

Compliance with 47 C.F.R. 73.525

There are several considerations outlined in 47 C.F.R. 73.525 for TV Channel 6 protection. Outlined below are the various factors as they apply to the proposed operation and KIVI-TV.

1) Distance between proposed operation and KIVI-TV

47 C.F.R. 73.525(a)(1) requires a minimum separation of 180 km for a channel 215 operation. The distance between the proposed station and KIVI-TV is 96.58 km.

2) Population Limitation

When a proposed non-commercial station is not co-located with the channel 6 station in question, the applicant is required to show that the interference area (as predicted by the procedures outlined in 47 C.F.R. 73.525(e)(1)) contains no more than 3,000 persons. The actual population figures are contained in Exhibit 18-B, and a map of the interference area is shown in Exhibit 18-C.

3) Vertically Polarized Transmissions

When an applicant wishes to use vertically polarized transmissions only, C.F.R. 74.525(e)(4) limits the vertical ERP to the maximum permissible horizontally polarized ERP multiplied by 40 (if the predicted interference area lies entirely outside the limits of a city of 50,000 persons) or 10 (if not). The maximum horizontally polarized ERP for the proposed facility is 0.005 kilowatts (See Exhibits 18-C). Since the predicted interference area lies entirely outside the limits of a city of 50,000 persons, that is multiplied by 40 to obtain the vertical-only ERP of 0.2 kilowatts specified in this application.

For the reasons outlined above, the proposed operation fully complies with the provisions of 47 C.F.R. 73.525.

73.525 Compliance

Population in the predicted interference area was determined using the centroid method and the 2000 census. The predicted interference contour (of the theoretical horizontal component of 0.005 kilowatts) is contained within the KIVI channel 6 grade B (47 dBu F(50,50)) contour (see Exhibit 18-C).

The predicted interference contour is determined from 47 C.F.R. 73.599 for channel 215 to be 74.0 dBu.

Exhibit 18-C shows the 47 dBu F(50,50) contour for KIVI, and the 74 dBu F(50,10) contour for the proposed channel 215 facility.

Exhibit 18-D is a computation of the area and population contained within the 74 dBu interfering contour of the proposed facility. The total population in this contour is 8 persons.

Therefore, the proposed operation is within the limitations of 47 CFR 73.525(c).



Exhibit 18-C

KIDH.P

Latitude: 43-00-25 N
Longitude: 116-42-13 W
ERP: 0.005 kW
Channel: 215
Frequency: 90.9 MHz
AMSL Height: 2463.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

KIVI

BLCT20011217AAZ
Latitude: 43-45-21 N
Longitude: 116-05-54 W
ERP: 56.00 kW
Channel: 06Z
Frequency: 85.0 MHz
AMSL Height: 2240.0 m
Elevation: 2047.54 m
Horiz. Pattern: Omni
Vert. Pattern: Yes
Elec Tilt: 0.0

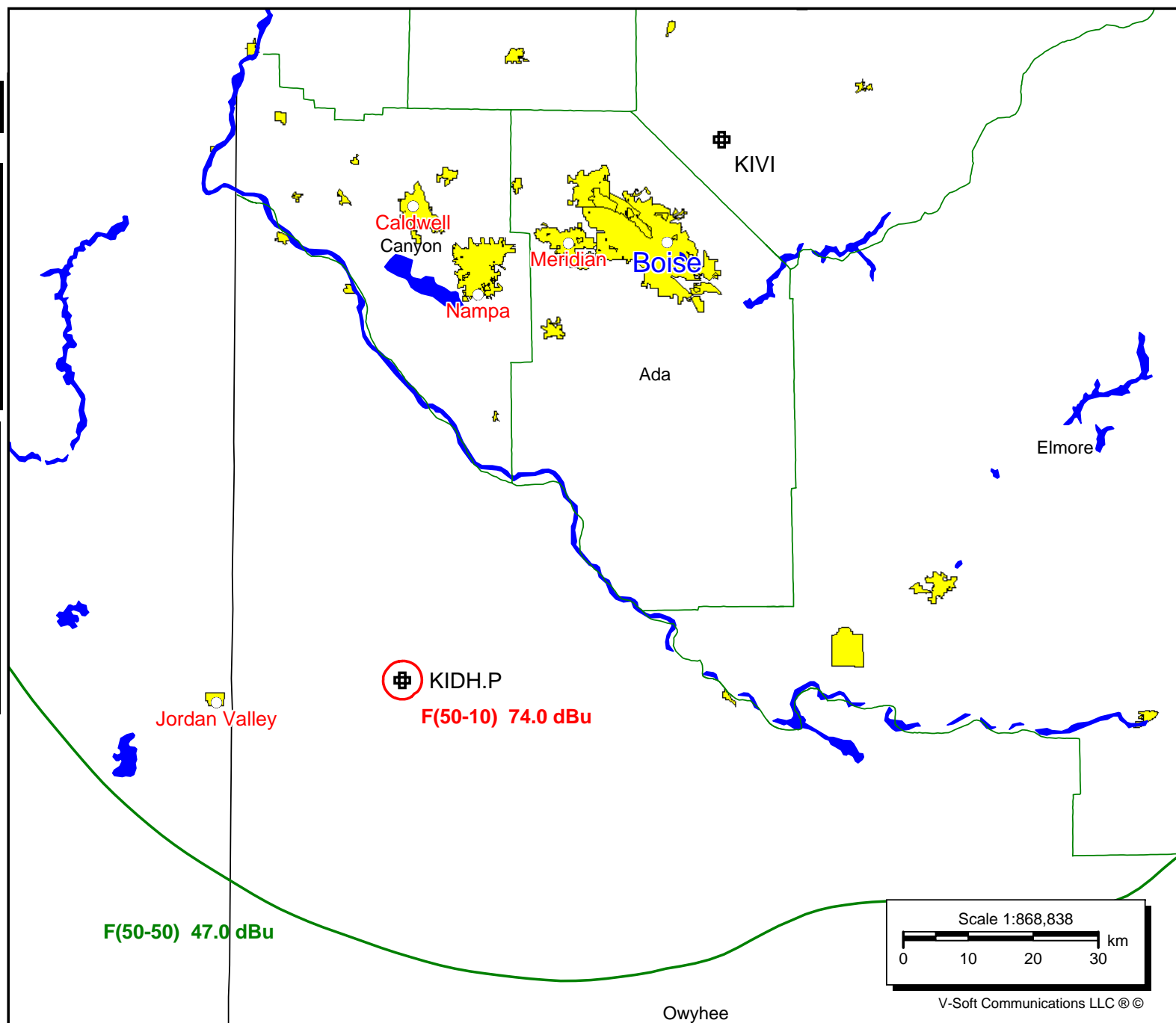


Exhibit 18-D

V-Soft Communications Population Report

Contour Parameters:

Type: FCC Contour

F(50-10) FS: 74.00 dBu [360 Radials]

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 30 Second US Database

Secondary Terrain: V-Soft 3 Second US Terrain

Transmitter Information:

Call Letters: KIDH.P

Latitude: 43-00-25 N

Longitude: 116-42-13 W

ERP: 0.005 kW

Channel: 215

Frequency: 90.9 MHz

AMSL Height: 2463.0 m

Elevation: 2454.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: No

Total Population Within Contour: 8

Total Housing Units Within Contour: 8

Total Area Within Contour: 27.42 sq. km

Channel 6 vs Channel 215

Channel 6 Contour	Value from 73.599	Channel 215 Contour	Adjusted 6 dB
47 (grade B)	27.0	74.0	80.0
48	25.4	73.4	79.4
49	23.4	72.4	78.4
50	22.0	72.0	78.0
51	20.5	71.5	77.5
52	19.0	71.0	77.0
53	17.5	70.5	76.5
54	16.4	70.4	76.4
55	15.2	70.2	76.2
56	14.2	70.2	76.2
57	13.1	70.1	76.1
58	12.1	70.1	76.1
59	11.1	70.1	76.1
60	10.3	70.3	76.3
61	9.5	70.5	76.5
62	8.8	70.8	76.8
63	8.1	71.1	77.1
64	7.5	71.5	77.5
65	6.9	71.9	77.9
66	6.5	72.5	78.5
67	6.1	73.1	79.1

Channel 6 Contour	Value from 73.599	Channel 215 Contour	Adjusted 6 dB
68 (grade A)	5.7	73.7	79.7
69	5.4	74.4	80.4
70	5.2	75.2	81.2
71	5.0	76.0	82.0
72	4.8	76.8	82.8
73	4.6	77.6	83.6
74	4.4	78.4	84.4
75	4.3	79.3	85.3
76	4.1	80.1	86.1
77	4.0	81.0	87.0
78	3.8	81.8	87.8
79	3.6	82.6	88.6
80	3.5	83.5	89.5
81	3.3	84.3	90.3
82	3.2	85.2	91.2
83	3.0	86.0	92.0
84	2.9	86.9	92.9
85	2.7	87.7	93.7
86	2.6	88.6	94.6
87	2.5	89.5	95.5
88	2.3	90.3	96.3
89	2.2	91.2	97.2
90	2.0	92.0	98.0