT 20100115AAE LIC

KGAN - Cedar Rapids, Iowa - Appendix A

Page 3

28A WI MILWAUKEE BLCDT 20001218ACR LIC
29A IN KOKOMO BLCDT 20090930ABD LIC

After Analysis

Results for: 29A IL CHICAGO BLCDT 20010531ACY LIC
HAAT 508.0 m, ATV ERP 350.0 kW

Table with 3 columns: Description, POPULATION, AREA (sq km). Rows include: within Noise Limited Contour, not affected by terrain losses, lost to NTSC IX, lost to additional IX by ATV, lost to ATV IX only, lost to all IX.

Potential Interfering Stations Included in above Scenario 1

28A IN ELKHART BLCDT 20100115AAE LIC
28A WI MILWAUKEE BLCDT 20001218ACR LIC
29A IN KOKOMO BLCDT 20090930ABD LIC
29A IA CEDAR RAPIDS BLCDT 20100308ABL LIC

Percent new IX = 0.0153%
Worst case new IX 0.0153% Scenario 1

#####

Analysis of Interference to Affected Station 2

Analysis of current record

Channel Call City/State Application Ref. No.
29 WFTC MINNEAPOLIS MN BLCDT -20100809CJF

Stations Potentially Affecting This Station

Table with 6 columns: Chan, Call, City/State, Dist(km), Status, Application Ref. No. Rows include: 28 KAWB BRAINERD MN, 30 WHLA-TV LA CROSSE WI, 29 KGAN CEDAR RAPIDS IA.

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 2
Before Analysis

Results for: 29A MN MINNEAPOLIS BLCDT 20100809CJF LIC
HAAT 389.0 m, ATV ERP 1000.0 kW

Table with 3 columns: Description, POPULATION, AREA (sq km). Rows include: within Noise Limited Contour, not affected by terrain losses, lost to NTSC IX, lost to additional IX by ATV, lost to ATV IX only, lost to all IX.

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 29A MN MINNEAPOLIS BLCDT 20100809CJF LIC
HAAT 389.0 m, ATV ERP 1000.0 kW

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	POPULATION	AREA (sq km)
within Noise Limited Contour	3431865	35934.3
not affected by terrain losses	3423449	35503.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	6484	169.1
lost to ATV IX only	6484	169.1
lost to all IX	6484	169.1

Potential Interfering Stations Included in above Scenario 1
 29A IA CEDAR RAPIDS BLCDT 20100308ABL LIC

Percent new IX = 0.1894%
 Worst case new IX 0.1894% Scenario 1

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
29	KMBC-TV	KANSAS CITY MO	BLCDT	-20090618ACY

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	KGAN	CEDAR RAPIDS IA	423.3	LIC	BLCDT	-20100308ABL

Proposal causes no interference

#####

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
30	WHLA-TV	LA CROSSE WI	BMLEDT	-20041013AAL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WFTC	MINNEAPOLIS MN	197.1	LIC	BLCDT	-20100809CJF
30	WMBD-TV	PEORIA IL	383.1	LIC	BLCDT	-20061019ADD
31	WFXS-DR	WITTENBERG WI	205.3	APP	BPRM	-20080612ADX
31	WFXS-DT	WITTENBERG WI	205.3	LIC	BLCDT	-20090310AED
29	KGAN	CEDAR RAPIDS IA	170.1	LIC	BLCDT	-20100308ABL

Total scenarios = 1

Result key: 3
 Scenario 1 Affected station 4
 Before Analysis

Results for: 30A WI LA CROSSE BMLEDT 20041013AAL LIC
 HAAT 344.0 m, ATV ERP 307.5 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	444266	26742.0
not affected by terrain losses	418192	25699.8
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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After Analysis

Results for: 30A WI LA CROSSE BMLEDT 20041013AAL LIC
 HAAT 344.0 m, ATV ERP 307.5 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	444266	26742.0
not affected by terrain losses	418192	25699.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	120	20.1
lost to ATV IX only	120	20.1
lost to all IX	120	20.1

Potential Interfering Stations Included in above Scenario 1
 29A IA CEDAR RAPIDS BLCDDT 20100308ABL LIC

Percent new IX = 0.0287%
 Worst case new IX 0.0287% Scenario 1

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
29	KGAN	CEDAR RAPIDS IA	BLCDDT	-20100308ABL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WMAQ-TV	CHICAGO IL	351.6	LIC	BLCDDT	-20010531ACY
29	WFTC	MINNEAPOLIS MN	321.3	LIC	BLCDDT	-20100809CJF
29	KMBC-TV	KANSAS CITY MO	423.3	LIC	BLCDDT	-20090618ACY
30	WHLA-TV	LA CROSSE WI	170.1	LIC	BMLEDT	-20041013AAL

Total scenarios = 1

Result key: 4
 Scenario 1 Affected station 5
 Before Analysis

Results for: 29A IA CEDAR RAPIDS BLCDDT 20100308ABL LIC
 HAAT 585.0 m, ATV ERP 850.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1037634	45177.1
not affected by terrain losses	1015608	44515.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1155	217.7
lost to ATV IX only	1155	217.7
lost to all IX	1155	217.7

Potential Interfering Stations Included in above Scenario 1

29A IL CHICAGO	BLCDDT	20010531ACY	LIC
29A MN MINNEAPOLIS	BLCDDT	20100809CJF	LIC
30A WI LA CROSSE	BMLEDT	20041013AAL	LIC

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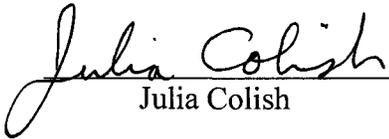
FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that a copy of the foregoing “**Petition for Rulemaking**” was served via hand delivery on this 3rd day of June 2013, to the following:

Barbara Kreisman
Chief, Video Services Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Kevin Harding
Media Bureau
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Julia Colish