

## Displacement Application Narrative

Call Sign: KCNH-LD

Facility ID: 186288

Applicant respectfully submits the attached displacement application pursuant to the terms set forth in the Special Displacement Window Public Notice.<sup>1</sup> Applicant has used TVStudy to identify Channel 26 as an available channel and verifies that the displacement facility proposed will not create harmful interference.

Applicant is eligible to participate in the Special Displacement Window. KCNH-LD qualifies as both “operating” and “displaced” as defined under the FCC’s eligibility criteria.<sup>2</sup> Applicant’s displacement proposal does not move the station’s facilities an impermissible distance.<sup>3</sup>

The interference analysis completed utilizing TVStudy, indicates KCNH-LD, Facility ID: 186288’s 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.<sup>4</sup> The TVStudy analysis shows that KCNH-LD will not cause unacceptable interference to the predicted service of (1) all other primary users in the repacked TV Band or in adjacent bands (including land mobile operations); (2) licenses and valid construction permits for LPTV/translator stations; (3) 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.<sup>5</sup>

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<sup>1</sup> 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”).

<sup>2</sup> See id. ¶ 5.

<sup>3</sup> See id. ¶ 6 (citing 47 C.F.R. §§ 76.53, 74.787(a)(4) and 73.3572(a)(4)(i)).

<sup>4</sup> See 47 C.F.R. § 74.793.

<sup>5</sup> 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 (IATF & MB May 12, 2017).