

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

In the Matter of	)	
	)	
Amendment of Section 73.622,	)	MB Docket No. _____
Digital Television Table of Allotments	)	
For KFVS-TV, Cape Girardeau, MO	)	Rulemaking No. _____
(Facility 592)	)	

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

**PETITION FOR RULEMAKING**

Gray Television Licensee, LLC (“Gray”), licensee of Station KFVS-TV (“KFVS”), Cape Girardeau, Missouri, hereby requests that the Commission institute a rulemaking proceeding for the purpose of amending the DTV Table of Allotments (the “DTV Table”) contained in Section 73.622(i) of the Commission’s rules.<sup>1</sup> Gray requests that the Commission amend the DTV Table to substitute UHF Channel 32 for VHF Channel 11 with the technical parameters as set forth in the attached Engineering Statement. As set forth herein, grant of this Petition will create a preferential arrangement of allotments by expanding the availability of free over-the-air television service in this market.

The FCC has described the goal of the DTV Table as ensuring the provision of digital television service “to the American people in an expeditious and efficient manner.”<sup>2</sup> In considering channel substitution requests, the Commission considers the

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<sup>1</sup> See 47 C.F.R. §§ 1.401, 1.420, 73.622(i).

<sup>2</sup> See, e.g., *In the Matter of Amendment of Section 73.622(B), Table of Allotments, Digital Television Broadcast Stations (Nampa, Idaho)*, Report and Order, 19 FCC Rcd. 4491, 4493 (2004); *In the Matter of Amendment of Section 73.622(B), Table of Allotments, Digital Television Broadcast Stations (In the Matter of Amendment of Section*

petitioner's public interest justification and whether the proposal would comply with the principal community coverage requirements of Section 73.625(a).<sup>3</sup>

This channel substitution serves the public interest because it will resolve significant over-the-air reception problems in KFVS's existing service area.<sup>4</sup> With viewers increasingly reliant on over-the-air signals to receive the most valued video content,<sup>5</sup> providing a strong broadcast signal is more important than it has been in decades. Yet, the challenges with digital reception of VHF signals are well-documented. Ten years ago, the Commission recognized the deleterious effects manmade noise has on the reception of VHF signals, finding that "the propagation characteristics of these

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73.622(B), *Table of Allotments, Digital Television Broadcast Stations (Albany, New York)*, 19 FCC Rcd. 4329, 4331 (2004); see also *In the Matter of Advanced Television Systems & Their Impact Upon the Existing Television Broadcast Service*, 12 FCC Rcd. 14588 ¶ 76 (1997).

<sup>3</sup> See, e.g., *In Re Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Mesa, Arizona)*, Notice of Proposed Rulemaking, MB Docket No. 20-331, RM-11863, DA-20-1192 (rel. Oct. 13, 2020) ("Mesa NPRM"); *In Re Amendment of Section 73.622(b), Table of Allotments, Digital Television Broad. Stations, Ontario, CA*, Notice of Proposed Rulemaking, 16 FCC Rcd. 2276 (2001); *In Re Amendment of Section 73.606(b), Table of Allotments, Television Broad. Stations, Moscow, Idaho*, Notice of Proposed Rulemaking, 17 FCC Rcd. 19447 (2002).

<sup>4</sup> See *Mesa NPRM* ¶ 6 (recognizing effect of "VHF propagation challenges"); *In Re Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations, Missoula, Mt.*, Notice of Proposed Rulemaking, 16 FCC Rcd. 2232 (2001) (finding that proposal to substitute channels to improve signal coverage and eliminate interference "warrants consideration").

<sup>5</sup> See, e.g., Parks Associates, *TV Antenna Usage in US Broadband Households Jumped to 25% in 2019 and Is Expected to Grow More as COVID-19 Keeps Consumers at Home* (Mar. 26, 2020), <http://www.parksassociates.com/blog/article/pr-03262020> (finding that OTA viewing increased from 15% in 2018 to 25% in 2019); Phil Kurz, *New Research Reveals Resurgence in OTA Antenna Viewing*, TVTechnology (Apr. 29, 2019), available at <https://www.tvtechnology.com/news/new-research-reveals-resurgence-in-ota-antenna-viewing> (finding that viewers consume 19% of viewing time over the air); *The Evolving Over-the-Air Home*, Nielsen Local Watch Report (Jan. 14, 2019), available at <https://www.nielsen.com/wp-content/uploads/sites/3/2019/04/q2-2018-local-watch-report.pdf> (finding that more than 14% of TV households lack cable or satellite service).

channels allow undesired signals and noise to be receivable at relatively farther distances, nearby electrical devices tends to emit noise in this band that can cause interference, and reception of VHF signals requires physically larger antennas ... relative to UHF channels.”<sup>6</sup> KFVS’s real world experience confirms these observations. By moving from VHF Channel 11 to UHF Channel 32, KFVS will be able to deliver a more reliable over-the-air signal to viewers throughout its coverage area.

Attached is an Engineering Statement of Chesapeake RF Consultants, LLC,<sup>7</sup> which sets forth in detail the proposed KFVS’s Channel 32 DTV Table specifications. Gray proposes to operate from the Station’s existing tower by substituting a top-mount Channel 32 antenna in place of the existing Channel 11 antenna. This proposal is in compliance with all relevant technical requirements for amendment of the post-transition DTV Table, including the interference protection requirements of 47 C.F.R. §73.616 and the 0.5% de minimis interference standard with respect to all allotments and assignments, existing and proposed. As further reflected in the Engineering Statement, the proposed Channel 32 facility will provide full principal community coverage to Cape Girardeau, Missouri and will not result in any population loss.

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<sup>6</sup> See *Matter of Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, 25 FCC Rcd. 16498 ¶ 42 (2010) (recognizing that “VHF channels have certain characteristics that have posed challenges for their use in providing digital television service.”)

<sup>7</sup> See Exhibit 1 (“Engineering Statement”).

For the foregoing reasons, Gray respectfully requests that the Commission grant this Petition and immediately comments a rulemaking proceeding to change the digital allotment for KFVS from Channel 11 to Channel 32 as proposed herein.

Respectfully submitted,

GRAY TELEVISION LICENSEE, LLC

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Dated: November 27, 2020

Exhibit 1

**Engineering Statement**  
prepared for  
**Gray Television Licensee, LLC**  
KFVS-TV Cape Girardeau, MO  
Facility ID 592  
Ch. 32 473 kW 601 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC* (“Gray”), licensee of KFVS-TV (Facility ID 592, Cape Girardeau MO) in support of a *Petition for Rulemaking* to amend §73.622(i) by changing KFVS-TV’s digital television channel assignment. KFVS-TV is licensed to operate on Channel 11 (file# 0000115816) as reassigned in the incentive auction proceeding.<sup>1</sup> As described herein, *Gray* requests substitution of Channel 32 in lieu of Channel 11 for KFVS-TV.

The KFVS-TV pre-auction Channel 12 and the existing Channel 11 operation are in the VHF spectrum and have proven to be ineffective for satisfactory viewer reception as discussed herein and elsewhere in the petition. The use of Channel 32 would place KFVS-TV in the UHF spectrum which is known to provide robust signal levels for home reception.

*Gray* has determined that many viewers experience significant difficulty in receiving KFVS-TV’s signal. Problems with digital VHF reception by stations in many markets were widely publicized since the 2009 digital transition date. It has been established that indoor reception is difficult for digital VHF stations such as KFVS-TV due to the longer wavelength signal’s inability to readily pass through buildings (the windows are smaller than the wavelength size), the ineffectiveness of many indoor antennas many of which were designed to emphasize the shorter wavelengths for UHF reception, and high levels of manmade and environmental noise.

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<sup>1</sup>*Incentive Auction Closing and Channel Reassignment Public Notice* (“CCRPN”, DA 17-317, released April 13, 2017). The post-incentive auction transition period ended on July 13, 2020. The FCC’s rules have not yet been amended to reflect all new full power channel assignments in a revised Table of Allotments. Because the Table has not yet been amended, it is understood that FCC’s Media Bureau will continue to refer to the Post-Transition Table of DTV Allotments, 47 CFR § 73.622(i) (2018), for the purpose of post-auction channel change rulemaking proceedings.

No change in transmitting location is proposed. The KFVS-TV tower structure corresponds to FCC Antenna Structure Registration (“ASR”) number 1003017. Gray proposes to implement the Channel 32 substitution with a top-mounted transmitting antenna on the existing tower structure which would replace the existing top-mounted Channel 11 antenna.

The licensed Channel 11 facility operates with 11.8 kW effective radiated power (“ERP”) nondirectional at 609 meters antenna height above average terrain. Gray proposes herein to utilize 473 kW ERP nondirectional on Channel 32 while maintaining the antenna HAAT at 609 meters.

A summary of the licensed Channel 11 and proposed Channel 32 technical parameters is provided in the following.

**Licensed Channel 11 Parameters (file# 0000115816)**

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
592	KFVS-TV	11	CAPE GIRARDEAU	MO	372546	893014	745	609	11.8	ND

**Proposed Channel 32 Parameters**

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
592	KFVS-TV	32	CAPE GIRARDEAU	MO	372546	893014	745	609	473	ND

A map is supplied as Figure 1, which depicts the standard predicted coverage contours. As demonstrated thereon, the proposed facility complies with §73.625(a)(1) as the entire community of Cape Girardeau will be encompassed by the 48 dBμ contour.

Interference study per FCC OET Bulletin 69<sup>2</sup> shows that the proposal complies with the 0.5 percent limit of new interference caused to pertinent nearby full service and Class A television

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<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). This analysis employed the FCC’s current “TVStudy” software with the default application processing template settings, 2 km cell size, and 1 km terrain increment. Comparisons of various results of this computer program (run on a Mac processor) to the FCC’s implementation of TVStudy show excellent correlation.

stations and reassignments as required by §73.616. The interference study output report is provided as Table 1.

The proposed 473 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 609 meters permitted by §73.622(f)(8)(i). Section 73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the largest station within the same market. As demonstrated in Figure 2, the total area within the proposed KFVS-TV Channel 32 noise limited service contour (“NLSC”) is 40,804 square kilometers, which matches the NLSC location and area of the licensed KFVS-TV Channel 11 facility (40,804 sq. km). Thus, the 473 kW ERP specified herein complies with §73.622(f)(5) of the FCC’s Rules.

Since there is no change in NLSC location (see Figure 2), no areas of service loss will result from the proposed channel substitution.

## **Conclusion**

The proposed channel substitution complies with the FCC’s principal community coverage requirements of §73.625 and the interference protection requirements of §73.616. No NLSC loss area will be created.

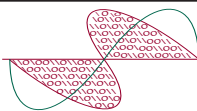
## List of Attachments

Figure 1	Proposed Coverage Contours
Figure 2	Coverage Contour Comparison
Table 1	TVStudy Analysis of Proposal

## **Chesapeake RF Consultants, LLC**

Joseph M. Davis, P.E.	November 17, 2020	
207 Old Dominion Road	Yorktown, VA 23692	703-650-9600





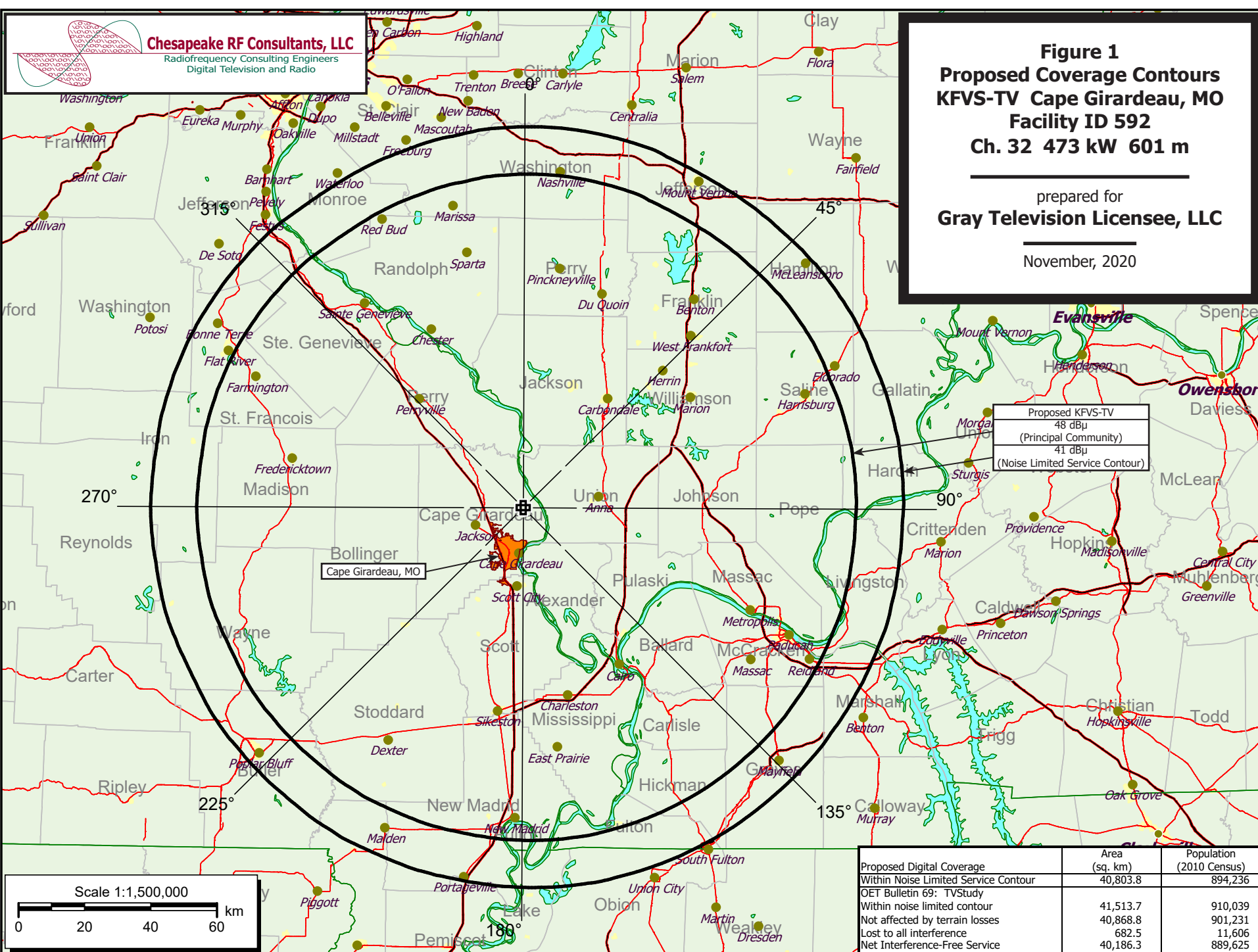
**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

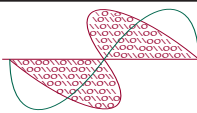
**Figure 1**  
**Proposed Coverage Contours**  
**KFVS-TV Cape Girardeau, MO**  
**Facility ID 592**  
**Ch. 32 473 kW 601 m**

prepared for  
**Gray Television Licensee, LLC**

November, 2020

Proposed KFVS-TV  
48 dBu  
(Principal Community)  
41 dBu  
(Noise Limited Service Contour)





**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

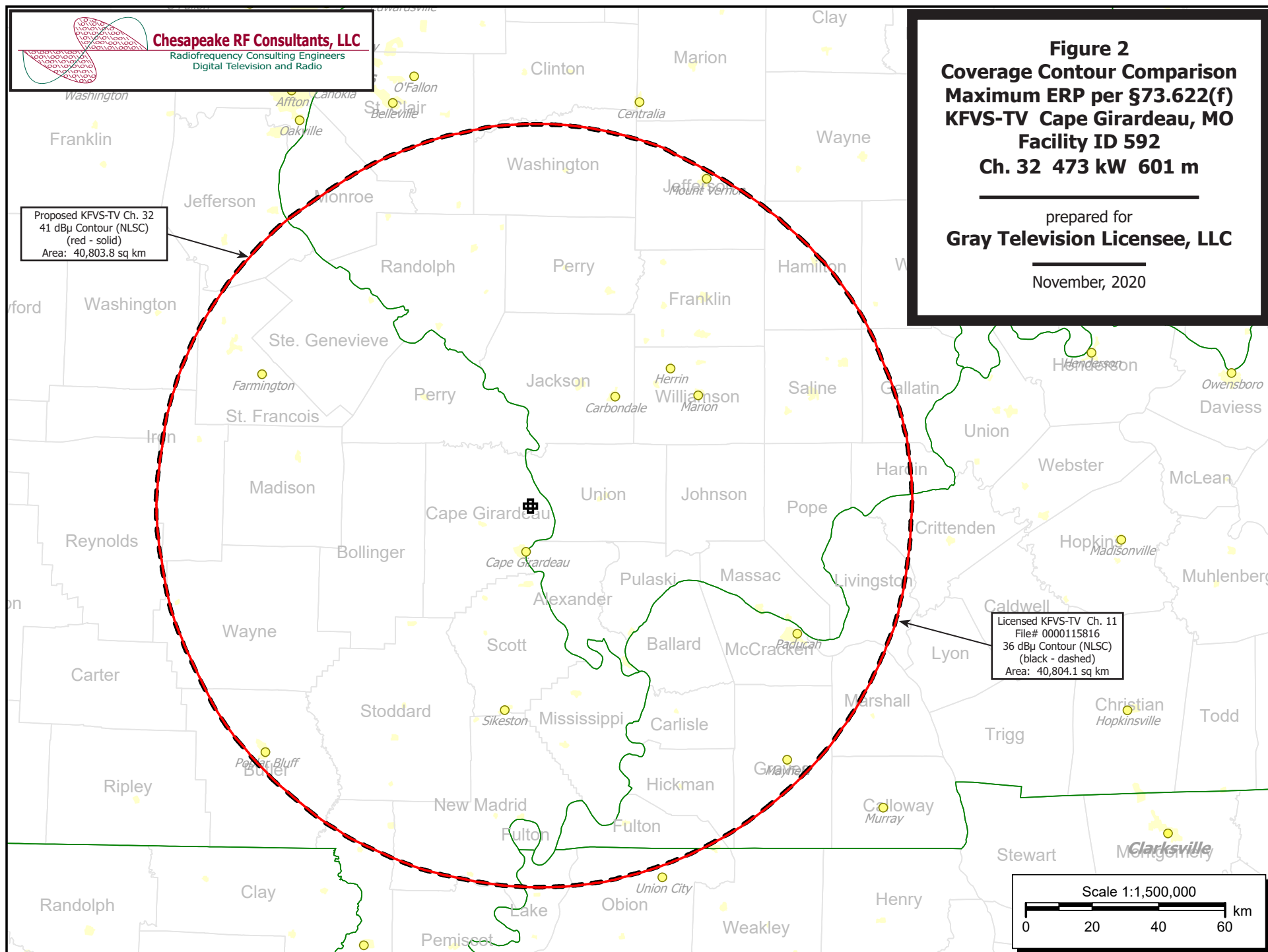
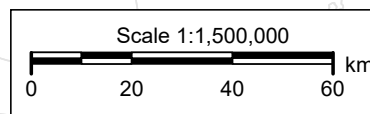
Proposed KFVS-TV Ch. 32  
41 dBu Contour (NLSC)  
(red - solid)  
Area: 40,803.8 sq km

**Figure 2**  
**Coverage Contour Comparison**  
**Maximum ERP per §73.622(f)**  
**KFVS-TV Cape Girardeau, MO**  
**Facility ID 592**  
**Ch. 32 473 kW 601 m**

prepared for  
**Gray Television Licensee, LLC**

November, 2020

Licensed KFVS-TV Ch. 11  
File# 0000115816  
36 dBu Contour (NLSC)  
(black - dashed)  
Area: 40,804.1 sq km



# **Table 1 KFVS-TV TVStudy Analysis of Proposal** (page 1 of 5)



tvstudy v2.2.5 (4uoc83)  
Database: localhost, Study: KFVS-TV Ch32\_PRM, Model: Longley-Rice  
Start: 2020.11.17 11:44:50

Study created: 2020.11.17 11:44:49

Study build station data: LMS TV 2020-11-15

Proposal: KFVS-TV D32 DT APP CAPE GIRARDEAU, MO  
File number: KFVS-TV Ch32 PRM  
Facility ID: 592  
Station data: User record  
Record ID: 3275  
Country: U.S.  
Zone: II

Search options:  
Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WVUT	D31	DT	LIC	VINCENNES, IN	BLANK0000087466	223.5 km
No	WKMA-TV	D31	DT	LIC	MADISONVILLE, KY	BLANK0000087442	178.0
Yes	KDNL-TV	D31	DT	LIC	ST. LOUIS, MO	BLCDT20021216AAE	146.9
No	WLMT	D31	DT	LIC	MEMPHIS, TN	BLCDT20050427ABN	240.6
Yes	KARK-TV	D32	DT	LIC	LITTLE ROCK, AR	BMLCDT20121102ACP	397.3
Yes	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	324.2
Yes	WTJR	D32	DT	LIC	QUINCY, IL	BLCDT20091110ADL	323.9
Yes	WDRB	D32	DT	LIC	LOUISVILLE, KY	BLANK0000087865	336.5
No	KSMO-TV	D32	DT	LIC	KANSAS CITY, MO	BLANK0000072612	471.2
No	WABG-TV	D32	DT	LIC	GREENWOOD, MS	BLCDT20051024ABR	460.5
No	W32EV-D	D32	DC	LIC	ADAMSVILLE, TN	BLANK0000121663	264.8
Yes	WNPX-TV	D32	DT	LIC	FRANKLIN, TN	BLANK0000087615	269.5
Yes	KTVI	D33	DT	LIC	ST. LOUIS, MO	BLANK0000108077	144.6
No	WPGD-TV	D33	DT	LIC	HENDERSONVILLE, TN	BMLCDT20131125BGF	273.3
No	WPXX-TV	D33	DT	LIC	MEMPHIS, TN	BLANK0000063435	248.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D32  
Latitude: 37 25 46.00 N (NAD83)  
Longitude: 89 30 14.00 W  
Height AMSL: 745.0 m  
HAAT: 609.1 m  
Peak ERP: 473 kW  
Antenna: Omnidirectional  
Elev Pattn: Generic  
Elec Tilt: 0.75

40.5 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	473 kW	629.4 m	116.0 km
45.0	473	616.8	115.4
90.0	473	622.5	115.6
135.0	473	633.4	116.2
180.0	473	619.8	115.5
225.0	473	582.7	113.7
270.0	473	579.1	113.5
315.0	473	589.4	114.1

ERP exceeds maximum  
ERP: 473 kW ERP maximum: 317 kW

Distance to Canadian border: 738.7 km

Distance to Mexican border: 1386.1 km

Conditions at FCC monitoring station: Powder Springs GA

**Table 1 KFVS-TV TVStudy Analysis of Proposal**  
(page 2 of 5)



Bearing: 131.1 degrees Distance: 586.0 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 287.2 degrees Distance: 1392.7 km

Study cell size: 2.00 km  
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to BLCDT20021216AAE LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KDNL-TV	D31	DT	LIC	ST. LOUIS, MO	BLCDT20021216AAE	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	146.9 km
	WTCT	D30	DT	LIC	MARION, IL	BLANK0000096223	161.2
	KWBM	D31	DT	CP	HARRISON, AR	BLANK0000036086	318.3
	WQAD-TV	D31	DT	LIC	MOLINE, IL	BLANK0000120809	303.7
	KCWE	D31	DT	LIC	KANSAS CITY, MO	BLCDT20051014ABT	366.8
	WLMT	D31	DT	LIC	MEMPHIS, TN	BLCDT20050427ABN	370.6
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
31360.1		2,987,219		30974.5		2,973,543	1.23 0.19
Undesired		Total IX		Unique IX, before		Unique IX, after	
KFVS-TV D32 DT APP		404.0		6,800		376.3	5,684
WTCT D30 DT LIC		23.7		1,103		0.0	0
KWBM D31 DT CP		51.5		1,475		43.5	1,345
WQAD-TV D31 DT LIC		167.1		455		167.1	455
KCWE D31 DT LIC		12.1		46		8.0	26
WLMT D31 DT LIC		15.9		135		7.9	12

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Interference to BLCDT20021216AAE LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KDNL-TV	D31	DT	LIC	ST. LOUIS, MO	BLCDT20021216AAE	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	146.9 km
	WTCT	D30	DT	LIC	MARION, IL	BLANK0000096223	161.2
	KWBM	D31	DT	LIC	HARRISON, AR	BLCDT20091201ASC	318.3
	WQAD-TV	D31	DT	LIC	MOLINE, IL	BLANK0000120809	303.7
	KCWE	D31	DT	LIC	KANSAS CITY, MO	BLCDT20051014ABT	366.8
	WLMT	D31	DT	LIC	MEMPHIS, TN	BLCDT20050427ABN	370.6
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
31360.1		2,987,219		30743.9		2,974,858	1.22 0.19
Undesired		Total IX		Unique IX, before		Unique IX, after	
KFVS-TV D32 DT APP		404.0		6,800		376.3	5,684
WTCT D30 DT LIC		23.7		1,103		0.0	0
KWBM D31 DT LIC		11.9		30		11.9	30
WQAD-TV D31 DT LIC		167.1		455		167.1	455
KCWE D31 DT LIC		12.1		46		12.1	46
WLMT D31 DT LIC		15.9		135		11.9	122

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Interference to BMLCDT20121102ACP LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KARK-TV	D32	DT	LIC	LITTLE ROCK, AR	BMLCDT20121102ACP	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	397.3 km
	KPXJ	D32	DT	LIC	MINDEN, LA	BLANK0000071631	269.7
	WABG-TV	D32	DT	LIC	GREENWOOD, MS	BLCDT20051024ABR	240.1

**Table 1 KFVS-TV TVStudy Analysis of Proposal**  
(page 3 of 5)



Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
39662.5 1,212,038	37928.1 1,196,196	36996.0 1,189,510	36992.0 1,189,499	0.01 0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	8.1 26		4.0 11
KPXJ D32 DT LIC	823.9 5,669	735.8 5,250	735.8 5,250
WABG-TV D32 DT LIC	196.3 1,436	108.2 1,017	104.2 1,002

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Interference to BLANK0000059351 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	324.2 km
	WLPD-CD	D32	DC	LIC	PLANO, IL	BLANK0000113895	197.1
	WTJR	D32	DT	LIC	QUINCY, IL	BLCDDT20091110ADL	290.9
	WANE-TV	D32	DT	LIC	FORT WAYNE, IN	BLANK0000121250	257.2
	WDRB	D32	DT	LIC	LOUISVILLE, KY	BLANK0000087865	260.9

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
35941.9 1,238,332	35905.8 1,237,046	34944.3 1,225,744	34944.3 1,225,744	0.00 0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	103.6 433		0.0 0
WLPD-CD D32 DC LIC	51.7 145	51.7 145	51.7 145
WTJR D32 DT LIC	292.2 4,346	284.3 4,337	220.5 4,038
WANE-TV D32 DT LIC	127.7 2,598	123.7 2,554	123.7 2,554
WDRB D32 DT LIC	501.8 4,266	489.9 4,213	458.0 4,088

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Interference to BLCDDT20091110ADL LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTJR	D32	DT	LIC	QUINCY, IL	BLCDDT20091110ADL	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	323.9 km
	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	290.9
	KSMO-TV	D32	DT	LIC	KANSAS CITY, MO	BLANK0000072612	286.8
	KTVO	D33	DT	CP	KIRKSVILLE, MO	BLANK0000111691	113.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
26378.3 334,527	26279.0 334,221	25930.3 332,518	25910.3 332,497	0.08 0.01

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	47.8 163		19.9 21
WICD D32 DT LIC	96.1 249	88.1 226	72.2 124
KSMO-TV D32 DT LIC	28.0 97	16.0 71	12.0 54
KTVO D33 DT CP	236.7 1,383	232.6 1,380	232.6 1,380

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Interference to BLCDDT20091110ADL LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTJR	D32	DT	LIC	QUINCY, IL	BLCDDT20091110ADL	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	323.9 km
	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	290.9
	KSMO-TV	D32	DT	LIC	KANSAS CITY, MO	BLANK0000072612	286.8
	KTVO	D33	DT	LIC	KIRKSVILLE, MO	BLCDDT20030604AAC	113.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
26378.3 334,527	26279.0 334,221	26154.9 333,880	26134.9 333,859	0.08 0.01

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	47.8 163		19.9 21
WICD D32 DT LIC	96.1 249	88.1 226	72.2 124
KSMO-TV D32 DT LIC	28.0 97	20.0 74	16.0 57
KTVO D33 DT LIC	8.0 18	8.0 18	8.0 18

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Interference to BLANK0000087865 LIC scenario 1

**Table 1 KFVS-TV TVStudy Analysis of Proposal**  
(page 4 of 5)



Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WDRB	D32	DT	LIC	LOUISVILLE, KY	BLANK0000087865	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	336.5 km
	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	260.9
	WANE-TV	D32	DT	LIC	FORT WAYNE, IN	BLANK0000121250	310.3
	WOUB-TV	D32	DT	LIC	ATHENS, OH	BLANK0000068360	337.7
	WNPX-TV	D32	DT	LIC	FRANKLIN, TN	BLANK0000087615	215.8
	WTIU	D33	DT	LIC	BLOOMINGTON, IN	BLANK0000087599	104.3
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
35820.8 2,054,813		35038.4 2,037,086		33860.4 2,005,109		33836.5 2,004,830	0.07 0.01

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	143.2 8,598	23.9 279	
WICD D32 DT LIC	539.6 19,558	412.1 14,949	328.5 10,490
WANE-TV D32 DT LIC	12.0 179	4.0 32	4.0 32
WOUB-TV D32 DT LIC	28.1 513	20.1 280	20.1 280
WNPX-TV D32 DT LIC	334.2 7,253	294.6 3,408	286.7 3,293
WTIU D33 DT LIC	395.6 9,192	315.7 8,590	315.7 8,590

Interference to BLANK0000087615 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WNPX-TV	D32	DT	LIC	FRANKLIN, TN	BLANK0000087615	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	269.5 km
	WKMA-TV	D31	DT	LIC	MADISONVILLE, KY	BLANK0000087442	104.0
	WSB-TV	D32	DT	LIC	ATLANTA, GA	BLANK0000104824	372.7
	WDRB	D32	DT	LIC	LOUISVILLE, KY	BLANK0000087865	215.8
	W32EV-D	D32	DC	LIC	ADAMSVILLE, TN	BLANK0000121663	208.3
	WPGD-TV	D33	DT	LIC	HENDERSONVILLE, TN	BMLCDT20131125BGF	30.3
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
26048.9 2,084,890		25479.7 2,071,017		22874.3 1,902,473		22798.3 1,899,254	0.33 0.17

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	216.0 4,770	76.0 3,219	
WKMA-TV D31 DT LIC	92.1 899	24.0 212	16.0 191
WSB-TV D32 DT LIC	4.0 166	0.0 0	0.0 0
WDRB D32 DT LIC	732.3 13,196	604.1 11,032	560.1 10,550
W32EV-D D32 DC LIC	24.1 607	0.0 0	0.0 0
WPGD-TV D33 DT LIC	1909.3 156,377	1829.0 154,764	1809.1 154,654

Interference to BLANK0000108077 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KTVI	D33	DT	LIC	ST. LOUIS, MO	BLANK0000108077	
Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	144.6 km
	WAOE	D33	DT	BL	PEORIA, IL	DTVBL52280	243.3
	KTVO	D33	DT	CP	KIRKSVILLE, MO	BLANK0000111691	283.9
	WPXX-TV	D33	DT	LIC	MEMPHIS, TN	BLANK0000063435	372.8
	WSIL-TV	D34	DT	LIC	HARRISBURG, IL	BLCDDT20080718AAR	166.5
	WQEC	D34	DT	CP	QUINCY, IL	BLANK0000035763	179.5
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
32261.2 2,995,764		31640.5 2,991,513		31517.6 2,987,234		31283.6 2,980,476	0.74 0.23

Undesired	Total IX	Unique IX, before	Unique IX, after
KFVS-TV D32 DT APP	277.5 10,264	234.0 6,758	
WAOE D33 DT BL	11.9 41	0.0 0	0.0 0
KTVO D33 DT CP	43.9 303	31.9 262	31.9 262
WPXX-TV D33 DT LIC	7.9 77	7.9 77	0.0 0
WSIL-TV D34 DT LIC	71.2 3,899	71.2 3,899	35.6 470

Interference to BLANK0000108077 LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KTVI	D33	DT	LIC	ST. LOUIS, MO	BLANK0000108077	

**Table 1 KFVS-TV TVStudy Analysis of Proposal**  
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Undesireds:	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM	144.6 km		
	WAOE	D33	DT	BL	PEORIA, IL	DTVBL52280	243.3		
	WPXX-TV	D33	DT	LIC	MEMPHIS, TN	BLANK0000063435	372.8		
	WSIL-TV	D34	DT	LIC	HARRISBURG, IL	BLCDT20080718AAR	166.5		
	WQEC	D34	DT	CP	QUINCY, IL	BLANK0000035763	179.5		
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Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
32261.2	2,995,764	31640.5	2,991,513	31549.5	2,987,496	31315.5	2,980,738	0.74	0.23
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Undesired				Total IX	Unique IX, before		Unique IX, after		
KFVS-TV	D32	DT	APP	277.5	10,264		234.0	6,758	
WAOE	D33	DT	BL	11.9	41	11.9	41	11.9	41
WPXX-TV	D33	DT	LIC	7.9	77	7.9	77	0.0	0
WSIL-TV	D34	DT	LIC	71.2	3,899	71.2	3,899	35.6	470
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Interference to proposal scenario 1									
1.29% interference received									
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Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	KFVS-TV	D32	DT	APP	CAPE GIRARDEAU, MO	KVFS-TV Ch32 PRM			
Undesireds:	KDNL-TV	D31	DT	LIC	ST. LOUIS, MO	BLCDT20021216AAE	146.9 km		
	KARK-TV	D32	DT	LIC	LITTLE ROCK, AR	BMLCDT20121102ACP	397.3		
	WICD	D32	DT	LIC	CHAMPAIGN, IL	BLANK0000059351	324.2		
	WTJR	D32	DT	LIC	QUINCY, IL	BLCDT20091110ADL	323.9		
	WDRB	D32	DT	LIC	LOUISVILLE, KY	BLANK0000087865	336.5		
	WNPX-TV	D32	DT	LIC	FRANKLIN, TN	BLANK0000087615	269.5		
	KTVI	D33	DT	LIC	ST. LOUIS, MO	BLANK0000108077	144.6		
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Service area		Terrain-limited		IX-free		Percent IX			
41513.7	910,039	40868.8	901,231	40186.3	889,625	1.67	1.29		
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Undesired				Total IX	Unique IX		Prcnt Unique IX		
KDNL-TV	D31	DT	LIC	189.8	4,648	19.7	682	0.05	0.08
KARK-TV	D32	DT	LIC	4.0	25	4.0	25	0.01	0.00
WICD	D32	DT	LIC	123.2	516	39.8	176	0.10	0.02
WTJR	D32	DT	LIC	87.2	2,945	51.6	1,878	0.13	0.21
WDRB	D32	DT	LIC	214.9	1,184	107.5	911	0.26	0.10
WNPX-TV	D32	DT	LIC	55.8	201	12.0	95	0.03	0.01
KTVI	D33	DT	LIC	336.5	7,553	154.6	2,903	0.38	0.32