

**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 KAIT, Jonesboro, Arkansas)	Rulemaking No. _____
(Facility 13988))	

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

PETITION FOR RULEMAKING

Gray Television Licensee, LLC (“Gray”), licensee of Station KAIT (“KAIT”), Jonesboro, Arkansas, 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.¹ Gray requests that the Commission amend the DTV Table to substitute UHF Channel 27 for VHF Channel 8 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.”² In considering channel substitution requests, the Commission considers the

¹ See 47 C.F.R. §§ 1.401, 1.420, 73.622(i).

² 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 73.622(B), Table of Allotments, Digital Television Broadcast Stations (Albany, New York)*, 19 FCC Rcd. 4279, 4331 (2004); see also *In the Matter of Advanced Television*

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

This channel substitution serves the public interest because it will resolve significant over-the-air ("OTA") reception problems in KAIT's existing service area.⁴ With viewers increasingly reliant on OTA signals to receive the most valued video content,⁵ 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 channels allow undesired signals and noise to be receivable at relatively farther distances,

Systems & Their Impact Upon the Existing Television Broadcast Service, 12 FCC Rcd. 14588 ¶ 76 (1997).

³ 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).

⁴ 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. 2227 (2001) (finding that proposal to substitute channels to improve signal coverage and eliminate interference "warrants consideration").

⁵ 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-02762020> (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).

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.”⁶ The Commission also observed the “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.”⁷

KAIT’s real world experience confirms these observations. Almost immediately after completing its transition to digital on VHF Channel 8, KAIT experienced a substantial drop off in its OTA reception. By moving from VHF Channel 8 to UHF Channel 27, KAIT 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,⁸ which sets forth in detail the proposed KAIT’s Channel 27 DTV Table specifications. 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 27 facility will provide full principal community coverage to Jonesboro, Arkansas.

⁶ 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.”)

⁷ *Id.* ¶ 44.

⁸ See Exhibit 1 (“Engineering Statement”).

Although the proposed Channel 27 facility will result in a slight theoretical reduction in KAIT's predicted coverage and population served in order to protect WBUY-TV and WREG-TV from impermissible interference, as demonstrated by the attached Engineering Statement, when compared to KAIT's existing Channel 8 DTV allotment, the proposed Channel 27 facilities will not create any new white or gray areas. The terrain-limited loss population is just 1,276 persons, all of whom would have five or more other services.⁹ And this prediction almost certainly overstates the actual loss area given the specific VHF propagation challenges KAIT faces. In practice, Gray expects that few if any persons who are currently able to receive KAIT's OTA signal on Channel 8 would no longer be able to receive KAIT's OTA signal as a result of the transition to Channel 27. Moreover, the small handful of viewers on the fringe of KAIT's service area predicted to lose service all live in the well-served Memphis television market and are unlikely to watch a television station from far away Jonesboro when the Memphis stations already offer so many local options.

⁹ See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, 22 FCC Rcd. 9478, 9493, ¶ 38 (2007) ("The Commission is generally most concerned where there is a loss of an area's only network or NCE TV service, or where the loss area results in an area becoming less than well-served, i.e., served by fewer than five full-power over-the-air signals.")(footnotes and citations omitted); *In Re Amendment of Sections 73.606(b) & 73.622(b)*, Report and Order, 18 FCC Rcd. 15577, 15580 (2003) (explaining that areas that receive at least five other existing full power services are considered well-served).

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 KAIT from Channel 8 to Channel 27 as proposed herein.

Respectfully submitted,

GRAY TELEVISION LICENSEE, LLC

By: /s/ Joan Stewart

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Dated: November 27, 2020

Exhibit 1

Engineering Statement
prepared for
Gray Television Licensee, LLC
KAIT Jonesboro, AR
Facility ID 13988
Ch. 27 1000 kW 527 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC* (“Gray”), licensee of KAIT(DT) (Facility ID 13988, Jonesboro AR) in support of a *Petition for Rulemaking* to amend §73.622(i)¹ by changing KAIT’s digital television channel assignment. KAIT is licensed to operate on Channel 8 (BLC DT-20090803ABV). As described herein, *Gray* requests substitution of Channel 27 in lieu of Channel 8 for KAIT.

The KAIT Channel 8 facility is in the VHF spectrum and has proven to be ineffective for satisfactory viewer reception as discussed herein and elsewhere in the petition. The use of Channel 27 would place KAIT 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 KAIT’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 KAIT 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.

¹The post-incentive auction transition period ended on July 13, 2020, pursuant to the *Incentive Auction Closing and Channel Reassignment Public Notice* (DA 17-317, released April 13, 2017). 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 KAIT tower structure corresponds to FCC Antenna Structure Registration (“ASR”) number 1064518. *Gray* proposes to implement the Channel 27 substitution with a top-mounted transmitting antenna on the existing tower structure which would replace the existing top-mounted Channel 8 antenna.

The licensed Channel 8 facility operates with 28.2 kW effective radiated power (“ERP”) nondirectional at 531 meters antenna height above average terrain. *Gray* proposes herein to utilize 1000 kW ERP directional on Channel 27 at 527 meters antenna HAAT.

A summary of the licensed Channel 8 and proposed Channel 27 technical parameters is provided in the following.

Licensed Channel 8 Parameters (file# BLCDDT-20090803ABV)

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
13988	KAIT	8	JONESBORO	AR	355322	905608	608	531	28.2	ND

Proposed Channel 27 Parameters

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
13988	KAIT	27	JONESBORO	AR	355322	905608	605	527	1000	DA

The proposed directional antenna azimuthal pattern is plotted in Figure 1. A map is supplied as Figure 2, which depicts the standard predicted coverage contours. As demonstrated thereon, the proposed facility complies with §73.625(a)(1) as the entire community of Jonesboro will be encompassed by the 48 dBμ contour.

Interference study per FCC OET Bulletin 69² shows that the proposal complies with the 0.5 percent limit of new interference caused to pertinent nearby full service and Class A television stations and reassignments as required by §73.616. FCC processing of this proposal is requested

²FCC 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 0.1 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.

using a 2.0 km cell size and 0.1 km terrain profile point increment. The interference study output report is provided as Table 1.

The proposed 1000 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 527 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 3, the total area within the proposed KAIT noise limited service contour (“NLSC”) is 39,187 square kilometers, which does not exceed the NLSC area of the licensed KAIT Channel 8 facility (43,359 sq. km). Thus, the 1000 kW ERP specified herein complies with §73.622(f)(5) of the FCC’s Rules.

Figure 3 also shows that the proposed Channel 27 NLSC will fall short of matching that of the licensed Channel 8 facility at locations to the east, southeast, and south. These areas are in the pattern minima region of the proposed directional antenna. On Channel 27, the best available UHF channel at Jonesboro, the directional pattern is necessary to avoid causing impermissible interference to other stations, principally first-adjacent channel stations WBUY-TV (Ch. 26, Fac ID 60830, Holly Springs MS) and WREG-TV (Ch. 28, Fac ID 66174, Memphis TN).

Figure 3 depicts the proposed KAIT Channel 27 resulting NLSC loss areas along with the NLSC of alternative authorized television services that overlap a portion of loss area. The stations³ providing the alternative services are listed in Table 2. Figure 3 shows that much of the KAIT NLSC area has three or fewer other television services, nearly all of which will be encompassed by the proposed Channel 27 NLSC. Areas in the southeast and southwest portions of the existing KAIT NLSC are well-served (5 or more services) by stations located in the nearby Memphis TN and Little Rock AR markets, respectively. The areas on Figure 3 that are tinted yellow represent locations where there are less than 5 other services remaining in the loss area. A summary of the number of alternative services for the loss area is provided on the map and in the following table.

³Class A television stations are included in the alternative service facility count to determine if an area is well-served, as they have the same primary status and public service obligations as full-power television stations.

Loss Area Analysis – Standard FCC Contours

KAIT Population Within NLSC	(2010 census)	
Licensed Ch. 8 Total	847,899	
Proposed Ch. 27 Total:	604,514	
Gain Area Population:	660	
Loss Area Population:	244,045	
Common Area Population:	603,854	
Number of Other Services	<u>Loss Pop</u>	<u>Gain Pop</u>
0	0	49
1	152	125
2	652	101
3	1,752	146
4	3,988	123
5 or more	237,501	116
Total Change	244,045	660
Total less than 5 services	6,544	544
Total less than 5 (percentage)	0.77%	0.06%

The licensed Channel 8 facility's NLSC encompasses 847,899 persons and the proposed Channel 27 facility's NLSC would encompass 604,514 persons. The resulting NLSC loss population is 244,045 persons, of which only 6,544 persons would have less than five other services representing 0.77 percent of the total population within the licensed KAIT Channel 8 NLSC. The loss area includes portions of the Memphis metropolitan area which has high population density and is well-served by TV stations local to Memphis.

The proposed Channel 27 facility would continue to provide NLSC coverage to considerable areas that are not well-served. As shown in the following table the proposed KAIT will provide the only TV service to 6,228 persons and a second service to 46,752 persons. Over 56 percent of the proposed KAIT Channel 27 NLSC population is in areas that have three or fewer other services, involving 340,655 persons.

Service Count Population Report Proposed KAIT Ch. 27 NLSC			
Within NLSC	Population	Area (sq. km)	
-----	-----	-----	
0 Other Service	6,228	1670.00	
1 Other Service	46,752	5938.43	
2 Other Service	148,398	9674.48	
3 Other Service	139,277	7725.71	
4 Other Service	38,215	1678.16	
5 or more Other Service	225,644	12499.79	
Total NLSC	604,514	39186.57	
	Population	Running Total	Percent
0 Other Service	6,228	6,228	1.0 %
1 Other Service	46,752	52,980	8.8 %
2 Other Service	148,398	201,378	33.3 %
3 Other Service	139,277	340,655	56.4 %
4 Other Service	38,215	378,870	62.7 %
5 or more Other Service	225,644	604,514	100.0 %

The results of additional loss area analysis are provided in Figure 4, now to consider terrain-limited coverage predictions of the licensed Channel 8 facility and the proposed Channel 27 operation. Here, the FCC's TVStudy computer program was used to determine terrain-limited coverage predictions at locations beyond the proposed Channel 27 NLSC. The study area was set using the "fixed geography" option to match the licensed Channel 8 NLSC. Study cell size of 2.0 km and terrain profile step increment of 0.1 km were employed, consistent with the interference analysis for the proposal. The analysis included examination of each cell that is located beyond the Channel 27 NLSC and beyond the NLSC of at least five other stations (the same, yellow-tinted area as Figure 3) as bounded by the existing Channel 8 facility's NLSC. Cells in the NLSC loss area region were counted as lost service if they are predicted to have terrain-limited service from the licensed Channel 8 facility and not from the proposed Channel 27. The results regarding the number of alternative services for the loss areas are provided on Figure 4 and in the following table.

Loss Area Analysis – Terrain-Limited

KAIT Terrain-Limited Population	
TVStudy at Fixed Geography Area	(2010 census)
Licensed Ch. 8 Total	840,437
Number of Other Services	<u>Loss Pop</u>
0	0
1	0
2	0
3	0
4	0
5 or more	1,276
Total Loss	1,276
Total less than 5 services	0
Total less than 5 (percentage)	0.00%

This analysis shows that the terrain-limited loss population is 1,276 persons of the KAIT licensed digital Channel 8 facility. The terrain-limited analysis shows that all of the proposed Channel 27 facility's loss population (1,276 persons) would have five or more other services.

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 area of service loss would be created that is not well-served.

List of Attachments

Figure 1	Antenna Azimuthal Pattern
Figure 2	Proposed Coverage Contours
Figure 3	Coverage Contour Comparison; Loss Area Analysis – Standard FCC Contours
Figure 4	Loss Area Analysis – Terrain-Limited Method
Table 1	TVStudy Analysis of Proposal
Table 2	Authorized Alternate Television Services

Chesapeake RF Consultants, LLC

Joseph M. Davis, P.E.	November 18, 2020	
207 Old Dominion Road	Yorktown, VA 23692	703-650-9600

AZIMUTH PATTERN

Type: ATW-C1

Numeric	dBd
1.52	1.82

Directivity: 1.52

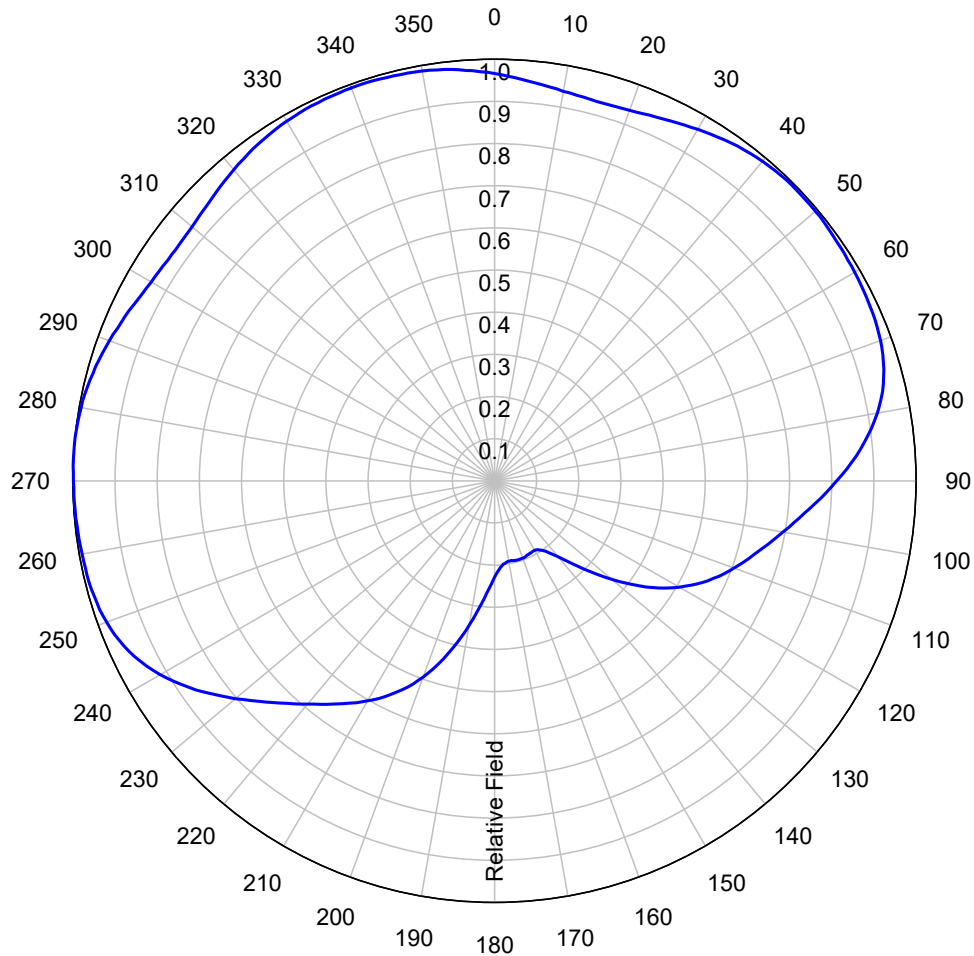
Peak(s) at:

Channel: 27

Location: Jonesboro AR

Polarization: Horizontal

Note: Pattern shape and directivity may vary with channel and mounting configuration.



Preliminary, subject to final design and review.

ELECTRONICS RESEARCH, INC. ERI®



Figure 1
Antenna Azimuthal Pattern
KAIT Jonesboro, AR
Facility ID 13988
Ch. 27 1000 kW 527 m

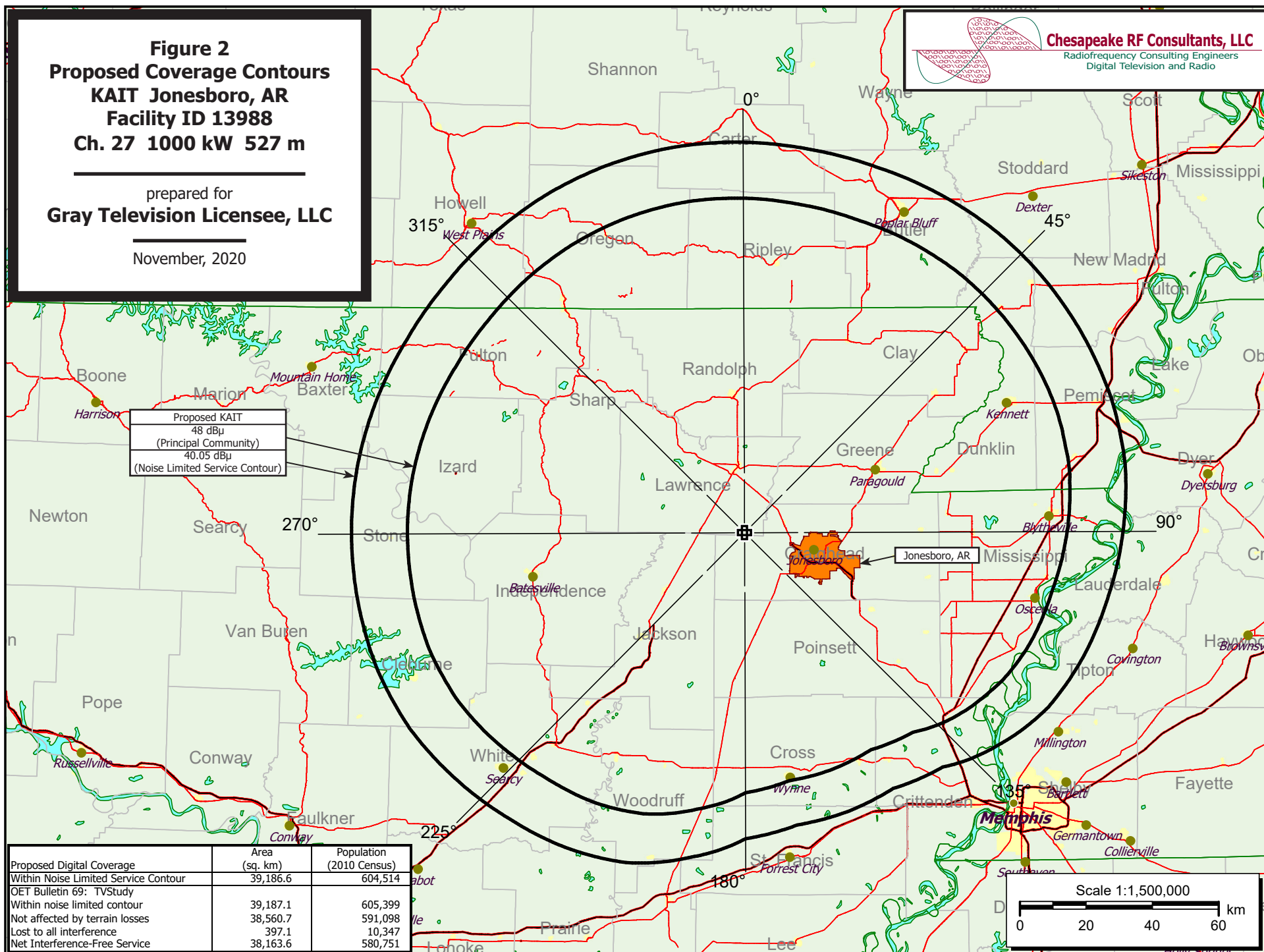
prepared for
Gray Television Licensee, LLC

November, 2020

Figure 2
Proposed Coverage Contours
KAIT Jonesboro, AR
Facility ID 13988
Ch. 27 1000 kW 527 m

prepared for
Gray Television Licensee, LLC

November, 2020



prepared for
Gray Television Licensee, LLC

Gray Television Licensee, LLC

November, 2020

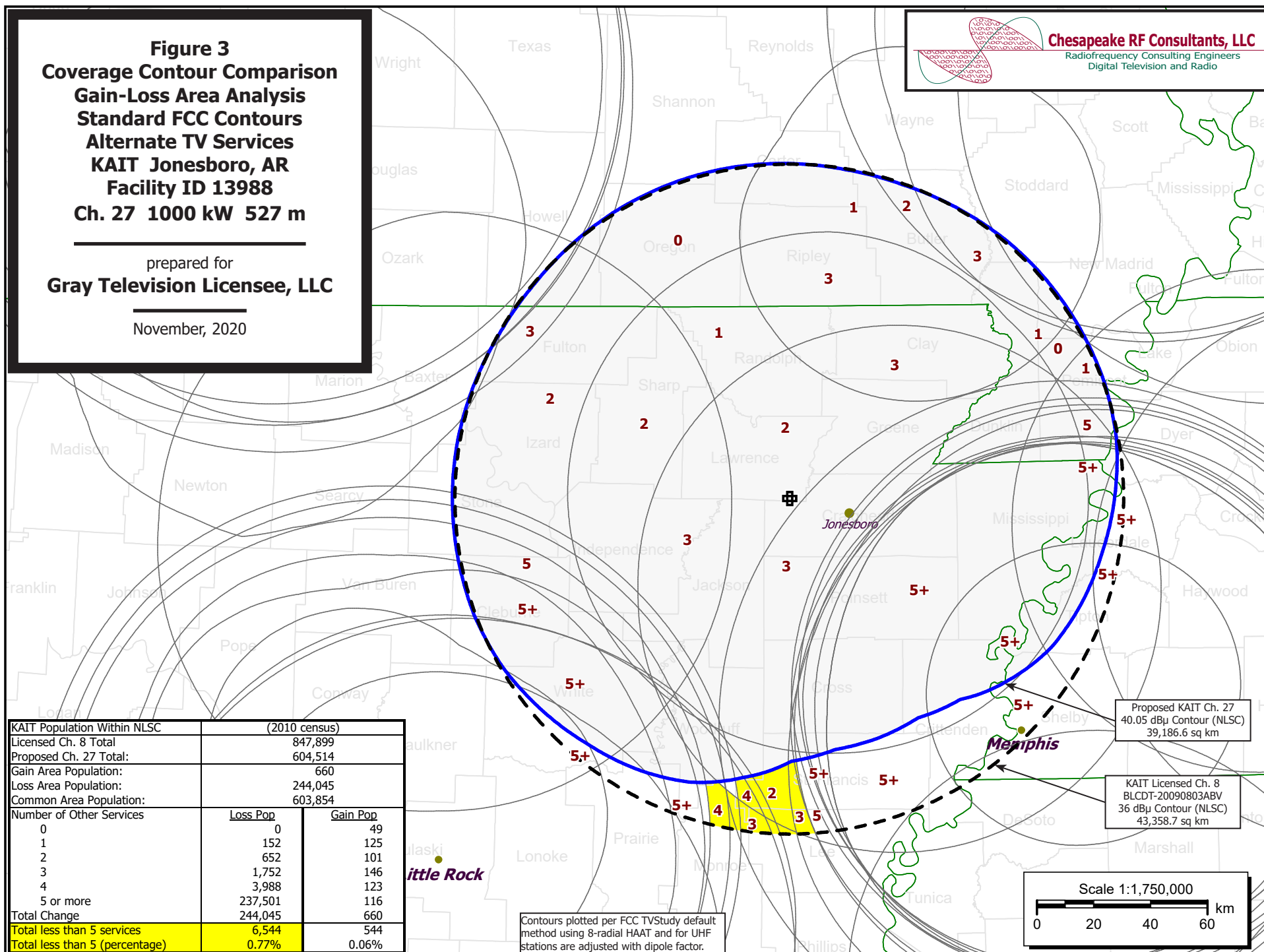


Figure 4
Loss Area Analysis
Terrain-Limited Method
KAIT Jonesboro, AR
Facility ID 13988
Ch. 27 1000 kW 527 m

prepared for
Gray Television Licensee, LLC

November, 2020



KAIT Terrain-Limited Population	(2010 census)
TVStudy at Fixed Geography Area	840,437
Licensed Ch. 8 Total	
Number of Other Services	<u>Loss Pop</u>
0	0
1	0
2	0
3	0
4	0
5 or more	1,276
Total Loss	1,276
Total less than 5 services	0
Total less than 5 (percentage)	0.00%

FCC "TVStudy" Analysis (Study cell size: 2.0 km Profile point spacing: 0.1 km)
 Terrain-Limited Results

- No Loss Cells Having Terrain-Limited Service From Licensed Ch. 8
Terrain-Limited Service Is Provided for Proposed Ch. 27
- Loss Cells Having Terrain-Limited Service From Licensed Ch. 8
Terrain-Limited Service Is Lost for Proposed Ch. 27

Contours plotted per FCC TVStudy default
 method using 8-radial HAAT and for UHF
 stations are adjusted with dipole factor.

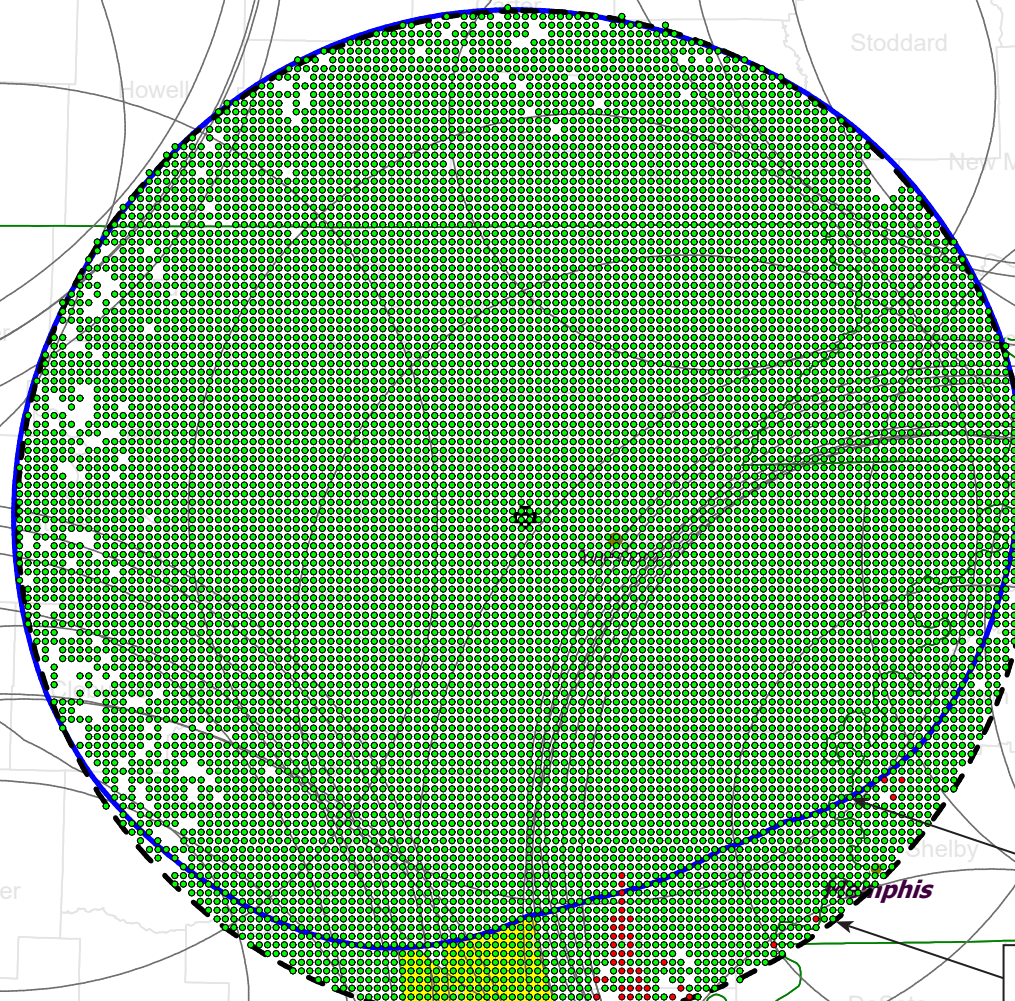
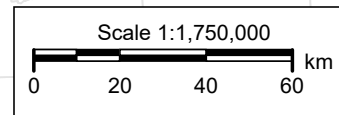


Table 1 KAIT TVStudy Analysis of Proposal
(page 1 of 4)



tvstudy v2.2.5 (4uoc83)
Database: localhost, Study: KAIT Ch27 ATW-C1_2.0-0.1, Model: Longley-Rice
Start: 2020.11.17 15:51:08

Study created: 2020.11.17 15:51:08

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

Proposal: KAIT D27 DT APP JONESBORO, AR
File number: KAIT Ch27 ATW-C1
Facility ID: 13988
Station data: User record
Record ID: 3281
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
Yes	WBUY-TV	D26	DT	LIC	HOLLY SPRINGS, MS	BLANK0000063641	125.0 km
Yes	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	334.1
Yes	KFTA-TV	D27	DT	LIC	FORT SMITH, AR	BLCDT20090331AEC	289.4
Yes	KOMU-TV	D27	DT	APP	COLUMBIA, MO	BLANK0000125105	353.4
Yes	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	302.8
Yes	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	211.3
Yes	WKRN-TV	D27	DT	LIC	NASHVILLE, TN	BLANK0000115874	369.7
No	KARZ-TV	D28	DT	LIC	LITTLE ROCK, AR	BLANK0000074890	186.0
No	KOZL-TV	D28	DT	LIC	SPRINGFIELD, MO	BLCDT20070213ABB	232.7
Yes	WREG-TV	D28	DT	LIC	MEMPHIS, TN	BLCDT20050513AAE	127.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D27
Latitude: 35 53 22.00 N (NAD83)
Longitude: 90 56 8.00 W
Height AMSL: 605.0 m
HAAT: 527.4 m
Peak ERP: 1000 kW
Antenna: ERI ATW-C1 340.0 deg
Elev Pattn: Generic
Elec Tilt: 1.50

40.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	933 kW	526.3 m	117.7 km
45.0	985	529.0	118.4
90.0	658	520.7	114.0
135.0	89.4	528.0	96.5
180.0	52.0	531.0	92.2
225.0	558	529.2	113.1
270.0	998	528.5	118.4
315.0	903	526.8	117.4

ERP exceeds maximum
ERP: 1000 kW ERP maximum: 445 kW

Distance to Canadian border: 950.1 km

Distance to Mexican border: 1181.4 km

Conditions at FCC monitoring station: Powder Springs GA
Bearing: 109.9 degrees Distance: 609.4 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Table 1 KAIT TVStudy Analysis of Proposal (page 2 of 4)



Bearing: 294.9 degrees Distance: 1335.0 km

Study cell size: 2.00 km
Profile point spacing: 0.10 km

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

----- Interference to BLANK0000063641 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WBUY-TV	D26	DT	LIC	HOLLY SPRINGS, MS	BLANK0000063641	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	125.0 km
	WATN-TV	D25	DT	LIC	MEMPHIS, TN	BLCDT20050628AAP	0.0
	WTJP-TV	D26	DT	LIC	GADSDEN, AL	BLCDT20110304ACB	345.3
	KPLR-TV	D26	DT	CP	ST. LOUIS, MO	BLANK0000050068	369.9
	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	116.4
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
27864.6		1,569,254		27633.7		1,558,732	1.42
				27493.8		1,555,017	0.46
				27103.3		1,547,800	
Undesired			Total IX		Unique IX, before		Unique IX, after
KAIT D27 DT APP			390.5		7,217		390.5
WATN-TV D25 DT LIC			12.0		14		12.0
WTJP-TV D26 DT LIC			67.4		2,031		67.4
WLJT-DT D27 DT LIC			60.5		1,670		60.5

----- Interference to BLCDT20070105ABH LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	334.1 km
	KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000073076	167.1
	KFTA-TV	D27	DT	LIC	FORT SMITH, AR	BLCDT20090331AEC	341.1
	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	319.4
	KBTW-TV	D27	DT	LIC	PORT ARTHUR, TX	BLANK0000063140	365.1
	KARZ-TV	D28	DT	LIC	LITTLE ROCK, AR	BLANK0000074890	192.9
	KTBS-TV	D28	DT	LIC	SHREVEPORT, LA	BLANK0000053971	165.3
	KCEB	D28	DT	LIC	LONGVIEW, TX	BLANK0000080719	165.3
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
44563.0		641,139		44362.1		639,417	0.16
				42922.8		611,996	0.21
				42854.6		610,699	
Undesired			Total IX		Unique IX, before		Unique IX, after
KAIT D27 DT APP			84.2		1,719		68.1
KTAL-TV D26 DT LIC			925.1		21,544		123.7
KFTA-TV D27 DT LIC			32.1		55		24.1
WCBI-TV D27 DT LIC			8.0		421		0.0
KBTW-TV D27 DT LIC			80.6		2,231		44.4
KARZ-TV D28 DT LIC			4.0		1		0.0
KTBS-TV D28 DT LIC			1231.1		26,327		0.0
KCEB D28 DT LIC			1231.1		26,327		0.0

----- Interference to BLCDT20090331AEC LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KFTA-TV	D27	DT	LIC	FORT SMITH, AR	BLCDT20090331AEC	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	289.4 km
	KOTV-DT	D26	DT	LIC	TULSA, OK	BLANK0000116553	142.8
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	341.1
	KFOR-TV	D27	DT	LIC	OKLAHOMA CITY, OK	BLANK0000121786	303.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
24213.4		818,859		22799.4		806,906	0.16
				22433.8		799,087	0.10
				22397.8		798,286	
Undesired			Total IX		Unique IX, before		Unique IX, after
KAIT D27 DT APP			48.2		967		36.0

Table 1 KAIT TVStudy Analysis of Proposal
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KOTV-DT D26 DT LIC	201.0	3,692	144.7	2,765	144.7	2,765
KTVE D27 DT LIC	40.1	494	40.1	494	28.0	328
KFOR-TV D27 DT LIC	180.8	4,560	124.5	3,633	124.5	3,633

Interference to BLANK0000125105 APP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KOMU-TV	D27	DT	APP	COLUMBIA, MO	BLANK0000125105	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	353.4 km
	KPLR-TV	D26	DT	CP	ST. LOUIS, MO	BLANK0000050068	171.5
	KFXA	D27	DT	LIC	CEDAR RAPIDS, IA	BLCDT20050713ABD	356.1
	KSNT	D27	DT	LIC	TOPEKA, KS	BLCDT20090910ABY	305.2
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
25878.0		542,230		25710.5		539,411	0.06 0.02
				539,545		25698.6	
						539,494	
						25682.6	
						539,411	
Undesired		Total IX		Unique IX, before		Unique IX, after	
KAIT D27 DT APP		15.9		83		15.9	83
KFXA D27 DT LIC		7.9		19		7.9	19
KSNT D27 DT LIC		4.0		32		4.0	32

Interference to BLANK0000059851 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	302.8 km
	WFNA	D27	DT	LIC	GULF SHORES, AL	BLANK0000120977	354.4
	WAIQ	D27	DT	LIC	MONTGOMERY, AL	BLEDT20060706ACK	284.9
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	319.4
	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	218.4
	WKRN-TV	D27	DT	LIC	NASHVILLE, TN	BLANK0000115874	316.1
	WMAW-TV	D28	DT	LIC	MERIDIAN, MS	BLANK0000106235	180.4
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
37837.1		680,511		37381.0		670,480	0.04 0.02
				676,020		36829.8	
						670,584	
						36813.8	
						670,480	
Undesired		Total IX		Unique IX, before		Unique IX, after	
KAIT D27 DT APP		39.8		167		15.9	104
WFNA D27 DT LIC		36.0		566		16.0	424
WAIQ D27 DT LIC		140.0		833		83.9	476
KTVE D27 DT LIC		228.1		1,677		212.1	1,478
WLJT-DT D27 DT LIC		99.5		1,965		35.8	862
WKRN-TV D27 DT LIC		167.5		1,879		75.8	696
WMAW-TV D28 DT LIC		4.0		36		4.0	36

Interference to BLANK0000058637 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	211.3 km
	WBUY-TV	D26	DT	LIC	HOLLY SPRINGS, MS	BLANK0000063641	116.4
	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	218.4
	WKRN-TV	D27	DT	LIC	NASHVILLE, TN	BLANK0000115874	164.1
	WREG-TV	D28	DT	LIC	MEMPHIS, TN	BLCDT20050513AAE	125.6
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
15720.4		385,493		15648.1		355,858	0.52 0.13
				384,950		14484.1	
						356,317	
Undesired		Total IX		Unique IX, before		Unique IX, after	
KAIT D27 DT APP		300.7		5,644		76.2	459
WBUY-TV D26 DT LIC		64.6		197		0.0	0
WCBI-TV D27 DT LIC		159.7		5,458		35.9	703
WKRN-TV D27 DT LIC		1048.0		27,889		739.2	21,442
WREG-TV D28 DT LIC		48.4		209		0.0	0

Interference to BLANK0000115874 LIC scenario 1

Table 1 KAIT TVStudy Analysis of Proposal
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	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WKRN-TV	D27	DT	LIC	NASHVILLE, TN	BLANK0000115874	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	369.7 km
	WAGA-TV	D27	DT	LIC	ATLANTA, GA	BLCDT20060728AEL	338.0
	WTVQ-DT	D27	DT	LIC	LEXINGTON, KY	BLANK0000087240	309.0
	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	316.1
	WUNW	D27	DD	CP	CANTON, NC	BLANK0000036076	357.6
	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	164.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
37626.3 2,409,767		36728.9 2,393,314		36123.0 2,382,143		36111.0 2,381,471	0.03 0.03

Undesired	Total IX	Unique IX, before	Unique IX, after
KAIT D27 DT APP	64.1 2,154	12.0 672	
WAGA-TV D27 DT LIC	16.1 149	4.0 54	
WTVQ-DT D27 DT LIC	76.1 1,335	56.0 739	
WCBI-TV D27 DT LIC	72.0 1,306	24.1 785	
WLJT-DT D27 DT LIC	521.7 9,593	449.7 8,476	409.7 7,060

Interference to BLCDT20050513AAE LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WREG-TV	D28	DT	LIC	MEMPHIS, TN	BLCDT20050513AAE	
Undesireds:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	127.1 km
	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	125.6
	KARZ-TV	D28	DT	LIC	LITTLE ROCK, AR	BLANK0000074890	245.9
	KOZL-TV	D28	DT	LIC	SPRINGFIELD, MO	BLCDT20070213ABB	359.8
	WMAW-TV	D28	DT	LIC	MERIDIAN, MS	BLANK0000106235	345.0
	WKNO	D29	DT	LIC	MEMPHIS, TN	BLEDT20060627ABE	3.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
30894.0 1,642,307		30642.9 1,636,429		30386.7 1,626,695		30177.5 1,625,860	0.69 0.05

Undesired	Total IX	Unique IX, before	Unique IX, after
KAIT D27 DT APP	285.8 1,832	209.3 835	
WLJT-DT D27 DT LIC	36.3 1,031	36.3 1,031	
KARZ-TV D28 DT LIC	71.6 5,490	39.6 5,287	35.6 5,206
KOZL-TV D28 DT LIC	76.6 926	64.5 912	0.0 0
WMAW-TV D28 DT LIC	67.8 2,404	47.8 2,215	47.8 2,215
WKNO D29 DT LIC	35.8 86	35.8 86	35.8 86

Interference to proposal scenario 1
**MX: 1.75% interference received

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KAIT	D27	DT	APP	JONESBORO, AR	KAIT Ch27 ATW-C1	
Undesireds:	WBUY-TV	D26	DT	LIC	HOLLY SPRINGS, MS	BLANK0000063641	125.0 km
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	334.1
	KFTA-TV	D27	DT	LIC	FORT SMITH, AR	BLCDT20090331AEC	289.4
	KOMU-TV	D27	DT	APP	COLUMBIA, MO	BLANK0000125105	353.4
	WCBI-TV	D27	DT	LIC	COLUMBUS, MS	BLANK0000059851	302.8
	WLJT-DT	D27	DT	LIC	LEXINGTON, TN	BLANK0000058637	211.3
	WKRN-TV	D27	DT	LIC	NASHVILLE, TN	BLANK0000115874	369.7
	WREG-TV	D28	DT	LIC	MEMPHIS, TN	BLCDT20050513AAE	127.1
Service area		Terrain-limited		IX-free		Percent IX	
39187.1 605,399		38560.7 591,098		38163.6 580,751		1.03 1.75	

Undesired	Total IX	Unique IX	Prcnt Unique IX
WBUY-TV D26 DT LIC	88.7 1,059	20.2 332	0.05 0.06
KTVE D27 DT LIC	76.2 7,001	52.2 6,533	0.14 1.11
KFTA-TV D27 DT LIC	28.2 428	8.0 35	0.02 0.01
KOMU-TV D27 DT APP	47.8 145	35.8 129	0.09 0.02
WCBI-TV D27 DT LIC	4.0 0	0.0 0	0.00 0.00
WLJT-DT D27 DT LIC	184.3 2,273	116.2 1,735	0.30 0.29
WKRN-TV D27 DT LIC	36.0 432	0.0 0	0.00 0.00
WREG-TV D28 DT LIC	100.7 758	40.3 31	0.10 0.01

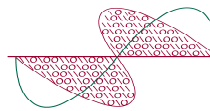


Table 2

Authorized Alternate Television Services

prepared for

Gray Television Licensee, LLC

KAIT Jonesboro, AR

Call Sign	Ch.	Facility ID	Status	File Number	Community
WMC-TV	5	19184	Lic	BLCDT-20090622ABL	Memphis, TN
KETS	7	2770	Lic	BLEDT-20090615ABT	Little Rock, AR
KOLR	10	28496	Lic	BLCDT-20090810ACN	Springfield, MO
KFVS-TV	11	592	Lic	0000115816	Cape Girardeau, MO
KTHV	12	2787	Lic	BLCDT-20041029AIX	Little Rock, AR
KEMV	13	2777	Lic	BLEDT-20100608ACU	Mountain View, AR
WHBQ-TV	13	12521	Lic	BLCDT-20100917AAC	Memphis, TN
KPOB-TV	15	73998	Lic	BLCDT-20090623ABU	Poplar Bluff, MO
W15EA-D	15	168014	Lic	0000093191	Memphis, TN
KVTJ-DT	18	2784	Lic	0000064048	Jonesboro, AR
KYTV	19	36003	Lic	0000073156	Springfield, MO
WPSD-TV	19	51991	Lic	0000116960	Paducah, KY
KTEJ	20	2769	Lic	BLEDT-20110818AAQ	Jonesboro, AR
WJKT	21	68519	Lic	0000114687	Jackson, TN
KATV	22	33543	Lic	BLCDT-20090225AAV	Little Rock, AR
KRBK	22	166319	Lic	0000063419	Osage Beach, MO
WTWV	23	81692	Lic	0000048888	Memphis, TN
WWTW	23	84214	Lic	0000048875	Senatobia, MS
KVTN-DT	24	607	Lic	BLCDT-20071231AFB	Pine Bluff, AR
WATN-TV	25	11907	Lic	BLCDT-20050628AAP	Memphis, TN
WBUY-TV	26	60830	Lic	0000063641	Holly Springs, MS
KARZ-TV	28	37005	Lic	0000074890	Little Rock, AR
KOZL-TV	28	3659	Lic	BLCDT-20070213ABB	Springfield, MO
WREG-TV	28	66174	Lic	BLCDT-20050513AAE	Memphis, TN
WKNO	29	42061	Lic	BLEDT-20060627ABE	Memphis, TN
KLRT-TV	30	11951	Lic	BLCDT-20020507AAK	Little Rock, AR
KWBM	31	78314	CP	0000036086	Harrison, AR
WLMT	31	68518	Lic	BLCDT-20050427ABN	Memphis, TN
KARK-TV	32	33440	Lic	BMLCDT-20121102ACP	Little Rock, AR
WPXX-TV	33	21726	Lic	0000063435	Memphis, TN
KASN	34	41212	Lic	0000073008	Pine Bluff, AR
WBBJ-TV	35	65204	Lic	0000116047	Jackson, TN
KBSI	36	19593	Lic	0000115700	Cape Girardeau, MO
KKAP	36	58267	Lic	BLEDT-20090522AFW	Little Rock, AR
WMAV-TV	36	43193	Lic	BLEDT-20090612AAK	Oxford, MS