

EXHIBIT 6
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ALLOCATION CONSIDERATIONS
Montgomery Communications, Inc.
Topeka, KS

The proposed KTLJ-LP operating facilities will provide the required contour protection to all analog TV broadcast stations requiring protection consideration pursuant to Section 74.705 of the FCC Rules. These proposed facilities will also provide the required contour protection to all LPTV, Class A TV, and TV Translator stations requiring protection consideration pursuant to Sections 74.707 and 74.708 of the FCC Rules. With three exceptions, they will also provide the required contour protection to all DTV facilities requiring protection consideration pursuant to Section 74.706 of the FCC Rules.

The three exceptions involve the following stations:

KODE-DT	Joplin, Missouri	Channel 43
KPTM-DT	Omaha, Nebraska	Channel 43
WIBW-DT	Topeka, Kansas	Channel 44

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to these three DTV facilities from the proposed KTLJ-LP facilities. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. The version of the "FLR" program utilized in conducting these studies employed the same 2 kilometer cell size as was employed by the FCC in conducting the initial DTV allotment studies. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsidera-

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tion of the Fifth and Sixth Report and Orders in MM Docket 87-268 and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the “FLR” program faithfully reproduces the results obtained by the FCC in their implementation of this program.

These interference studies were conducted on both the allotment and construction permit facilities for KODE-DT and KPTM-DT, since the construction permits for both stations specify maximized facilities. The WIBW-DT construction permit facilities are considered to be “checklist” facilities. Thus, the OET 69 evaluation procedures do not require that additional interference studies be conducted for the WIBW-DT construction permit facilities. For this reason, these interference studies on WIBW-DT were conducted only for their DTV allotment facilities. In conducting these studies, the “FLR” program was run in the “paired” mode for both the allotment and construction permit facilities for KODE-DT in order to evaluate service and interference to the entire area within the KODE-DT Channel 12 Grade B contour, including the portions of this area which fall outside the noise limited contour for the DTV facilities being studied. The studies for KPTM-DT and WIBW-DT were run in the “unpaired” mode, since the noise limited contour for the DTV allotment facilities for both of these stations is congruent to the Grade B contour for their present analog operating facilities.

In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities

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which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service population for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

The results of these studies are presented in Tables 6.0 through 6.4. These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program both with and without the proposed KTLJ-LP facilities. As shown by this data, the proposed KTLJ-LP facilities are not predicted to cause any new interference whatsoever to either the allotment or construction permit facilities for KODE-DT or to the WIBW-DT allotment facilities. While these proposed facilities will result in a very slight amount of new interference to both the allotment and construction permit facilities for KPTM-DT, this new interference falls well below the 0.5% rounding tolerance which is employed to evaluate new interference in this situation. This OET 69 analysis serves as the basis for the certification in response to Question 13(b) of Section III of FCC Form 346 that the proposed facilities protect DTV facilities as required by Section 74.706 of the FCC Rules.

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If it is deemed to be necessary, a waiver of Section 74.706 of the FCC Rules is respectfully requested with regard to this situation to permit the attached application to be granted in spite of the prohibited contour overlap with these three DTV facilities.

TABLE 6.0

OET 69 INTERFERENCE STUDIES
 KODE-DT - JOPLIN, MO
(ALLOTMENT FACILITIES)
 Montgomery Communications, Inc.
 Topeka, KS

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KODE-DT	Joplin, MO	43	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KAUT-TV	Oklahoma City, OK	43	NTSC	Licensed	BLCT-19800925KI
KWBF-DT	Little Rock, AR	43	DTV	Allotment	
KYTV-DT	Springfield, MO	44	DTV	Allotment	
KTFO-DT	Tulsa, OK	42	DTV	CP	BMPCDT-20010806AAH
KTLJ-LP	Topeka, KS	43	NTSC	Applicant	

STUDY RESULTS WITHOUT KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	524690	29005.5
not affected by terrain losses	521435	28477.1
lost to NTSC IX	338	56.0
lost to additional IX by ATV	15698	948.8
lost to ATV IX only	15797	956.8
lost to all IX	16036	1004.9

STUDY RESULTS INCLUDING PROPOSED KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	524690	29005.5
not affected by terrain losses	521435	28477.1
lost to NTSC IX	338	56.0
lost to additional IX by ATV	15698	948.8
lost to ATV IX only	15797	956.8
lost to all IX	16036	1004.9

TABLE 6.0(cont'd)

OET 69 INTERFERENCE STUDIES
 KODE-DT - JOPLIN, MO
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without KTLJ-LP</u>	<u>With Proposed KTLJ-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	505,399	505,399	0
Percent Loss(Gain)*	0.32%	0.32%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 507,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.1

OET 69 INTERFERENCE STUDIES
 KODE-DT - JOPLIN, MO
(CONSTRUCTION PERMIT FACILITIES)
 Montgomery Communications, Inc.
 Topeka, KS

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KODE-DT	Joplin, MO	43	DTV	CP	BPCDT-19991022AAV

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KAUT-TV	Oklahoma City, OK	43	NTSC	Licensed	BLCT-19800925KI
KWBF-DT	Little Rock, AR	43	DTV	Allotment	
KYTV-DT	Springfield, MO	44	DTV	Allotment	
KTFO-DT	Tulsa, OK	42	DTV	CP	BMPCDT-20010806AAH
KTLJ-LP	Topeka, KS	43	NTSC	Applicant	

STUDY RESULTS WITHOUT KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	524463	28981.5
not affected by terrain losses	519330	28389.0
lost to NTSC IX	435	56.0
lost to additional IX by ATV	14843	976.9
lost to ATV IX only	14994	988.9
lost to all IX	15278	1032.9

STUDY RESULTS INCLUDING PROPOSED KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	524463	28981.5
not affected by terrain losses	519330	28389.0
lost to NTSC IX	435	60.1
lost to additional IX by ATV	14843	976.9
lost to ATV IX only	14994	988.9
lost to all IX	15278	1036.9

TABLE 6.1(cont'd)

OET 69 INTERFERENCE STUDIES
 KODE-DT - JOPLIN, MO
(CONSTRUCTION PERMIT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without KTLJ-LP</u>	<u>With Proposed KTLJ-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	504,052	504,052	0
Percent Loss(Gain)*	0.58%	0.58%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 507,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.2

OET 69 INTERFERENCE STUDIES
KPTM-DT - OMAHA, NE
(ALLOTMENT FACILITIES)
Montgomery Communications, Inc.
Topeka, KS

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KPTM-DT	Omaha, NE	43	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
NEW	Des Moines, IA	43	NTSC	Application	BPET-19960508KE
KPTH	Sioux City, IA	44	NTSC	Licensed	BLCT-19991105AAH
KRWF	Redwood Falls, MN	43	NTSC	Licensed	BLCT-19870424KH
KPTM	Omaha, NE	42	NTSC	CP	BPCT-19870902KE
KTLJ-LP	Topeka, KS	43	NTSC	Applicant	

STUDY RESULTS WITHOUT KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1109572	34254.1
not affected by terrain losses	1108950	34049.2
lost to NTSC IX	1703	349.5
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1703	349.5

STUDY RESULTS INCLUDING PROPOSED KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1109572	34254.1
not affected by terrain losses	1108950	34049.2
lost to NTSC IX	1722	361.6
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1722	361.6

TABLE 6.2(cont'd)

OET 69 INTERFERENCE STUDIES
 KPTM-DT - OMAHA, NE
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without KTLJ-LP</u>	<u>With Proposed KTLJ-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,107,247	1,107,228	(19)
Percent Loss(Gain)*	0.07%	0.07%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,108,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.3

OET 69 INTERFERENCE STUDIES
KPTM-DT - OMAHA, NE
(CONSTRUCTION PERMIT FACILITIES)
Montgomery Communications, Inc.
Topeka, KS

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KPTM-DT	Omaha, NE	43	DTV	CP	BPCDT-19991101AGZ

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
NEW	Des Moines, IA	43	NTSC	Application	BPET-19960508KE
KPTH	Sioux City, IA	44	NTSC	Licensed	BLCT-19991105AAH
KRWF	Redwood Falls, MN	43	NTSC	Licensed	BLCT-19870424KH
KPTM	Omaha, NE	42	NTSC	CP	BPCT-19870902KE
KTLJ-LP	Topeka, KS	43	NTSC	Applicant	

STUDY RESULTS WITHOUT KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1140967	37251.2
not affected by terrain losses	1137347	36970.0
lost to NTSC IX	7722	454.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	7722	454.0

STUDY RESULTS INCLUDING PROPOSED KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1140967	37251.2
not affected by terrain losses	1137347	36970.0
lost to NTSC IX	7749	466.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	7749	466.0

TABLE 6.3(cont'd)

OET 69 INTERFERENCE STUDIES
KPTM-DT - OMAHA, NE
(CONSTRUCTION PERMIT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without KTLJ-LP</u>	<u>With Proposed KTLJ-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,129,625	1,129,598	(27)
Percent Loss(Gain)*	(1.95)%	(1.95)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,108,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.4

OET 69 INTERFERENCE STUDIES
 WIBW-DT - TOPEKA, KS
(ALLOTMENT FACILITIES)
 Montgomery Communications, Inc.
 Topeka, KS

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WIBW-DT	Topeka, KS	44	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KPTH	Sioux City, IA	44	NTSC	Licensed	BLCT-19991105AAH
KTPX	Okmulgee, OK	44	NTSC	Licensed	BLCT-19970630KF
Vacant	Centerville, IA	44	DTV	Allotment	
KSNW-DT	Wichita, KS	45	DTV	Allotment	
KYTV-DT	Springfield, MO	44	DTV	Allotment	
KTLJ-LP	Topeka, KS	43	NTSC	Applicant	

STUDY RESULTS WITHOUT KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	663671	34789.0
not affected by terrain losses	636727	34273.7
lost to NTSC IX	83	47.9
lost to additional IX by ATV	13003	279.6
lost to ATV IX only	13057	299.6
lost to all IX	13086	327.6

STUDY RESULTS INCLUDING PROPOSED KTLJ-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	663671	34789.0
not affected by terrain losses	636727	34273.7
lost to NTSC IX	83	47.9
lost to additional IX by ATV	13003	279.6
lost to ATV IX only	13057	299.6
lost to all IX	13086	327.6

TABLE 6.4(cont'd)

OET 69 INTERFERENCE STUDIES
 WIBW-DT - TOPEKA, KS
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without KTLJ-LP</u>	<u>With Proposed KTLJ-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	623,641	623,641	0
Percent Loss(Gain)*	1.32%	1.32%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 632,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.