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

In the Matter of	)	
	)	
Amendment of Section 73.622(i)	)	
Post-Transition Table of Allotments,	)	MB Docket No. _____
Digital Television Broadcast Stations	)	RM - _____
(Oklahoma City, Oklahoma)	)	

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

ACCEPTED/FILED
NOV 15 2013
Federal Communications Commission
Office of the Secretary

PETITION FOR RULE MAKING
TO AMEND THE DTV TABLE OF ALLOTMENTS

Family Broadcasting Group, Inc. ("Licensee"), licensee of KSBI-TV, Facility ID No. 38214, Oklahoma City, Oklahoma, (the "Station"), by its attorneys and pursuant to Sections 1.401, 73.616 and 73.622(a) of the Commission's Rules, hereby petitions the Commission to institute a rulemaking to amend Section 73.622(i), the DTV Table of Allotments, to substitute Channel 23 as the Station's DTV channel in lieu of Channel 51 at Oklahoma City, Oklahoma. The Commission has stated that it would lift the freeze on DTV channel change petitions filed by stations seeking to relocate from Channel 51.[1] The proposed channel change would serve the public interest.

[1] *See General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications*, Public Notice, 26 FCC Rcd 11409 (Med. Bur. 2011). Licensee has entered into a voluntary relocation agreement regarding the Station with USCOC of Greater Oklahoma, LLC.

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As requested, the DTV Table of Allotments would be amended as follows:

Current

Oklahoma City, OK 7, *13, 15, 24, 27, 33, 39, 40, 50, **51**

Proposed

Oklahoma City, OK 7, *13, 15, **23**, 24, 27, 33, 39, 40, 50

The proposed channel substitution would allow the Station to relocate its broadcast operations to Channel 23 and eliminate potential interference to and from wireless operations in the adjacent Lower 700 MHz A Block.[2]

As shown in the attached Technical Statement, the proposed facility would comply with the Commission's rules for post-transition DTV operation. The Station's proposed service area would encompass its community of license, and the proposed parameters would comply with the Commission's interference standards.[3] In addition, the proposed facilities would not increase the Station's noise-limited contour in any direction beyond the area resulting from the Station's present parameters as represented in its authorization.[4]

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[2] *See, e.g., Lincoln, Nebraska,* 27 FCC Rcd 433 (Med. Bur. 2012) (public interest served by clearing DTV broadcaster from Channel 51); Jackson, Mississippi, 26 FCC Rcd 3935 (Med. Bur. 2011) (same); *see also Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)*, Report and Order, 17 FCC Rcd 1022, 1096, n.549 (2002) (public interest served by making new or advanced wireless services available to consumers).

[3] *See* Attachment A, Technical Statement.

[4] *See Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications*, Public Notice, DA 13-618 (rel. Apr 5, 2013).

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

Present:

Facility ID	State and City		DTV					
			Ch	ERP kW	HAAT (m)	ASR	Latitude NAD27 (DDMMSS)	Longitude NAD27 (DDDMMSS)
38214	OK	OKLAHOMA CITY	51	1000	457.9	1045226	35-35-52.0	97-29-22.0

Proposed:

Facility ID	State and City		DTV					
			Ch	ERP kW	HAAT (m)	ASR	Latitude NAD27 (DDMMSS)	Longitude NAD27 (DDDMMSS)
38214	OK	OKLAHOMA CITY	23	1000	330.4	1045226	35-35-52.0	97-29-22.0

For the reasons set forth above, Family Broadcasting Group, Inc., respectfully requests that the Commission amend the DTV Table of Allotments as proposed herein.

Respectfully submitted,

FAMILY BROADCASTING GROUP, INC.

By: John Bagwell

John W. Bagwell
Lerman Senter PLLC
2000 K Street, N.W.
Suite 600
Washington, DC 20006
(202) 429-8970

Its Attorneys

Dated: November 14, 2013

227 Central Avenue
Metuchen, NJ 08840-1242
(732) 494-6400 Phone
(732) 494-6401 Fax

Merrill Weiss Group LLC

Consultants in Electronic Media Technology/Management

Technical Statement for Petition for Rulemaking:

Family Broadcasting Group, Inc.
Station KSBI
Channel 51
Oklahoma City, OK

Allotment of Channel 23 to Oklahoma City
Clearing of Channel 51 for Wireless Carrier Use

Introduction

This Technical Statement provides the supplemental technical data and information associated with the Petition for Rulemaking of Family Broadcasting Group, Inc. ("Family") for a modification of the Table of Allotments in 47 CFR §73.622(b) to substitute Channel 23 for the current Channel 51 allotment to Oklahoma City, OK. In particular, it addresses interference analyses conducted to demonstrate that a facility can be built on Channel 23 at Oklahoma City that will maintain service comparable to that currently provided on Channel 51 while causing only *de minimis* predicted interference to other stations.

The current Petition is a consequence of the acquisition of the 700 MHz A Block spectrum immediately adjacent to Channel 51 (i.e., the old Channel 52) by U.S. Cellular Corporation ("USCC") and an agreement between the two parties that will permit operations by USCC in advance of the spectrum repacking anticipated by the FCC following completion of the Incentive Spectrum Auction that is part of the Commission's Broadband Plan. Specifically, USCC seeks to operate handsets in the 698 – 704 MHz band adjacent to Channel 51 and will require deployment of very sensitive receivers in that band. KSBI operates with an effective radiated power (ERP) of 1 MW in the 692 – 698 MHz band (Channel 51) immediately adjacent to USCC's intended deployment. Given its field strength exceeding 100 dBu over a large area and exceeding 70 dBu throughout most of the Oklahoma City region, continuing KSBI operations are

likely to significantly reduce the service that USCC could provide from wireless handsets in the adjacent portion of the spectrum. Correspondingly, such wireless handsets also could cause impermissible and unacceptable interference to the reception of KSBI's Channel 51 signal.

Consequently, an agreement has been reached between Family and USCC to enable KSBI to be moved from Channel 51 to Channel 23, thereby permitting USCC to begin service in its spectrum throughout the Oklahoma City market a number of years earlier than would be possible if it had to wait for completion of the spectrum repacking by the Commission and the subsequent reconstruction by KSBI. This Technical Statement provides details on the facilities modeled to enable carrying out interference studies and the results of the studies that were conducted.

Transmitter Site

The current KSBI Channel 51 transmitter site is shared with several other television and FM stations and is operated by American Tower Corporation (ATC). KSBI proposes to operate from the same site on Channel 23. Consequently, the geographic reference point proposed for a new allotment of Channel 23 to Oklahoma City is at the same location as the current KSBI Channel 51 operation, i.e., 35-35-51.9 N, 97-29-22.1 W (NAD 27).

Facilities

The current KSBI Channel 51 antenna is installed with its center of radiation at an elevation of 469.4 meters (1540 feet) above ground level (AGL) and 806.4 meters (2646 feet) above mean sea level (AMSL). The current KSBI Channel 51 antenna is mounted on a candelabra structure with the antenna of another station stacked on top of it. Because of the impossibility of removing and replacing the KSBI antenna without causing major disruption to the operations of other stations, as well as the need for KSBI to go off the air for a substantial period to enable such an antenna replacement, the new KSBI antenna is planned to be installed at an elevation of 342.9 meters (1125 feet) on the side of the ATC tower.

The current KSBI operation on Channel 51 uses horizontal polarization and has an effective radiated power (ERP) of 1 MW. The new KSBI operation planned for Channel 23 will use elliptical polarization and also will operate with an ERP of 1 MW. Due to the difference in heights of the two antennas, the contour of the planned Channel 23 operation falls inside the

contour of the existing Channel 51operation in all directions, despite the advantage of Channel 23 over Channel 51 after application of the dipole factor adjustment.

The locations of the existing Channel 51 noise-limited (42.1 dBu) contour (in brown) and of the proposed Channel 23 noise-limited (39.7 dBu) contour (in orange) are shown on the map in Figure 1 below. Also shown on the map is the 46.7 dBu (noise limited +7 dB) principal community contour (in blue). As noted above, the proposed Channel 23 noise limited contour falls completely within the contour of the currently-licensed Channel 51 facility, thereby meeting the limitation imposed under the current FCC freeze on facility changes that proposed modified facilities not expand the coverage of the associated station in any direction.[1]

Principal Community Coverage

As shown in Figure 1, from the location of the KSBI transmitter and the elevation chosen for the proposed Channel 23 antenna, the principal community contour completely covers the principal community of Oklahoma City. As required by §73.625(a)(2), there is no major obstruction in the path over the principal community to be served.

Interference Analyses

To evaluate the suitability of Channel 23 for KSBI operations, interference analyses were conducted using a version of the Commission's TV_Process program. The interference analysis method applied by the TV_Process program is divided into two stages. In the first stage, all stations having specific channel relationships and within defined distances to the proposed facilities were identified for inclusion in the studies. Next, stations among the selected group were studied preliminarily to determine whether there were any study cells to which interference was predicted to be caused, without consideration of masking by other stations, by the signals of the proposed KSBI transmitter. Once stations predicted to receive any amount of unmasked interference were identified, in the second stage, those stations then were studied in detail to determine the amount of any increase in interference predicted with respect to the interference predicted to be caused by the existing facilities of other stations. The amount of interference is based upon population counts of those predicted to receive signals with less than the required

[1] Public Notice, DA 13-618, "Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate," pg. 2.

ratio between desired and undesired signals as specified in the Commission's rules for the particular channel relationship.

The results of the interference analyses are shown in Table 1. In the table, each station that was identified by TV_Process as relevant and its basic identification information are listed in the leftmost four columns. The five columns on the right side of the table show the number of scenarios studied for each desired station, the baseline population against which changes are measured, the population predicted to receive interference from the existing facilities of other stations, the population predicted to receive interference when the proposed facility is included, and the amount of change, expressed as a percentage.

Two symbols used in Table 1 signify certain results reported by the TV_Process program. An asterisk (*) indicates that TV_Process reported that the "Proposed station is beyond the site to nearest cell evaluation distance." A dash (—) denotes that TV_Process reported that the "Proposal causes no interference." In both of these cases, the initial culling pass performed by TV_Process found that there would be no interference predicted to the subject stations. In the case of the asterisks, this resulted because the closest study cells were too far away from the proposed transmitter for evaluation. In the case of the dashes, the result occurred because an initial interference study found, without consideration of masking by other stations, that there was no interference predicted to any study cell in the service area of the desired station studied.

The interference studies were conducted using the FCC default study cell parameters, i.e., 2 km per side for study cell size and 1 km for terrain extraction spacing. A total of six stations were selected by TV_Process for study. Of the stations shown in the table, one is a Class A station, which will be discussed in detail in the next section of this Technical Statement; the other five are full service stations.

Table 1 — KSBI Channel 23 Interference Studies to Neighboring Stations

Chnl	Station	City	Application Reference Number	# Scen-arios	Baseline Population	Ref IX Population	DTV IX Population	% IX Chg
22	KOKI-TV	Tulsa, OK	BLCDT-20021127AGL	3	1,247,692	14,352	15,317	0.0782
22	KAUZ-TV	Wichita Falls, TX	BLCDT-20090724ACR	—	—	—	—	—
23	KJEP-CA	Nashville, AR	BLTTL-19960111AE	*	*	*	*	*
23	KUVN-DT	Garland, TX	BLCDT-20110919ACP	1	5,440,595	953	2,201	0.0229
24	KOKH-TV	Oklahoma City, OK	BLCDT-20041207ACV	1	1,448,642	0	402	0.0278
24	K24HH-D	Wichita Falls, TX	BLDTL-20101026ABY	*	*	*	*	*

Note: Studies conducted using default 2 km-per-side study cell size and 1 km terrain extraction spacing.

Only three of the full-service stations found (KOKI-TV, KUVN-DT, and KOKH-TV) were identified by the TV_Process program as requiring analysis for interference from the proposed KSBI operation on Channel 23. The three stations, each having a single Application Record Number to be evaluated, then were evaluated in detail. As shown in Table 1, there is only a minuscule increase in predicted interference to each of the three stations – well under 0.1 percent. Thus, no impermissible interference is predicted to be caused to any full-service station by the move of KSBI to Channel 23.

To determine the future potential for the KSBI Channel 23 antenna to be returned to operation on the top of the tower, an identical set of studies was conducted with the Channel 23 antenna at the current elevation (469.4 m AGL) of the Channel 51 antenna. No impermissible interference was predicted.

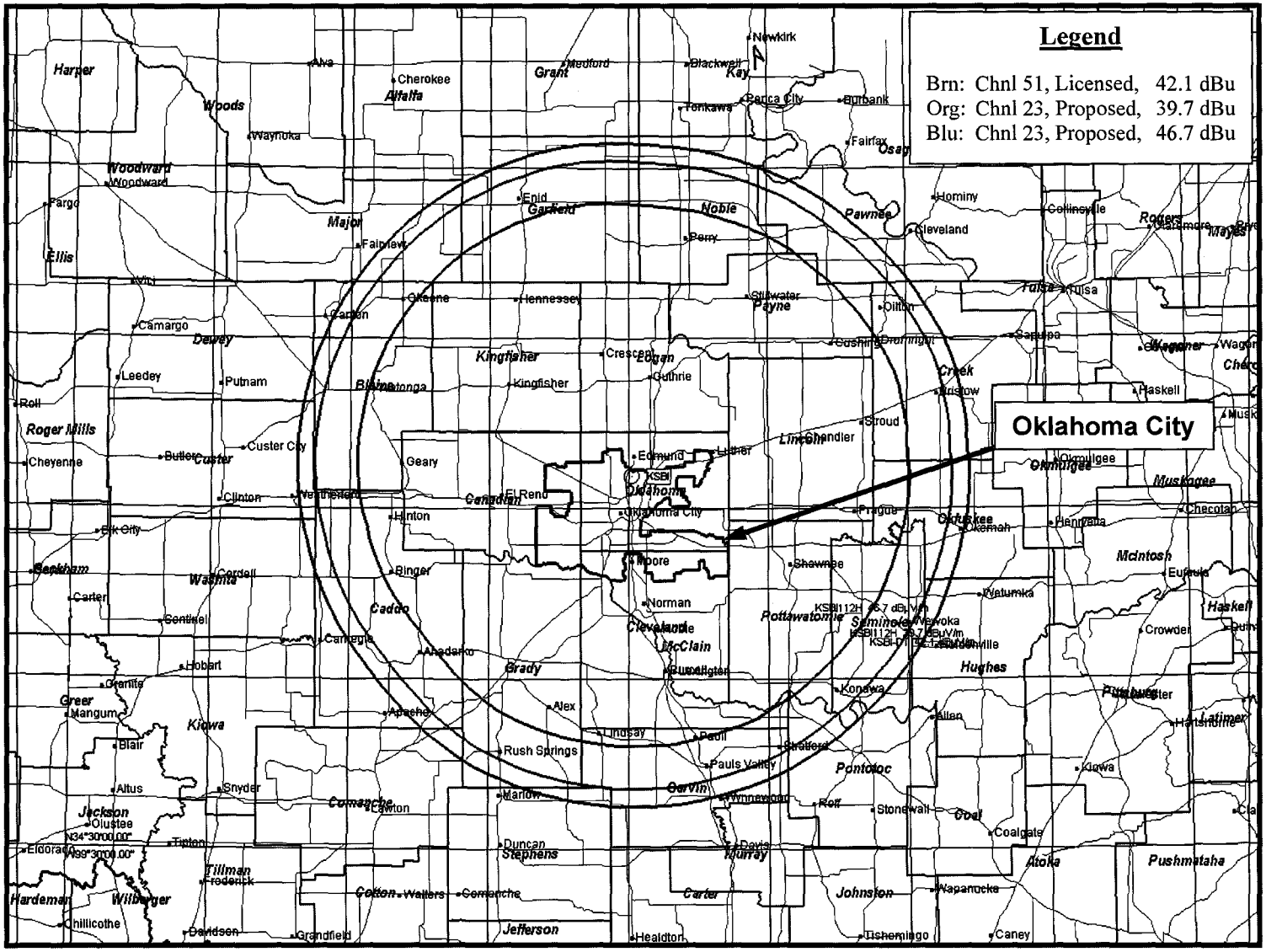
Considerations Regarding Class A Stations

The primary form of analysis of interference protection to a Class A station is through evaluation of the overlap of a contour from the proposed operation with the protected contour of the Class A station. The contour from the proposed operation that must be evaluated for overlap is the contour having a field strength that differs from the Class A protected contour value by the required D/U protection ratio for the channel relationship between the two stations.

In the case of operation of KSBI on Channel 23, TV_Process identified only one Class A station (KJEP-CA) as relevant and found that "Proposed station is beyond the site to nearest cell evaluation distance." Therefore, no further study beyond the initial culling process was required. Thus, no impermissible interference is predicted to be caused to any Class A station by the move of KSBI to Channel 23.

Border Issues

The transmitter site that would remain the reference point for the new allotment in Oklahoma City on Channel 23 is located outside both of the border zones in which coordination with either Canada or Mexico is required. Thus, no concurrence with the proposed channel substitution is required from either country.


Legend
Brn: Chnl 51, Licensed, 42.1 dBu
Org: Chnl 23, Proposed, 39.7 dBu
Blu: Chnl 23, Proposed, 46.7 dBu
Oklahoma City
Harper
Woods
Woodward
Ellis
Roger Mills
Cheyenne
Dewey
Major
Garfield
Noble
Pawnee
Osage
Kay
Grant
Alfalfa
Kingfisher
Blaine
Canadian
Logan
Payne
Lincoln
Creek
Tulsa
Rogers
Mayes
Muskogee
Okmulgee
McIntosh
Haskell
Pottawatomie
Seminole
Hughes
Pontotoc
Coal
Atoka
Pushmataha
Johnston
Murray
Carter
Garvin
McClain
Cleveland
Grady
Caddo
Washita
Beckham
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Greer
Kiowa
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Snyder
Blair
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Clinton
Elk City
Sentinel
Carnegie
Anadarko
Binger
Hinton
Geary
El Reno
Edmond
Guthrie
Kingfisher
Crescent
Stillwater
Cushing
Drumright
Sapulpa
Tulsa
Bristow
Stroud
Chandler
Prague
Shawnee
Norman
Moore
Purcell
Pauls Valley
Rush Springs
Lindsay
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Konawa
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Checotah
Haskell
Crowder
Stonewall
Coalgate
Allen
Hartshorne
Kiowa
Durant
Madill
Marlow
Duncan
Davis
Lawton
Frederick
Waurika
Comanche
Waters
Tishomingo
Caney
Healdton
Hominy
Cleveland
Collinsville
Fairfax
Burbank
Ponca City
Tonkawa
Blackwell
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