

TECHNICAL SUMMARY

TELEVISION STATION KVOS-TV
BELLINGHAM, WASHINGTON
CHANNEL 14 780 KW (MAX-DA) 799 M HAAT

1. The instant application is to amend the pending application for construction permit to maximize the facility of KVOS-TV, Bellingham, WA (Channel 14).^{*} By means of this application the proposed maximum effective radiated power (ERP) is reduced to 780 kW with horizontal-only polarization. There are no other changes proposed.

2. The proposed facility is compliant with the ‘largest station in the market’ provision of Section 73.622(f)(5) of the FCC Rules. The proposed KVOS-TV facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facility has been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Seattle-Tacoma market is KCPQ, Tacoma, WA, Channel 13[†], which is licensed to provide noise-limited 36 dBu, f(50,90) service to an area of 47,780 square kilometers. The proposed KVOS-TV operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 47,760 square kilometers.[‡] Therefore, the proposed KVOS-TV facility is compliant with the largest station in the market provision of the FCC Rules. See largest station in the market analysis map exhibit.

3. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC’s *TVStudy* analysis are attached hereto as an exhibit. A higher resolution terrain profile point spacing of 0.1 km is requested.

4. The instant proposal is compliant with the city coverage requirements of Bellingham, which has been previously demonstrated in its original application for construction permit for its replication facility.[§]

^{*} See FCC File No. 0000034502.

[†] KCPQ is licensed for operation with a non-directional ERP of 30 kW and an antenna HAAT of 610 m. See FCC File No. BLCDDT-20090918ABR.

[‡] Clarification of the largest station provision is provided in the *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39 at paragraphs 73-74.

[§] See FCC File No. 0000027890.