**Displacement Narrative**

**Low Power Television Station KBBA-LD**

Cedar Rapids, IA

DTV America Corporation (DTV America) amends the displacement application of KBBA-LD, Cedar Rapids, IA with this updated narrative to explain the proposed move to channel 26 from channel 14 and the proposed tower location change enabling it to co-locate with two other low-power digital stations also owned by DTV America in the Cedar Rapids market.

***Background.*** DTV America is the licensee of low-power digital television station KBBA-LD, Cedar Rapids, IA (FCC Facility ID 188733), currently licensed to operate on channel 14 under (LMS File No. 0000004383).[[1]](#footnote-1) KBBA-LD was marked by the FCC as potentially displaced as a result of receiving more than 3% aggregate interference. This 3% aggregate receive interference is above the 2% threshold that the FCC used when determining whether a LPTV/Translator station was potentially displaced as a result of interference received.[[2]](#footnote-2) In addition to filing for channel 26 in this displacement application, DTV America is also proposing to change the tower location of KBBA-LD so that it can co-locate with two other DTV America stations already in the market - KMIK-LD (FCC Facility ID 188736) and KMKI-LD (FCC Facility ID 188741). All three stations plan to broadcast from the same tower (ASRN No. 1017229), which is less than thirty miles from KBBA-LD’s currently licensed facility.[[3]](#footnote-3) Because the Special Displacement Window is ongoing, KBBA-LD does not require or request a new waiver of the freeze on LPTV displacement application.[[4]](#footnote-4)

***Public Interest Benefits.*** Grant of DTV America’s displacement application promotes the public interest. First, grant will allow KBBA-LD to continue to provide free, over-the-air programming in Cedar Rapids, IA and its surrounding areas. Second, grant will not create harmful interference: channel 26 is currently vacant and moving KBBA-LD’s broadcast signal to channel 26 will not interfere with any co- or adjacent-channel stations. Third, grant will allow KBBA-LD to avoid future operations on channel 14 which can conflict with land mobile operations in adjacent spectrum. Finally, grant would allow KBBA-LD to co-locate with other DTV America stations in the market, maximizing operational and repacking efficiencies, resulting in a faster and cheaper transition.

***Satisfying the Displacement Criteria.*** KBBA-LD’s application fully satisfies the requirements for grant of a displacement application under the Special Displacement Window Public Notice. KBBA-LD used *TVStudy* to identify Channel 26 as an available channel and verifies that the displacement facility proposed will not create harmful interference. KBBA-LD is eligible to participate in the Special Displacement Window. KBBA-LD qualifies as both “operating” and “displaced” as defined under the FCC’s eligibility criteria.[[5]](#footnote-5) KBBA-LD’s

displacement proposal does not move the station’s facilities an impermissible distance.[[6]](#footnote-6)

The interference analysis completed utilizing *TVStudy*, indicates KBBA-LD interference amount is less than the 0.5 percent interference allowance for predicted loss of service to DTV, authorized Class A or digital Class A stations.[[7]](#footnote-7) The analysis shows that

KBBA-LD will not cause unacceptable interference to the predicted service of (1) any other primary users in the repacked TV Band or in adjacent bands (including land mobile operations); (2) any licenses and valid construction permits for LPTV/translator stations; (3) any licenses and valid construction permits for full power and Class A stations that were not reassigned; (4) the post-auction channels of reassigned full power and Class A stations as reflected in the Closing and Reassignment Public Notice; and (5) the alternate channels and expanded facilities proposed during the two filing windows by reassigned full power and Class A stations.[[8]](#footnote-8)

***Conclusion.*** DTV America respectively requests that the Commission accept this amended displacement application during the Special Displacement Window.

1. KBBA-LD is currently “licensed and silent.” *See* Request for Silent STA Extension, LMS File No. 0000047866 (filed Mar. 5, 2018). [↑](#footnote-ref-1)
2. *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, Appendix ¶ 9 (rel. Feb. 9, 2018) (“*Special Displacement Window Public Notice*”). [↑](#footnote-ref-2)
3. *Id.* at *¶* 6 (citing 47 C.F.R. §§ 76.53, 74.787(a)(4) and 73.3572(a)(4)(i)). [↑](#footnote-ref-3)
4. *See* Public Notice*, Media Bureau Freezes the Filing of Minor Change Applications for LPTV/Translator Stations,* DA 17-1227(rel. Dec. 20, 2017). [↑](#footnote-ref-4)
5. *Special Displacement Window Public Notice* at *¶* 5. [↑](#footnote-ref-5)
6. *Id.* at *¶* 6 (citing 47 C.F.R. §§ 76.53, 74.787(a)(4) and 73.3572(a)(4)(i)). [↑](#footnote-ref-6)
7. 47 C.F.R. §§ 74.973. [↑](#footnote-ref-7)
8. *See The Incentive Auction Task Force and Media Bureau Announce Procedures for Low Power*

   *Television, Television Translator and Replacement Translator Stations During the Post-Incentive Auction Transition*, Public Notice, 32 FCC Rcd 3860 ¶ 11 (rel. May 12, 2017). [↑](#footnote-ref-8)