

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

In the Matter of: )  
 )  
Advanced Television Services and ) MB Docket No. 87-268  
Their Impact upon the Existing )  
Television Broadcast Service )

Directed to: The Commission

**COMMENTS OF  
RICHLAND RESERVE, LLC**

Richland Reserve, LLC (“Richland”), permittee of a new DTV station, Facility Identification Number 166510, Greeley, Colorado, by its attorneys, hereby respectfully submits its Comments in response to the Commission’s *Seventh Further Notice of Proposed Rule Making*, FCC 06-150, released October 20, 2006 (“*SFNPRM*”). With respect thereto, the following is stated:

1. Richland’s construction permit for new Greeley DTV station was granted pursuant to the proceedings in FCC Auction No. 64. The auction notices specified that DTV Channel 45 at Greeley was to be auctioned, and Richland’s construction permit consequently authorizes the new station to operate on that channel at this time. Due to interference considerations, however, Richland hereby seeks to have the channel assigned to the facility changed to DTV Channel 49 and to have Channel 49 rather than Channel 45 added to the Digital Television Digital Television (“DTV”) Table of Allotments. Neither channel was included in the draft DTV Table of Allotments attached to the *SFNPRM* due to the fact that the initial construction permit for the Greeley DTV station had not yet been granted at the time of the release of the *SFNPRM*. Indeed, that construction permit was not granted until January 10, 2007, immediately prior to the

extended deadline for the submission of initial comments in the instant proceeding.

2. As noted above, the DTV Channel 45 allotment at Greeley was included in Auction No. 64, and Richland was the winning bidder for that authorization. Thereafter, Richland filed its “long-form” application for construction permit for the new Greeley station (File No. BNPCDT-20060421AAO). As indicated above, the application was granted, and the construction permit was issued on January 10, 2007. As the Commission noted in the *SFNPRM*, the channel election process for final DTV allotments was limited to licensees and permittees. *SFNPRM* at ¶50. Therefore, at the time of the grant of the construction permit, there was no channel included for the new Greeley station in the draft DTV Table of Allotments.

3. The *SFNPRM* provides, however, that new permittees such as Richland will be accommodated with Tentative Channel Designations (“TCD’s”) in the DTV Table of Allotments and outlined procedures whereby that accommodation will take place. *Id.* at ¶¶50-53. In accordance with those procedures, Richland first had its engineer determine whether its current DTV channel would be appropriate for post-transition DTV operations. As set forth in the attached Engineering Statement, it was determined that the current channel, Channel 45, would cause interference in excess of the standards for post-transition operation set forth in the *SFNPRM*, and that Channel 45 therefore would not be appropriate as the station’s final, post-transition channel. Richland’s consulting engineer further determined that Channel 49 could be allotted in accordance with the Commission’s technical standards, and that this channel will replicate the proposed service area of the authorized Channel 45 facility without interference.

4. In the *SFNPRM*, the Commission provided that, for new permittees situated as Richland, it would follow essentially the same procedures as those followed for new permittees

with permits granted prior to the release of the *SFNPRM*. *SFNPRM* at ¶53. For those permittees, the Commission indicated that it would first determine whether a permittee's current channel could be used as its TCD and, if not, would designate a "best available" channel. *SFNPRM* at ¶52. The Commission also stated that it would allow such permittees to request alternate channel designations. *Id.* Likewise, for permits granted after the release of the *SFNPRM*, the Commission indicated that the Media Bureau will release public notices requesting comments as to a proposed TCD, and such comments will be incorporated in the instant proceeding.

5. Here, Richland has already determined that its currently authorized DTV Channel 45 would not be appropriate as its post-transition TCD but that alternate DTV Channel 49 would be. Accordingly, in order to expedite the channel designation process and to make it more efficient, Richland is now requesting that Channel 49 be specified as its TCD, and that the Media Bureau issue a public notice proposing this specification. As set forth in the attached Engineering Statement, the allotment of Channel 49 fully complies with all of the applicable technical rules and policies. Accordingly, this approach will provide for a technically feasible TCD from the outset.

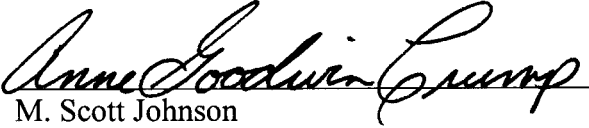
6. Richland further requests that it be allowed to file an application for modification of its construction permit to specify the alternate channel. At this juncture, with substantially less than two years remaining before the transition to all-DTV operation, it makes little sense to construct a DTV facility on one channel, only to change to a new channel just over a year after construction can be completed. The alternative is to wait until the DTV application freeze is lifted and then to seek the planned modification. In order to expedite construction and commencement of operation of a new DTV facility, it is therefore requested that Richland be allowed to seek modification of its current authorization at this time.

7. Accordingly, Richland hereby requests that the proposed DTV Table of Allotments be amended to specify DTV Channel 49 for the new Greeley facility.

WHEREFORE, the premises considered, Richland hereby respectfully requests that the foregoing comments be accepted and that the proposed DTV Table of Allotments be amended as set forth herein.

Respectfully submitted,

RICHLAND RESERVE, LLC

By:   
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May 25, 2007

**ENGINEERING STATEMENT  
RE: COMMENTS OF RICHLAND RESERVE, LLC  
MB DOCKET NO. 87-268**

**INTRODUCTION**

This statement was prepared on behalf of Richland Reserve, LLC, (“Richland”), the new permittee of DTV Channel 45, Greeley, CO, Facility ID No. 166510. Richland was the successful applicant for DTV Channel 45 at Greeley, CO in Auction 64 and was ultimately awarded Construction Permit BNPCDT-20060421AAO on January 10, 2007. The Commission was unable to consider a temporary channel designation (TCD) for Greeley, CO since the above construction permit was granted subsequent to the release of the new DTV Table of Allotments proposed in the *Seventh Further Notice of Proposed Rule Making*, MB Docket No. 87-268, FCC 06-150 (“7<sup>th</sup> FNPRM”). Circumstances such as this are known to the Commission and certain provisions have been provided by the agency to enable new licensees and permittees to seek the inclusion of their current NTSC or DTV channel in the new table or request an alternate channel, see 7<sup>th</sup> FNPRM, Paragraphs 50-53.

**POST-TRANSITION DTV CHANNEL**

The office of the undersigned has determined that operation of the Greeley DTV CP on Channel 45 will not satisfy the interference protection criteria outlined in the 7<sup>th</sup> FNPRM. Specifically, operation of the CP facility on Channel 45 would cause 0.3 percent new interference to the Channel 46 TCD of KWHD, Castle Rock, CO. Additionally, the Greeley CP would receive 2.8 percent new interference from the Channel 46 TCD at Castle Rock. A similar situation is cited in the 7<sup>th</sup> FNPRM, at Footnote 122, in which the Commission found the Mobile, AL DTV CP on Channel 18 to be inappropriate for post-transition operation. In this case the Commission determined that DTV operation of the Mobile CP on Channel 18 would cause 0.4 percent new interference to the Channel 18 TCD of WMAU-TV, Bude, MS. Since the

Mobile CP was granted after the completion of the first round of channel elections and was consequently not eligible to participate in the channel election process, it is similarly situated with the Greeley CP.

In view of the fact that operation of the Greeley CP on Channel 45 will result in new interference exceeding the 0.1 percent limit, we initiated a complete allocation analysis in search of a new channel to substitute for the Greeley CP channel that would be appropriate to add to the new DTV Table of Allotments. Our studies have determined that Channel 49 can be used in lieu of Channel 45 to replicate the Greeley CP service area consistent with the interference criteria described in the 7<sup>th</sup> FNPRM. In fact, an operation on Channel 49, based on the same parameters authorized for the Channel 45 facility in BNPCDT-20060421AAO, will not cause new interference to any licensee's TCD and will be completely free of any received interference.

The interference analyses of the Greeley CP, on Channel 45 and Channel 49, were conducted using the "TV Interference and Spacing Analysis Program" developed by Techware, Inc. The Commission's staff employs a similar version of the same computer program to evaluate requests for modification of DTV facilities and changes in channel allotments. Figure 1 shows the analysis results for the Greeley CP on Channel 45 based on the TCDs that have been approved for the new the DTV Table. The outcome of the post-transition study regarding the Greeley CP service replication on Channel 49 is attached as Figure 2.

## **DTV TRANSITION**

Richland's proposal to substitute Channel 49 in lieu of Channel 45 was also evaluated in terms of operation during the DTV transition period pursuant to the existing interference protection provisions in 47 C.F.R. Section 73.623(a). Figure 3 demonstrates that operation of the Greeley CP parameters on Channel 49 will not cause new interference in excess of the 2/10 percent limits to any existing analog or digital television station.

## CONCLUSION

In consideration of the unusual circumstances described above, Richland respectfully requests that Channel 49 be added to the new DTV Table of Allotments and it be permitted to modify the Greeley CP to specify operation on Channel 49. Reflected in the following table are the appropriate technical and statistical facts concerning the alternate channel proposal for Greeley:

Facility ID	State & City	NTSC	DTV								
		Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	% Interference Received
166510	CO GREELEY		49	943	382		402448	1041940	31982	2364	0.0

Respectfully submitted,

/s/  
D. Scott Turpie

**LOHNES AND CULVER**  
8309 Cherry Lane  
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May, 2007

FIGURE 1  
 POST-TRANSITION ANALYSIS  
 CHANNEL 45 C.P. BNPCDT-20060421AAO  
 GREELEY, COLORADO

Census data selected 2000  
 TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-14-2007 Time: 16:19:35

Record Selected for Analysis

NEW-DT USERRECORD-01 GREELEY CO US  
 Channel 45 ERP 943. kW HAAT 379. m RCAMSL 01798 m  
 Latitude 040-24-48 Longitude 0104-19-40  
 Status APP Zone 2 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	943.000	325.4	99.0
45.0	943.000	376.4	103.5
90.0	943.000	386.4	104.3
135.0	943.000	417.7	107.2
180.0	943.000	404.1	105.9
225.0	943.000	392.0	104.8
270.0	943.000	376.1	103.4
315.0	943.000	356.0	101.7

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

No spacing violations found to other full service stations

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance



FIGURE 1  
 POST-TRANSITION ANALYSIS  
 CHANNEL 45 C.P. BNPCDT-20060421AAO  
 GREELEY, COLORADO

Proposed station is OK toward AM broadcast stations

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 Start of Interference Analysis

	Proposed Station			
Channel	Call	City/State		ARN
45	NEW-DT	GREELEY CO		USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
46	KWHD	CASTLE ROCK CO	112.5	CP	BPCDT	-19991005ABO

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
46	KWHD	CASTLE ROCK CO	BPCDT	-19991005ABO

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	NEW-DT	GREELEY CO	112.5	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1  
 Scenario 1 Affected station 1  
 Before Analysis

Results for: 46A CO CASTLE ROCK BPCDT 19991005ABO CP  
 HAAT 178.0 m, ATV ERP 300.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2530099	14868.4
not affected by terrain losses	2332995	13108.8
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

After Analysis

Results for: 46A CO CASTLE ROCK BPCDT 19991005ABO CP  
 HAAT 178.0 m, ATV ERP 300.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2530099	14868.4
not affected by terrain losses	2332995	13108.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	7164	180.8
lost to ATV IX only	7164	180.8
lost to all IX	7164	180.8

FIGURE 1  
 POST-TRANSITION ANALYSIS  
 CHANNEL 45 C.P. BNPCDT-20060421AAO  
 GREELEY, COLORADO

Potential Interfering Stations Included in above Scenario 1

45A CO GREELEY USERRECORD01 APP

Percent new IX = 0.3071%

Worst case new IX 0.3071% Scenario 1

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
45	NEW-DT	GREELEY CO	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
46	KWHD	CASTLE ROCK CO	112.5	CP	BPCDT -19991005ABO

Total scenarios = 1

Result key: 2  
 Scenario 1 Affected station 2  
 Before Analysis

Results for: 45A CO GREELEY USERRECORD01 APP

HAAT 379.0 m, ATV ERP 943.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	2418288	32977.3
not affected by terrain losses	2408358	32347.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	67344	128.4
lost to ATV IX only	67344	128.4
lost to all IX	67344	128.4

Potential Interfering Stations Included in above Scenario 1

46A CO CASTLE ROCK BPCDT 19991005ABO CP

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

FIGURE 2  
POST-TRANSITION ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

Census data selected 2000  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 05-10-2007 Time: 15:10:50

Record Selected for Analysis

NEW USERRECORD-01 GREELEY CO US  
Channel 49 ERP 943. kW HAAT 379. m RCAMSL 01798 m  
Latitude 040-24-48 Longitude 0104-19-40  
Status APP Zone 2 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	943.000	325.4	99.0
45.0	943.000	376.4	103.5
90.0	943.000	386.4	104.3
135.0	943.000	417.7	107.2
180.0	943.000	404.1	105.9
225.0	943.000	392.0	104.8
270.0	943.000	376.1	103.4
315.0	943.000	356.0	101.7

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

No spacing violations found to other full service stations

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

FIGURE 2
POST-TRANSITION ANALYSIS
CHANNEL 49 - REPLICATION FACILITY
GREELEY, COLORADO

Proposed facility OK toward West Virginia quite zone
Proposed facility OK toward Table Mountian
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Proposed Station
Channel Call City/State ARN
49 NEW GREELEY CO USERRECORD01

Stations Potentially Affected by Proposed Station

Chan Call City/State Dist(km) Status Application Ref. No.
%%%

Analysis of Interference to Affected Station 1

Analysis of current record
Channel Call City/State Application Ref. No.
49 NEW GREELEY CO USERRECORD-01

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No.
Total scenarios = 1

Result key: 1
Scenario 1 Affected station 1
Before Analysis

Results for: 49A CO GREELEY USERRECORD01 APP
HAAT 379.0 m, ATV ERP 943.0 kW
POPULATION AREA (sq km)
within Noise Limited Contour 2375361 32648.2
not affected by terrain losses 2364471 31982.2
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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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

Census data selected 1990  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 05-10-2007 Time: 15:32:35

Record Selected for Analysis

NEW USERRECORD-01 GREELEY CO US  
Channel 49 ERP 943. kW HAAT 379. m RCAMSL 01798 m  
Latitude 040-24-48 Longitude 0104-19-40  
Status APP Zone 2 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	943.000	325.4	99.0
45.0	943.000	376.4	103.5
90.0	943.000	386.4	104.3
135.0	943.000	417.7	107.2
180.0	943.000	404.1	105.9
225.0	943.000	392.0	104.8
270.0	943.000	376.1	103.4
315.0	943.000	356.0	101.7

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

No spacing violations found to other full service stations

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Prepared By  
Lohnes and Culver Laurel, Maryland  
May, 2007

FIGURE 3  
 CURRENT DATABASE ANALYSIS  
 CHANNEL 49 – REPLICATION FACILITY  
 GREELEY, COLORADO

Proposed facility OK toward West Virginia quite 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

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 Start of Interference Analysis

Channel	Proposed Station	ARN
49	Call City/State NEW GREELEY CO	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
41	KRMT	DENVER CO	117.5	LIC	BLET	-20050519AHE
47	KSBS-LP	DENVER CO	129.7	LIC	BLTTA	-20040524ALT
47	KSBS-LP	DENVER CO	129.7	CP	BPTTA	-20040524ALN
48	NEW	PUEBLO CO	191.0	APP	BNPCT	-20060424ADP
50	KCEC	DENVER CO	108.1	LIC	BLCT	-20030102AAY
53	KWHD	CASTLE ROCK CO	112.5	APP	BSTA	-20050929ANG
53	KWHD	CASTLE ROCK CO	112.5	LIC	BLCT	-19990922AAX

%%%

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
41	KRMT	DENVER CO	DTVPLN	-NPLN1600

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
34	KWGN-DT	DENVER CO	15.0	PLN	DTVPLN	-DTVP0928
38	KBDI-DT	BROOMFIELD CO	26.2	PLN	DTVPLN	-DTVP1041
40	KRMT-DT	DENVER CO	0.0	PLN	DTVPLN	-DTVP1116
41	DNCE	MONTICELLO UT	406.5	PLN	DTVPLN	-NPLN1613
42	KOAA-DT	PUEBLO CO	147.5	PLN	DTVPLN	-DTVP1184
43	KUBD-DT	DENVER CO	8.2	PLN	DTVPLN	-DTVP1220
49	DNCE	LEADVILLE CO	100.8	PLN	DTVPLN	-NPLN1767

Results for: 41N CO DENVER	DTVPLN	NPLN1600	PLN
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1917572	13446.2	
not affected by terrain losses	1872629	11934.0	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	1961	76.0	
lost to all IX	1961	76.0	

FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

## Analysis of current record

Channel	Call	City/State	Application Ref. No.
41	KRMT	DENVER CO	BLET -20050519AHE

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
34	KWGN-DT	DENVER CO	15.0	PLN	DTVPLN -DTVP0928
34	KWGN-TV	DENVER CO	15.0	CP	BPCDT -19991029AHP
38	KBDI-TV	BROOMFIELD CO	26.2	CP	BPEDT -20000428ACX
38	KBDI-DT	BROOMFIELD CO	26.2	PLN	DTVPLN -DTVP1041
40	KRMT	DENVER CO	0.0	LIC	BLEDT -20061221ACX
40	KRMT-DT	DENVER CO	0.0	PLN	DTVPLN -DTVP1116
42	KOAA-TV	PUEBLO CO	99.6	CP	BPCDT -19991029AGS
42	KOAA-DT	PUEBLO CO	147.5	PLN	DTVPLN -DTVP1184
43	KPXC-TV	DENVER CO	58.9	APP	BMPCDT -20070104ACH
43	KUBD-DT	DENVER CO	8.2	PLN	DTVPLN -DTVP1220
43	KPXC-TV	DENVER CO	8.2	CP	BPCDT -19990923AAM
45	NEW	GREELEY CO	108.3	LIC	BPRM -20040520AJS
45	NEW	GREELEY CO	117.5	CP	BNPCDT -20060421AAO
48	NEW	PUEBLO CO	99.7	APP	BNPCT -20060424ADP
48	960920YN	PUEBLO CO	149.1	APP	BPCT -19960920YN
48	NEW	PUEBLO CO	149.1	LIC	BPRM -20000717ACR
49	NEW	GREELEY CO	117.5	APP	USERRECORD-01

Proposal causes no interference

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## Analysis of Interference to Affected Station 2

## Analysis of current record

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

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
40	KRMT	DENVER CO	27.6	LIC	BLEDT -20061221ACX
40	KRMT-DT	DENVER CO	27.6	PLN	DTVPLN -DTVP1116
43	KPXC-TV	DENVER CO	76.7	APP	BMPCDT -20070104ACH
43	KUBD-DT	DENVER CO	35.2	PLN	DTVPLN -DTVP1220
43	KPXC-TV	DENVER CO	35.2	CP	BPCDT -19990923AAM
45	NEW	GREELEY CO	123.5	LIC	BPRM -20040520AJS
45	NEW	GREELEY CO	129.7	CP	BNPCDT -20060421AAO
46	KWHD-DT	CASTLE ROCK CO	34.1	PLN	DTVPLN -DTVP1320
46	KWHD	CASTLE ROCK CO	34.1	LIC	BLCDT -20050810AAF
47	K47IH	BOULDER CO	71.2	LIC	BLTT -20030527AIV
47	K47EC	ESTES PARK CO	115.2	LIC	BLTT -19940506II
47	K47FJ	MANITOU SPRINGS CO	59.1	LIC	BLTT -19980318JN
47	K47AC	SILT, ETC. CO	200.7	LIC	BLTT -19800513IB
48	K48FW	DENVER CO	40.2	LIC	BLTT -20021219AAB
48	NEW	PUEBLO CO	72.9	APP	BNPCT -20060424ADP
48	960920YN	PUEBLO CO	121.8	APP	BPCT -19960920YN
48	NEW	PUEBLO CO	121.8	LIC	BPRM -20000717ACR
51	KCEC-DT	DENVER CO	41.9	PLN	DTVPLN -DTVP1471
51	KCEC	DENVER CO	41.9	CP	BPCDT -19991029ACN
62	K58FY	LAKE GEORGE, ETC. CO	54.7	LIC	BLTT -19870706IA
49	NEW	GREELEY CO	129.7	APP	USERRECORD-01

FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

Proposed station is beyond the site to  
nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
47	KSBS-LP	DENVER CO	BPTTA -20040524ALN

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
40	KRMT	DENVER CO	27.6	LIC	BLEDT -20061221ACX
40	KRMT-DT	DENVER CO	27.6	PLN	DTVPLN -DTVP1116
43	KPXC-TV	DENVER CO	76.7	APP	BMPCDT -20070104ACH
43	KUBD-DT	DENVER CO	35.2	PLN	DTVPLN -DTVP1220
43	KPXC-TV	DENVER CO	35.2	CP	BPCDT -19990923AAM
45	NEW	GREELEY CO	123.5	LIC	BPRM -20040520AJS
45	NEW	GREELEY CO	129.7	CP	BNPCDT -20060421AAO
46	KWHD-DT	CASTLE ROCK CO	34.1	PLN	DTVPLN -DTVP1320
46	KWHD	CASTLE ROCK CO	34.1	LIC	BLCDDT -20050810AAF
47	K47IH	BOULDER CO	71.2	LIC	BLTT -20030527AIV
47	K47EC	ESTES PARK CO	115.2	LIC	BLTT -19940506II
47	K47FJ	MANITOU SPRINGS CO	59.1	LIC	BLTT -19980318JN
47	K47AC	SILT, ETC. CO	200.7	LIC	BLTT -19800513IB
48	K48FW	DENVER CO	40.2	LIC	BLTT -20021219AAB
48	NEW	PUEBLO CO	72.9	APP	BNPCT -20060424ADP
48	960920YN	PUEBLO CO	121.8	APP	BPCT -19960920YN
48	NEW	PUEBLO CO	121.8	LIC	BPRM -20000717ACR
51	KCEC-DT	DENVER CO	41.9	PLN	DTVPLN -DTVP1471
51	KCEC	DENVER CO	41.9	CP	BPCDT -19991029ACN
62	K58FY	LAKE GEORGE, ETC. CO	54.7	LIC	BLTT -19870706IA
49	NEW	GREELEY CO	129.7	APP	USERRECORD-01

Proposed station is beyond the site to  
nearest cell evaluation distance

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
48	NEW	PUEBLO CO	BNPCT -20060424ADP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
40	KRMT	DENVER CO	99.7	LIC	BLEDT -20061221ACX
40	KRMT-DT	DENVER CO	99.7	PLN	DTVPLN -DTVP1116
41	KRMT	DENVER CO	99.7	LIC	BLET -20050519AHE
46	KWHD-DT	CASTLE ROCK CO	78.5	PLN	DTVPLN -DTVP1320
46	KWHD	CASTLE ROCK CO	78.4	LIC	BLCDDT -20050810AAF
50	KCEC	DENVER CO	114.4	LIC	BLCT -20030102AAY
51	KCEC-DT	DENVER CO	114.5	PLN	DTVPLN -DTVP1471



FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

51	KCEC	DENVER CO	114.4	CP	BPCDT	-19991029ACN
49	NEW	GREELEY CO	191.0	APP	USERRECORD-01	

Total scenarios = 2

Result key: 1  
Scenario 1 Affected station 4  
Before Analysis

Results for: 48N CO PUEBLO	BNPCT	20060424ADP	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	703934	21119.5	
not affected by terrain losses	571284	17975.3	
lost to NTSC IX	15213	224.6	
lost to additional IX by ATV	8160	172.5	
lost to all IX	23373	397.0	

Potential Interfering Stations Included in above Scenario 1

41N CO DENVER	BLET	20050519AHE	LIC
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN

After Analysis

Results for: 48N CO PUEBLO	BNPCT	20060424ADP	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	703934	21119.5	
not affected by terrain losses	571284	17975.3	
lost to NTSC IX	15213	224.6	
lost to additional IX by ATV	8160	176.5	
lost to all IX	23373	401.1	

Potential Interfering Stations Included in above Scenario 1

41N CO DENVER	BLET	20050519AHE	LIC
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN
49A CO GREELEY	USERRECORD01		APP

Percent new IX = 0.0000%

Result key: 2  
Scenario 2 Affected station 4  
Before Analysis

Results for: 48N CO PUEBLO	BNPCT	20060424ADP	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	703934	21119.5	
not affected by terrain losses	571284	17975.3	
lost to NTSC IX	15213	224.6	
lost to additional IX by ATV	12477	381.0	
lost to all IX	27690	605.6	

Potential Interfering Stations Included in above Scenario 2

41N CO DENVER	BLET	20050519AHE	LIC
46A CO CASTLE ROCK	BLCDT	20050810AAF	LIC



FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO

46	KWHD	CASTLE ROCK CO	59.9	LIC	BLCDT	-20050810AAF
48	NEW	PUEBLO CO	114.4	APP	BNPCT	-20060424ADP
51	KCEC-DT	DENVER CO	0.1	PLN	DTVPLN	-DTVP1471
51	KCEC	DENVER CO	0.0	CP	BPCDT	-19991029ACN
53	KWHD	CASTLE ROCK CO	59.9	APP	BSTA	-20050929ANG
53	KWHD	CASTLE ROCK CO	59.9	LIC	BLCT	-19990922AAX
49	NEW	GREELEY CO	108.1	APP	USERRECORD-01	

Total scenarios = 4

Result key: 3  
Scenario 1 Affected station 5  
Before Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	481	8.0	
lost to all IX	2639	212.2	

Potential Interfering Stations Included in above Scenario 1

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BPCDT	19990923AAM	CP
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN

After Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	32074	868.7	
lost to all IX	34232	1072.9	

Potential Interfering Stations Included in above Scenario 1

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BPCDT	19990923AAM	CP
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN
49A CO GREELEY	USERRECORD01		APP

Percent new IX = 1.6641%

Result key: 4  
Scenario 2 Affected station 5  
Before Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	481	8.0	
lost to all IX	2639	212.2	

Potential Interfering Stations Included in above Scenario 2

**FIGURE 3**  
**CURRENT DATABASE ANALYSIS**  
**CHANNEL 49 – REPLICATION FACILITY**  
**GREELEY, COLORADO**

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BPCDT	19990923AAM	CP
46A CO CASTLE ROCK	BLCDT	20050810AAF	LIC

After Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	32074	868.7	
lost to all IX	34232	1072.9	

Potential Interfering Stations Included in above Scenario 2

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BPCDT	19990923AAM	CP
46A CO CASTLE ROCK	BLCDT	20050810AAF	LIC
49A CO GREELEY	USERRECORD01		APP

Percent new IX = 1.6641%

Result key: 5  
 Scenario 3 Affected station 5  
 Before Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	51	20.0	
lost to all IX	2209	224.2	

Potential Interfering Stations Included in above Scenario 3

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BMPCDT	20070104ACH	APP
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN

After Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	31593	860.7	
lost to all IX	33751	1064.9	

Potential Interfering Stations Included in above Scenario 3

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BMPCDT	20070104ACH	APP
46A CO CASTLE ROCK	DTVPLN	DTVP1320	PLN
49A CO GREELEY	USERRECORD01		APP

Percent new IX = 1.6614%

**FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO**

Result key: 6  
Scenario 4 Affected station 5  
Before Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	51	20.0	
lost to all IX	2209	224.2	

Potential Interfering Stations Included in above Scenario 4

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BMPCDT	20070104ACH	APP
46A CO CASTLE ROCK	BLCDT	20050810AAF	LIC

After Analysis

Results for: 50N CO DENVER	BLCT	20030102AAY	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1898513	13307.3	
not affected by terrain losses	1850354	11726.0	
lost to NTSC IX	2158	204.2	
lost to additional IX by ATV	31593	860.7	
lost to all IX	33751	1064.9	

Potential Interfering Stations Included in above Scenario 4

53N CO CASTLE ROCK	BLCT	19990922AAX	LIC
43A CO DENVER	BMPCDT	20070104ACH	APP
46A CO CASTLE ROCK	BLCDT	20050810AAF	LIC
49A CO GREELEY	USERRECORD01		APP

Percent new IX = 1.6614%

Worst case new IX 1.6641% Scenario 1

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Analysis of Interference to Affected Station 6

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
53	KWHD	CASTLE ROCK CO	DTVPLN	-NPLN1820

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
46	KWHD-DT	CASTLE ROCK CO	0.0	PLN	DTVPLN	-DTVP1320
50	KCEC	DENVER CO	60.0	PLN	DTVPLN	-NPLN1770
51	KCEC-DT	DENVER CO	60.0	PLN	DTVPLN	-DTVP1471

**FIGURE 3  
CURRENT DATABASE ANALYSIS  
CHANNEL 49 – REPLICATION FACILITY  
GREELEY, COLORADO**

Results for: 53N CO CASTLE ROCK	DTVPLN	NPLN1820	PLN
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1796690	12532.7	
not affected by terrain losses	1675121	10439.2	
lost to NTSC IX	12579	64.3	
lost to additional IX by ATV	0	0.0	
lost to all IX	12579	64.3	

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
53	KWHD	CASTLE ROCK CO	BSTA	-20050929ANG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	NEW	GREELEY CO	110.4	LIC	BPRM	-20040520AJS
45	NEW	GREELEY CO	112.5	CP	BNPCDT	-20060421AAO
46	KWHD-DT	CASTLE ROCK CO	0.0	PLN	DTVPLN	-DTVP1320
46	KWHD	CASTLE ROCK CO	0.0	LIC	BLCDT	-20050810AAF
50	KCEC	DENVER CO	59.9	LIC	BLCT	-20030102AAY
51	KCEC-DT	DENVER CO	60.0	PLN	DTVPLN	-DTVP1471
51	KCEC	DENVER CO	59.9	CP	BPCDT	-19991029ACN
49	NEW	GREELEY CO	112.5	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
53	KWHD	CASTLE ROCK CO	BLCT	-19990922AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	NEW	GREELEY CO	110.4	LIC	BPRM	-20040520AJS
45	NEW	GREELEY CO	112.5	CP	BNPCDT	-20060421AAO
46	KWHD-DT	CASTLE ROCK CO	0.0	PLN	DTVPLN	-DTVP1320
46	KWHD	CASTLE ROCK CO	0.0	LIC	BLCDT	-20050810AAF
50	KCEC	DENVER CO	59.9	LIC	BLCT	-20030102AAY
51	KCEC-DT	DENVER CO	60.0	PLN	DTVPLN	-DTVP1471
51	KCEC	DENVER CO	59.9	CP	BPCDT	-19991029ACN
49	NEW	GREELEY CO	112.5	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
49	NEW	GREELEY CO	USERRECORD-01	

