

Exhibit 13 - Statement A (Amended)
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
KTUL, LLC
New Replacement Digital LPTV Translator Station
Caney, Kansas
Ch. 24 (Digital) 0.7 kW

KTUL, LLC (“*KTUL*”) is the licensee of digital television station KTUL(TV), Facility ID 35685, Tulsa, Oklahoma. In accordance with the procedures set forth in MB Docket No. 08-253¹, *KTUL* proposes herein to amend its pending application (BDRTCDT-20110817AAG) which seeks to construct a new replacement digital LPTV translator station to aid in reception of KTUL(TV) and ABC Network programming in Caney, Kansas and the surrounding areas.

The instant amendment is needed to reduce the area of the proposed translator contour extension past the former analog Grade B contour to a level that Commission Staff will consider “de minimis”. In crafting the amendment, the power level was reduced so that the contour extension area would be equal to or less than other such facilities that have been granted licenses.

As the Commission is aware, after the cessation of analog television operations, problems have been encountered with digital television transmission on high-band VHF channels. Since the termination of the analog Channel 8 operation, *KTUL* has received calls from viewers regarding reception difficulties. To alleviate the reception difficulties with KTUL(TV) in the Caney, Kansas area, a replacement digital LPTV translator is proposed to provide some level of fill-in service.

Nature of the Proposal

The proposed antenna system for the replacement digital LPTV translator station is a Kathrein 770 881 non-directional antenna which will be side-mounted on an existing antenna support structure (ASR number 1062553). No change in structure overall height is necessary to carry out this proposal. Since no change to the structure’s overall height is proposed, no change to structure marking/lighting requirements will result.

¹ See *Report and Order, Amendment of Parts 73 and 74 of the Commission’s Rules for Replacement Digital Low Power Television Translator Stations*, MB Docket No. 08-253, FCC 09-36, released May 8, 2009.

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The proposed digital facility will operate on Channel 24 using a “stringent” out of channel emission mask having a maximum effective radiated power (“ERP”) of 0.7 kW. The facility proposed herein will share a common antenna system with other area stations proposing new replacement digital LPTV translators for their respective stations.

Exhibit 13 - Figure 1 depicts the coverage contours for the formerly authorized KTUL(TV) analog facility, the currently licensed digital facility, and the proposed translator facility. While the predicted coverage contours depict a relatively small loss area between the former analog and the current digital coverage, actual high-band VHF reception of the KTUL(TV) Channel 10 digital signal in the Caney area is difficult. Since the translator facility proposed herein will be sharing an antenna system with others, the use of a custom directional pattern for KTUL on Channel 24 is not possible. Therefore, it is respectfully requested that the extension of the translator service contour past that of the analog Grade B contour be considered “de minimus”².

The recovered coverage area depicted in **Exhibit 13 – Figure 2** with the orange tinted boundary will replace coverage lost to 1,981 persons (2010 Census). The extension of the proposed translator service contour past the former KTUL analog Grade B contour encompasses 934.4 sq. km. The KOTV-DT replacement translator (see BLCDDT-20120816ABS) produces a service contour extension past the former KOTV-TV analog Grade B contour of 965.7 sq. km. Since the Commission Staff considered the KOTV-DT translator contour extension to be “de minimis” by granting the construction permit and subsequent license application, the lesser area produced by the KTUL proposal should also be deemed “de minimis”. *KTUL* desires to move quickly to implement the translator proposed herein. Therefore, expedited processing of the instant amendment is respectfully requested on behalf of the applicant.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. A

² *Report and Order*, paragraphs 18 to 22.

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detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69")³. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results, summarized in **Exhibit 13 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

Other Allocation Considerations

The nearest FCC monitoring station is at Grand Island, NE, at a distance of 490.4 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

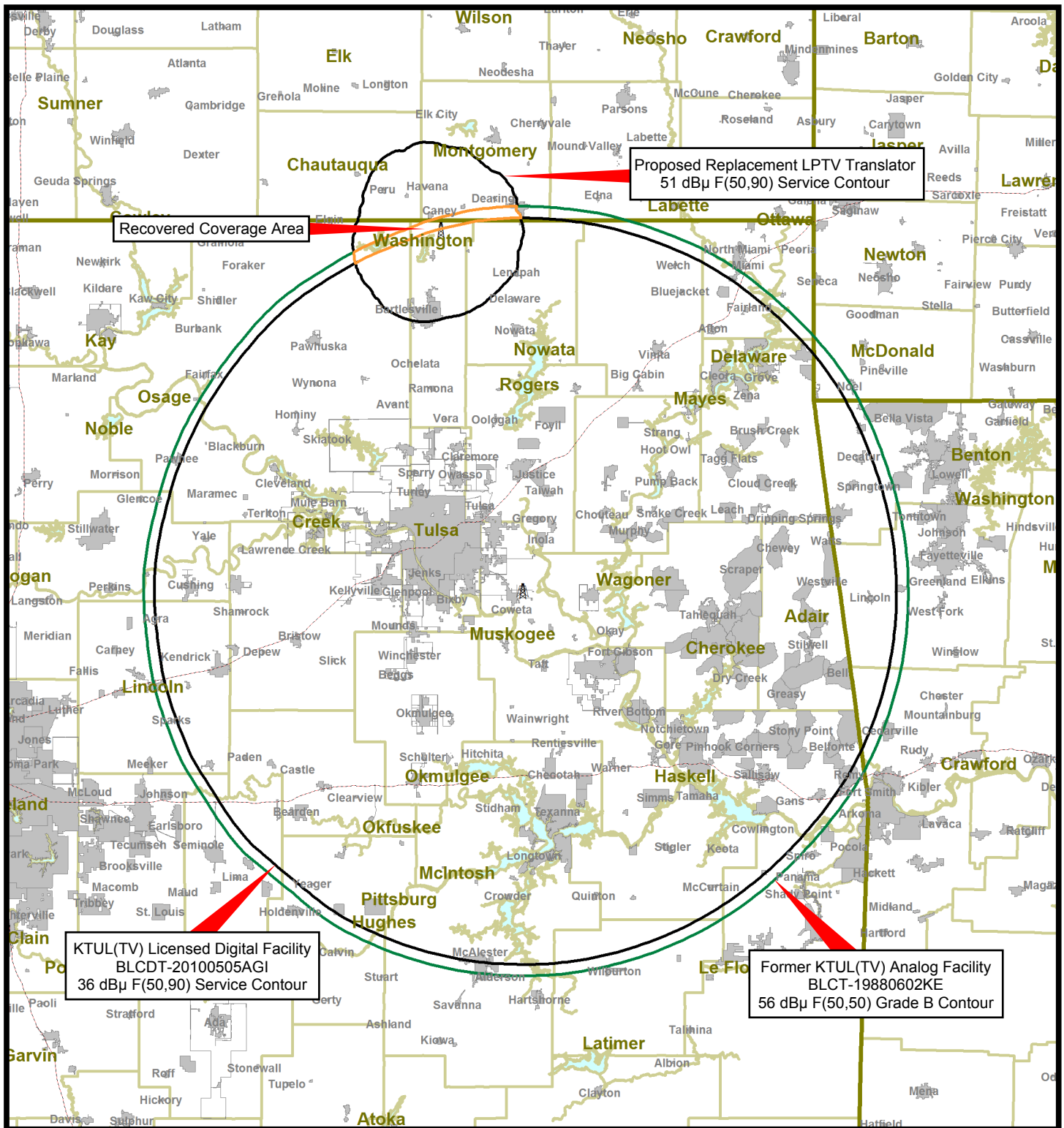
Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

³ The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.**

EXHIBIT 13 - FIGURE 1 (Amended)
PREDICTED COVERAGE CONTOURS

prepared for
KTUL, LLC

KTUL(TV) (Replacement Translator) Caney, Kansas
 Ch. 24 (Digital) 0.7 kW



30 0 30 60 90

Kilometers

Exhibit 13 - Table I (Amended)
INTERFERENCE STUDY RESULTS SUMMARY
 prepared for
KTUL, LLC
 KTUL(TV) Caney, KS
 Facility Id: 35685
 Ch. 24 0.7 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
23	K23LY-D	Emporia, KS	BNPDTL-20100930ARP			---	No Interference	---
23	NEW	Wichita, KS	BSFDTL-20060630BKG			---	No Interference	---
23	NEW	Wichita, KS	BSFDTL-20060630CPN			---	No Interference	---
23	K23LJ-D	Ponca City, OK	BNPDTL-20100216ABA			---	No Interference	---
23	K23MD-D	Tulsa, OK	BDCCDTL-20111219ADK			---	No Interference	---
24	K24JC-D	Springdale, AR	BNPDTL-20090825BUF	204,258	350	350	0	0.000 %
24	KFSM-TV	Van Buren, AR	BLCDDT-20110517AEQ			---	No Interference	---
24	K24LF-D	Chapman, KS	BNPDTL-20100514AHW			---	No Interference	---
24	K24LG-D	Russell, KS	BNPDTL-20100514AHI			---	No Interference	---
24	KGPT-LD	Wichita, KS	BDCCDTL-20111228ACD			---	No Interference	---
24	KJOM-LP	Asbury, MO	BLTTL-20060109ABS			---	No Interference	---
24	K24JY-D	Columbia, MO	BNPDTL-20100208ABC			---	No Interference	---
24	KCTV	Kansas City, MO	BPCDT-20080619AGA			---	No Interference	---
24	KCTV	Kansas City, MO	BLCDDT-20110405ABD			---	No Interference	---
24	KBBL-LP	Springfield, MO	BDISDTL-20110819ABD			---	No Interference	---
24	K24IW-D	Ardmore, OK	BNPDTL-20090825AUP			---	No Interference	---
24	KTUL	McAlester, OK	BDRTCDT-20110804ACB			---	No Interference	---
24	KOKH-TV	Oklahoma City, OK	BLCDDT-20041207ACV			---	No Interference	---
24	K24JT-D	Paris, TX	BMPDTL-20121002ACO			---	No Interference	---
25	K25NM-D	Fayetteville, AR	BNPDTL-20100205AAL			---	No Interference	---
25	KOZJ	Joplin, MO	BLEDT-20060620ABP			---	No Interference	---
25	K25GJ	Muskogee, OK	BSTA-20121029AAD			---	No Interference	---
25	K25GJ	Muskogee, OK	BLTT-20051206ADA			---	No Interference	---
25	KGCT-CD	Nowata, OK	BLDTA-20091222AAA			---	No Interference	---
25	K25MA-D	Ponca City, OK	BNPDTL-20100216AAZ			---	No Interference	---
25	KUTU-CD	Tulsa, OK	BLDTA-20110506AAV			---	No Interference	---
25	KUTU-CD	Tulsa, OK	BLTTL-20001120AAE			---	No Interference	---
25	K25MB-D	Vian, OK	BNPDTL-20100504ALY			---	No Interference	---