

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
)  
Sander Operating Co. III LLC ) MB Docket No. 20-\_\_\_\_  
) RM-\_\_\_\_\_  
Petition for Rulemaking to Amend the )  
DTV Table of Allotments for )  
Station KGW, Portland, OR )  
(Facility ID 34874) )

**PETITION FOR RULEMAKING**

Sander Operating Co. III LLC (“Licensee”), the licensee of television station KGW, Portland, Oregon (“KGW”), hereby petitions the Commission to commence a rulemaking pursuant to Section 1.401 of the Commission’s rules<sup>1</sup> to amend the digital television Table of Allotments by allotting Channel 26 to KGW in lieu of Channel 8.<sup>2</sup> Moving from VHF to UHF would allow KGW to dramatically improve over-the-air service to viewers in the Portland market, where a substantial portion of television households – more than 15 percent – view local broadcast stations over-the-air rather than through a traditional cable or satellite service.<sup>3</sup>

The proposed channel substitution would serve the public interest by addressing years of reception complaints KGW has received from viewers and by putting KGW on a level playing field with its Big Four<sup>4</sup> network-affiliated competitors, two out of three of whom provide over-the-air coverage in the Portland market on UHF channels. The proposed channel substitution

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<sup>1</sup> 47 C.F.R. § 1.401.

<sup>2</sup> 47 C.F.R. § 73.622(i). Licensee further requests that any such amendment to the existing DTV Table of Allotments also be incorporated in the revised Table of Allotments the Commission intends to issue after the conclusion of the ongoing repacking of the broadcast television bands.

<sup>3</sup> The Nielsen Company (US), LLC, *The Nielsen Local Watch Report: The Evolving Over-the-Air Home*, at 18 (2019), available at <https://www.nielsen.com/us/en/insights/report/2019/nielsen-local-watch-report-the-evolving-ota-home/> (“Nielsen OTA Report”).

<sup>4</sup> As used herein, the term “Big Four network” refers to the ABC, CBS, Fox and NBC broadcast television networks.

would better serve the Portland community by substantially improving its access to important and highly valued local news, emergency, NBC network and other programming. KGW further requests a waiver of the Commission's freeze on channel-substitution petitions, given that the reason for the freeze – the need to maintain a stable spectrum environment in order to facilitate the reallocation and repacking of broadcast television spectrum – no longer applies.<sup>5</sup>

## **I. Market Background**

KGW, an NBC affiliate, is licensed to Portland, Oregon, and broadcasts on Channel 8. The Commission has long recognized that “VHF channels have certain characteristics that have posed challenges for their use in providing digital television service,” including “propagation characteristics of these channels [that] allow undesired signals and noise to be receivable at relatively farther distances,” the tendency of “nearby electrical devices ... to emit noise in this band that can cause interference,” and the fact that “reception of VHF signals requires physically larger antennas that are generally not well suited to the mobile applications expected under flexible use, relative to UHF channels.”<sup>6</sup> The Commission further noted that independent studies by a private engineering firm and the Commission's own staff both found “large variability in the performance (especially intrinsic gain) of indoor antennas available to consumers, with most antennas receiving fairly well at UHF and the substantial majority not so well to very poor at high-VHF.”<sup>7</sup> The Commission continues to recognize that, although VHF reception issues are

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<sup>5</sup> See *Freeze on the Filing of Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, 26 FCC Rcd 7721 (MB 2011) (“*Channel Substitution Freeze*”).

<sup>6</sup> *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, NPRM, 25 FCC Rcd 16498, 16511 ¶ 42 (2010) (“*VHF Improvements NPRM*”).

<sup>7</sup> *Id.* at 16512 ¶ 44. See also *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, Second R&O, 25 FCC Rcd 10732, 10750 ¶ 37 (2011) (“As a result of the full power digital television transition, some full power stations on VHF channels have experienced reception problems and such problems have not been alleviated even by allowing these stations to operate with the maximum power permitted under the full power television rules.”).

not universal, “environmental noise blockages affecting [VHF] signal strength and reception exist” and “[vary] widely from service area to service area.”<sup>8</sup>

These findings are borne out by KGW’s experience. In the more than a decade since the 2009 digital television transition,<sup>9</sup> KGW has received a steady stream of complaints from viewers unable to receive the station’s over-the-air signal, despite being able to receive signals from other local stations.<sup>10</sup> The competing ABC and CBS affiliates in the Portland DMA, KATU and KOIN, broadcast on channels 24 and 25, respectively,<sup>11</sup> having been repacked to those channels from channels 43 and 40.<sup>12</sup> Although the local Fox affiliate, KPTV, also broadcasts on VHF (Channel 12),<sup>13</sup> public feedback indicates that viewers have particular trouble receiving KGW’s Channel 8 signal.<sup>14</sup>

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<sup>8</sup> *Assessment and Collection of Regulatory Fees for Fiscal Year 2020*, MD Docket No. 20-105, FCC 20-64, at ¶ 52 (rel. May 13, 2020).

<sup>9</sup> At the time of the DTV transition, KGW was licensed to King Broadcasting Company, whose ultimate parent at the time was Belo Corp. (“Belo”). See File No. BLCDDT-20091223AMO (license to cover maximized DTV Channel 8 facility); File No. BOA-20100707AIY (biennial ownership report of King Broadcasting Company as of Nov. 1, 2009). Belo sold KGW to Licensee, then a subsidiary of Sander Media Co., LLC (“Sander”), in December 2013 in connection with the acquisition of Belo by TEGNA Inc. (“TEGNA”), then known as Gannett Co., Inc. See *Applications for Consent to Transfer of Control from Shareholders of Belo Corp. to Gannett Co., Inc.*, 28 FCC Rcd 16867, 16870 (MB 2013). TEGNA acquired control of Licensee in 2015. See File No. BTCCDDT-20150629ABF.

<sup>10</sup> See generally Exhibit A, which provides a sampling of the feedback KGW has received.

<sup>11</sup> See Sinclair Portland Licensee, LLC, Letter, File No. 0000115919, at 1-2 (MB Vid. Div. June 17, 2020) (tolling KATU post-Auction construction permit and noting KATU is operating on Channel 24 using interim facilities) (“*KATU Tolling Grant*”); File No. 0000084971 (license to cover KOIN Channel 25 facility).

<sup>12</sup> See FCC, “Current Post Incentive Auction Television Transition Data Files,” [https://data.fcc.gov/download/incentive-auctions/Current\\_Transition\\_Files/](https://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/) (last visited May 8, 2020) (file “Phase Assignment (last updated May 1, 2020)”).

<sup>13</sup> See KPTV Online Public Inspection File, <https://publicfiles.fcc.gov/tv-profile/kptv> (last visited June 17, 2020) (showing station broadcasts on RF Channel 12).

<sup>14</sup> See, e.g., Exhibit A at 1 (“I receive all other channels very clearly since switching to antennae but not KGW.”); *id.* (“All stations from Portland returned strong and crystal clear as usual, using a rooftop antenna (not a dish system), but Channel 8 is completely gone.”); *id.* (“Unfortunately, even after the channel scan, KGW channel 8 no longer appears as a channel on the channel list. All the other usual channels are there (KOIN 6, KATU 2, PBS ch 10, FOX 12, ... they all work fine.”); *id.* at 2 (“Since TV went digital a few years ago I have been unable to receive a consistent signal. Sometimes I get a weak signal for a week or two and then nothing for months at a time. Channel 12 is the only other local channel that gives me similar problems.”); *id.* (“I have an HD antenna and I live in West Linn, but I can’t find your signal. I can see KOIN and KATU clearly, but not yours.”); *id.* at 3 (“Hi, I live in upper Oregon city and have been wondering why my antenna reception is so poor when all other channels come in so clearly.”).

## II. The Proposed Channel Substitution Would Improve Service to Local Viewers

Over-the-air coverage is increasingly important as more American households cut the cord on traditional cable and satellite services.<sup>15</sup> Many of these households are choosing instead to rely on free local broadcast signals, often (though not always) in combination with online streaming services. According to Nielsen, nationwide “[t]he percent of homes without traditional cable (wired or satellite) that receive local broadcast stations on a TV set via some form of digital antenna has increased 48%” between May 2010 and May 2018, rising from 11 million such homes (representing 9 percent of TV homes) to 16 million such homes (representing 14 percent of TV homes).<sup>16</sup> About 6.6 million of these homes do not subscribe to any online streaming services, thus relying entirely on over-the-air broadcasts for video service.<sup>17</sup> The ongoing COVID-19 pandemic, which has driven a dramatic surge in viewership of local and national broadcast television newscasts, only underscores the key role free, over-the-air broadcast TV coverage plays in making crucial information broadly accessible to communities.<sup>18</sup>

Over-the-air coverage is especially critical in the Portland market, where 15.6 percent of TV households are “OTA homes” without a traditional MVPD subscription.<sup>19</sup> This includes 4.8

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<sup>15</sup> Jon Lafayette, “Cord-Cutting Hit Record Levels in First Quarter,” *Broadcasting + Cable*, <https://www.broadcastingcable.com/news/cord-cutting-hit-record-levels-in-first-quarter> (May 8, 2020); Aaron Pressman, “Cord cutting is speeding up as the coronavirus pandemic squeezes consumers,” *Fortune*, <https://fortune.com/2020/05/05/cord-cutting-coronavirus-cable-satellite-tv-comcast-verizon-charter-altice-att-dish/> (May 5, 2020).

<sup>16</sup> Nielsen OTA Report at 4.

<sup>17</sup> *Id.* at 5.

<sup>18</sup> See Ted Johnson, “As Viewers Flock Back To Evening Newscasts During Coronavirus Crisis, ‘World News Tonight’ Reaches Ratings Milestone,” *Deadline*, <https://deadline.com/2020/05/abc-world-news-tonight-david-muir-ratings-coronavirus-1202926423/> (May 5, 2020); “Comscore figures reveal surging levels of Coronavirus TV coverage driven by diverse audience,” *Comscore*, <https://www.comscore.com/Insights/Press-Releases/2020/4/Surging-levels-of-Coronavirus-local-TV-coverage> (April 7, 2020); Stephen Battaglio, “A hunger for information is driving TV news to peak levels,” *Los Angeles Times*, <https://www.latimes.com/entertainment-arts/business/story/2020-03-25/tv-news-audiences-are-surging-thanks-to-coronavirus-pandemic> (March 25, 2020).

<sup>19</sup> Nielsen OTA Report at 18 (showing percentage of OTA homes in Local People Meter (“LPM”) markets).

percent of Portland TV homes without any online streaming service subscriptions.<sup>20</sup> The channel substitution proposed herein would allow KGW to better serve these viewers with a more robust and reliable UHF signal. In addition, moving to UHF would improve the station's future ability to offer robust ATSC 3.0 service over the air.<sup>21</sup> In connection with the forthcoming launch of ATSC 3.0 service in Portland, KGW will offer a 3.0-formatted version of its primary stream via host station KPDX, while maintaining ATSC 1.0 coverage on KGW's own facilities.<sup>22</sup> However, such simulcasting arrangements are intended as a transitional measure.<sup>23</sup> Having its own UHF channel would improve KGW's future ability to offer the full benefits of ATSC 3.0 via the station's own dedicated facilities.

The station's engineering study, attached hereto as Exhibit B (the "Engineering Statement"), confirms that with KGW's proposed parameters, including a 1,000 kW ERP, Channel 26 can be substituted for Channel 8 at Portland, Oregon, in compliance with the Commission's rules. The proposed facility would continue to provide a principal community contour completely covering KGW's community of license<sup>24</sup> and would not cause impermissible interference to any station.<sup>25</sup>

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<sup>20</sup> *Id.*

<sup>21</sup> See National Association of Broadcasters, *Next Generation Television (ATSC 3.0) Station Transition Guide*, at 8 (April 2019), available at [https://nabpilot.org/wp-content/uploads/2019/04/NAB-ATSC-3.0-Guide\\_Final.pdf](https://nabpilot.org/wp-content/uploads/2019/04/NAB-ATSC-3.0-Guide_Final.pdf) ("Performance of VHF channels 7 through 13 is better than low-band VHF, but the longer wavelength of VHF reduces the chances of successful reception for many portable use cases, due to utilization of built-in antennas in these devices," while "[d]ue to the short wavelengths and resulting reception advantages in this part of the TV spectrum, UHF is suitable for all anticipated ATSC 3.0 service models.>").

<sup>22</sup> See File No. 0000107807 (authorizing KGW to offer ATSC 3.0 service via host station KPDX, Vancouver, Washington).

<sup>23</sup> *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, Second R&O and Order on Recon., GN Docket No. 16-142, FCC 20-72, at ¶ 40 (rel. June 16, 2020).

<sup>24</sup> Engineering Statement at 3.

<sup>25</sup> *Id.* at 2 & Appendix A.

The study confirms KGW's Channel 26 contour would be fully contained within the station's existing Channel 8 contour and would continue to reach the population within the station's current service area, including fully covering the city of Portland.<sup>26</sup> An analysis using the Commission's TVStudy tool indicates that KGW's move from Channel 8 to Channel 26 would in fact increase the station's interference-free population served by 99,546 people – a gain of 3.58 percent – notwithstanding the slight reduction in the geographic area within the station's contour.<sup>27</sup> Given the persistent feedback KGW has received about reception issues within the station's core coverage area, any such reduction in outlying geographic coverage would be more than outweighed not only by the predicted population gain but also by the substantial improvement in the station's actual over-the-air reception within its community of license and in other core portions of its service area. The proposed move to Channel 26 therefore would serve the public interest by giving Portland-area residents greater, more reliable access to KGW's free over-the-air signal.

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<sup>26</sup> See *id.* at 3-4.

<sup>27</sup> Engineering Statement at 3. Alternatively, applying the analysis TEGNA sets forth in the VHF-to-UHF petitions concurrently being filed for KPNX, Mesa, Arizona, and KARE, Minneapolis, Minnesota – which accounts for terrain limitations and other over-the-air television services but not for interference – KGW's channel change would leave only 1,360 people currently receiving KGW's signal in areas not considered "well served," and all of those people would continue to receive at least two full power or Class A over-the-air television signals. *Id.* at 4 & Appendices D-F. See also *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, NPRM, 22 FCC Rcd 9478, 9493 ¶ 38 (2007) ("The Commission is generally most concerned where there is a loss of an area's only network or NCE TV service, or where the loss results in an area becoming less than well served, *i.e.*, served by fewer than five full-power over-the-air signals.") (footnotes and citations omitted) ("*Third DTV Review NPRM*"). Although Class A stations operate under low power technical rules, they have the same primary status and public service obligations as full power stations, and their signals thus should be counted like those of full power stations when determining if an area is well served. See 47 C.F.R. §§ 73.6001, 73.6026.

### **III. The Commission Should Allow KGW to Proceed Without Delay**

KGW requests that the Commission waive the current freeze on channel-substitution petitions so that KGW may proceed with its move to UHF immediately, thus providing Portland-area viewers with improved over-the-air service as soon as possible.<sup>28</sup>

The Commission may waive a rule or other requirement for good cause shown,<sup>29</sup> and such a waiver is appropriate “where particular facts would make strict compliance inconsistent with the public interest.”<sup>30</sup> In this case, withholding action on KGW’s request due to the *Channel Substitution Freeze* would be inconsistent with the public interest because KGW’s proposal does not implicate any of the concerns that justified the freeze. The Media Bureau initially established a freeze on the filing of channel-substitution petitions in 2011, shortly after the Commission began proceedings to consider reallocating broadcast television spectrum for broadband service, in order “[t]o permit the Commission to evaluate its reallocation and repacking proposals and their impact on the Post-Transition Table of DTV Allotments.”<sup>31</sup> Subsequently, in approving the Incentive Auction and repacking process, the Commission determined that it would not act on any further VHF-to-UHF channel-substitution requests, including those then pending, while the addition of a new station to the UHF band would

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<sup>28</sup> See *Channel Substitution Freeze* 26 FCC Rcd at 7721. Because KGW’s proposal would not expand the station’s service contour in any direction, no waiver is needed with respect to the separate freeze on full-power television license modification applications. See *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*, Public Notice, 28 FCC Rcd 4364, 4365 (MB 2013) (announcing freeze on applications “by full power and Class A television broadcast licensees and permittees for changes to existing television service areas that would increase a full power station’s noise-limited contour or a Class A station’s protected contour in one or more directions beyond the area resulting from the station’s present parameters as represented in its authorizations (license and/or construction permit)”).

<sup>29</sup> 47 C.F.R. § 1.3.

<sup>30</sup> *Northeast Cellular Telephone Co., LP v. FCC*, 897 F. 2d 1164, 1166 (D.C. Cir. 1990).

<sup>31</sup> *Channel Substitution Freeze* 26 FCC Rcd at 7721.

“increase[e] the number of constraints on the repacking process and limit[] our flexibility.”<sup>32</sup>

Instead, the Commission instructed the Media Bureau to hold pending VHF-to-UHF petitions in abeyance until the relevant filing freezes were lifted.<sup>33</sup> The Commission later affirmed that its action did not “preclude grant of [the] petitions after conclusion of the repacking process.”<sup>34</sup>

None of the concerns that motivated the freeze are applicable to KGW’s proposed channel substitution, given the advanced status of the repacking. The Commission established the UHF Band’s post-Incentive Auction structure and channel assignments more than three years ago.<sup>35</sup> The tenth and final phase of the repacking is scheduled to end on July 3, 2020.<sup>36</sup> As of the end of the first quarter of 2020, “848 out of 987 total repacked TV stations nationwide (over 85%) have already vacated their pre-auction channels, over 82% of those using permanent facilities.”<sup>37</sup> All repacked full-power and Class A stations in the Portland, Oregon DMA were assigned to Phase 6 or earlier.<sup>38</sup> All these stations have vacated their pre-Auction channels, and all but KATU have licensed their permanent post-Auction facilities.<sup>39</sup> As of May 1, 2020 – the deadline for Phase 9 stations to transition to their post-Auction channels – only 105 remaining

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<sup>32</sup> *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report & Order, 29 FCC Rcd 6567, 6668 ¶ 228 (2014) (“*Incentive Auction R&O*”).

<sup>33</sup> *Id.* at 6669-70 ¶ 231.

<sup>34</sup> *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Second Order on Reconsideration, 30 FCC Rcd 6746 (2015) (“*Incentive Auction 2nd Recon*”).

<sup>35</sup> *Incentive Auction Closing and Channel Reassignment Public Notice*, Public Notice, 32 FCC Rcd 2786 (IATF, MB & WTB 2017).

<sup>36</sup> FCC, “Transition Schedule,” <https://www.fcc.gov/about-fcc/fcc-initiatives/incentive-auctions/transition-schedule> (last visited May 8, 2020).

<sup>37</sup> Jean Kiddoo and Hillary DeNigro, “FCC Makes Funds Available to Reimburse Eligible LPTV/Translator Stations For Displacement Facility Costs,” FCC Blog, <https://www.fcc.gov/news-events/blog/2020/03/26/fcc-makes-funds-available-reimburse-eligible-lptvtranslator-stations> (March 26, 2020).

<sup>38</sup> See FCC, “Current Post Incentive Auction Television Transition Data Files,” [https://data.fcc.gov/download/incentive-auctions/Current\\_Transition\\_Files/](https://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/) (last visited May 8, 2020) (file “Phase Assignment (last updated May 1, 2020)”) (“May 1 Repacking Spreadsheet”).

<sup>39</sup> See File No. 0000084971 (license to cover KOIN Channel 25 facility); File No. 0000075180 (license to cover KNMT Channel 32 facility); File No. 0000071559 (license to cover KKEI-CD Channel 36 facility); File No. 0000054912 (license to cover KOXO-CD Channel 15 facility); *KATU Tolling Grant*, *supra* n.11 (tolling KATU post-Auction construction permit and noting KATU is operating on Channel 24 using interim facilities).

stations were scheduled to transition in Phase 10.<sup>40</sup> KGW's proposed move from Channel 8 to Channel 26 protects all operating and approved post-Auction facilities in accordance with the Commission's rules.<sup>41</sup> KGW's proposed channel substitution thus does not constrain the Commission's repacking process.<sup>42</sup>

Nor would the construction of KGW's Channel 26 facility impede the timely completion of other stations' remaining repacking-related construction. KGW has confirmed with both Dielectric and GatesAir that those vendors have the capacity to supply the antenna and transmitter equipment necessary for KGW's proposed Channel 26 facility without affecting the fulfillment of any other station's repacking-related orders, to the extent any such orders are still outstanding at this late date.<sup>43</sup> With respect to tower crew availability, although some repacking-related work is likely to continue for a period after the conclusion of Phase 10 – primarily to transition repacked stations from interim to permanent post-Auction facilities – the amount and scope of such work likely to be ongoing at any given time should be limited in comparison with the amount of work occurring during the main repacking phases, and most if not all of this work would already have been scheduled. To the extent KGW's construction requires tower work, KGW will coordinate the scheduling of any tower crew it hires with any repacked stations that

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<sup>40</sup> See May 1 Repacking Spreadsheet. By June 18, 2020, the number of transitioned stations had increased to 895, or more than 90 percent of repacked stations, leaving only 92 stations remaining. See "Post-Broadcast Television Incentive Auction Transition Deadline Approaching," News Release, available at <https://www.fcc.gov/document/post-broadcast-tv-incentive-auction-transition-deadline-approaching> (June 18, 2020) ("Of the 987 TV stations that were assigned to new channels, only 92 stations have yet to transition, and the Commission does not anticipate the need for more than a few other short extensions where, like WFOX, unforeseeable circumstances may also arise through no fault of a television station.").

<sup>41</sup> See Engineering Statement at 2 & Appendix A.

<sup>42</sup> See also *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Station WNLO(TV), Buffalo, New York*, NPRM, MB Docket No. 19-118, DA 19-316 at ¶ 6 (MB April 23, 2019) (proposing to waive channel-substitution and contour extension freezes "because the underlying purpose of the freeze is not implicated" given that "the incentive auction and repacking have been completed"), *proposal adopted by Report and Order*, MB Docket No. 19-118, DA 19-553 (MB June 12, 2019).

<sup>43</sup> Letters from Dielectric and GatesAir affirming this point are attached as Exhibit C.

crew is scheduled to service in order to accommodate any Commission deadlines and ensure all work is completed in an efficient and timely manner.

Accordingly, the public interest would be best served by promptly granting KGW's request to move from Channel 8 to Channel 26 with the specifications set forth below, so that Portland-area viewers may benefit from substantially improved over-the-air broadcast television service as soon as possible:

<u>City and State</u>	<u>Channel</u>	<u>DTV Power (kW)</u>	<u>Antenna HAAT (m)</u>
Portland, Oregon	26	1000	538.7

# Exhibit A

## KGW Viewer Complaints

A. Croze, I am having trouble with my phone getting through when given prompts to push a number for a department. Yesterday, I did get through to engineering and he suggested I try Ch. 36 on my antennae TV as I can't get Ch. 8. I receive all other channels very clearly since switching to antennae but not KGW. We tried lining the antennae up with the tower as it shows you on the map and it says the antennae is in the best place. I even get OPB which is usually one that is hard to get with antennae. I am up in Battle Ground which is 25-30 miles north east of the towers. Any other suggestions?

P. Kelter, For the past several weeks we have been having tv reception issues. The picture and sound pixilate for seconds then it returns to normal, and then this repeats. We receive our signal via an antenna. A local technician could not find a solution to our problem. Last night we tried watching KOIN news without any problems. Can you advise us how to fix this? It's so annoying. Thanks so much.

S. Hoessman, Hello, We are having difficulties getting NBC on our over the air antenna. Is there current technical difficulties? Any idea when this will be resolved?

D. Edmonds, Question. I live in NBC no-man's land, Independence, OR. We get aerial reception from Ch22 (ION) which comes off the same antenna as KGW, but we can't get KGW. We are also apparently too far to get Eugene's station either. My question is why we get Ch22, but not Ch8. Also do you have any suggestions for getting NBC?

J. D'Archer, Why can I no longer get channel 8 with rabbit-ears hd-tv.

My favorite shows are on ch 8 and my income is limited (i.e., no cable) so this is very frustrating!

V. Hopfe, Your programing feed has been all messed up gor over an hour. This had hapoened off and in for the last 2 weeks. Today it won't go away. Can't watch to crazy.

R. Rossavil, I live in Gresham. This morning we woke to a broken signal and find viewing very difficult. The question is, is KGW upgrading the antenna as is KATU and KOIN or, is this a conspiracy conducted by Comcast?

S. Phoenix, My mother-in-law has air reveption only in her assisted living place. Only Ch. 8 had gone dark. We're double-scanned twice to no avail. Please contact us ASAP.

j. Esbenshade, KGW TV: your strong HD digital broadcast signal has disappeared here (area code 97338, 20 miles to the west of Salem, Oregon). Please explain and return it as soon as possible. I performed a "double rescan" using the digital TV box. All stations from Portland returned strong and crystal clear as usual, using a rooftop antenna (not a dish system), but Channel 8 is completely gone. Thank you for your attention to this matter.

S. Knight. We're hoping you can provide some insight why "8-1" does not appear on our new HD antenna? 2-1, 6-1, 10-1 and others are no problem and the reception is great. Any idea? Thanks in advance.

D. Magnusson, Hello, Just recently, within the last week or so, the KGW over the air channel simply disappeared from my television. Thinking that maybe the channels got shuffled around, I went into my TV's setup and had it do an auto channel scan. Unfortunately, even after the channel scan, KGW channel 8 no long appears as a channel on the channel list. All the other usual channels are there (KOIN 6, KATU 2, PBS ch 10, FOX 12, ... they all work fine). So, any ideas why our tuner no longer picks up your signal? Thank you

G. Rumsey, The reception is out, trying to watch the playoff game today Sunday the 5th of January 2020...What the hell?

H. Sweeny, Not getting channel 8 at all. Lives in a motorhome, has a wyneguard system and does not receive channel 8.

N. Duffan, For the past four days the tv has been cutting out and I finally have had to go to another station. I do not have cable or dish, just rabbit ears which usually work. I live over near Killingsworth/Interstate.

D. Prickett, I have enjoyed watching your station for quite a few years now, and particularly more so once Crime TV started airing on channel 8.2. However, within the past few weeks I've noticed the reception of your station degrade, and it's to the point it no longer comes in, except for some scattered pixels and a few audible words here and there. I cannot determine anything changing on my end of things. Do you know of anything that has changed with the output on your end?

G. Lancaster, Since TV went digital a few years ago I have been unable to receive a consistent signal. Sometimes I get a weak signal for a week or two and then nothing for months at a time. Channel 12 is the only other local channel that gives me similar problems. I have a rooftop antenna. I am aware that I am in a problem area (bottom of a canyon in Eagle Creek) but all the other local channels work well.

D. Seals, We do not have cable TV and use our antenna for service. It works very well with all the other channels but we have been noticing KGW loses the signal around 9 or so in the evening. What is going on? Do you lessen your signal? It is so very frustrating! I have yet to get to watch AGT and it is the one show we as a family love to get together for. This has been going on that we have noticed for a week or so.

R. Llesegang, WE lose the KGW signal just about every evening. We are on an antenna but have never had this problem until the last several weeks. We live in the community of Roy two miles east of Banks OR

E. Kennedy, I have a converter box to receive digital TV programming but have not any reception the past 5 days. WHY?

L. Lesbo, Why is chanel 8 on our tv coming in with terrible reception. We have Antena tv. Haven't had this problem before last sunday. What is going on

P. Lies, Hello,I have a question. I cannot afford Direct TV or Dish. I have an indoor antenna. KGW was doing great for me. Yesterday it is not working. Please tell me why? Please? I would like an honest answer please.

S. McMahn, I have an HD antenna and I live in West Linn, but I can't find your signal. I can see KOIN and KATU clearly, but not yours.

B.Flynn, Second night of not receiving your channel...started receiving after 9pm and most of the Voice already aired. Cannot get cable, do not want cable...is that only way to receive?

D. Hanson, Come on KGW, get with the program! I have a 20' outdoor VHF TV antenna that pulls in 10 and 12 but you're too weak. Together with my UHF antenna I pull in 38 stations including CBS from Eugene! Knowing that this is a problem in our area, both 10 and 12 also rebroadcast on a local translator. So that leaves KGW as the only station I can't pull in. Oddly I was pulling you in fairly consistently last year and then you just disappeared. Sadly, KGW was my favorite source for news; no longer. So come on, add a translator for those of us in the shadow of the hills.

K. Shurm, Hello Engineering!!!! The "burps" and skips have returned...burps on remote video (audio portion) and skips also occur on video....Reception has been great all summer....I think with the onset of crappy weather is when all of this begins.....lots of rain, freezing cold, snow, brings it on.....the burps and whatnot have just begun.

B. Kirk, Have you recently (say in the last month or so) lowered your over-the-air signal strength? I have roof top antennas and have never had trouble with reception of KGW, but lately it's just terrible...I can't watch the evening news because the picture is so pixelated. My other stations seem to come in just fine. Thanks for any help you can give me.

J. Hosack, did a double scan on all 3 of our TV's and now I cannot get your station at all. All I get is distorted sound and picture. Any ideas??

L. Johnson, Your over-the-air signal seems to be having problems, beginning yesterday (or maybe earlier this week). The "meter" on my A to D converter fluctuates between 25 and 45. At 25, I only see "Weak Signal". KOIN, KATU, and Channel 49 run about 80 or above. Is the problem at my end? I live in Laurelhurst and have been using a VHF/UHF in my attic for about 30 years - this is the first time a problem with channel 8, at least in my memory.

T. Anderson, Sir or Madam, I'm trying to be a loyal KGW watcher BUT It is getting harder and harder given your dwindling signal strength. I live on Bull Mountain in Tigard have an in the attic antenna, a Tivo [measures signal strength-direction-distance] and over the years your signal strength drops with my equipment all being the same. While I am more than happy to take the blame, I would like to understand how come when the weather changes your signal strength drops as much as 38% and only your signal.

M. Ballard, Hi, I live in upper Oregon city and have been wondering why my antenna reception is soo poor when all other channels come in so clearly. It is pointed at skyline to all the antennas. What do u think I can do to help boost your signal since it seems to be a bit weaker than than the others. Appreciate your help, thank you.

W. Nickerson, Hi. Did something happen with your power output in the last week or two? I have an indoor antenna and received your signal just fine, but sometime in the last couple weeks the signal has become weaker as I'm now having reception problems (even though would expect the opposite as the leaves fall off the trees). I'm only about 8-9 miles from your antenna. But again, this is only something in the last couple weeks or so. Thanks -w

R. Hutcheson, Over the past week I have lost my OTA signal for 8.1-8.3. I have tried re-scanning and double scanning to no avail. Has there been a significant change to the translator in Portland, OR. I live in North Portland so signal strength should not be an issue. Thank you for your help.

F. Gecina, have re-scanned via instructions numerous times to still get no KGW8 reception, even though my antenna has not changed position from when I used to get reception.

R. Zander, This morning channel 8 OTA signal was strong and clear. Now it shows black and a little pixelation flickers. All my other OTA channels are fine.

J. Green, Hi - I recently moved from NE to SE, 6th & Tacoma. I'm wondering if you might have a recommendation for an antenna that will actually pull in your network? The new one I bought, TERK Amplified Indoor Flat HDTV range of 65 miles somehow can't find NBC.