

Exhibit 6 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for

**Mountain Licenses, L.P.**

KBWU-LP Richland, Etc., Washington

Facility ID 58685

Ch. 36 50 kW

*Mountain Licenses, L.P.*, (“*MLLP*”) is the licensee of KBWU-LP, analog LPTV Channel 66, Pasco, Etc., Washington (file number BLTTL-19920508IE). The instant application herein seeks a new Construction Permit<sup>1</sup> (“CP”) to specify a different community name, a different operating frequency, a different antenna system, and an increase in effective radiated power (“ERP”). The proposed facility will use the existing antenna structure and antenna radiation center height above ground, but corrects the center of radiation height above mean sea level and the geographic coordinates of the transmitter site.

Operation on Channel 36 with a maximum ERP of 50 kW is proposed. The instant application qualifies as a “displacement” application per §73.3572(a)(4)(ii) of the Commission’s Rules, as KBWU-LP’s licensed operation on Channel 66 is between Channels 52 and 69.

The proposed antenna system for KBWU-LP is a directional antenna which will be side mounted on an existing antenna support structure (no ASR number). The proposed antenna is an Andrew model ALP8M6-HSWR-36. The overall height of the structure will increase slightly to 14.9 meters. This overall structure elevation passes the FCC’s TOWAIR program for the transmitter location, thus FAA notification and commensurate FCC structure registration is not necessary.

### **Allocation Considerations**

The instant proposal complies with the Commission’s standard contour overlap protection and pertinent minimum distance separation requirements toward all NTSC, DTV, television

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<sup>1</sup>*MLLP* had been issued a CP (BPTTL-19990527JI) for Channel 52. This facility was not built as it is not an “in-core” channel, and that CP expired on August 11, 2003.

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translator, LPTV, and Class A stations except those listed in the table below. The stations which would experience contour overlap are listed below.

<u>Call</u>	<u>City, State</u>	<u>Ch.</u>	<u>Relationship</u>
K36DP	Pendleton, Etc., OR	36	Co-chan
KSKN-DT (App)	Spokane, WA	36	Co-chan
KSKN-DT (CP)	Spokane, WA	36	Co-chan
KSTW-DT (CPM)	Tacoma, WA	36	Co-chan

Consistent with Commission policy regarding potential interference from LPTV and television translator facilities, a detailed interference study was 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")<sup>2</sup>. The interference study examined the change in interference as experienced by the subject LPTV and DTV stations that would result from the proposed facility. All stations considered in this study are listed in **Exhibit 6 - Table I**. The results show that any increase in interference to any of the stations considered would not exceed the Commission's 0.5 percent rounding tolerance.

Except in the instances discussed above, the proposed facility of KBWU-LP fully complies with the standard requirements of §74.705, §74.706, and §74.707 of the FCC Rules. An OET Bulletin 69 analysis indicates that no more than 0.25 percent new interference will be caused to any of the stations studied, which does not exceed the Commission's 0.5 percent rounding tolerance.

Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, TV translator, or Class A television facilities as a result of the instant proposal. Nevertheless, if a waiver of §§74.705 through 74.707 is required with respect to the stations listed, then such a waiver is respectfully requested on behalf of *MLLP* for the reasons stated above.

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<sup>2</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

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**International Considerations**

The Proposed transmitter site is located 322 km from the U.S.-Canadian border, within the required coordination distance for international coordination. The “worst case” interfering contour for co-channel UHF facilities with no offset is 24 dB $\mu$  F(50,10).<sup>3</sup> **Exhibit 6 - Figure 1** demonstrates that the worst case interfering contour of the proposed KBWU-LP facility does not reach the Canadian border. The US-Canadian agreement<sup>4</sup> provides for authorization without international coordination in cases where the interfering contour of an LPTV station does not reach the border, such as the case at hand.

**Other Allocation Considerations**

The nearest FCC monitoring station is at Ferndale, Washington, at a distance of 408.6 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required.

There are no AM broadcast stations located within 3.2 km (2 miles) of the KBWU-LP site, according to information extracted from the Commission’s engineering database.

Thus, this proposal is believed to be in compliance with the current Commission’s Rules and policy with respect to allocation matters.

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<sup>3</sup>The *Working Arrangement for Allotment and Assignment of VHF and UHF Television Broadcasting Channels Under the Agreement Between the Government of the United States of America and the Government of Canada Relating to the TV Broadcasting Service*, March 1, 1989 Annex IV, Table I

<sup>4</sup>Ibid., Paragraph 5.4.1 states: “Proposals for low power stations not on allotted channels, at locations in excess of 32 km from the border, whose interfering F(50,10) contour would not fall within the territory of the other county, may be authorized without referral or notification.”

**Exhibit 6 - Table I**  
**OET-69 INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Mountain Licenses, L.P.**  
 KBWU-LP Richland, Etc., Washington  
 Facility ID 58685  
 Ch. 36 50 kW

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Service Population (2)</u>	<i>---- Unique Interference ---- from proposal</i>	
					<u>Population (3)</u>	<u>Percentage (4)</u>
K36DP (LIC)	Pendleton, Etc., OR 36	99.9	-----Proposal Causes No Interference-----			
KSKN-DT (App)	Spokane, WA 36	216.8	434,000	437,155	242	0.06
KSKN-DT (CP)	Spokane, WA 36	216.8	434,000	466,047	1125	0.25
KSTW-DT (CP-MOD)	Tacoma, WA 36	294.9	-----Proposal Causes No Interference-----			

Notes:

- (1) Greater of NTSC or DTV Service Population, from FCC Table  
For NTSC Stations: Population within noise-limited contour  
For LPTV & Class A Stations: Population within 74 dBμ contour (with dipole factor)
- (2) Interference-free service population per OET-69 before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal  
(Numbers in parentheses indicate a decrease in interference.)
- (4) 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"

