

## NARRATIVE

Oregon Trail Broadcasting Company ("OTB") has retained this firm to prepare an engineering study in support of the instant application. OTB is the licensee of KPVI-TV, Pocatello, Idaho (BLCT-2335, Facility Number 1270), which is translated in Driggs, Idaho, by K09UZ (BLTVL-19890615IC, Facility Number 1266). OTB is also the licensee of K09UZ. KPVI operates on channel 6 minus. K09UZ presently operates on channel 9N. OTB proposes to move K09UZ to channel 51Z, as described in the application, due to the fact that K09UZ is being displaced by a DTV construction permit, as detailed below.

Attached to this narrative is an allocation study demonstrating that K09UZ is seriously short-spaced to a DTV construction permit held by KIFI-TV, Idaho Falls, Idaho (BPCDT-19991019AAZ, Facility Number 66258). Thus K09UZ is to be displaced by the operation of KIFI-DT in the near future. Due to proximity to the KIFI-DT protected contour and terrain factors, there exists no combination of power reduction and/or antenna pattern change which would protect KIFI-DT without destroying the K09UZ coverage in Driggs. Therefore, OTB requests processing as a displacement, as outlined in footnote 79, page 48 of the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (in MM Docket 87-268; FCC 98-24), wherein the Commission establishes a distance of 260 kilometers between the transmission sites of the DTV and low-power station, relative to operation on TV channels 7 through 13, as the limit within which the low-power station will be considered to be displaced. K09UZ presently operates on channel 9, and as the accompanying allocation study shows, is located 142.9 kilometers from the KIFI-DT permit.

Also attached to this narrative is an allocation study of the proposal on channel 51Z, and contour maps of the predicted interfering and protected contours.

The above and attached information is true and correct as to my knowledge and belief.

June 11, 2002



Gary O. Keener



TV Study for: K09UZ FCC Data Base Date: 6/2002 43-47-18  
 Location: DRIGGS, ID ZONE: 2 LPTV 110-56-02  
 LPTV Facilities used as assumption: 493 HAAT 0.077 ERP

CALL STATUS	LOCATION STATE	CHANNEL ZONE	ERP:KW(DA) HAAT	LATITUDE LONGITUDE	DISTANCE BEARING	REQUIRED CLEAR (km)
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>>>>>>> Study For Channel: 9 <<<<<<<<

KIFI-TV	IDAHO FALLS, ID	8 +	316.	43-30-02	142.9	129.5 [ -1]
LIC TV	BLCT-1099	ZONE:2	463	112-39-36	257.7	+13.4 Close
K09UZ F(50,50) 68 dBu = 16 km, KIFI-TV F(50,50) 56 dBu = 114 km						
K09LP	GALLATIN RIVER,, MT	9 N	.045 Y	45-16-27	169.1	129.5 [ +0]
LIC TX	BLTTV-19820322IE	ZONE:	211	111-23-36	347.7	+39.6 Clear
K09UZ F(50,10) 23 dBu = 128 km, K09LP F(50,50) 68 dBu = 2 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 78: Separation +91.5*						
K09ID	SODA SPRINGS, ET, ID	9 N	.026 Y	42-37-48	142.4	131.6 [ +0]
LIC TX	BLTTV-19821116ID	ZONE:	301	111-41-00	205.6	+10.8 Close
K09UZ F(50,10) 23 dBu = 128 km, K09ID F(50,50) 68 dBu = 4 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 80: Separation +62.7*						
KIFI-TV	IDAHO FALLS, ID	9	63.0	43-30-03	142.9	283.8 [ +0]
CP DT	BPCDT-19991019AAZ	ZONE:2	463	112-39-36	257.7	-140.9 SHORT*
K09UZ F(50,10) 15 dBu = 159 km, KIFI-TV F(50,90) 36 dBu = 125 km						
K09SF	NORTH FORK, ETC., WY	9 N	.089 Y	44-29-08	160.7	131.9 [ +0]
LIC TX	BLTTV-19830314ID	ZONE:	620	109-10-29	60.6	+28.8 Clear
K09UZ F(50,10) 23 dBu = 128 km, K09SF F(50,50) 68 dBu = 4 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 80: Separation +80.7*						
KUSM	BOZEMAN, MT	9 Z	44.0 Y	45-40-24	209.5	202.5 [ +0]
CP TV	BPET-20010215ABH	ZONE:2	249	110-52-02	1.4	+7.1 Close
K09UZ F(50,10) 11 dBu = 179 km, KUSM F(50,50) 56 dBu = 24 km*						
K09UZ F(50,10) 28 dBu = 111 km Offset required 135: Separation +74.6						
ALLOC-DT	IDAHO FALLS, ID	9	21.8	43-30-02	142.9	270.2 [ +0]
VAC DT	Doc98-315	ZONE:	463	112-39-36	257.7	-127.3 SHORT*
K09UZ F(50,10) 15 dBu = 159 km, ALLOC-DT F(50,90) 36 dBu = 111 km						
K09UT	MAMMOTH, ETC., WY	9 N	.073 Y	44-55-56	128.4	131.9 [ +0]
LIC TX	BLTTV-19880125IJ	ZONE:	292	110-42-22	8.1	-3.5 Short
K09UZ F(50,10) 23 dBu = 128 km, K09UT F(50,50) 68 dBu = 4 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 80: Separation +48.4*						
K09UZ	DRIGGS, ID	9 N	.077 Y	43-47-18	0.0	128.2 [ +0]
LIC TX	BLTVL-19890615IC	ZONE:	493	110-56-02	0.0	-128.2 SHORT*
K09UZ F(50,10) 23 dBu = 128 km, K09UZ F(50,50) 68 dBu = 0 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 76: Separation -76.3*						
K09VJ	SMOOT, WY	9 N	.060 Y	42-38-10	128.1	128.1 [ +0]
LIC TX	BLTTV-19900319JG	ZONE:	61	110-59-30	182.1	+0.0 Close
K09UZ F(50,10) 23 dBu = 128 km, K09VJ F(50,50) 68 dBu = 0 km*						
K09UZ F(50,10) 40 dBu = 76 km Offset required 76: Separation +51.9*						



# K09UZ 9N ALLOCATION STUDY

K09UZ  
Driggs, ID  
Exhibit 6

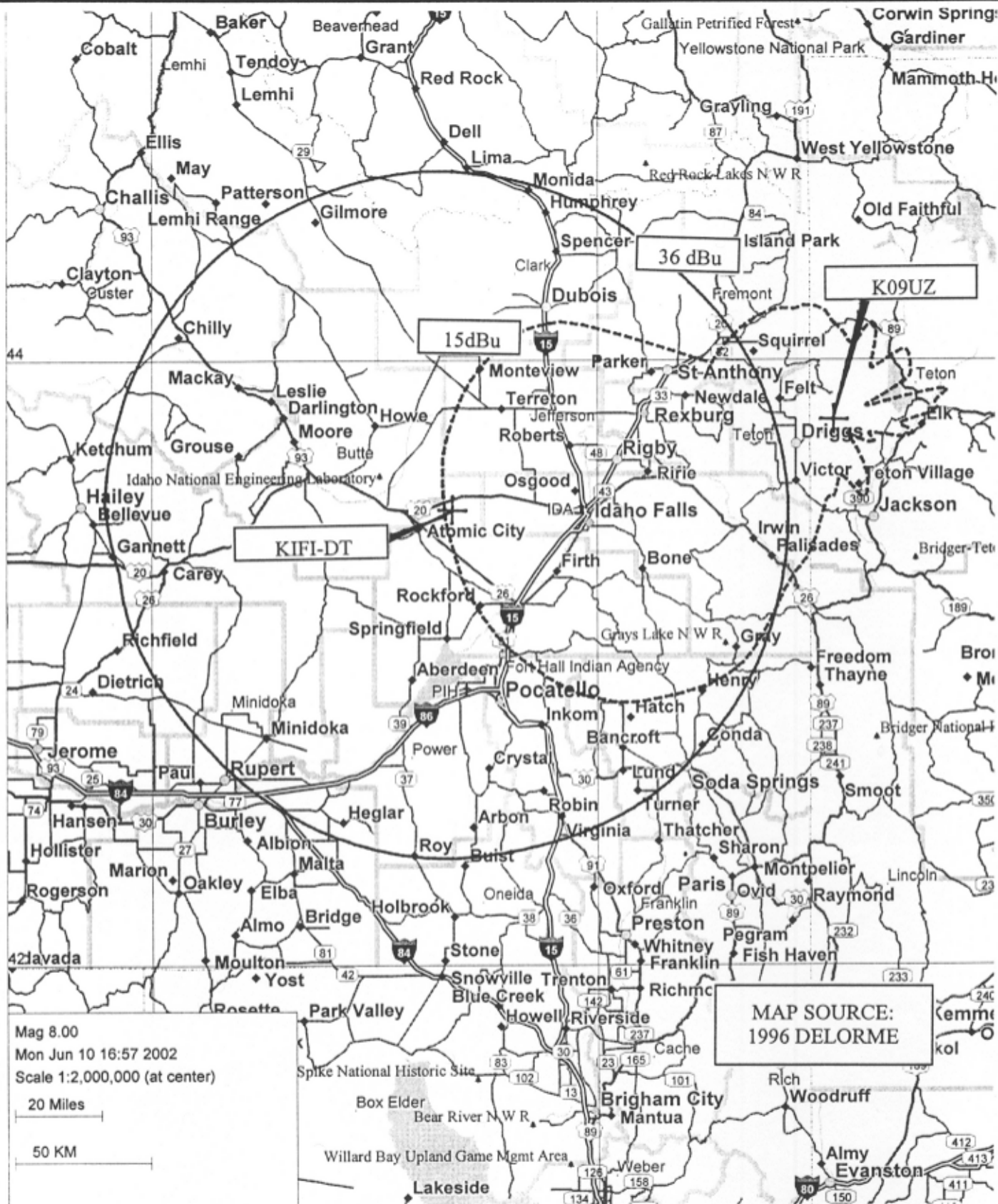
TV Study for: K09UZ FCC Data Base Date: 6/2002 43-47-18  
 Location: DRIGGS, ID ZONE: 2 LPTV 110-56-02  
 LPTV Facilities used as assumption: 493 HAAT 0.077 ERP

CALL STATUS	LOCATION STATE	CHANNEL ZONE	ERP:KW(DA) HAAT	LATITUDE LONGITUDE	DISTANCE BEARING	REQUIRED CLEAR (km)
K09VD	ASHTON, ID	9 N	.150 Y	44-03-59	52.3	128.9 [ +0]
LIC TX	BLTTV-19900716IA	ZONE:	493	111-27-31	306.4	-76.6 SHORT*
K09UZ F(50,10)	23 dBu = 128 km,	K09VD	F(50,50)	68 dBu =	1 km*	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	77: Separation	-24.7*	
KUSM	BOZEMAN, MT	9 Z	3.39	45-40-00	208.9	215.0 [ +0]
LIC TV	BLET-19910701KH	ZONE:2	-104	111-03-10	357.5	-6.0 Short
K09UZ F(50,10)	11 dBu = 179 km,	KUSM	F(50,50)	56 dBu =	36 km	
K09UZ F(50,10)	28 dBu = 111 km		Offset required	147: Separation	+61.5	
K09IJ	LA BARGE, WY	9 N	.160 Y	42-19-26	170.2	130.1 [ +0]
LIC TX	BLTTV-19951003IF	ZONE:	421	110-19-08	162.7	+40.1 Clear
K09UZ F(50,10)	23 dBu = 128 km,	K09IJ	F(50,50)	68 dBu =	2 km*	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	78: Separation	+92.0*	
K09PL	DINGLE, ETC., ID	9 N	.012	42-19-15	165.5	130.4 [ +0]
LIC TX	BLTTV-19810721IE	ZONE:	-81	111-17-12	190.1	+35.2 Clear
K09UZ F(50,10)	23 dBu = 128 km,	K09PL	F(50,50)	68 dBu =	3 km	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	78: Separation	+87.1*	
K09KH	WATKINS, ETC., MT	9 N	.012 Y	45-20-11	182.4	130.7 [ +0]
LIC TX	BLTTV-3765	ZONE:	-192	111-41-50	340.8	+51.7 Clear
K09UZ F(50,10)	23 dBu = 128 km,	K09KH	F(50,50)	68 dBu =	3 km*	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	79: Separation	+103.6*	
K09GI	CLARKS FORK, ETC, WY	9 N	.012 Y	44-53-42	160.7	130.4 [ +0]
LIC TX	BLTTV-1264	ZONE:	-353	109-38-12	39.6	+30.3 Clear
K09UZ F(50,10)	23 dBu = 128 km,	K09GI	F(50,50)	68 dBu =	3 km*	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	78: Separation	+82.2*	
K09LF	SOUTH PARK, WY	9 N	.010 Y	43-23-20	47.1	129.1 [ +0]
LIC CA	BLTTV-3970	ZONE:	-185	110-44-15	160.3	-82.0 SHORT*
K09UZ F(50,10)	23 dBu = 128 km,	K09LF	F(50,50)	68 dBu =	1 km*	
K09UZ F(50,10)	40 dBu = 76 km		Offset required	77: Separation	-30.1*	
KISU-TV	POCATELLO, ID	10 Z	123.	43-30-02	142.9	129.5 [ +1]
LIC TV	BLET-19891218KE	ZONE:2	465	112-39-36	257.7	+13.4 Close
K09UZ F(50,50)	62 dBu = 26 km,	KISU-TV	F(50,50)	56 dBu =	104 km	



# K09UZ 9N ALLOCATION STUDY

K09UZ  
Driggs, ID  
Exhibit 6



Paradigm Associates, Inc.

K09UZ 9N CONTOURS TO KIFI-DT

K09UZ  
 Driggs, ID  
 Exhibit 6

TV Study for: K09UZQ FCC Data Base Date: 6/2002 43-47-18  
 Location: DRIGGS, ID ZONE: 2 LPTV 110-56-02  
 LPTV Facilities used as assumption: 494 HAAT 1.000 ERP

CALL STATUS	LOCATION STATE	CHANNEL ZONE	ERP:KW(DA) HAAT	LATITUDE LONGITUDE	DISTANCE BEARING	REQUIRED CLEAR (km)
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>>>>>>> Study For Channel: 51 <<<<<<<<

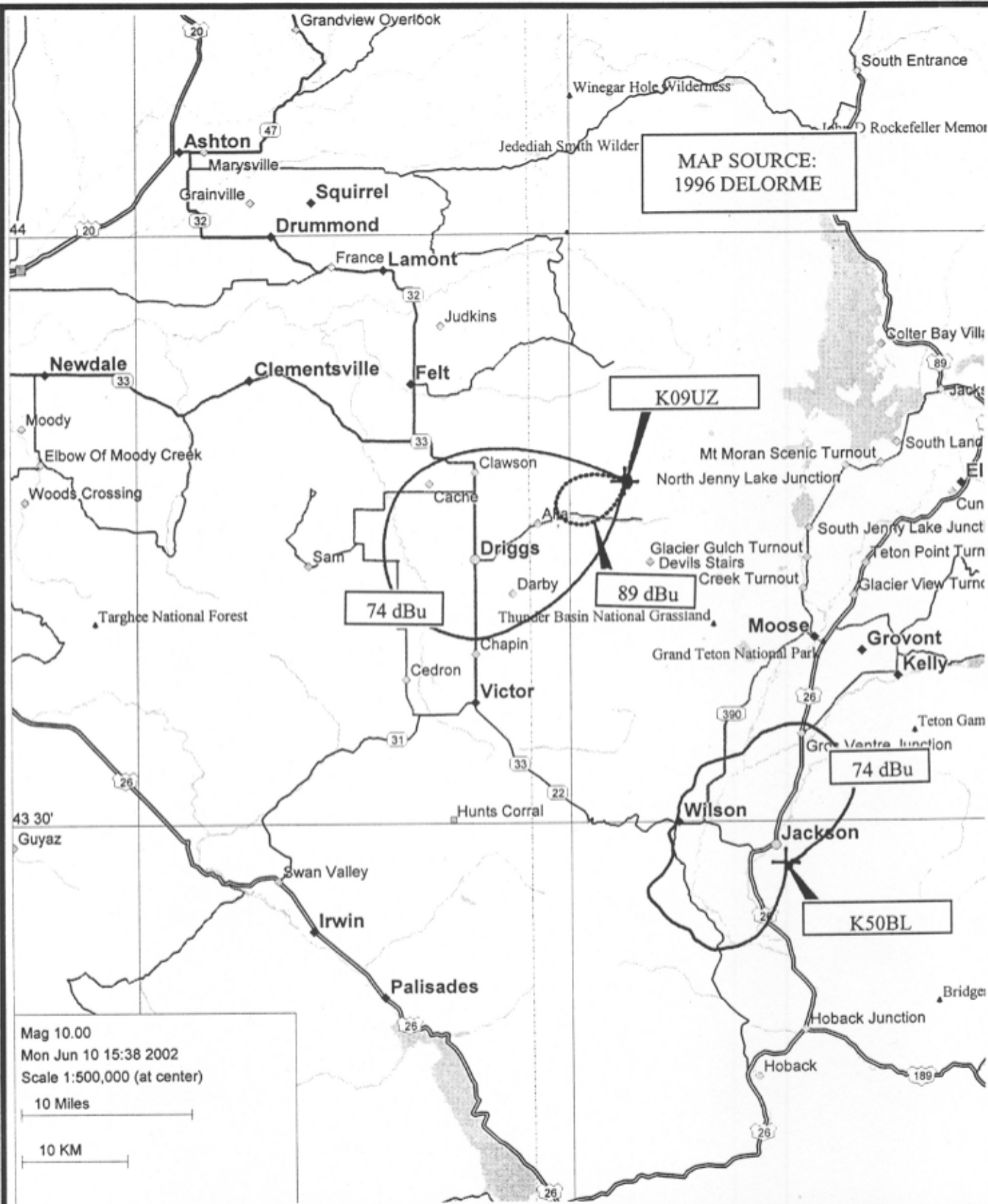
K50BL	JACKSON, WY	50 N	.352 Y	43-27-45	39.1	17.5 [ -1]
LIC TX	BLTT-19901016ID	ZONE:	278	110-45-03	157.7	+21.6 Clear
K09UZQ	F(50,50) 89 dBu =	6 km, K50BL	F(50,50) 74 dBu =	11 km*		
NEW	POCATELLO, ID	51 -	10.0	42-52-26	163.5	161.2 [ +0]
APP TX	BNPTT-20000828AIN	ZONE:	303	112-30-47	232.1	+2.3 Close
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	30 km		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	99: Separation	+64.4	
NEW	POCATELLO, ID	51 -	10.0	42-52-26	163.5	161.2 [ +0]
APP TX	BNPTT-20000828AVS	ZONE:	304	112-30-47	232.1	+2.3 Close
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	30 km		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	99: Separation	+64.4	
NEW	REXBURG, ID	51 -	10.0 Y	43-47-58	67.8	143.1 [ +0]
APP TX	BNPTT-20000830AZK	ZONE:	65	111-46-32	271.3	-75.4 SHORT*
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	12 km*		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	81: Separation	-13.2	
NEW	POCATELLO, ID	51 Z	1.00 Y	43-11-30	132.0	132.8 [ +0]
APP TX	BNPTT-20000831BJS	ZONE:	25	112-20-41	240.3	-0.8 Short
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	2 km*		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	71: Separation	+61.3	
NEW	SODA SPRINGS ETC, ID	51 N	1.13	42-37-48	142.4	144.8 [ +0]
APP TX	BNPTT-20000801ACA	ZONE:	364	111-41-00	205.6	-2.4 Short
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	14 km		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	83: Separation	+59.7*	
NEW	IDAHO FALLS, ID	51 Z	4.00 Y	43-29-30	95.8	131.9 [ +0]
APP TX	BNPTT-20000807AET	ZONE:	6	112-02-53	250.2	-36.2 Short
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	1 km*		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	70: Separation	+26.0	
NEW	POCATELLO, ID	51 -	7.38 Y	42-57-28	152.4	145.8 [ +0]
APP TX	BNPTT-20000807AFH	ZONE:	31	112-25-49	233.2	+6.6 Close
K09UZQ	F(50,10) 29 dBu = 131 km, NEW		F(50,50) 74 dBu =	15 km*		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	84: Separation	+68.7	
NEW	COKEVILLE, WY	51 Z	150.	42-05-03	189.3	146.4 [ +0]
APP TX	BNPTT-20000829AJE	ZONE:	58	110-57-09	180.5	+42.9 Clear
K51AK	CODY, ETC., WY	51 N	1.18	44-35-14	188.6	151.5 [ +0]
LIC TX	BLTT-19810318JR	ZONE:	482	108-51-08	61.2	+37.1 Clear
K09UZQ	F(50,10) 29 dBu = 131 km, K51AK		F(50,50) 74 dBu =	21 km		
K09UZQ	F(50,10) 46 dBu = 69 km		Offset required	89: Separation	+99.2*	



## K09UZ PROPOSAL ON 51Z ALLOCATION STUDY

K09UZ  
Driggs, ID  
Exhibit 6





Mag 10.00  
Mon Jun 10 15:38 2002  
Scale 1:500,000 (at center)

10 Miles

10 KM



Paradigm Associates, Inc.

K09UZ PROPOSAL ON 51Z  
CONTOURS TO K50BL ON 50N

K09UZ  
Driggs, ID  
Exhibit 6



Paradigm Associates, Inc.

# K09UZ PROPOSAL ON 51Z CONTOURS TO K51AK ON 51N

K09UZ  
Driggs, ID  
Exhibit 6