

Exhibit 6 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for  
**Mountain Licenses, L.P.**  
KCYU-LP Yakima, Washington  
Facility ID 58694  
Ch. 41 25.4 kW

*Mountain Licenses, L.P.*, (“*MLLP*”) is the licensee of KCYU-LP, analog LPTV Channel 68, Yakima, Washington (file number BLTTL-19930517IC). *MLLP* has also been issued a Construction Permit (“CP”) (BPTTL-19980601YL) to change the transmitter location, specify a different operating frequency, and utilize a new directional antenna system. The instant application herein seeks a minor modification of the CP to specify a new transmitter location, a different antenna system, and a slight increase in effective radiated power (“ERP”).

The proposed antenna system for KCYU-LP is a directional antenna which will be side mounted on an existing antenna support structure (ASR number 1235050). The proposed antenna (Scala SL-8) is a standard, “off-the-shelf” directional antenna which can be found in the Commission’s database. According to information provided by representatives of the applicant, no change in overall tower structure height is contemplated as a result of this proposal.

**Allocation Considerations**

The instant proposal complies with the Commission’s standard contour overlap protection and pertinent minimum distance separation requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations except those listed in the table below. The stations which would experience contour overlap are listed below.

<u>Call</u>	<u>City, State</u>	<u>Ch.</u>	<u>Relationship</u>
K41CK (App)	Ellensburg, WA	41	Co-chan
K41CK	Ellensburg, WA	41	Co-chan
K41CL	Wasco/Heppner, OR	41	Co-chan
K41FI	Soap Lake, WA	41	Co-chan
KCTS-DT	Seattle, WA	41	Co-chan
960726KN (App)	Portland, OR	41	Co-chan

**Cavell, Mertz & Davis, Inc.**

Exhibit 6 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(Page 2 of 3)

Consistent with Commission policy regarding potential interference from LPTV and television translator facilities, 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")<sup>1</sup>. The interference study examined the change in interference as experienced by the subject NTSC, LPTV, and DTV stations that would result from the proposed facility. All stations considered in this study are listed in **Exhibit 6 - Table I**. The results show that any increase in interference to any of the stations considered would not exceed the Commission's 0.5 percent rounding tolerance.

Except in the instances discussed above, the proposed facility of KCYU-LP fully complies with the standard requirements of §74.705, §74.706, and §74.707 of the FCC Rules. An OET Bulletin 69 analysis indicates that no more than 0.16 percent new interference will be caused to any of the stations studied.

Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, TV translator, or Class A television facilities as a result of the instant proposal. Nevertheless, if a waiver of §§74.705 through 74.707 is required with respect to the stations listed, then such a waiver is respectfully requested on behalf of *MLLP* for the reasons stated above.

**Other Allocation Considerations**

The nearest FCC monitoring station is at Ferndale, Washington, at a distance of 310.0 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

---

<sup>1</sup>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. 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 6 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(Page 3 of 3)

also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required.

There are no AM broadcast stations located within 3.2 km (2 miles) of the KCYU-LP site, according to information extracted from the Commission's engineering database. No new tower erection or modification which affects the overall height to the tower is envisioned by the instant proposal.

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

Exhibit 6 - Table I  
**OET-69 INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Mountain Licenses, L.P.**  
 KCYU-LP Yakima, Washington  
 Facility ID 58694  
 Ch. 41 25.4 kW

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Service Population (2)</u>	<i>---- Unique Interference ---- from proposal</i>	
					<u>Population (3)</u>	<u>Percentage (4)</u>
K41CK (App)	Ellensburg, WA 41	40.1	25,939	20,949	41	0.16
K41CK (LIC)	Ellensburg, WA 41	41.7	26	26	0	0.00
K41CL (LIC)	Wasco/Heppner, OR 41	83.6	8	0	0	0.00
K41FI (LIC)	Soap Lake, WA 41	125.8	0	0	0	0.00
KCTS-DT (LIC)	Seattle, WA 41	182.1	-----Proposal Causes No Interference-----			
960726KN (App)	Portland, OR 41	205.9	-----Proposal Causes No Interference-----			

Excepting K41CK (APP), in addition to the lack of new interference to population, no interference was predicted to any of the service area to any of the stations listed above.

Notes:

- (1) Greater of NTSC or DTV Service Population, from FCC Table  
 For NTSC Stations: Population within noise-limited contour  
 For LPTV & Class A Stations: Population within 74 dBμ contour (with dipole factor)
- (2) Interference-free service population per OET-69 before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal  
 (Numbers in parentheses indicate a decrease in interference.)
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

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"