Displacement Application Narrative

Applicant respectfully submits the attached displacement application pursuant to the terms set forth in the *Special Displacement Window Public Notice.*[1] The applicant has used the *TVStudy* software to identify an available channel and verify the proposed will not cause harmful interference.

The station is eligible to participate in the Special Displacement Window by qualifying as both "operating" and "displaced" under the FCC's eligibility criteria[2] and does not move the stations facility more than 30 miles.

The interference analysis completed utilizing the *TVStudy* software indicates the proposed will cause less that 0.5% interference to Full Power and Class A stations, and less than 2% interference to other Low Power TV (LPTV) stations, therefore, it is grantable.

K38IM is currently on Channel 38 and is out-of-core. They do have a CP for channel 14, however, it causes 14.28% interference to KAOE-LD, channel 14, Santa Fe NM, and 4.55% interference to K14JS, Cortez, CO, (See Below) therefore, as part of this grant, the Channel 14 CP will be dismissed.

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[1] *See Incentive Auction Task Force and Media Bureau Announce Post-Incentive Auction Special Displacement Window April 10, 2018, through May 15, 2018, and Make Location and Channel Data Available*, Public Notice, DA 18-124 (IATF & MB Feb. 9, 2018) ("*Special Displacement Window Public Notice*").
[2] *See id.* ¶ 5.

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Study created: 2018.05.28 08:19:42

Study build station data: LMS TV 2018-05-27 (72)
    Proposal: K38IM D14 LD CP ALBUQUERQUE, NM
 File number: BDISDTL20091013AGI
 Facility ID: 40743
Station data: User record
   Record ID: 1779
     Country: U.S.
Build options:
Protect pre-transition records not on baseline channel
Protect baseline records from LPTV
Stations potentially affected by proposal:
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IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	K14JS-D	D14	LD	LIC	CORTEZ, ETC, CO	BLDTT20090522ACM	283.3 km
No	K14QG-D	D14	LD	LIC	ALAMOGORDO, NM	BLANK0000001405	270.4
No	K14PK-D	D14	LD	CP	HOBBS, NM	BNPDTL20101012AFA	414.6
No	K14QE-D	D14	LD	CP	MAGDALENA, NM	BNPDTL20100513AEN	260.3
No	K14KO	N14-	TX	LIC	PORTALES, NM	BLTT20050927AHI	312.2
No	K14KO	D14	LD	APP	PORTALES, NM	BDFCDTT20081222AAO	312.2
Yes	KAOE-LD	D14	LD	CP	SANTA FE, NM	BNPDTL20091014AAS	104.5
No	NEW	D14	LD	APP	LAREDO, TX	BMJADTL20100524AIG	277.0
No	KREZ-TV	D15	DT	LIC	DURANGO, CO	BLCDT20030324ADD	262.2
Yes	KTEL-CD	D15	DC	LIC	ALBUQUERQUE, NM	BLDTL20141007ACM	0.0

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No   K15JJ-D    D15          LD  CP      LAS VEGAS, NM              BNPDTT20100730ADU      119.4
No   K51LO-D    D15          LD  APP     MT. POWELL, NM             BLANK0000030131        164.7
No   K15HC-D    D15          LD  LIC     QUEMADO/PIE TOWN, NM       BLDTT20090910ABO       168.9
No   K15HD-D    D15          LD  LIC     TAOS, NM                   BLDTT20061026ADG       154.9
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No non-directional AM stations found within 0.8 km
No directional AM stations found within 3.2 km
Record parameters as studied:
    Channel: D14
      Mask: Stringent
   Latitude: 35 12 49.80 N (NAD83)
  Longitude: 106 27 3.30 W
Height AMSL: 3262.0 m
     HAAT: 0.0 m
  Peak ERP: 7.66 kW
   Antenna: Omnidirectional
Elev Pattrn: Generic
48.7 dBu contour:

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Azimuth        ERP       HAAT    Distance
  0.0 deg   7.66 kW  1192.7 m    79.0 km
 45.0        7.66    1232.7      79.8
 90.0        7.66    1107.8      77.1
135.0        7.66     906.9      72.9
180.0        7.66    1003.2      74.8
225.0        7.66    1507.2      82.9
270.0        7.66    1578.0      83.3
315.0        7.66    1475.2      82.7
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Database HAAT does not agree with computed HAAT
Database HAAT: 0 m   Computed HAAT: 1250 m
Distance to Canadian border: 1532.3 km
Distance to Mexican border: 381.3 km
Conditions at FCC monitoring station: Douglas AZ
Bearing: 216.7 degrees   Distance: 508.6 km
Proposal is not within the West Virginia quiet zone area
Conditions at Table Mountain receiving zone:
Bearing: 10.6 degrees   Distance: 555.2 km
No land mobile station failures found
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 BNPDTL20091014AAS CP scenario 1, 14.28% interference caused
**IX check failure to BLDTL20141007ACM LIC scenario 1, 3.19% interference caused
**IX check failure to BLDTL20141007ACM LIC scenario 2, 4.55% interference caused