Exhibit 34 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Hawaii Public Television Foundation
KHET-DT Honolulu, Hawaii
Facility ID 26431
Ch. 18 9.5 kW 637 m

The DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 120 kW and 33 meters, respectively, for KHET-DT have been established under **Appendix B** of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268, FCC 98-315, released December 18, 1998 ("*SMO&O*"), per §73.622(f)(1) of the Commission's rules. The proposed KHET-DT facility will operate with 9.5 kW ERP at 637 meters HAAT; the proposed ERP and HAAT combination thus exceeds the reference ERP and HAAT. Further, the proposed facility is situated 29.3 km from the Commission's DTV reference site for KHET-DT. Accordingly, as required by §73.622(f)(5) and §73.622(d)(1), a study was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed KHET-DT facility.

A 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 number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").[2] The interference study examined the net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference KHET-DT). All stations considered in this study are listed in **Exhibit 34 - Table 1**. The results of the interference study, also summarized in **Exhibit 34 - Table 1**, indicate that no interference is predicted to be caused to any of the pertinent stations.

Class A Station Protection

The instant proposal does not involve prohibited contour overlap to any television stations that have been granted a Class A License or hold a Class A Construction Permit.

[2]The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

Exhibit 34 - Table 1 (Page1 of 2)

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Hawaii Public Television Foundation

KHET-DT Honolulu, Hawaii

Facility ID 26431

Ch. 18 9.5 kW 637 m

DTV Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	Percentage Reduction of Baseline Population ("10 percent" test) (6)
KHVO-DT (Ref)	Hilo, HI 18	366.4			---------- no interference caused by proposal ----------			
KHVO-DT (CP)	Hilo, HI 18	366.4			---------- no interference caused by proposal ----------			
KIKU-DT (Ref)	Honolulu, HI 19	0.5			---------- no interference caused by proposal ----------			
KIKU-DT (Lic)	Honolulu, HI 19	0.5			---------- no interference caused by proposal ----------			
New (RM)	Mililani Town, HI 19 (BPRM-20000717AFF)	0.7			---------- no interference caused by proposal ----------			

NTSC Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	---Total Interference--- from DTV only ("10 percent" test) Population (7)	Percentage (8)
KWHE(TV) (Lic)	Honolulu, HI 14	26.8			---------- no interference caused by proposal ----------				
KIKU(TV) (Lic)	Honolulu, HI 20	0.5			---------- no interference caused by proposal ----------				

INTERFERENCE ANALYSIS RESULTS SUMMARY

NTSC Facilities (continued)

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	---Total Interference--- from DTV only ("10 percent" test) Population (7)	Percentage (8)
KAAH-TV (Lic)	Honolulu, HI 26	0.7	---------- no interference caused by proposal ----------						
KAAH-TV (App)	Honolulu, HI 26	0.7	---------- no interference caused by proposal ----------						

Notes:

(1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour

(2) Service population after reduction from terrain and interference losses, before consideration of proposal

(3) Service population after reduction from terrain and interference losses, considering proposal

(4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.

(5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent

(6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).

(7) NTSC station total population subject to interference from DTV only sources (considering proposal)

(8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice *"Additional Application Processing Guidelines for Digital Television"*