

# GREG BEST CONSULTING, INC.

9223 N. Manning Ave.  
Kansas City, MO 64157  
816-792-2913

December 21, 2005

Federal Communications Commission  
Media Bureau, Video Division  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

This instant application is for converting the analog construction permit granted for K31GS to a digital translator construction permit through the "Flash Cut" process. There is no material change in the coordinates for the location of the facilities proposed.

In evaluating the proposed DTV flash cut facility change for K31GS, an evaluation of possible interference according to FCC rules was conducted.

## PROPOSED STATION EVALUATION TO POSSIBLE INTERFERENCE CRITERIA

Proposed facility does not interfere with FCC Monitoring Stations

Proposed facility does not interfere with West Virginia quite zone

Proposed facility does not interfere with Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance but no agreement for coordination for low power digital TV facilities is in place yet. The proposed facilities have been operated over the past year under an experimental license at the ERP indicated in this proposal without any known interference to any Mexican stations.

Proposed station is OK toward AM broadcast stations

There is possible interference with full service, digital, Class A, and Low Power TV stations.

An evaluation according to OET-69 is presented to support this proposed facility change. In evaluating the proposed facility change for K31GS, an outgoing interference study was executed using the OET-69 Longley Rice Methodology using a signal resolution of 1 km and a spacing increment of 0.1 km with a digital ERP of 15 kW. The following stations were considered in the study:

Call Sign	FCC File Number	City	State	Distance	Bearing
K17EM (17N)	BLTT19970515JB	Roswell	NM	0.3	165.9
K30GM (30Z)	BLTT20011002AAR	Capitan/ruidoso	NM	130.5	270.5
K31DR (31N)	BLTT19930312JE	Caballo	NM	269.4	260.6
K31EO (31-)	BLTT20030721AEH	Mora	NM	297.5	342.8
K31GJ (31Z)	BLTT20020722ABJ	Alamogordo	NM	154.3	246.1
KENW-D (32)	BLEDT20030219ADP	Portales	NM	141.6	47.9
KENW-D.R (32)	BLET365	PORTALES	NM	69.8	75.6
KEYU.D (31)	BLCDT20050210ALO	Borger	TX	318.7	46.9
KKGD-L.C (33N)	BPTTL20030129ALE	Roswell	NM	14.1	250.8
KLCP-L.A (31+)	BPTTL20050715ABR	Las Cruces	NM	248.7	244.2
KOSATV-D.R (31)	BLCT604	ODESSA	TX	240.1	134.8

KRPV (27-)	BLCT19860915KG	Roswell	NM	17.4	274.4
KRPV.C (27-)	BMPCT20040402AAM	Roswell	NM	0.9	155.5
NEW.A-1 (31Z)	BNPTTL20000830BOU	Plainview	TX	262.8	69.0
NEW.A-2 (34+)	BNPTTL20000828AFK	Roswell	NM	22.7	267.0
NEW.A-3 (34+)	BNPTTL20000828AEN	Roswell	NM	22.7	267.0
NEW.A-4 (31Z)	BNPTTL20000818ABW	Plainview	TX	248.1	68.0

Of the considered stations, the following stations showed possible interference:

Call Sign	FCC File Number
K17EM	BLTT19970515JB
KENW-D (32)	BLEDT20030219ADP
KENW-D.R (32)	BLET365

Each of the above stations was evaluated for incoming interference using the OET-69 Longley Rice methodology. In all but one case, there was zero percent (when rounded to the nearest percent) interference present. The following table identifies the actual percentage interference from the incoming interference analyses.

Call Sign	FCC File Number	Percentage Interference
K17EM	BLTT19970515JB	0.0
KENW-D (32)	BLEDT20030219ADP	0.0
KENW-D.R (32)	BLET365	41.8

Although there is interference to the FCC allocation of KENW-DT (BLET365), there is no interference to the currently licensed facilities of KENW-DT. Furthermore, KENW is the originating station for this translator. Please refer to the attachment that indicates KENW will accept any interference generated by the facilities proposed by this DTV flash cut application.

Should you have any questions concerning this analysis, please contact me and I will be happy to help.

Sincerely,

*Greg Best*

President  
Attachment