

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Section 73.622,	)	MB Docket No. 20- _____
Digital Television Table of Allotments for	)	RM- _____
	)	
KOMU-TV, Columbia, Missouri	)	
Facility ID Number 65583	)	
	)	

To: Office of the Secretary, Federal Communications Commission  
Attn: Chief, Media Bureau

**PETITION FOR RULEMAKING**

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October 23, 2020

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**PETITION FOR RULEMAKING**

The Curators of the University of Missouri (the “University”), licensee of digital television station KOMU-TV, Columbia, Missouri, hereby petition the Commission to commence a rulemaking proceeding to amend the DTV Table of Allotments in Section 73.622(i) of the Commission’s Rules to substitute Channel 27 for Channel 8 as KOMU-TV’s allotted channel.

**Introduction and Summary**

As set forth herein, grant of the instant Petition will result in a preferential arrangement of allotments by restoring over-the-air reception of KOMU-TV in the Columbia, Missouri television market to those who have been deprived of it and the station’s vital news, information and entertainment programming since the transition to DTV. To the extent necessary, the University requests that the Commission waive the Media Bureau’s freeze on the acceptance and

processing of channel substitution petitions<sup>1</sup> and facilities modifications that increase a television station's noise limited contour<sup>2</sup> so that the station can plan for and make the technical modifications necessary to implement the channel substitution during the retirement of the station's aging tower, which is scheduled to be dismantled next year.

### **Background**

KOMU-TV is the NBC and CW-affiliated television station licensed to and serving the Columbia, Missouri television market. The station is operated by the University as part of its mission as a land-grant university to be “the stewards and builders of a priceless state resource, a unique physical infrastructure and scholarly environment in which our tightly interlocked missions of teaching, research, service and economic development work together on behalf of all citizens.”<sup>3</sup> In fulfillment of that mission, in 1953 the University provided the mid-Missouri region with a priceless state resource and unique physical infrastructure—its first television station, KOMU-TV—which brought the television-starved region not only the programming of the NBC network, but that of ABC, CBS and Dumont as well. The University's mission has been pursued throughout the station's history, which is filled with other notable firsts:

- The first mid-Missouri station to broadcast in color.
- The first to provide mid-Missouri with live news coverage with the first and only satellite news gathering truck.
- The first station in mid-Missouri to feature African-Americans on the air.
- The first to have Doppler weather radar.
- The first to have a [website](#).

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<sup>1</sup> See *Freeze on the Filing of Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, 26 FCC Red 7721 (MB 2011) (“*Channel Substitution Freeze*”).

<sup>2</sup> See *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*, Public Notice, 28 FCC Red 4364 (MB 2013) (“*Facilities Modification Freeze*”).

<sup>3</sup> See *University of Missouri, Mission and Values* available at: <https://missouri.edu/mission-values> (last visited October 20, 2020).

- The first to have a full power high definition digital television signal.<sup>4</sup>

KOMU-TV operates as an NBC affiliate, and also delivers the CW Network in HD as a multicast stream. In addition to providing network-quality national programming, the station provides high-quality state and local news, along with informational, educational, sports and entertainment programming to residents of the state's capital city and the surrounding Columbia-Jefferson City DMA. Further, KOMU-TV serves as an important adjunct to the University's renowned School of Journalism, helping to produce generations of journalists trained in the latest techniques and technologies for electronic journalism and who are vital to our democracy and civic life as a nation.

KOMU-TV operates on VHF Channel 8, and since the end of the DTV transition, has experienced ongoing complaints from viewers of poor or no reception of its over-the-air signal. The station regularly receives complaints from viewers who report being able to receive all other signals in the market, including a low power television station operating on a UHF channel, but not KOMU-TV.<sup>5</sup> Many complaints reflect that viewers have purchased new television sets and expect that with their expensive technology upgrade, they should be able to receive the station's

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<sup>4</sup> See *KOMU Celebrates 50 Years of News and Community Service*, February 9, 2004, available at: <https://journalism.missouri.edu/2004/02/komu-celebrates-50-years-of-news-coverage-and-community-service-2/> (last visited October 20, 2020).

<sup>5</sup> See, e.g., Appendix A at Complaint 2 (“Why is it that your station is the ONLY one having transmission issues? I have checked all other stations all are OK. DANG. Wish it would get better. This seems to happen at least 3 or 4 times a week????? Thanks hope you get it fixed.”); Complaint 5 (“I live less than 10 miles from your transmission tower, yet you give me the worst picture of all the stations I receive. Is your signal underpowered? Is there some kind of interference from the airport? Fight the cable conspiracy, and clean up your broadcast signal.”); Complaint 6 (“Great reception on all the other local channels, except, sadly enough, KOMU NBC channel 8. My favorite one of them all.”); Complaint 7 (“All other channels (KMIZ, KRCG, PBS) all come in clearly.”); Complaint 8 (“Why do we daily lose several hours of day time tv? Sometimes we lose evening reception also? This does not happen with any other stations?”); Complaint 9 (“Why is it that I cannot receive any of Channel 8 free TV shows? I live in Jefferson City now, and I can pick up 4 free channels from Sedalia, and 5 free channels from KMIZ in Columbia, and of course all of KRCG channels?”); Complaint 10 (“we live in Eldon Missouri we get all station in your area [b]ut 8 komu on our antenna”).

signal.<sup>6</sup> Others have purchased new antennae advertised to receive both UHF and VHF signals originating 50 or more miles away, only to find they can't receive KOMU-TV, which is located much closer than that.<sup>7</sup> Some viewers demand that KOMU-TV "increase" its power or fix its transmitting equipment because, again, given their technology upgrades, in their eyes the problem must be with KOMU-TV's transmitting equipment or parameters.<sup>8</sup> As the sampling attached hereto in Appendix A demonstrates, some of these complaints are quite angry in tone,<sup>9</sup> occupy the station's engineering personnel trying to address these complaints, and too often sour the station's relationship with its audience and community. One viewer even accused KOMU-TV of being cheap and turning down its transmitter power to lower its electricity bills.<sup>10</sup>

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<sup>6</sup> See, e.g., Appendix A at Complaint 9 ("I purchased a new TV last fall and for 1 day I was able to pick up I think 3 channel 8 channels?").

<sup>7</sup> See, e.g., Appendix A at Complaint 19 ("I live in California (MO) and have an outside antenna made to receive digital signals. Had it installed when the signals changed. This problem rarely if ever occurs with any of the other stations (KMOS, KRCG, etc.). This makes me think the problem has to be with your station's signal. I do hope something can be done about this."); Complaint 21 ("I cannot receive KOMU over the air with my antenna - recently purchased. Do you know whether, besides having a roof antenna, whether your station can be picked up with inside antennas? This antenna states it can pick up stations within a 50-mile radius."), Complaint 25 ("We thought our antennae may have gone bad. We have a tall antennae outside the house that we have to position just right for reception, so we replaced it, but still can't get KOMU."), and Complaint 27 ("[W]e purchased an antenna that was advertised to be able to get TV signals at distances up to 75 miles. We are having no problems picking up the CBS and ABC signals, but cannot bring in the NBC signal!").

<sup>8</sup> See, e.g., Appendix A at Complaint 6 ("After further investigation I found that the power from your station is much less than the others.. So, my question is, would there possibly be a chance that you might be increasing your signal broadcasting power sometime in the future? To compete with the other channels?"); Complaint 13 ("Please engineer your station coverage, build a taller tower or something!"); Complaint 17 ("I hope that you will be able to improve your towers so that people are able to enjoy your programming again."); Complaint 27 ("We were just wondering why you can't increase your power so your signals can be picked up by an ota antenna! I am sure many others are experiencing this same problem. Please inform."); Complaint 28 ("I was wondering, if there is any way you could boost your signal. as alot of us in the Fayette Armstrong area, are not able to get your signal thru our converter box.").

<sup>9</sup> See, e.g., Appendix A at Complaint 19 ("What in the HELL is going on with KMOU transmissions? If it wasn't so frustrating it would be a joke . . . If I need to call our Rep's office (for all the good that would do) let me know."); Complaint 27 ("It really doesn't matter who makes the antenna. What does matter is that it effectively picks up other network signals in your area, but not yours, even with the antenna directed right at your location. You need to increase your power output!").

<sup>10</sup> See e.g., Appendix A at Complaint 15 ("Since the leaves have started coming back my reception in Jeff City has been very poor for Komu! Do you adjust transmitter power For the different seasons? I am barely at half the radius of your coverage footprint! A little bit disappointing. I suppose your power savings could be considerable if you are figuring a 20 dB path loss improvement during winter months? Anyway, I don't believe the signal strength issue exists its my home distribution system... All other channels are fine.").

But, as the Commission has indicated, these reception problems are all too common for VHF stations operating digitally in populous areas.<sup>11</sup> Specifically,

the propagation characteristics of these channels allow undesired signals and noise to be receivable at relatively farther distances, nearby electrical devices tends [sic] to emit noise in this band that can cause interference, and reception of VHF signals requires physically larger antennas that are generally not well suited to the mobile applications expected under flexible use, relative to UHF channels. We recognize that television broadcasters have had some difficulty in ensuring consistent reception of VHF signals . . . .<sup>12</sup>

KOMU-TV's experiences confirm these problems. For example, KOMU-TV's Chief Engineer responded to a consumer complaint that the viewer had unreliable reception of the station, particularly during evening viewing hours. Upon investigation, it was discovered that the consumer had installed a new florescent light fixture in the kitchen of the home, and turned it on in the evenings to prepare and eat dinner, interfering with reception of KOMU-TV.

Multiply this problem by the over 170,000 households in the Columbia-Jefferson City DMA, and the scope of the issue becomes evident. Even in individual cases, the cause of interference is often hard to determine, especially in a multiple dwelling unit, apartment complex, duplex, mobile home park, or senior's facility where the source of interference may be a neighbor and completely invisible to the consumer. Plus, even where the source of interference can be located, a building landlord is not going to remove all of the recently-installed fluorescent lights in a building because of complaints from those tenants relying on over-the-air reception, particularly if the landlord benefits from the sale of MVPD subscriptions in that building.

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<sup>11</sup> See *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, Second Report and Order, 25 FCC Rcd 10732, 10750 ¶ 37 (2011) ("As a result of the full power digital television transition, some full power stations on VHF channels have experienced reception problems and such problems have not been alleviated even by allowing these stations to operate with the maximum power permitted under the full power television rules.")

<sup>12</sup> *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, 25 FCC Rcd 16498, 16511 (2010) ("*VHF Improvements*").

Increasingly, complaints are coming from cord cutters—those who have ceased receiving their local broadcast channels via cable or satellite. These new over-the-air viewers rely on an antenna, and often an indoor antenna, for their reception. However, the Commission has acknowledged that “[i]ndependent investigations of currently marketed indoor antennas by the consulting engineering firm of Meintel, Sgrignoli and Wallace (MSW) and our Laboratory staff showed large variability in the performance (especially intrinsic gain) of indoor antennas available to consumers, with most antennas receiving fairly well at UHF and the substantial majority not so well to very poor at high-VHF.”<sup>13</sup> As seen by the representative complaints included in this Petition,<sup>14</sup> many consumers have chosen antennae that are not well-suited to reception of KOMU-TV’s VHF signal.

The situation is further aggravated due to the geographic layout of the Columbia market. In large portions of the market, using an antenna, whether indoor or outdoor, to improve reception of other television station signals actually worsens reception of KOMU-TV. This is because KOMU-TV operates on its VHF channel from a site on the University’s campus to the Southeast of Columbia, while the ABC, FOX and PBS affiliates in the market operate on UHF channels from sites to the Southwest of Columbia.<sup>15</sup> As a result, consumers in Columbia proper must often choose between orienting their antenna to the Southwest to receive the bulk of the signals in the market, or to the Southeast in hopes of being able to receive KOMU-TV’s signal.

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<sup>13</sup> *Id.* at 16512.

<sup>14</sup> See Appendix A.

<sup>15</sup> The CBS affiliate in the market also operates on a VHF channel from the Southeast of Columbia, but it has recently secured a construction permit to increase its ERP from 15.1 kW to 125 kW, see FCC File No. 0000035648, an option that is not available to KOMU-TV.

The impact of this dilemma is best illustrated by the case of the University's own former Chancellor who hired a professional antenna installer to install new receiving equipment for his home in conjunction with the DTV transition. When the Chancellor was unable to receive KOMU-TV's signal after the DTV transition, the station's Chief Engineer discovered that the installer had placed two UHF/VHF antennae in the Chancellor's attic—one pointed to the Southeast and the other to the Southwest—in an obvious attempt to receive signals originating from both directions. The result, however, was that the UHF/VHF antenna pointed to the Southeast still received the higher power UHF signals, overriding reception of KOMU-TV's VHF signal.

Moreover, despite repeated requests from its viewers to do so, KOMU-TV is prevented from taking the only action that might improve the situation—increasing its effective radiated power—by the maximized facility of WSIU-TV operating on Channel 8 at Carbondale, Illinois. When KOMU-TV sought a modest increase in ERP from its authorized 13.6 kW to 17.3 kW, the Commission dismissed the application because it would reduce the population receiving the new facilities of WSIU-TV, which had undertaken a massive upgrade from 14.1 kW to 53 kW ERP, effectively boxing KOMU-TV into its current facilities on Channel 8.<sup>16</sup>

Having sought to address the problem through conventional means—applying for a power increase and helping viewers improve their receiving equipment on a house-by-house basis—the University recognizes that more significant action is needed, and that it has run out of time and options. Following the devastating and deadly collapse of the television tower at Missouri State University in 2018,<sup>17</sup> the University accelerated its ongoing tower review and

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<sup>16</sup> See FCC File No. BPCDT-200090721AAU.

<sup>17</sup> See FCC File No. 0000053437.

replacement due diligence, and upon review of the KOMU-TV/KBIA-FM tower built in 1953, determined to remove the structure and erect a new tower some 183 meters away, as expeditiously as possible.

To date, that effort has been thwarted by the spectrum repack process and the demands it has placed on the equipment suppliers and tower crews needed to construct a new tower. With the repack largely completed, those resources are again becoming available and the University wishes to move as quickly as possible to assure that its tower cannot experience the type of failure seen just miles away at a fellow public institution of higher education. It makes little sense, however, to incur the expense of building a new tower structure designed for a Channel 8 antenna and thereby perpetuate KOMU-TV's reception problems when it could instead be designed to support a Channel 27 antenna and overcome years of VHF reception complaints from the local community. This is particularly true where the advent of ATSC 3.0—a technology that clearly favors use of UHF frequencies—could open a plethora of opportunities for the University, its renowned School of Journalism, and the community itself. Given the convergence of these circumstances at this moment in time, allocation of Channel 27 for use by KOMU-TV is clearly in the public interest, as is any waiver, to the extent required, of the Commission's longstanding freezes that have literally frozen in place the problems facing KOMU-TV.

### **Argument**

Substituting Channel 27 for Channel 8 at Columbia, Missouri in the DTV Table of Allotments would serve the public interest. As demonstrated in the attached Engineering Statement, Channel 27 can be allotted at Columbia, Missouri as KOMU-TV's channel of operation in compliance with the Commission's rules. Specifically, the station's proposed

facilities to be built pursuant to a grant of this petition, as reflected in the accompanying Engineering Statement, would provide the requisite coverage of the station's community of license and would not cause impermissible interference to any other station. The substitution would result in a preferential arrangement of the Table of Allotments as it would restore over-the-air reception of KOMU-TV to a large portion of the Columbia market left behind by the DTV transition, and position the station for a future to include ATSC 3.0.

As the Commission is well aware, cord-cutting has been growing for some time, making over-the-air reception of a station's digital television signal ever more important. According to research published by *Fortune*, pay television subscriptions peaked in 2014 and have been declining ever since.<sup>18</sup> The pandemic has accelerated this trend, with a 7.5% year-over-year decline in pay television subscriptions thus far in 2020, the worst annual decline ever.<sup>19</sup> While this trend is important nationwide, it is particularly important in the Columbia, Missouri market. Comscore data indicate that over-the-air viewership is already above 25% in the market. This is certainly borne out by KOMU-TV's viewer complaints, which evidence viewers cutting the cord only to discover that they can no longer receive their favorite network television station.

When analyzing the public interest benefits of a proposed channel substitution, the Commission also looks at any potential service loss and countervailing factors such as service gains.<sup>20</sup> The FCC has said that its process for doing so is "more than a mere comparison of

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<sup>18</sup> Aaron Pressman, *Cord Cutting Is Breaking Records During Pandemic*, Fortune.com (September 21, 2020, 1:00 PM) available at: <https://fortune.com/2020/09/21/cord-cutting-record-covid-19-pandemic/> (last visited October 20, 2020).

<sup>19</sup> *Id.* See also Sarah Perez, *Pandemic Accelerated Cord Cutting, Making 2020 Worst-Ever Year for Pay TV*, Techcrunch.com (September 21, 2020, 12:48 PM) available at: <https://techcrunch.com/2020/09/21/pandemic-accelerated-cord-cutting-making-2020-the-worst-ever-year-for-pay-tv/> (last visited October 20, 2020).

<sup>20</sup> See *VHF Improvements* at 16507.

numbers.”<sup>21</sup> Specifically, the Commission will look at the extent of the loss,<sup>22</sup> such as whether any “white” or “gray” areas<sup>23</sup> will be created, as well as the extent to which viewers remain “well served” after implementing the proposal.<sup>24</sup>

As shown in the Engineering Statement attached hereto, a total of 401 people are predicted to lose coverage as a result of the proposed channel substitution, and all but 7 of those will receive at least five full power TV signals, a loss considered *de minimis* under the Commission’s precedent.<sup>25</sup> Also, counterbalancing this small loss of coverage, more than 21,000 people will gain coverage from use of the new channel. Thus, any service loss is *de minimis* and outweighed by far larger reception gains.

Moreover, it should be remembered that some change in population coverage will occur even if KOMU-TV were to remain on Channel 8 because, independent of this proceeding, the station’s tower site will need to move 183 meters to the East to permit continuous service to the public from the old tower while the new tower is being built. The reception gains under this proposal are to the West, precisely the area where losses would likely be greatest from relocating KOMU-TV as a Channel 8 facility to its new tower East of its current site. Providing KOMU-TV the enhanced signal density of a UHF channel, then, may well serve to prevent greater service loss occasioned by its critically important tower infrastructure upgrade project.

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<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> See *VHF Improvements* at 16507. A “white area” is an area where the population does not receive any over-the-air television service and a “gray area” is where the population receives only one over-the-air television service. See *Apogee, Inc.*, 99 FCC 2d 979, ¶ 7 (1985).

<sup>24</sup> See *VHF Improvements* at 16507. An area is “underserved” where the population receives less than five other existing services. See *Cambridge and St. Michaels, Maryland*, 19 FCC Rcd 2592 (AD 2004).

<sup>25</sup> See *WSET, Inc.*, 80 FCC 2d 233, 246 (1980) (a loss area that contains fewer than 500 viewers will be disregarded as *de minimis*).

In that regard, the upcoming relocation of KOMU-TV to a new tower will unavoidably change the station's coverage area to some degree. Care has been taken in the selection of the new tower site to create the least disruption to current viewers possible. Nevertheless, precise replication of the station's current contour from even a nearby site/tower is not possible, particularly where that would entail reducing power in some directions to stay within the current signal contour as required by the freeze, causing greater loss of service regardless of whether it is a Channel 8 or a Channel 27 operation. To the extent *any* operation from the new tower (Channel 8 or Channel 27) will need to slightly exceed the current Channel 8 signal contour in order to replicate current service, a waiver of the Media Bureau's freeze on television station modifications that increase coverage will be needed. The University therefore requests such a waiver in association with its Channel 27 proposal hereunder. A waiver of the Media Bureau's freeze on the filing of channel substitution requests is also requested to allow KOMU-TV to implement the Channel 27 substitution in coordination with the design and construction of its new tower facilities and the removal of its nearly 70-year-old tower to ensure the safety of its employees and the public. The Commission may waive any provision of its rules if it determines that good cause to do so exists,<sup>26</sup> and where, as here, doing so promotes public safety, continuity of broadcast service, improved reception by the public, and expanded broadcast service, the public interest benefits are manifest.

With respect to the relocation of KOMU-TV to a new tower, this is a major infrastructure upgrade grounded in the public safety and well-being. It is being undertaken by a public institution that must follow public procurement requirements and timelines in addition to meeting the FCC's requirements, and it involves the facilities of co-owned station KBIA-FM,

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<sup>26</sup> See 47 C.F.R. § 1.3. See also *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

making the project that much more complex and requiring lead time to plan. Moreover, this important project has already been delayed by a lack of equipment and tower crews due to the high demand on those resources created by the Commission's multi-year spectrum repack. With respect to the proposed channel substitution, there is ample evidence that the channel change will restore service to a public that has suffered signal reception difficulties since the termination of analog operations, while opening the door to the many potential benefits of ATSC 3.0 for the station, the University, and its community.

The Media Bureau imposed its freeze on channel substitution requests nine years ago in response to the adoption of the National Broadband Plan "to permit the Commission to evaluate its reallocation and repacking proposals and their impact on the Post-Transition Table of DTV Allotments."<sup>27</sup> As the incentive auction and repack took shape, the Bureau found that "the imposition of limits on the filing and processing of modification applications is now appropriate to facilitate analysis of repacking methodologies and to assure that the objectives of the broadcast television incentive auction are not frustrated," particularly because that "work requires a stable database of full power and Class A broadcast facilities."<sup>28</sup> The repack has now concluded. Moreover, the Columbia market was almost completely untouched by the entire repack process. No full power television stations in the market were repacked. One LPTV station filed a displacement application, but has since constructed and licensed its operation on a new channel.<sup>29</sup>

The purposes for which these freezes were instituted have thus been achieved nationwide and in the Columbia, Missouri market in particular. Even were that not the case, however, the

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<sup>27</sup> *Channel Substitution Freeze* at 7721.

<sup>28</sup> *Facilities Modification Freeze* at 4364.

<sup>29</sup> See FCC File Nos. 0000093409 and 0000096860.

Bureau, when implementing its freeze on facilities modifications, specifically envisioned granting freeze waivers where necessary to “maintain quality service to the public” or where circumstances require relocation to a new tower site.<sup>30</sup> As shown herein, both rationales apply to the instant proposal. Substituting Channel 27 for Channel 8 will maintain quality service to the public by restoring reliable reception to viewers who have lost it since the end of the DTV transition and limit losses that might otherwise arise from the station’s tower site relocation. The tower relocation has been deemed necessary for safety while preserving continuity of service to the public during tower construction—construction that has been on hold due both to the Commission’s freezes and the unavailability of tower crews and equipment pending completion of the Commission’s spectrum repack. The FCC has previously granted waivers of both these freezes, acknowledging that “the underlying purpose of the freeze is not implicated” because “the incentive auction and repacking have been completed.”<sup>31</sup> It should do so in the instant case as well.

### **Conclusion**

Based on the above, it is respectfully requested that the Commission commence a rulemaking proceeding to allocate Channel 27 at Columbia, Missouri as the channel of operation of KOMU-TV from the site specified in the attached Engineering Statement, and that the Commission waive its freezes on the filing and processing of channel substitution petitions and

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<sup>30</sup> *Facilities Modification Freeze* at 4365.

<sup>31</sup> *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Station WNLO(TV), Buffalo, New York, Notice of Proposed Rulemaking*, 34 FCC Rcd 2395, 2397 (MB 2019). See also *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Minneapolis, Minnesota*, DA 20-1221 (released October 15, 2020); *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Mesa, Arizona*, DA 20-1192 (released October 13, 2020); *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Portland, Oregon*, DA 20-1193 (released October 13, 2020).



## APPENDIX A

Below is a sampling of written communications received from the public concerning reception of KOMU-TV's over-the-air signal. While there are many more, this sampling excludes, for example, communications that did not include contact information, and those which contained vulgar language. Names and addresses have been deleted for privacy reasons, but will be provided to the Commission upon request. In some cases where the commenter replied to the station's response, content from the original and reply messages has been combined. Stations referred to by commenters are:

KOMU-TV, Columbia, Missouri (NBC/CW, Channel 8 Virtual and OTA)  
 KMIZ(TV), Columbia, Missouri (ABC, Channel 17 Virtual and OTA)  
 KQFX-LD, Columbia, Missouri (FOX, formerly Channel 22, now Channel 30 OTA)  
 KNLJ-TV, Jefferson City, Missouri (REL, Channel 25 Virtual, Channel 20 OTA)  
 KRCG(TV), Jefferson City, Missouri (CBS, Channel 13 Virtual, Channel 12 OTA)  
 KMOS-TV, Sedalia, Missouri (PBS, Channel 6 Virtual, Channel 15 OTA)

Number	Date	Text of Message	Name
1	6/27/2014	I was wondering why we use to be able to get channel 8 at all times but here lately we might get it through the night and early morning then at 9am it loses signal and we don't get it rest of the afternoon and we really like that channel. I have just basic tv with hd but not satellite and cable out here in the country and never have had any problems before everything went digital so was wondering if you could help us with this problem or have any ideas on what to do. We have an outside antenna but that don't help either and if weather is bad it cuts in and out alot...	SW
2	8/19/2014	Why is it that your station is the ONLY one having transmission issues? I have checked all other stations all are OK. DANG. Wish it would get better. This seems to happen at least 3 or 4 times a week????? Thanks hope you get it fixed.	SE
3	1/18/2015	Hello, Ever since you went to digital my father and others can no longer receive Channel 8. They feel bad because they like your station's programming,etc. Is there any fix in sight for stronger signals?	DV
4	1/15/2015	Why do I lose your station every evening around 7pm. I get no signal to watch any programs after 7pm. What is going on?	DG
5	10/21/2019	I live less than 10 miles from your transmission tower, yet you give me the worst picture of all the stations I receive. Is your signal underpowered? Is there some kind of interference from the airport? Fight the cable conspiracy, and clean up your broadcast signal.	DP
6	1/27/2019	Hello, My name is [ ], and I live just east of Linn along [ ]. I am working on cutting the cord with the satellite TV provider Dish Network. So, after some research, I bought the best digital antenna that I was referred to, and got it up as high as I could. Great reception on all the other local channels, except, sadly enough, KOMU NBC channel 8. My favorite one of them all. After further investigation I found that the power from your station is much less then the others.. So, my question is, would there possibly be a chance that you might be increasing your signal broadcasting power	DM

Number	Date	Text of Message	Name
		sometime in the future? To compete with the other channels? And if so, is there a timeline when this would happen? I'd appreciate any info that you may have to relay to me on this subject. Thanks so much! Best regards, [ ]	
7	11/29/2018	I live in Columbia and I have a Clearstream HD antenna mounted on my roof and until recently I have had good reception but lately reception has been very poor. All other channels (KMIZ, KRCG, PBS) all come in clearly. Any help would be greatly appreciated	BS
8	9/14/2018	We live in St Elizabeth MO/ Miller County We have antenna tv Why do we daily loose several hours of day time tv? Sometimes we loose evening reception also? This does not happen with any other stations?? Is there something we can do? Thank you	MS
9	9/12/2018	Chris: Why is it that I cannot receive any of Channel 8 free TV shows? I live in Jefferson City now, and I can pick up 4 free channels from Sedalia, and 5 free channels from KMIZ in Columbia, and of course all of KRCG channels? I purchased a new TV last fall and for 1 day I was able to pick up I think 3 channel 8 channels? Please advise Thank you [ ] PS: I only am using an indoor antenna?	CE
10	2/1/2018	we live in Eldon Missouri we get all station in your area put 8 komu on our anenna.	JC
11	3/25/2017	I live in Jefferson City near [ ] and [ ]. I have tried every which way to receive your signal with no luck. Everybody else comes in strong and clear ?	BG
12	12/1/2019	I am kindly asking how is it possible that your antenna is the closest to my location yet I get the worst reception? Seems like you're throttling you're service. Maybe it's not possible but sure seems that way. Kinda fishy when I have a good signal until a popular program comes on. PBS is almost 60 miles away and almost always have a clear picture. Your tower is 38 miles from me and I hardly ever get your station. KMIZ is pretty much equal distance and I always get a perfect signal and picture.	AS
13	2/18/2018	I am quite frustrated with someone ! I have an antenna for my TV. I always was able to get channel 8. For some reason now all I get is bbbbbb. Nnnn bleep bleepbbbaaabb and am for the most part I am unable to watch it. I have NOT been able to watch the Olympics!  Please engineer your station coverage, build a taller tower or something!  Thank you	RM
14	7/15/2017	This isn't the first Saturday morning my OTA reception of channels 8.1 and 8.3 have been on the fritz. This morning everything was fine until about 7:50 a.m. All my other OTA channels are clear, including channel 6 (KMOS) out of Warrensburg. Since the channel 6 reception is fine, it's my perception that the problem lies with your transmitter rather than my antenna. Saturday mornings I love to watch Calling Dr. Pol and The Dog Whisperer. This morning I	BT

Number	Date	Text of Message	Name
		guess I'll give up on your signal and see what Netflix has to offer. :(	
15	4/24/2017	Since the leaves have started coming back my reception in Jeff City has been very poor for Komu! Do you adjust transmitter power For the different seasons? I am barely at half the radius of your coverage footprint! A little bit disappointing. I suppose your power savings could be considerable if you are figuring a 20 dB path loss improvement during winter months? Anyway, I don't believe the signal strength issue exists its my home distribution system... All other channels are fine. Any idea what might be going on?	P
17	3/29/2017	I am disappointed that I am unable to receive your broadcasts over the air. I do not have cable or internet and enjoyed watching your programming. I realize there are times when the weather will interfere with reception, but I have been unable to watch NBC / KOMU for over a week. I hope that you will be able to improve your towers so that people are able to enjoy your programming again.	AK
18	11/7/2016	<b>Sir:</b>  <b>For some time our channel 8 reception has come in "broken up." It is getting worse. We live two miles south of [___], approximately 6 miles due west of Columbia with a roof mounted antenna designed for the high definition signal. Can you offer any suggestions regarding improving our signal. We watch Channel 8 a lot especially for our news and weather. My wife's favorite Soap Opera, Days of our lives, is also on your channel. A happy wife is important, don't we all know!!!</b>  <b>Thanks in advance for any help you can offer.</b>  <b>A faithful viewer,</b>	JG
19	10/14/2015	What in the HELL is going on with KMOU transmissions? If it wasn't so frustrating it would be a joke. As I write this I'm watching the news. Jim's picture is on there no movement, no sound. A minute ago the picture was all scrambled then went black. This happens quite often with the evening news and with the programming around 9:00 – 9:30 PM.  I live in California (MO) and have an outside antenna made to receive digital signals. Had it installed when the signals changed. This problem rarely if ever occurs with any of the other stations (KMOS, KRCG, etc.). This makes me think the problem has to be with your station's signal. I do hope something can be done about this. (I'm tired of the "Black List" being interrupted.)  If I need to call our Rep's office (for all the good that would do) let me know. NBC has some good programming and I hate to miss out on it.	JM
20	9/7/2014	I have an outside antenna, RCA Digital Flat Multidirectional. The model number is ANT800F. I installed the antenna about 4 months ago. No problems until about a month ago and we lost KOMU and CW about 95% of the time. No problems with the other 9 channels we get. Your stations would work only at late night hours.	GB

Number	Date	Text of Message	Name
21	10/27/2018	I cannot receive KOMU over the air with my antenna - recently purchased. Do you know whether, besides having a roof antenna, whether your station can be picked up with inside antennas? This antenna states it can pick up stations within a 50-mile radius. Thank you.	JV
22	9/29/2018	I have a digital antenna and used to get KOMU no problem. However over the past few months I have changed over to Channel 17 ABC because I can no longer receive Channel 8 NBC. Please let me know how I can get back to KMOU broadcasting. Thank you, [ ]	VS
23	2/10/2014	I live in Holts Summit and had historically watched lots of NBC programming. We do not have cable or a satellite dish but had always picked up KOMU with our antenna. Quite a while back, we stopped receiving KOMU. No matter how we move the antenna, nor which antenna we have tried, we can't seem to capture the station. We pick up KMIZ and KRCG perfectly. Can you help me identify what the problem may be?  Thanks much.	BM
24	9/25/2013	Hello, We receive KOMU8 digital broadcast via a roof antenna. Our TV is a high quality HDTV with autoprogramming capability, and has always picked up your NBC and CW signal with little problem. Today, however, your channels are gone from the available selections and will not reappear even after running the autoprogram function. Is there a problem on your end? Thanks,	LD
25	8/8/2013	I live in the country near Armstrong, outside of Fayette. We used to get really good reception for KOMU, but couple of months ago it suddenly stopped. We thought our antennae may have gone bad. We have a tall antennae outside the house that we have to position just right for reception, so we replaced it, but still can't get KOMU.  Were there any changes made to the reception and why we can get it?  Thanks,	EW
26	6/11/2013	I have a digital hdtv antenna (Clearstream 2) purchased from Best Buy that I installed on the outside of our house this past fall. We live in [ ] subdivision off of [ ] boulevard. It is aimed directly at your station to the southeast. Until a month or so ago our signal has been great but now our reception has been really bad to no signal at all. We get PBS 6.1,6.2, and 6.3; CBS 13.1; ABC 17.1,17.2, and 17.3; Fox 22.1; and KNLJ-DT 25.1 all come in high definition great signal quality. Has anyone else reported similar reception issues. Any help would be appreciated.  Thanks	BS
27	8/12/2018	We have decided to cut our cable and use an over the air antenna to view our local network stations. We live just west of Mexico, Mo, so we purchased an antenna that was advertised to be able to get TV signals at distances up to 75 miles. We are having no problems picking up the CBS and ABC signals, but cannot bring in the NBC signal! We are used to watching the Today Show and several other	PL

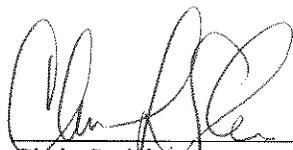
Number	Date	Text of Message	Name
		<p>NBC programs, including KOMU's news and weather broadcasts. We were just wondering why you can't increase your power so your signals can be picked up by an ota antenna! I am sure many others are experiencing this same problem. Please inform.</p> <p><i>KOMU Response: Please provide a street address and the manufacturer and model of antenna that you chose to use to receive KOMU. Thanks!</i></p> <p>We live at [____], Mexico, Mo., 65265. The antenna was purchased on Amazon. It is sold by New Tree Bee and following is their description: <a href="#">Tree New Bee</a>  <a href="#">3.6 out of 5 stars</a>  <a href="#">5,932</a>  Reviews  Amplified HD Digital Outdoor HDTV Antenna 150 Miles Long Range with Motorized 360 Degree Rotation, UHF/VHF/FM Radio with Infrared Remote Control.  It really doesn't matter who makes the antenna. What does matter is that it effectively picks up other network signals in your area, but not yours, even with the antenna directed right at your location. You need to increase your power output!</p>	
28	3/17/2013	I was wondering, if there is any way you could boost your signal. as alot of us in the Fayette Armstrong area, are not able to get your signal thru our converter box.	CL
29	4/21/2014	I LIVE IN RUSSELLVILLE AREA AND WE CAN NO LONGER GET YOUR STATION IN. WE HAVE TRIED NEW ANNTINA, AJUSTMENT ECT. HAVE SPOKEN TO MANY OTHERS IN THE AREA AND FOUND THEY ALSO NO LONG RECIEVE YOUR STATION. HAS SOMETHING CHANGED ON THE BROADCASTING END??? I THE LAST WEEK WEEK WE HAVE DISCOVERED THAT AT MIDNIGHT 8-1 AND THE CW BOTH POP BACK ON AND WORK GREAT FOR A FEW HOURS BUT ARE GONE AGAIN BY THE EARLY AM WE MISS YOUR SERVICE PLEASE LET US KNOW WHAT THE PROBLEM IS	SS

## DECLARATION

I, Chris Swisher, do hereby declare under penalty of perjury that the following is true and correct:

1. I am the Chief Engineer of KOMU-TV, Columbia, Missouri.
2. I have reviewed the attached "Petition for Rulemaking."
3. Except for (a) matters cited therein contained in the FCC's records, (b) matters for which other support is provided, and (c) matters of which the Commission may take official notice, the information contained therein is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,



Chris Swisher

Dated: October 23, 2020