

## **Displacement Request**

### **K32MH-D FI 167099 Licensed to UT Board of Higher Education**

This application is a request to waive displacement rules in place that might disallow such an application.

Stations involved:

K323MH-D FI 167099 UT Board of Higher Education  
K32NC-D FI FI 167101 University of Utah  
K31EA-D FI 43385 Mohave County Board of Supervisors  
KWWB-LP FI 39491, displacement to Ch 29 File # 0000052515

Many of the translator stations in Utah were coordinated under an unusually large repack plan. During the process the University of Utah and the UT Board of Higher Education worked to coordinate with all users in an area to ensure that residents in given areas were afforded the best service possible with the limited number of channels available. Ultimately, some channels were used multiple times in areas that were known to have potential and unavoidable interference issues. This is one such case.

K32MH-D is located to serve Washington, etc.  
K32NC-D is located to serve Toquerville, Hurricane  
K31EA-D is located to serve Littlefield, AZ

It has been discovered in practice that where a viewer resides related to existing terrain they may be able to watch K32MH-D or K32NC-D. Other viewers in line of site to both stations may not be able to watch either channel, thus depriving them of service.

As part of the process, it has come to light that channel 29 remains unused in the area. The Applicant, Entravision, subsequently dismissed KWWB-LP, FI 39491 (see attached memo). This creates an opportunity to better serve the public and reduce overall interference in the process between the Utah stations and K31EA-D aligned to serve Littlefield, AZ.

As the three stations are currently licensed, K32MH-D causes 55.8% interference to K32NC-D. K32MH-D receives 14.39% from K31EA-D, per TVStudy. Displacing K32MH-D to Ch 29 eliminates interference between all three stations, thus providing better coverage to the public in the very rural communities of southwest Utah and north east Arizona.

The UT Board of Higher Education respectfully requests that displacement rules be waived in this instance, allowing improved coverage to viewers and is wholly in the public interest as these stations provide full service KUED, KUEN and KSAZ programming.

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B. W. St. Clair  
303-378-8209

## Existing license scenario

Study created: 2023.05.22 13:54:40

Study build station data: LMS TV 2023-05-16

**Proposal: K32MH-D D32 LD LIC WASHINGTON, ETC., UT Utah Bd of Higher Ed**

File number: BLANK0000063182

Facility ID: 167099

Station data: LMS TV 2023-05-16

Record ID: 25076f91667cad180166c70558b84eb7

Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	DK17JQ	N17z	TX	APP	ST. GEORGE, UT	BLTTL20121207ACG	29.8 km
No	K24CY-D	N24	TX	LIC	ST. GEORGE, UT	BLTT19930730JE	29.3
No	K31PA-D	D31	LD	LIC	DOLAN SPRINGS, AZ	BLANK0000071728	176.5
Yes	K31EA-D	D31	LD	LIC	LITTLEFIELD, AZ	BLDTL20130308ABV	0.0
No	K31NR-D	D31	LD	LIC	OVERTON, NV	BLANK0000137689	77.0
No	K31KP-D	D31	LD	LIC	ALTON, UT	BLDTT20091228ABU	121.6
No	K31OI-D	D31	LD	LIC	BERYL, MODENA ETC., UT	BLANK0000091061	62.2
No	K31EI-D	D31	LD	LIC	CEDAR CANYON, UT	BLDTT20090728ABS	103.2
No	K18DN-D	D31	LD	LIC	KANAB, UT	BLANK0000060008	121.3
No	K31OG-D	D31	LD	LIC	PAROWAN, ENOCH, ETC., UT	BLANK0000091236	110.6
No	K31JX-D	D31	LD	LIC	ROCKVILLE, UT	BLDTT20100802AUE	75.4
No	K31IS-D	D31	LD	LIC	TOQUERVILLE, UT	BLDTT20070214ABW	55.7
No	K31EL-D	D31	LD	LIC	TROPIC, ETC., UT	BLDTT20090708AJL	170.9
No	K32ME-D	D32-	LD	LIC	CAMP VERDE, ETC., AZ	BLANK0000192867	349.1
No	K32DW-D	D32	LD	LIC	CHLORIDE, AZ	BLDTT20130308AAU	197.1
No	KAZF	D32	DT	CP	FLAGSTAFF, AZ	BLANK0000195680	323.4
No	K32LO-D	D32	LD	LIC	PRESCOTT, AZ	BLDTL20141201BCU	320.2
No	DDK43AG-D	D32	LD	APP	EDWARDS, CA	BLANK0000054794	426.6
No	K32CJ-D	D32	LD	LIC	ELY, NV	BLDTT20100111AAL	230.8
Yes	KMCC	D32	DD	CP	LAUGHLIN, NV	BLANK0000203825	169.0
Yes	KMCC	D32	DD	LIC	LAUGHLIN, NV	BLANK0000203289	169.0
Yes	K32OB-D	D32	LD	LIC	PANACA, NV	BLANK0000078476	61.7
Yes	K32LZ-D	D32	LD	LIC	ALTON, UT	BLANK0000059951	121.6
No	K32MV-D	D32	LD	LIC	ANTIMONY, UT	BLANK0000072667	198.2
No	K32NB-D	D32	LD	LIC	BEAVER ETC., UT	BLANK0000091255	180.3
No	K32HQ-D	D32	LD	LIC	BOULDER, UT	BLDTT20090407ACE	232.3
No	K32MP-D	D32	LD	LIC	CAINEVILLE, UT	BLANK0000081903	294.8
No	K32MO-D	D32	LD	LIC	CAPITOL REEF NATIONA, UT	BLANK0000084090	260.7
No	K32NI-D	D32	LD	LIC	CLEAR CREEK, UT	BLANK0000093699	364.8
No	K32MI-D	D32	LD	LIC	DELTA, OAK CITY, ETC, UT	BLANK0000091272	278.5
No	K32JI-D	D32	LD	LIC	EMERY, UT	BLDTT20100310AAM	307.4
No	K32MR-D	D32	LD	LIC	ESCALANTE, UT	BLANK0000075924	213.7
No	K32NH-D	D32	LD	LIC	FERRON, UT	BLANK0000094869	322.0
No	K32JW-D	D32	LD	LIC	FILLMORE, ETC., UT	BLDTT20101209AAA	249.5
No	K32JB-D	D32	LD	LIC	FOUNTAIN GREEN, UT	BLDTT20100914AHQ	331.6
No	K32MQ-D	D32	LD	LIC	Fremont, UT	BLANK0000080639	237.0
No	K32NE-D	D32	LD	LIC	GARRISON, ETC., UT	BLANK0000139783	216.7
No	K32NG-D	D32	LD	LIC	GREEN RIVER, UT	BLANK0000094885	364.3
No	K32MU-D	D32	LD	LIC	HANKSVILLE, UT	BLANK0000080679	310.7
No	K32NJ-D	D32	LD	LIC	HUNTINGTON, UT	BLANK0000094687	350.6
No	K32DC-D	D32	LD	LIC	KANAB, UT	BLDTT20100610ACK	121.3
No	KMTI-LD	D32	LD	LIC	MANTI AND EPHRAIM, UT	BLDTL20121203ASD	303.3
No	K32ND-D	D32	LD	LIC	MODENA, ETC., UT	BLANK0000091037	62.2
No	K32AG-D	D32	LD	LIC	PAROWAN, ENOCH, ETC., UT	BLDTT20090728ABV	110.6
No	KUTH-DT	D32	DT	LIC	PROVO, UT	BLCDT20090616ACK	386.2
No	KUTH-DT	D32	DT	CP	PROVO, UT	BPCDT20100921AAY	415.7
No	K32ML-D	D32	LD	LIC	RURAL GARFIELD COUNT, UT	BLANK0000080545	221.3
No	K32IZ-D	D32	LD	LIC	SCOFIELD, UT	BLDTT20100127ABW	378.1
No	K32NF-D	D32	LD	LIC	SPRING GLEN, UT	BLANK0000093947	361.4

Yes	K32NC-D	D32	LD	LIC	TOQUERVILLE, UT	BLANK0000093334	55.8
No	K32MT-D	D32	LD	LIC	TROPIC, ETC., UT	BLANK0000074871	170.9
No	K33OK-D	D33	LD	LIC	OVERTON, NV	BLANK0000137698	77.0
No	K33NQ-D	D33	LD	LIC	ALTON, UT	BLANK0000059967	121.6
No	K33EB-D	D33	LD	LIC	CEDAR CANYON, UT	BLD TT20090728ABU	103.2
No	K40JM-D	D33	LD	LIC	KANAB, UT	BLANK0000060009	121.3
No	K33KF-D	D33	LD	LIC	KANARRAVILLE, ETC, UT	BLD TT20140430AAH	70.4
No	K33JE-D	D33	LD	LIC	MODENA, BERYL, ETC., UT	BLD TT20090728AEM	62.4
No	K33OZ-D	D33	LD	LIC	PAROWAN, ENOCH, ETC., UT	BLANK0000091224	110.6
No	K33JW-D	D33	LD	LIC	ROCKVILLE/SPRINGDALE, UT	BLD TT20081202AHI	75.4
No	K33PC-D	D33	LD	LIC	SANTA CLARA, UT	BLANK0000064147	0.0
No	K33PD-D	D33	LD	LIC	TOQUERVILLE, HURRICA, UT	BLANK0000093337	55.8
No	K33HX-D	D33	LD	LIC	TROPIC & CANNONVILLE, UT	BLD TL20090708AJH	170.9

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  
Mask: Stringent  
Latitude: 37 9 18.80 N (NAD83)  
Longitude: 113 52 59.20 W  
Height AMSL: 2342.0 m (Adjusted based on actual ground elevation calculation)  
HAAT: 0.0 m  
Peak ERP: 0.200 kW  
Antenna: SCA-SL-8 (ID 23503) 115.0 deg  
Elev Pattnr: Generic  
Elec Tilt: 1.75

50.5 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.083 kW	980.9 m	41.3 km
45.0	0.125	1071.9	45.1
90.0	0.188	1167.5	49.0
135.0	0.196	781.8	43.7
180.0	0.133	1045.7	45.2
225.0	0.085	1173.5	43.6
270.0	0.097	1252.7	45.4
315.0	0.095	1149.9	44.2

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 1078 m

Distance to Canadian border: 1316.3 km

Distance to Mexican border: 499.0 km

Conditions at FCC monitoring station: Livermore CA  
Bearing: 277.6 degrees Distance: 697.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 63.6 degrees Distance: 817.9 km

Study cell size: 1.00 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%

**\*\*IX check failure to BLANK0000093334 LIC scenario 1, 51.75% interference caused**

---- Below is IX received by proposal BLANK0000063182 ----

Proposal receives 14.39% interference from scenario 1. **K31EA-D Mohave Bd of County Supervisors**  
Proposal receives 14.39% interference from scenario 2. K32NC-D Univ of UT

51.75% caused to K32NC-D Toquerville, UT Licensed to: University of UTAH

## Displacement to Ch 29

Study created: 2023.05.22 14:10:22

Study build station data: LMS TV 2023-05-16

Proposal: CH 29 D29 LD LIC WASHINGTON, ETC., UT

File number: Ch 29 @ 1 kW Fmask

Facility ID: 167099

Station data: User record

Record ID: 810

Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	DKDLU-LP	N26	TX	APP	ST. GEORGE, UT	BLTTL19961024JB	29.3 km
No	KVPX-LD	D28	LD	LIC	LAS VEGAS, NV	BLDTL20111006ACC	169.7
No	K28IT-D	D28	LD	LIC	KANAB, UT	BLDTT20100610ACN	121.3
No	K28PE-D	D28	LD	LIC	KANARRAVILLE, ETC., UT	BLANK0000091250	70.4
No	K28OW-D	D28	LD	LIC	PAROWAN, ENOCH, ETC., UT	BLANK0000091232	110.6
No	K28OJ-D	D28	LD	LIC	TROPIC & CANNONVILLE, UT	BLANK0000074876	170.9
No	K28EA-D	D28	LD	LIC	WASHINGTON, UT	BLDTT20110630AAO	0.1
No	K29LM-D	D29	LD	LIC	COTTONWOOD, ETC., AZ	BLANK0000062886	317.1
No	K29LO-D	D29	LD	LIC	KINGMAN, AZ	BLANK0000071727	230.5
No	K29FD-D	D29	LD	LIC	LAKE HAVASU CITY, AZ	BLDTT20130308ABP	287.1
No	KTAZ	D29	DT	LIC	PHOENIX, AZ	BLANK0000190913	455.7
No	K29NN-D	D29z	LD	LIC	LUCERNE VALLEY, CA	BLANK0000082013	403.1
No	DDK29GM	N29	TX	APP	DUCKWATER, ETC., NV	BLTT20040929APW	314.8
No	K29NK-D	D29	LD	LIC	EUREKA, NV	BLANK0000157580	316.8
Yes	K29NH-D	D29	DD	LIC	LAS VEGAS, NV	BLANK0000159469	162.3
No	K29NH-D	D29	LD	LIC	LUND & PRESTON, NV	BLANK0000087551	251.9
Yes	DDDKWWB-LPD	D29	LD	APP	MESQUITE, ETC., NV	BLANK0000052515	0.1
Yes	K29JA-D	D29	LD	LIC	ALTON, UT	BLDTT20091211AGI	121.6
No	K44JU-D	D29	LD	LIC	ANTIMONY, UT	BLANK0000072671	198.2
Yes	K29FA-D	D29	LD	LIC	BERYL, MODENA ETC., UT	BLDTT20090728ADI	62.2
No	K29MA-D	D29	LD	LIC	BOULDER, UT	BLANK0000080361	232.3
No	K29IX-D	D29	LD	LIC	CAINEVILLE, UT	BLDTT20100223AEN	294.8
No	K29IW-D	D29	LD	LIC	CLEAR CREEK, UT	BLDTT20121019AAO	364.8
No	K29KD-D	D29	LD	LIC	DELTA, UT	BLDTT20110523AAC	278.4
No	K29MR-D	D29	LD	LIC	EMERY, UT	BLANK0000094930	307.4
No	K29HN-D	D29	LD	LIC	ESCALANTE, UT	BLDTT20110503ABJ	213.7
No	K29IY-D	D29	LD	LIC	FERRON, UT	BLDTT20100107ACA	322.0
No	K29MN-D	D29	LD	LIC	FILLMORE, ETC., UT	BLANK0000125971	249.5
No	K29JQ-D	D29	LD	LIC	FISHLAKE RESORT, UT	BLDTT20100803ABC	241.0
No	K29LZ-D	D29	LD	LIC	FOUNTAIN GREEN, UT	BLANK0000072229	331.6
No	K29IV-D	D29	LD	LIC	FREMONT, UT	BLDTT20100514AEC	243.3
No	K29MP-D	D29	LD	LIC	GARRISON, UT	BLANK0000139794	216.7
No	K29MS-D	D29	LD	LIC	GREEN RIVER, UT	BLANK0000094890	364.3
No	K29LX-D	D29	LD	LIC	HANKSVILLE, UT	BLANK0000080676	310.7
No	K29IZ-D	D29	LD	LIC	HUNTINGTON, UT	BLDTT20100107AAW	350.6
No	K24II-D	D29	LD	LIC	KANAB, UT	BLANK0000060007	121.3
No	K29ML-D	D29	LD	LIC	KANARRAVILLE/NEW HAR, UT	BLANK0000091040	70.4
No	K29EM-D	D29	LD	LIC	MANTI & EPHRAIM, UT	BLDTT20090720ABM	303.2
No	K29MI-D	D29	LD	LIC	PAROWAN, ENOCH, ETC., UT	BLANK0000091228	110.6
No	KUPX-TV	D29	DT	LIC	PROVO, UT	BLCDT20020510AAP	415.1
Yes	K29MJ-D	D29	LD	LIC	ROCKVILLE, UT	BLANK0000132302	75.5
No	K29MT-D	D29	LD	LIC	SCOFIELD, UT	BLANK0000093930	378.1
No	K29MV-D	D29	LD	LIC	SPRING GLEN, UT	BLANK0000093755	361.4
No	K29GJ-D	D29	LD	LIC	TROPIC & CANNONVILLE, UT	BLDTL20090708AJI	170.9
No	KDNU-LD	D30	LD	LIC	LAS VEGAS, NV	BLANK0000165183	169.7
No	K30MH-D	D30	LD	LIC	OVERTON, NV	BLANK0000137693	77.0
No	K30QE-D	D30	LD	LIC	PANACA, NV	BLANK0000078475	62.3
No	K30OE-D	D30	LD	LIC	ALTON, UT	BLANK0000059960	121.6
No	K30PJ-D	D30	LD	LIC	BERYL, NEW CASTLE, M, UT	BLANK0000091248	62.2
No	K30PD-D	D30	LD	LIC	KANAB, UT	BLANK0000060011	121.3

No	K30PK-D	D30	LD	LIC	KANARRAVILLE, ETC., UT	BLANK0000091222	70.4
No	K30PE-D	D30	LD	LIC	PAROWAN, ENOCH ETC., UT	BLANK0000091234	110.6
No	K30OT-D	D30	LD	LIC	TROPIC/CANNONVILLE, UT	BLANK0000074869	170.9
No	K30OL-D	D30	LD	LIC	WASHINGTON, ETC., UT	BLANK0000091273	0.2

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D29  
Mask: Full Service  
Latitude: 37 9 18.80 N (NAD83)  
Longitude: 113 52 59.20 W  
Height AMSL: 2342.0 m (Adjusted based on actual ground elevation calculation)  
HAAT: 0.0 m  
Peak ERP: 1.00 kW  
Antenna: SCA-SL-8 (ID 23503) 115.0 deg  
Elev Pattn: Generic  
Elec Tilt: 1.75

50.2 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.416 kW	980.9 m	52.1 km
45.0	0.624	1071.9	56.0
90.0	0.941	1167.5	59.9
135.0	0.980	781.8	54.3
180.0	0.664	1045.7	56.0
225.0	0.422	1173.5	54.7
270.0	0.483	1252.7	56.6
315.0	0.476	1149.9	55.2

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 1078 m

Distance to Canadian border: 1316.3 km

Distance to Mexican border: 499.0 km

Conditions at FCC monitoring station: Livermore CA  
Bearing: 277.6 degrees Distance: 697.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 63.6 degrees Distance: 817.9 km

Study cell size: 1.00 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%

\*\*MX with BLANK0000052515 APP scenario 1, 91.56% interference caused

---- Below is IX received by proposal Ch 29 @ 1 kW Fmask ----

\*\*MX with BLANK0000052515 APP scenario 1, 90.05% interference received