

Exhibit 6 - Statement A
ALLOCATION and INTERFERENCE CONSIDERATIONS
prepared for
Ventana Television, Inc.
K26CR Kansas City, Missouri
Facility ID 49176
Ch. 45+ 150 kW

Ventana Television, Inc. (“*Ventana*”) is the licensee of analog low power television station K26CR, Channel 26, Kansas City, Missouri, Facility ID 49176 (file number BLTTL-20030624ABG). K26CR has been displaced from Channel 26 due to modifications to nearby KSHB-TV (NTSC Ch. 41) and the allotment of a DTV facility on an adjacent channel. Pursuant to Section 73.3572(a)(4) of the Commission’s rules, a “displacement” application is therefore submitted to modify K26CR’s existing Channel 26 facility. A search of the TV spectrum for a replacement channel for K26CR has yielded Channel 45 as the most suitable alternative.

Displacement Details

K26CR as licensed on Ch. 26+ is displaced by recent modifications to KSHB-TV (NTSC Ch. 41, Kansas City, MO, Facility ID 59444) and by the allotment of Channel 24 as a paired DTV channel for KCTV (NTSC Ch. 5, Kansas City, MO, Facility ID 41230).

KSHB has recently been granted a license (BLCT-20030902ACA) for a facility with an increase in effective radiated power (“ERP”) from 1320 kW to 3980 kW. Observations by Ventana’s engineering staff report that this N+15 taboo channel relationship is having a very deleterious effect on the reception of K26CR within its protected 74 dB μ service contour. Based on an application of OET-69, as many as 728,525 of the 846,475 people within the 74 dB μ contour are now predicted to receive interference from KSHB-TV.

Additionally, according to an OET-69 analysis, 50,655 of the 846,475 people within the 74 dB μ contour are predicted to receive interference from the second adjacent authorized DTV facility, KCTV-DT (BMPCDT-20011130AEM)

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Considering this collective observed and predicted received interference, Ventana is proposing to stay at the same site and change to Channel 45+ with an increase in ERP from 23.9 kW to 150 kW.

NTSC, DTV, Class A, and LPTV Considerations

A detailed analysis of the potential for interference that may result from the use of Channel 45 as proposed herein for K26CR has been performed. The instantly proposed facility complies with contour overlap and minimum distance separation requirements with respect to all but the following authorized NTSC stations and DTV stations:

Call	Ch.	City, State	Distance
KSHB-TV	41	Kansas City, MO	5.2 km
KMTV-DT(CP)	45	Omaha, NE	284.6 km
KSNW-DT(CPMod)	45	Wichita, KS	296.6 km

OET-69 Study Background

With regard to these stations, pursuant to the Commission's Rules, requests for waivers of the standard contour protection requirements of §§73.705, 74.706, 74.707, and 74.708 may be based on a more detailed analysis to show that interference is not likely. Specifically, interference protection to an NTSC, DTV, Class A, or LPTV station from an LPTV minor modification may be demonstrated using OET-69 methods.

A detailed interference study was therefore conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").¹ The interference study examined the net change in interference that would result from the proposed facility. The results, as listed in **Table I**

¹ The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed for all full service facilities. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show excellent correlation.

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for DTV and NTSC facilities, show that there is no new interference proposed when the impact, in terms of percentage, is rounded to the nearest whole percent.

Protection of KSHB-TV

The K26CR site is within 32 km of KSHB-TV (Ch. 41, Kansas City, MO). The KSHB-TV analog channel 41 facility represents an "N-4" taboo relationship. Section 74.705 requires that such stations be separated by a minimum of 32 km, as the proposed ERP for K26CR will exceed 50 kW. In this instance, KSHB-TV is 5.2 km from the proposed K26CR facility on Ch. 45.

The KSHB-TV Channel 41 facility is four channels removed from that of the proposed Channel 45 K26CR operation. The minimum distance separation requirement of 32 km is primarily intended to avoid intermodulation interference. Any resulting intermodulation problem from the "N+/-4" relationship would be expected to affect reception of an NTSC station with the assignment of $2A \text{ minus } B$, where "A" represents either the K26CR or KSHB-TV channel number and "B" would be the other station's channel. Such interference (which occurs in an NTSC television receiver and is not emitted over the air) would be present only when both channel "A" and "B" signal levels are very high, and would occur in areas nearby the transmitter site.

In this case, "N+/-4" intermodulation interference could impair reception of NTSC stations on channels 37 and/or 49, only within the immediate area of the Kansas City. A search of the Commission's database shows that there are no NTSC full service stations on Channel 37 (the radio astronomy reserved channel) and no NTSC full service stations on channel 49 in such close proximity to K26CR and KSHB-TV to warrant concern. The closest station on Channel 49 is KTKA-TV (Ch. 49, Topeka, KS) 121.5 km distant. Thus, there are no potential "victim" stations to this intermodulation combination which provide useable service to the area near K26CR. Additionally, as shown in **Exhibit 6 - Table I**, the OET Bulletin 69 detailed interference analysis shows that no "crossmodulation" interference to KSHB-TV will result.

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Thus, the instant proposal complies with the Commission's protection requirements with respect to these stations which fail to meet the contour protection or minimum distance separation requirement. If necessary, waivers of the contour protection requirements toward these stations are respectfully requested based on the OET-69 interference analyses described herein.

Proximity of AM station KCCV(AM)

K26CR is situated on an existing tower and is proposing to remain on this existing tower. No change is proposed herein for K26CR's center of radiation or the overall height of the antenna support structure. The existing tower on which the existing antenna for K26CR is mounted is situated 2.1 kilometers from KCCV(AM), 760 kHz, Overland Park, KS, Facility ID 6491. KCCV(AM) operates with a three tower directional array. The proposed change in antenna systems is not expected to have a measurable effect on the operating parameters of KCCV(AM). KCCV(AM) is also the subject of a very recent partial proof of performance prepared on behalf of the K26CR tower owner (Richland Tower) to address changes resulting from the recent replacement of the existing K26CR antenna support structure (see BLH-20030422ABI for KRBZ(FM)). Therefore, the applicant respectfully requests that a Construction Permit grant not be conditioned with respect to KCCV(AM). In the event that Commission staff determine that additional information is warranted with regard to the proposed change in antenna systems for K26CR on the existing tower, such information will be provided.

Conclusion

The proposed use of Channel 45 fully complies with the standard requirements of §§74.705, 74.706, 74.707, and 74.708 of the FCC Rules. Requisite interference protection will be provided to primary TV, Low Power TV, TV translator stations, Class A television stations and digital television stations.

Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, or Class A television facilities as a result of the instant proposal.

Exhibit 6 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Ventana Television, Inc.

K26CR Kansas City, Missouri

Facility ID 49176

Ch. 45+ 150 kW

DTV Facilities

Stations <u>Considered</u>	City, State <u>Channel</u>	Distance <u>(km)</u>	Baseline <u>Population</u> (1)	Calculated	Calculated	--- Net "New" Interference --- ("0.5 percent" test)	
				"Before" Service <u>Population</u> (2)	"After" Service <u>Population</u> (3)	<u>Population</u> (4)	<u>Percentage</u> (5)
KMTV-DT (CP)	Omaha, NE 45	284.6	1,131,000	1,100,392	1,100,248	144	0.01
KSNW-DT (CP)	Wichita, KS 45	296.6	684,000	676,132	676,066	66	0.01

NTSC Facilities

Stations <u>Considered</u>	City, State <u>Channel</u>	Distance <u>(km)</u>	Baseline <u>Population</u> (1)	Calculated	Calculated	--- Net "New" Interference --- ("0.5 percent" test)	
				"Before" Service <u>Population</u> (2)	"After" Service <u>Population</u> (3)	<u>Population</u> (4)	<u>Percentage</u> (5)
KSHB-TV (Lic)	Kansas City, MO 41	5.2	1,718,408	1,716,538	1,716,538	0	0.00

OET-69 DTV, NTSC Notes:

- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
 For NTSC stations, total population within noise-limited contour
 For Class A Stations (UHF) Population within 74 dBμ contour
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal
- (3) Service population after reduction from terrain and interference losses, considering proposal
- (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A number in parenthesis indicates a *reduction* in interference.
- (5) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "*Additional Application Processing Guidelines for Digital Television*"