

REQUEST FOR WAIVER OF PHASE ASSIGNMENT

Louisiana Educational Television Authority d/b/a Louisiana Public Broadcasting (LPB), licensee of noncommercial educational television Station KLPA-TV, Alexandria, Louisiana, FAC ID 38590 (the “Station”), seeks waiver of the Station’s Post-Incentive Auction Transition Phase assignment, and corresponding testing dates and construction completion deadlines for KLPA-TV. Pursuant to the *Closing and Reassignment Public Notice*, the Station has been assigned to Transition Phase 2, for which the testing cannot begin until December 1, 2018. LPB seeks modification of its current transition phase assignment to Transition Phase 1, so that it may begin testing on November 1, 2018.

As explained in the attached statement of Walter P. Beaver, Jr., a communication received concerning a November 1, 2018 start date was misunderstood as having originated with the FCC. As also explained, LPB’s vendors were able to provide the needed equipment and installation to meet the erroneously understood November 1 start date, and LPB also commenced the scheduling of the needed medical, MVPD and consumer notifications with that date.

LPB believes the requested change can be made without negative impact on the transition or any other station, as documented by the attached TV Study run. LPB’s limited staff also is involved in the transitions of LPB’s Station KLTS-TV and in providing assistance to the licensee of Station WLAE-TV, New Orleans. Adherence to the Phase 2 deadlines would now be burdensome not only to LPB and the viewers, but to health care facilities and MVPDs. Only one rescan is required in the market, and so no countervailing factor prevents the change to Phase 1, which would serve the public interest.

Walter P. Beaver, Jr. Technical Services

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Summary of events at Louisiana Educational Television Authority (LPB) causing early notification of the repack channel change at KLPA-TV.

1. A mis-understood communication and the following mis-handling of that communication determining the date KLPA-TV could switch to the new FCC post auction channel 33 is what happened.
2. The LPB engineering staff is actively working two repack stations, KLPA-TV and KLTS-TV, and shortly starting a third WLAE-TV. The LPB staff has been stretched maintaining the daily workings of the LPB group of stations throughout the state of Louisiana while doing their best to support Technical Services staff to keep the repack stations on schedule.
3. Working with LPB Engineering, utilizing the FCC TVStudy program, determined that KLPA-TV would not cause an un-acceptable interference level to the closest channel 33 station located in Beaumont, TX. LPB is also aware the FCC is encouraging the repack stations to get ready to switch channels at the beginning of the assigned repack phase program test period not the end.
4. The transmitter vendor, Continental Electronics Corporation (CEC), completed the KLPA-TV RF amplifier sections in May while delivery of the other major components, RF amplifier combiner, harmonic filter, and FCC channel mask filter were in various stages of fabrication with the mask filter being the most troublesome to determine.
5. A notification reverse schedule was created based upon whether the notification was to medical facilities, MVPD's, the viewing public, etc. with the long pole of longest being a 90 day requirement. When the transmitter factory acceptance and following delivery / installation became real 90 days plus two weeks was added to that date creating the earliest date that would satisfy the all notification requirements. If the date was before December 1 we were good and all the days between it were additional cushion time. That date was November 1.
6. LPB was scheduled to complete the KLPA-TV tower and antenna work the week of September 17th also the long awaited delivery of the new repack transmitter had a firm delivery date and could plan to start installation. The tower work was completed September 21st with the transmitter delivery occurring as planned the next week.
7. The misunderstood communication that was thought to be a go for the channel change now had a date, November 1. LPB production department started in on production of the rescan messages, advertising, as well as the mass mailings to medical facilities, MVPD's, etc. at no small expense. Now LPB faces the expense undoing or redoing any or all of these notifications along with the potential which notification should be followed by the recipient. What happens if the medical facility or MVPD complies with the first notification?
8. The recent FCC update clarifying in particular phase 1 repack dates and procedures stated to contact IATransition@fcc.gov if one needed assistance or a station had a firm cease operation on pre-auction channel date. Enter the great cooperation and helpful advice from the IATransition@fcc.gov, in particular Mr. Evan Morris. Mr. Morris provided an understanding ear to our issues then carefully and clearly explaining what we at LPB had to provide first informally and now as a formal FCC filing to correct the mistake. LPB is thankful and grateful for the assistance at IATransition@fcc.gov.
– W. Beaver

tvstudy v2.2.5 (4uoc83)
Database: localhost, Study: KLPA_ch33, Model: Longley-Rice
Start: 2018.10.03 13:06:45

Study last edited: 2018.10.03 13:06:28

Proposal: KLPA-TV D33 DT CP ALEXANDRIA, LA
File number: BLANK0000028079
Facility ID: 38590
Station data: LMS TV 2018-09-30
Record ID: 25076ff35cef71cc015d19e811ab15f1
Country: U.S.
Zone: III

Proposal "before": KLPA-TV D33 DT BL ALEXANDRIA, LA
File number: DTVBL38590
Facility ID: 38590
Station data: LMS TV 2018-09-30
Record ID: DTVBL38590
Country: U.S.

Study has been edited. Stations studied for impact of proposal:

Call	Chan	Svc	Status	City, State	File Number	Distance
KPXJ	D32		DT CP	MINDEN, LA	BLANK0000035670	180.3 km
KTBU	D33		DT CP	CONROE, TX	BLANK0000034102	360.5
KITU-TV	D33		DT LIC	BEAUMONT, TX	BLEDT20110415ABG	201.5
KITU-TV	D33		DT STA	BEAUMONT, TX	BLANK0000030381	201.5

Record parameters as studied:

Channel: D33
Latitude: 31 33 57.00 N (NAD83)
Longitude: 92 32 51.00 W
Height AMSL: 462.6 m
HAAT: 412.6 m
Peak ERP: 572 kW
Antenna: Alive Telecom-ATC-BCE324S200-V3-33 (ID 1001768) 0.0 deg
Elev Pattn: Generic
Elec Tilt: 0.75

40.6 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	105 kW	397.0 m	88.2 km
45.0	59.5	411.0	85.1
90.0	319	413.4	97.5
135.0	468	397.6	99.7
180.0	572	415.7	102.9
225.0	468	425.7	101.9
270.0	319	426.1	98.4
315.0	59.1	423.6	85.7

Database HAAT does not agree with computed HAAT
Database HAAT: 413 m Computed HAAT: 414 m

Distance to Canadian border: 1420.4 km

Distance to Mexican border: 753.4 km

Conditions at FCC monitoring station: Kingsville TX
Bearing: 229.7 degrees Distance: 690.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 313.4 degrees Distance: 1483.4 km

Study cell size: 2.00 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%

Interference to BLANK0000035670 CP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KPXJ	D32	DT	CP	MINDEN, LA	BLANK0000035670	
Undesireds:	KLPA-TV	D33	DT	BL	ALEXANDRIA, LA	DTVBL38590	180.3 km
	KLPA-TV	D33	DT	CP	ALEXANDRIA, LA	BLANK0000028079	180.3
	KARK-TV	D32	DT	LIC	LITTLE ROCK, AR	BMLCDT20121102ACP	269.7
	WABG-TV	D32	DT	LIC	GREENWOOD, MS	BLCDT20051024ABR	325.3
	KPXB-TV	D32	DT	LIC	CONROE, TX	BLANK0000035588	377.9
	KDAF	D32	DT	LIC	DALLAS, TX	BLCDT20010606ABJ	283.7

	Service area		Terrain-limited		IX-free, before		IX-free, after		Percent
New IX	43859.6	1,140,156	43594.3	1,137,156	42106.3	1,120,649	42106.3	1,120,649	0.00
0.00									

Undesired				Total IX		Unique IX, before		Unique IX, after	
KLPA-TV	D33	DT	BL	4.1	10	4.1	10		
KLPA-TV	D33	DT	CP	4.1	10	4.1	10		
KARK-TV	D32	DT	LIC	828.8	4,946	420.7	2,648	420.7	2,648
WABG-TV	D32	DT	LIC	540.7	2,940	140.6	661	140.6	661
KPXB-TV	D32	DT	LIC	44.5	504	16.1	432	16.1	432
KDAF	D32	DT	LIC	506.4	10,477	470.1	10,386	470.1	10,386

Interference to BLEDT20110415ABG LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KITU-TV	D33	DT	LIC	BEAUMONT, TX	BLEDT20110415ABG	
Undesireds:	KLPA-TV	D33	DT	BL	ALEXANDRIA, LA	DTVBL38590	201.5 km
	KLPA-TV	D33	DT	CP	ALEXANDRIA, LA	BLANK0000028079	201.5
	KPXB-TV	D32	DT	LIC	CONROE, TX	BLANK0000035588	168.2
	WPXL-TV	D33	DT	CP	NEW ORLEANS, LA	BLANK0000053808	381.3
	KVUE	D33	DT	LIC	AUSTIN, TX	BLCDT20050624AAI	374.4
	KTBU	D33	DT	CP	CONROE, TX	BLANK0000034102	168.9
	KIAH	D34	DT	CP	HOUSTON, TX	BLANK0000035711	167.7

	Service area		Terrain-limited		IX-free, before		IX-free, after		Percent
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New IX								
27275.9	712,362	27275.9	712,362	23184.4	655,611	23060.5	654,519	0.53
0.17								
Undesired				Total IX	Unique IX, before		Unique IX, after	
KLPA-TV D33 DT CP		155.9		1,301		123.9		1,092
KPXB-TV D32 DT LIC		52.0		1,460	0.0	0	0.0	0
KTBU D33 DT CP		4091.5		56,751	3799.0	49,307	3767.0	49,098
KIAH D34 DT CP		292.5		7,444	0.0	0	0.0	0

Interference to BLANK0000030381 STA scenario 1								
Desired:	Call	Chan	Svc	Status	City, State	File Number		Distance
	KITU-TV	D33	DT	STA	BEAUMONT, TX	BLANK0000030381		
Undesireds:	KLPA-TV	D33	DT	BL	ALEXANDRIA, LA	DTVBL38590		201.5 km
	KLPA-TV	D33	DT	CP	ALEXANDRIA, LA	BLANK0000028079		201.5
	KPXB-TV	D32	DT	LIC	CONROE, TX	BLANK0000035588		168.2
	WPXL-TV	D33	DT	CP	NEW ORLEANS, LA	BLANK0000053808		381.3
	KVUE	D33	DT	LIC	AUSTIN, TX	BLCDT20050624AAI		374.4
	KTBU	D33	DT	CP	CONROE, TX	BLANK0000034102		168.9
	KIAH	D34	DT	CP	HOUSTON, TX	BLANK0000035711		167.7
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent
New IX								
23966.3	674,520	23962.3	674,497	20739.7	643,417	20739.7	643,417	0.00
0.00								
Undesired				Total IX	Unique IX, before		Unique IX, after	
KLPA-TV D33 DT BL		16.0		18	8.0	0		
KLPA-TV D33 DT CP		16.0		18		8.0		0
KTBU D33 DT CP		3214.6		31,080	3094.2	30,524	3094.2	30,524
KIAH D34 DT CP		112.5		538	0.0	0	0.0	0

Interference to BLANK0000034102 CP scenario 1								
Desired:	Call	Chan	Svc	Status	City, State	File Number		Distance
	KTBU	D33	DT	CP	CONROE, TX	BLANK0000034102		
Undesireds:	KLPA-TV	D33	DT	BL	ALEXANDRIA, LA	DTVBL38590		360.5 km
	KLPA-TV	D33	DT	CP	ALEXANDRIA, LA	BLANK0000028079		360.5
	KPXB-TV	D32	DT	LIC	CONROE, TX	BLANK0000035588		0.8
	KVUE	D33	DT	LIC	AUSTIN, TX	BLCDT20050624AAI		236.5
	KUVN-DT	D33	DT	CP	GARLAND, TX	BLANK0000034451		364.0
	KIAH	D34	DT	CP	HOUSTON, TX	BLANK0000035711		1.2
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent
New IX								
37094.3	6,035,927	37042.2	6,035,725	34331.1	5,995,636	34331.1	5,995,636	0.00
0.00								
Undesired				Total IX	Unique IX, before		Unique IX, after	
KLPA-TV D33 DT BL		12.0		156	0.0	0		
KLPA-TV D33 DT CP		12.0		156		0.0		0
KPXB-TV D32 DT LIC		12.1		2,431	8.0	0	8.0	0

KVUE D33 DT LIC	689.7	11,619	673.7	11,470	673.7	11,470
KUVN-DT D33 DT CP	12.0	269	0.0	0	0.0	0
KIAH D34 DT CP	2009.3	28,332	2005.3	25,901	2005.3	25,901

Interference to proposal scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KLPA-TV	D33	DT	CP	ALEXANDRIA, LA	BLANK00000028079	
Undesireds:	KTBU	D33	DT	CP	CONROE, TX	BLANK00000034102	360.5 km
Service area		Terrain-limited		IX-free		Percent IX	
28493.2	414,699	28433.6		414,447	28366.0	414,097	0.24 0.08
Undesired		Total IX		Unique IX		Prcnt Unique IX	
KTBU D33 DT CP		67.6		350	67.6	350	0.24 0.08