

ALLOCATION AND INTERFERENCE STUDY
PROPOSED KONG-DT
CHANNEL 31 - EVERETT, WASHINGTON
[FURTHER AMENDMENT TO BPCDT-19991101AFR]

The Commission allotted Channel 31 to KONG-DT with a nominal ERP of 290.6 kw at 239 meters above average terrain. The instant application specifies an ERP of 700 kw (directional) at 218 meters, which is allowable under the FCC's *de minimis* standards with respect to various NTSC and DTV facilities.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by KONG-DT to other pertinent stations are tabulated in Exhibit D-2.

For KWPX and the KWPX-DT CP, the study employed a signal resolution (cell size) of 2 kilometers and a profile spacing increment of 1 kilometer. For KBTC-TV and the KWPX-DT allotment facility, the study employed a signal resolution (cell size) of 1 kilometer, instead of 2 kilometers, and a profile spacing increment of 0.1 kilometer instead of 1 kilometer. In doing so, we relied on the Commission's August 10, 1998, Public Notice "Additional Applications Processing Guidelines for DTV."

As indicated, the proposed KONG-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its present service area.

EXHIBIT D-1

Therefore, this proposal meets the FCC's domestic *de minimis* interference standards for DTV operations.

There are two Canadian allotments that must be considered in this regard. NTSC Channel 31, Chilliwack, British Columbia, would receive interference to 114 persons. However, the KONG-DT allotment facility would cause interference to 1628 persons in the Chilliwack service area. Thus, the interference to that allotment would decrease. In the case of DTV Channel 31, Saltspring Island, British Columbia, both the KONG-DT allotment facility and the proposed KONG-DT facility would cause interference to 1693 persons, representing less than 0.1 percent of the total Saltspring Island coverage population.

It should be noted that even with the proposed facilities, the coverage of KONG-DT will not equal the coverage of at least two of its competitors in the Seattle-Tacoma, market. KOMO-DT is allotted 1000 kw at 247 meters and KIRO-DT is allotted 1000 kw at 250 meters, whereas the facilities proposed herein are 700 kw at 218 meters.

EXHIBIT D-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KONG-DT
CHANNEL 31 - EVERETT, WASHINGTON
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NTSC FACILITIES

		<u>INTERFERENCE LOSSES (POPULATION)</u>							
<u>Call Sign</u>	<u>City, State</u>	<u>Grade B Population F(50,50)</u>	<u>Ch.</u>	<u>NTSC & DTV</u>		<u>NTSC & DTV</u>		<u>Unmasked</u>	
				<u>NTSC Only</u>	<u>Without KONG-DT</u>	<u>With KONG-DT</u>	<u>%¹</u>	<u>DTV</u>	<u>%¹</u>
KBTC-TV	Tacoma, WA	28	2,925,118	51,225	197,456	146,231	5.0	201,881	6.9
KWPX	Bellevue, WA	33	3,545,378	0	14,679	14,679	0.4	36,656	1.0
								55,650	1.9
								21,977	0.6

DTV FACILITIES

		<u>INTERFERENCE LOSSES (POPULATION)</u>							
<u>Call Sign</u>	<u>City, State</u>	<u>NTSC/DTV³ Grade B Pop. Longley-Rice</u>	<u>Ch.</u>	<u>NTSC & DTV</u>		<u>NTSC & DTV</u>		<u>Unmasked</u>	
				<u>NTSC Only</u>	<u>Without KONG-DT</u>	<u>With KONG-DT</u>	<u>%¹</u>	<u>DTV</u>	<u>%¹</u>
KWPX-DT (Allot.)	Bellevue, WA	32	3,287,561	51,113	51,113	0	0	23,292	0.7
KWPX-DT (CP)	Bellevue, WA	32	3,583,167	981	981	0	0	51,479	1.6
								23,292	0.7
								51,479	1.6

¹ Cannot exceed 10%, under FCC *de minimis* interference standards.

² Cannot exceed 2%, under FCC *de minimis* interference standards.

³ Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.