Low Power Television Station K11SN • as Channel N32 • Columbia, Missouri

Waiver Request: §74.705, 74.706, and 74.707 With Respect to KMIZ(TV), WTJR-DT, WPSD-DT, and K32FH

The proposed operation on Channel 32 of LPTV Station K11SN meets all spacing and contour protection requirements with respect to full-service NTSC, DTV, Class A, LPTV, and TV Translator stations, except for four. Each of these stations was studied using the Commission's OET-69 methodology. As discussed below, waiver of Sections 74.705, 74.706, and 74.707 of the Rules is respectfully requested, as appropriate, inasmuch as it is unlikely that the proposed operation will result in interference to any of these stations.

The 70 dBu F(50,50) interference contour of the proposed operation would overlap the 64 dBu F(50,50) protected contour of TV Station KMIZ, Channel N17, Columbia, Missouri, which is also owned by the applicant. Interference is predicted from the proposed operation to just 0.4% of the baseline population of KMIZ. Pursuant to FCC policy,* this amount of interference rounds to zero.

The 20 dBu F(50,10) interference contour of the proposed operation would overlap the 41 dBu F(50,90) protected contours of both the allotted and permitted facilities of DTV Station WTJR-DT, Channel D32, Quincy, Illinois. Interference is predicted to 0.1% of the baseline population of this station. Pursuant to FCC policy, this amount of interference rounds to zero.

The 20 dBu F(50,10) interference contour of the proposed operation would overlap the 41 dBu F(50,90) protected contours of both the allotted and permitted facilities of DTV Station WPSD-DT, Channel D32, Paducah, Kentucky. Interference is predicted to less than 0.1% of the baseline population of this station. Pursuant to FCC policy, this amount of interference rounds to zero.

Finally, the 29 dBu F(50,10) interference contour of the proposed operation would overlap the 74 dBu F(50,50) protected contours of both the permitted and licensed facilities of LPTV Station K32FH, Warrensburg, Missouri. Zero interference is predicted to this station.

Analysis using the method of OET-69† shows that no interference is predicted to any of these stations. The complete results are not provided here. If a copy of the results of this study are needed by the Commission's staff, such results can be provided upon request.

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* "Additional Application Processing Guidelines for Digital Television," Public Notice 84889, August 10, 1998.

† The computer software tv_process_lp as implemented on a Sun Microsystems computer was used for the OET-69 evaluations. It is believed that this is the same software and platform used by the Commission's staff and would therefore be expected to produce identical results.