

Station KTVA-DT • DTV Channel 28 • Anchorage, Alaska

FCC Form 301 §III-D, Question 12

The locations of the 47.1 dBu F(50,90) City Grade field strength contours for the permitted (FCC File No. BMPCDT-20031121ABT), authorized STA (FCC File No. BDSTA-20050210AXB), and proposed operations have been determined in accordance with the procedures specified in Section 73.625(b) of the FCC Rules and are plotted on the map of accompanying Exhibit 43B. As shown, the contour area of the proposed operation is fully encompassed by the permitted contour, as is the authorized STA contour. As also shown, 39.7% area of Anchorage Borough, the community to be served, is encompassed by the contour of the permitted operation, 32.7% area of the Borough is encompassed by the authorized STA contour, and 36.5% area of the Borough is encompassed by the proposed operation. The City of Anchorage and Anchorage Borough (a county equivalent) are coextensive, occupying a land area of more than 5,000 square kilometers. The existing KTVA(TV) tower, the site of the KTVA-DT permitted, STA, and proposed operations, is located in the most populated area of Anchorage, the Anchorage Bowl region. Based on 2000 U.S. Census data, 47.1 dBu service from the permitted facility is provided to 99.2% of Anchorage Borough population, with only 2,083 of the Borough's 260,283 persons located outside the contour, to 98.7% of the Borough's population by the authorized STA facility, with only 3,271 persons located outside the contour, and to 99.1% of the Borough's population by the proposed facility, with only 2,297 persons located outside the contour. The Anchorage Borough land area falling outside the coverage contours primarily consists of the Chugach State Park and the Chugach State Forest, which accounts for the lack of population existing in that region. Thus, if a waiver of Section 73.625(b) is deemed necessary by Commission staff to authorize the proposed operation, it is respectfully requested.

The December 21, 2004, *FCC Table II of 1998 NTSC and DTV Replication Information*, lists the KTVA NTSC population as 296,677 persons and the DTV population as 296,063 persons. OET-69 coverage analysis calculations yield 296,436 persons within the permitted KTVA-DT interference-free service area (100.1% of the DTV table population), 285,403 persons within the authorized STA interference-free service area (96.4%) and 291,812 persons within the proposed interference-free service area (98.6%).

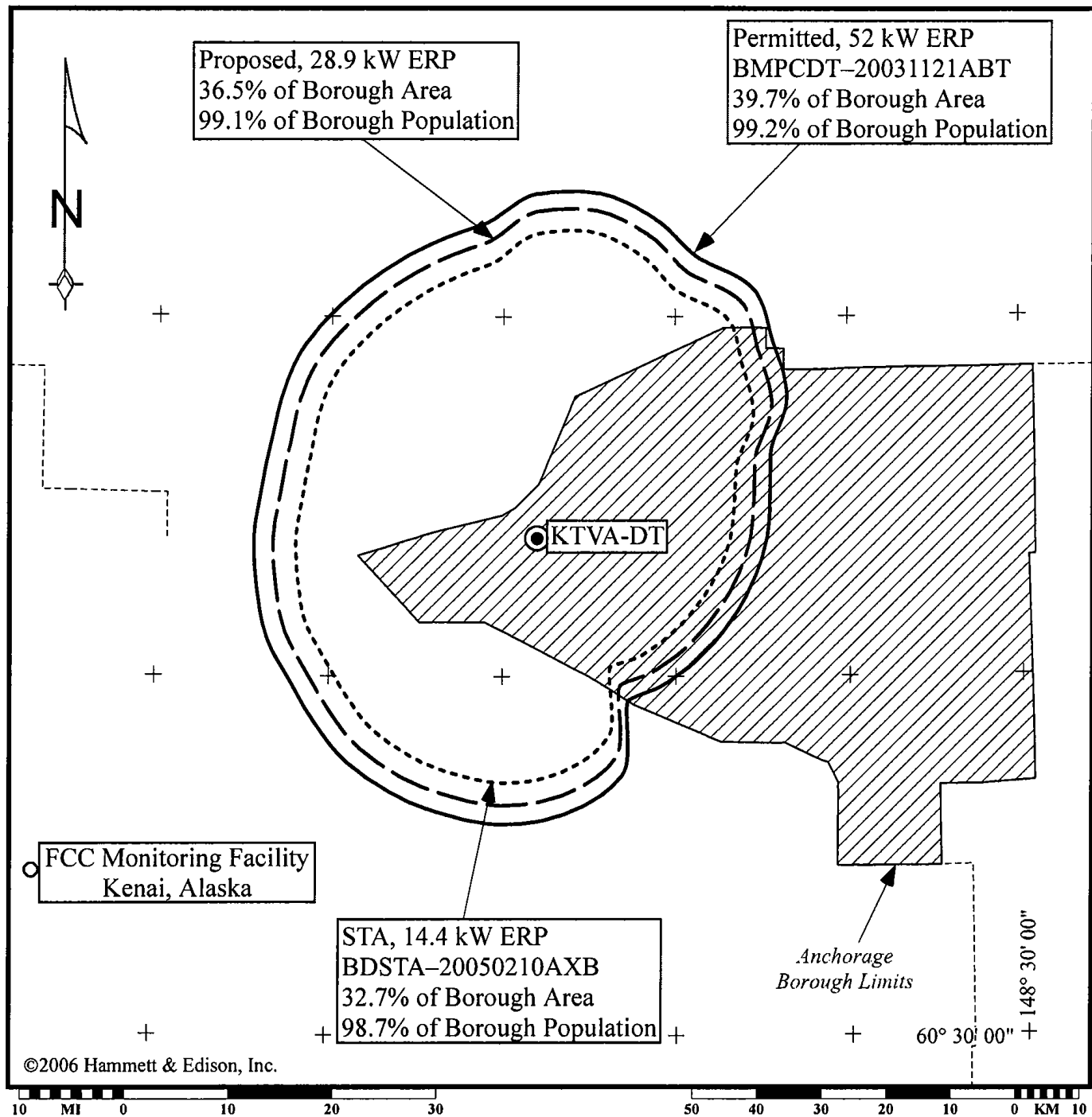
The Anchorage-area FCC Monitoring Facility was recently relocated to Kenai, Alaska. The contour projected over that facility by the permitted, authorized STA, and proposed KTVA-DT operations is well under the 10 mV/m limit specified in FCC Rules Section 73.1030(c)(1).



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**Comparison of FCC F(50,90) 47.1 dBu City Grade Contours
Transmitting Antenna Radiation Center 130.6 meters AMSL**

Area and Population figures based on 2000 U.S. Census



Lambert conformal conic map projection. Geographic coordinate marks shown at 30-minute increments. Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. County lines and borough limits shown taken from U.S. Census Bureau TIGER/Line 2000 data.



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Figure 43B