

REQUEST FOR WAIVER OF COMMISSION'S CONTINGENT APPLICATION RULE

The engineering data contained herein have been prepared on behalf of OMEGA MEDIA BROADCASTING, licensee of digital Low Power Television Station KOPS-LD, Channel 50 in Beaumont, Texas, in support of its displacement Application for Construction Permit to specify operation on Channel 25. This station is being displaced as a result of the spectrum auction and the relocation of upper UHF channel television stations to the band between Channels 14 and 36. No change in site location, effective radiated power, antenna azimuth pattern or antenna height is proposed herein.

Attached, as Exhibit B, is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed a cell size of 0.5 kilometer and an increment spacing of 0.1 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed KOPS-LD facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities, except to the pre-repack facility of KFDM-DT, Channel 25 in Beaumont. KFDM-DT has been allotted repack Channel 15 in Beaumont and the instant proposal protects that new facility. Since operation of KOPS-LD on proposed Channel 25 is contingent upon the move of KFDM-DT to its post-repack facility on Channel 15, the instant applicant has requested a waiver of the Commission's "contingent application Rule", which the FCC has said it will entertain during this LPTV displacement filing window.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K" and "F".

KEVIN T. FISHER

May 14, 2018

TVSTUDY INTERFERENCE ANALYSIS RESULTS  
 PROPOSED KOPS-LD  
 CHANNEL 25 – BEAUMONT, TEXAS

Study created: 2018.05.14 11:29:43

Study build station data: LMS TV 2018-04-07

Proposal: KOPS-LD D25 LD LIC BEAUMONT, TX  
 File number: BLANK0000014204  
 Facility ID: 128395  
 Station data: User record  
 Record ID: 239  
 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	K22GT	N22z		TX LIC	LAKE CHARLES, LA	BLTTL20060103ABZ	62.0 km
No	K24LJ-D	D24	LD	CP	ALEXANDRIA, LA	BNPDTL20100511ABM	200.3
No	WGMB-TV	D24	DT	CP	BATON ROUGE, LA	BLANK0000027707	273.8
No	W24DX-D	D24	LD	CP	IOWA, LA	BNPDTL20100407ABU	113.6
No	KFAM-CD	D24	DC	CP	LAKE CHARLES, LA	BLANK0000028592	78.2
No	K24KQ-D	D24	LD	CP	BEAUMONT, TX	BNPDTT20090825BRG	13.5
No	KETH-TV	D24	DT	LIC	HOUSTON, TX	BLEDT20101019ABX	148.0
No	K25NT-D	D25	LD	CP	EL DORADO, AR	BNPDTL20101020AAN	373.5
No	WLPB-TV	D25	DT	APP	BATON ROUGE, LA	BLANK0000035855	281.1
No	WLPB-TV	D25	DT	LIC	BATON ROUGE, LA	BLEDT20101201ALR	281.1
No	K25MH-D	D25	LD	CP	MONROE, LA	BNPDTL20100510AED	320.2
No	KPXD-TV	D25	DT	CP	ARLINGTON, TX	BLANK0000034349	380.0
Yes	KFDM	D25	DT	LIC	BEAUMONT, TX	BLCDT20110513ABB	13.5
No	K25FW-D	D25	LD	LIC	CORSICANA, TX	BLDTL20110113ABK	384.1
Yes	KYAZ	D25	DT	CP	KATY, TX	BLANK0000034934	148.3
No	KCTL-LD	D25	LD	CP	LIVINGSTON, TX	BLANK0000004532	99.4
Yes	KCTL-LD	D25	LD	LIC	LIVINGSTON, TX	BLDTL20140508ABU	100.1
No	K25ND-D	D25	LD	CP	MOUNT VERNON, TX	BMJADTL20100521ACE	343.9
No	KXCO-LD	D25	LD	LIC	REFUGIO, TX	BLDTL20110328ACB	398.1
No	KXCO-LD	D25	LD	CP	REFUGIO, TX	BDISDTL20090630AHN	397.7
No	KHPZ-CD	D25	DC	CP	ROUND ROCK, TX	BLANK0000027658	343.5

No	K25LG-D	D25	LD LIC	TYLER, TX	BLDTL20110927ACY	242.5
No	KVCT	D25	LD LIC	VICTORIA, TX	BLCDT20111216AAA	324.2
No	KBCA	D26	DT CP	ALEXANDRIA, LA	BLANK0000033835	166.8
No	KLPA-TV	D26	DT LIC	ALEXANDRIA, LA	BLEDT20100811AAY	218.7
No	KRIV	D26	DT APP	HOUSTON, TX	BLANK0000035805	146.3
No	KRIV	D26	DT LIC	HOUSTON, TX	BLCDT20111212AHM	146.3
No	KCEB	D26	DT LIC	LONGVIEW, TX	BLANK0000001435	249.2

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25  
Mask: Full Service  
Latitude: 30 8 2.00 N (NAD83)  
Longitude: 94 7 10.00 W  
Height AMSL: 111.5 m  
HAAT: 0.0 m  
Peak ERP: 15.0 kW  
Antenna: Omnidirectional  
Elev Pattn: Generic

49.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	108.5 m	45.0 km
45.0	15.0	106.1	44.7
90.0	15.0	107.3	44.9
135.0	15.0	110.1	45.1
180.0	15.0	106.7	44.8
225.0	15.0	103.5	44.4
270.0	15.0	102.2	44.3
315.0	15.0	104.3	44.5

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 106 m

Distance to Canadian border: 1636.2 km

Distance to Mexican border: 537.9 km

Conditions at FCC monitoring station: Kingsville TX

Bearing: 231.7 degrees Distance: 473.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 320.8 degrees Distance: 1497.8 km

Study cell size: 0.50 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%

\*\*IX check failure to BLCDT20110513ABB LIC scenario 1, 23.69% interference caused  
\*\*IX check failure to BLCDT20110513ABB LIC scenario 2, 23.82% interference caused