

Interference

This technical statement supports this application to make changes in K05LH on channel 5 in Sioux City, IA. FCC File No. BNPTVL-20000831APL, Facility ID 128012.

In this application, the Applicant is proposing to modify K05LH to change the station's offset, ERP, and transmitting antenna.

The proposed channel 5 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in Attachment A. The program lists in a column labeled "Clearance" the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. The "Total Pop" and "Old Pop" reflect the existing station's coverage without this proposed station. The "New Pop%" and "New Pop" show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment B, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed Sioux City operation to pertinent surrounding analog television allotments and assignments. Interference to these stations was

studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
WOI-TV (Lic)	8661	Ames, IA	5	891,363	815 (0.09%)	N/A	815 (0.09%)
KDLV-TV (Lic)	55375	Mithcell, SD	5	92,515	235 (0.25%)	N/A	235 (0.25%)
KHAS-TV (Lic)	48003	Hastings, NE	5	207,959	0 (0.0%)	N/A	0 (0.0%)
KHAS-TV (App)	48003	Hastings, NE	5	221,778	0 (0.0%)	N/A	0 (0.0%)
WOWT (Lic)	65528	Omaha, NE	6	1,070,504	134 (0.01%)	N/A	134 (0.01%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The “Clearance” to all digital television stations are positive numbers. Accordingly, FCC rule 74.706 is fully met and no waivers are required.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Sioux City operation to pertinent surrounding low power television (“LPTV”) allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
New (CP)	125123	Norfolk, NE	5	24,850	0 (0.0%)	N/A	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with

the spirit and intent of the FCC's interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals. The applicant requests a waiver of Section 74.705, 74.706, and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.