# 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

### <u>COMMENTS OF</u> <u>RICHLAND RESERVE, LLC</u>

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 this 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

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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.

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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

Toodin Grump By: M. Scott Johnson

Joseph M. Di Scipio Anne Goodwin Crump

Its Attorneys

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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> FNRPM"). 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. It this case the Commission determinated 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.

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# 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	State & City	NTSC						DTV			
ID		Chan	Chan	ERP	HAAT	Antenna	Latitude	Longitude	Area	Population	% Interference
				(kW)	(m)	ID	(DDMMSS)	(DDMMSS)	(sq km)	(thousand)	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 Laurel, MD 20707-4830 Telephone: 301-776-4488

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	ERP	HAAT	41.0 dBu F(50,90)	
(Deg)	(kW)	( m )	(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	
	Eval	uation tow	ard Class A Stati	ons

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 Mountian 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 Start of Interference Analysis Proposed Station Channel Call City/State NEW-DT GREELEY CO ARN 45 USERRECORD01 Stations Potentially Affected by Proposed Station Chan Call City/State Dist(km) Status Application Ref. No. CASTLE ROCK CO 46 KWHD 112.5 CP BPCDT -19991005ABO \*\*\*\*\*\*\* Analysis of Interference to Affected Station 1 Analysis of current record Channel Call City/State Application Ref. No. CASTLE ROCK CO 46 KWHD 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  $\begin{array}{c} \mbox{POPULATION} & \mbox{AREA}\;(\mbox{sq km}) \\ \mbox{within Noise Limited Contour} & 2530099 & 14868.4 \\ \end{array}$ 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 HAAT 178.0 m, ATV ERP 300.0 kW Results for: 46A CO CASTLE ROCK POPULATIONwithin Noise Limited Contour253009914868.4not affected by terrain losses233299513108.8lost to NTSC IX00.0lost to additional IX by ATV7164180.8lost to ATV IX only7164180.8lost to all IX7164180.8

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

Potential Interfering Stations Included in above Scenario 1 USERRECORD01 45A CO GREELEY APP Percent new IX = 0.3071% Worst case new IX 0.3071% Scenario 1 Analysis of Interference to Affected Station 2 Analysis of current record Channel Call City/State 45 NEW-DT GREELEY CO Application Ref. No. USERRECORD-01 Stations Potentially Affecting This Station City/StateDist(km) StatusApplication Ref. No.CASTLE ROCK CO112.5CPBPCDT-19991005ABO Chan Call 46 KWHD Total scenarios = 1 2 Result key: Result key:2Scenario1Affected station2 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 0 lost to NTSC IX 0.0 67344 128.4 lost to additional IX by ATV 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 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	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(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 Start of Interference Analysis Proposed Station Call City/State NEW GREELEY CO Channel ARN 49 USERRECORD01 Stations Potentially Affected by Proposed Station City/State Dist(km) Status Application Ref. No. Chan Call \*\*\*\*\*\*\* Analysis of Interference to Affected Station 1 Analysis of current record Channel Call City/State 49 NEW GREELEY CO Application Ref. No. 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 31982.2 not affected by terrain losses 2364471 lost to NTSC IX 0.0 0 0 0.0 lost to additional IX by ATV lost to ATV IX only 0 0.0 lost to all IX 0 0.0 Potential Interfering Stations Included in above Scenario 1 \*\*\*\*\*\* FINISHED FINISHED FINISHED FINISHED FINISHED

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	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	( m )	(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 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

Start of Interference Analysis

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

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Applicati	on 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

Call	City/State	Dist(km)	Status	Applicat	ion Ref. No
KWGN-DT	DENVER CO	15.0	PLN	DTVPLN	-DTVP0928
KBDI-DT	BROOMFIELD CO	26.2	PLN	DTVPLN	-DTVP1041
KRMT-DT	DENVER CO	0.0	PLN	DTVPLN	-DTVP1116
DNCE	MONTICELLO UT	406.5	PLN	DTVPLN	-NPLN1613
KOAA-DT	PUEBLO CO	147.5	PLN	DTVPLN	-DTVP1184
KUBD-DT	DENVER CO	8.2	PLN	DTVPLN	-DTVP1220
DNCE	LEADVILLE CO	100.8	PLN	DTVPLN	-NPLN1767
ts for: 4	1N CO DENVER	DTVPL	J NPL	N1600	PLN
		POPULATION	AREA (s	q km)	
thin Nois	e Limited Contour	1917572	13446	.2	
t affecte	d by terrain losses	1872629	11934	.0	
st to NTS	CIX	0	0	.0	
st to add	itional IX by ATV	1961	76	.0	
st to all	IX	1961	76	.0	
	Call KWGN-DT KBDI-DT KRMT-DT DNCE KOAA-DT KUBD-DT DNCE ts for: 4 thin Nois t affecte st to NTS st to add st to all	Call City/State KWGN-DT DENVER CO KBDI-DT BROOMFIELD CO KRMT-DT DENVER CO DNCE MONTICELLO UT KOAA-DT PUEBLO CO KUBD-DT DENVER CO DNCE LEADVILLE CO ts for: 41N CO DENVER thin Noise Limited Contour t affected by terrain losses st to NTSC IX st to additional IX by ATV st to all IX	CallCity/StateDist(km)KWGN-DTDENVER CO15.0KBDI-DTBROOMFIELD CO26.2KRMT-DTDENVER CO0.0DNCEMONTICELLO UT406.5KOAA-DTPUEBLO CO147.5KUBD-DTDENVER CO8.2DNCELEADVILLE CO100.8ts for:41N CO DENVERDTVPLMPOPULATIONthin Noise Limited Contour1917572t affected by terrain losses1872629st to NTSC IX0st to additional IX by ATV1961st to all IX1961	CallCity/StateDist(km) StatusKWGN-DTDENVER CO15.0PLNKBDI-DTBROOMFIELD CO26.2PLNKRMT-DTDENVER CO0.0PLNDNCEMONTICELLO UT406.5PLNKOAA-DTPUEBLO CO147.5PLNKUBD-DTDENVER CO8.2PLNDNCELEADVILLE CO100.8PLNts for:41N CO DENVERDTVPLNNPLthin Noise Limited Contour191757213446t affected by terrain losses187262911934st to NTSC IX000st to additional IX by ATV196176st to all IX196176	CallCity/StateDist(km) StatusApplicatKWGN-DTDENVER CO15.0PLNDTVPLNKBDI-DTBROOMFIELD CO26.2PLNDTVPLNKRMT-DTDENVER CO0.0PLNDTVPLNDNCEMONTICELLO UT406.5PLNDTVPLNKOAA-DTPUEBLO CO147.5PLNDTVPLNDNCELEADVILLE CO100.8PLNDTVPLNts for:41N CO DENVERDTVPLNNPLN1600POPULATIONAREA (sq km)191757213446.2t affected by terrain losses187262911934.0st to NTSC IX00.00.0st to additional IX by ATV196176.0

Analy	ysis of cu	rrent record	ł				
Chani	nel Ca	11	City/Stat	e Ap	pplicati	on Ref. No	•
41	l krm	T DENV	/ER CO		BLET	-20050	519AHE
	Stations	Potentially	Affecting	This Statio	on		
Chan	Call	City/Stat	ce	Dist(km)	Status	Applicati	on 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	USERRECOR	D-01
Prop	posal caus	es no interf	Eerence				

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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	USERRECORI	D-01

Proposed station is beyond the site to nearest cell evaluation distance

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	Applicatio	on 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	USERRECORI	D-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	ľ	VEW	PUEBL	0 CO	BNPCT	-200	)60424ADP

#### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Applicati	on 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	BLCDT	-20050810AAF
50	KCEC	DENVER CO	114.4	LIC	BLCT	-20030102AAY
51	KCEC-DT	DENVER CO	114.5	PLN	DTVPLN	-DTVP1471

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) 21119.5 703934 within Noise Limited Contour not affected by terrain losses 571284 17975.3 15213 lost to NTSC IX 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) not affected by terrain losses 571284 17975.3 lost to NTSC TX 15213 lost to NTSC IX lost to additional IX by ATV 8160 176.5 23373 lost to all IX 401.1 Potential Interfering Stations Included in above Scenario 1 BLET 20050519AHE LIC DTVPLN DTVP1320 PLN 41N CO DENVER 46A CO CASTLE ROCK 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 15213 224.6 lost to NTSC IX 12477 lost to additional IX by ATV 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

After Analysis

Results for: 48N CO PUEBLO	BNPCT	2006042	4ADP APP
within Noise Limited Cont not affected by terrain 1 lost to NTSC IX lost to additional IX by	cour 703934 losses 571284 15213 ATV 12477	21119.5 17975.3 224.6 385.0	/
lost to all IX	27690	609.6	
Potential Interfering Stati	ions Included in ab	ove Scenario	2
41N CO DENVER 46A CO CASTLE ROCK 49A CO GREELEY	BLET 20050519 BLCDT 20050810 USERRECORD01	AHE LIC AAF LIC APP	
Percent new IX = 0.0000%			
Worst case new IX 0.00008	Scenario 1		
*****	****	###########	##############
Analysis of Interference	ce to Affected Stat	ion 5	
NTSC Baceline Analysis			
Channel Call C 50 KCEC DENVER	City/State Ag CO	pplication R DTVPLN	ef. No. -NPLN1770
Stations Potentially Af	fecting This Statio	on	
Chan Call City/State 43 KUBD-DT DENVER CO 46 KWHD-DT CASTLE ROCK C 49 DNCE LEADVILLE CO 50 DNCE LAMAR CO 51 KCEC-DT DENVER CO 53 KWHD CASTLE ROCK C	Dist(km) 6.8 20 60.0 105.3 291.2 0.0 20 60.0	StatusAppPLNDTVPLNDTVPLNDTVPLNDTVPLNDTVPLNDTVPLNDTV	lication Ref. No. PLN -DTVP1220 PLN -DTVP1320 PLN -NPLN1767 PLN -NPLN1785 PLN -DTVP1471 PLN -NPLN1820
Results for: 50N CO DENVER	DTVPL	N NPLN177	0 PLN
within Noise Limited Cont not affected by terrain 1 lost to NTSC IX lost to additional IX by lost to all IX	POPULATION cour 1898919 losses 1871076 1839 ATV 63 1902	AREA (sq km 13459.6 11866.3 208.2 4.0 212.2	)
Analysis of current record Channel Call C 50 KCEC DENVER	City/State Aj R CO	oplication R BLCT	ef. No. -20030102AAY
Stations Potentially Af	fecting This Statio	on	
ChanCallCity/State42KOAA-TVPUEBLO CO43KPXC-TVDENVER CO43KUBD-DTDENVER CO43KPXC-TVDENVER CO46KWHD-DTCASTLE ROCK CO	Dist(km) 114.4 47.9 6.8 6.8 6.8 59.9	StatusAppCPBPCAPPBMPPLNDTVCPBPCPLNDTV	lication Ref. No. DT -19991029AGS CDT -20070104ACH PLN -DTVP1220 DT -19990923AAM PLN -DTVP1320

46 KWHD   48 NEW   51 KCEC   51 KCEC   53 KWHD   53 KWHD   49 NEW	CASTLE ROCK PUEBLO CO DENVER CO DENVER CO CASTLE ROCK CASTLE ROCK GREELEY CO	C0 C0 C0	59.9 114.4 0.1 0.0 59.9 59.9 108.1	LIC APP PLN CP APP LIC APP	BLCDT BNPCT DTVPLN BPCDT BSTA BLCT USERRECO	-20050810AAF -20060424ADP -DTVP1471 -19991029ACN -20050929ANG -19990922AAX DRD-01
Total sce	narios = 4					
Result key Scenario Before Ana	: 3 1 Affected lysis	l station	5			
Results fo within not aff lost to lost to lost to	r: 50N CO DENVER Noise Limited Cor ected by terrain NTSC IX additional IX by all IX	P ltour losses ATV	BLCT OPULATION 1898513 1850354 2158 481 2639	200 AREA (s 13307 11726 204 8 212	30102AAY 3q km) 7.3 5.0 4.2 8.0 2.2	LIC
Potential 53N CO CAS 43A CO DEN 46A CO CAS	Interfering Stat TLE ROCK VER TLE ROCK	BLCT BPCDT DTVPLN	luded in abo 199909222 199909232 DTVP1320	AAX LIC AAM CP PLN	nario 2 1	1
After Anal	ysis					
Results for within not aff lost to lost to lost to	r: 50N CO DENVER Noise Limited Cor ected by terrain NTSC IX additional IX by all IX	P ltour losses ATV	BLCT OPULATION 1898513 1850354 2158 32074 34232	200 AREA (s 13307 11726 204 868 1072	30102AAY 3q km) 2.3 5.0 5.2 5.7 2.9	LIC
Potential	Interfering Stat	ions Inc	luded in abo	ove Scer	ario	1
53N CO CAS 43A CO DEN 46A CO CAS 49A CO GRE	TLE ROCK VER TLE ROCK ELEY	BLCT BPCDT DTVPLN USERREC	199909227 199909237 DTVP1320 ORD01	AAX LIC AAM CP PLN APF	1	
Percent ne	w IX = 1.66418					
Result key Scenario Before Ana	2 Affected	l station	5			
Results fo within not aff lost to lost to lost to	r: 50N CO DENVER Noise Limited Cor ected by terrain NTSC IX additional IX by all IX	P ltour losses ATV	BLCT OPULATION 1898513 1850354 2158 481 2639	200 AREA (s 13307 11726 204 8 212	30102AAY sq km) .3 .0 .2 .0 .2 .0 .2	LIC
Potential	interfering Stat	lons Inc	luded in abo	ove Scer	lario	2

53N CO	CASTLE ROCK		BLCT	199909222	AAX A M	LIC	
46A CO	CASTLE ROCK		BLCDT	200508102	AAF	LIC	
1011 00			52051	200000101		210	
After A	Analysis						
Results	s for: 50N CC	DENVER		BLCT		20030102AAY	LIC
			I	POPULATION	AREA	A (sq km)	
with	in Noise Lim	ited Cont	lour	1898513	13	3307.3	
not	allected by	terrain	Losses	1850354	Τ	204 2	
lost	to addition	al TX by	ፚጥህ	32074		204.2 868 7	
lost	to all IX	ai in by	711 V	34232	1	.072.9	
Potent	tial Interfer	ing Stati	ions Ind	cluded in abo	ove S	Scenario	2
53N CO	CASTLE ROCK		BLCT	199909222	AAX	LTC	
43A CO	DENVER		BPCDT	199909232	AAM	CP	
46A CO	CASTLE ROCK		BLCDT	200508102	AAF	LIC	
49A CO	GREELEY		USERREC	CORD01		APP	
Percent	new IX =	1.6641%					
Result	key:	5					
Scenari	Lo 3	Affected	statior	n 5			
Before	Analysis						
Results	s for: 50N CC	DENVER		BLCT		20030102AAY	LIC
			I	POPULATION	AREA	A (sq km)	
with	nin Noise Lim	nited Cont	lour	1898513	13	3307.3	
not	affected by	terrain 1	losses	1850354	11	.726.0	
lost	to NTSC IX	al TV bar	7 177 7	2158		204.2	
lost	to addition	ai ix by	ATV	5⊥ 2209		20.0	
1050				2209		221.2	
Potent	ial Interfer	ing Stati	ions Ind	cluded in abo	ove S	Scenario	3
53N CO	CASTLE ROCK		BLCT	199909222	AAX	LIC	
43A CO	DENVER		BMPCDT	200701042	ACH	APP	
46A CO	CASTLE ROCK		DTVPLN	DTVP1320		PLN	
After A	Analysis						
Results	s for: 50N CC	) DENVER		BLCT		20030102AAY	LIC
			I	POPULATION	AREA	A (sq km)	
with	nin Noise Lim	ited Cont	cour	1898513	13	3307.3	
not	affected by	terrain 1	Losses	1850354	ΤŢ	.726.0	
lost	to NISC IX	al TY by	<u> </u>	21502		204.2	
lost	t to all IX	IAI IN DY	AIV	33751	1	.064.9	
Detert	ial Tratanfar	ing Chati		Juded in the			2
Potent	lai interier	ing Stati	lons ind	ziuded in abo	ove S	ocenar10	3
53N CO	CASTLE ROCK		BLCT	199909222	AAX	LIC	
43A CO	DENVER		BMPCDT	200701042	ACH	APP	
46A CO	CASTLE ROCK		DTVPLN	DTVP1320		PLN	
49A CO	GREELEA		USERRÉ(	CORDUI		АРР	

Percent new IX = 1.6614%

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 BLCT 20030102AAY LIC Results for: 50N CO DENVER POPULATION AREA (sq km) within Noise Limited Contour 1898513 13307.3 not affected by terrain losses 1850354 11726.0 204.2 860.7 lost to NTSC IX 2158 31593 lost to additional IX by ATV 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 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. 0.0PLNDTVPLN-DTVP132060.0PLNDTVPLN-NPLN177060.0PLNDTVPLN-DTVP1471 46 KWHD-DT CASTLE ROCK CO KCEC DENVER CO 50 51 KCEC-DT DENVER CO

Resul	ts for: 5	3N CO C.	ASTLE ROCK	ν τιταα	DTVPL	NPL	N1820	PLN
<b>1</b> 47 1	thin Nois	o Limit	ed Contour	1796	690	12522	9 KIII) 7	
w 1 n c	t affecte	d by to	eu concour rrain loggeg	1675	121	10/20	. /	
10	et to NTS	а руге. Стх	LIAIN IUSSES	1075	579	10439	3	
10	st to add	itional	TX by ATV	12	0	0	.5	
10	st to all	TX	IN DY HIV	12	579	64	.0 3	
10		±21		12	515	01	• 5	
Analy	rsis of cu	rrent r	ecord					
Chanr	nel Ca	11	City/S	tate	Ar	plicati	on Ref. No	•
53	в кмн	D	CASTLE ROCK	CO		BSTA	-20050	929ANG
	Stations	Potenti	ally Affecti	ng This	Statio	on		
Chan	Call	City	/State	Di	st(km)	Status	Applicati	on Ref. No.
45	NEW	GREELE	Y CO		110.4	LIC	BPRM	-20040520AJS
45	NEW	GREELE	Y 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	GREELE	Y CO		112.5	APP	USERRECOR	D-01
Prop near	oosed stat est cell	ion is l evaluat	beyond the s ion distance	ite to				
#####	****	#######	############	#######	######	+#######	###########	########
	Analysis	of Inte	rference to	Affecte	d Stati	lon 7		
			,					
Analy Chanr	vsis of cu	rrent r	ecora	tato	7 *	mlianti	on Pof No	
53	S KWH	D	CASTLE ROCK	CO	AF	BLCT	-19990	922AAX
	Stations	Potenti	ally Affecti	ng This	Static	on		
Chan	Call	City	/State	рi	st(km)	Status	Applicati	on Ref No
45	NEW	GREELE	Y CO		110.4	LTC	BPRM	-20040520AJS
45	NEW	GREELE	- 00 Y 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	GREELE	Y CO		112.5	APP	USERRECOR	D-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

Stations Potentially Affecting This Station

Chan	Call	L City/State	Dist(k	m) Statu	s Applic	ation Ref. No.
48	NEW	PUEBLO CO	191	.0 APP	BNPCT	-20060424ADP
50	KCEC	DENVER CO	108	.1 LIC	BLCT	-20030102AAY
Tota	al scer	narios = 1				
Resu	lt key:	: 7				
Scena	ario	1 Affected s	station 8	1		
Befoi	re Anal	lysis				
Resu	lts for	: 49A CO GREELEY	USE	RRECORDO	1	APP
HA	AAT 31	79.0 m, ATV ERP 94	3.0 kW			
			POPULATION	I AREA	(sq km)	
w	ithin 1	Noise Limited Conto	our 1877573	326	36.1	
no	ot affe	ected by terrain lo	sses 1866756	319	78.2	
10	ost to	NTSC IX	43187		48.1	
10	ost to	additional IX by A	VTV 0		0.0	
10	ost to	ATV IX only	0		0.0	
lo	ost to	all IX	43187		48.1	
Pote	ential	Interfering Static	ons Included in	above Sc	enario	1
50N (	CO DENV	/ER E	BLCT 200301	.02AAY L	IC	

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FINISHED FINISHED FINISHED FINISHED FINISHED