

GREG BEST CONSULTING, INC.

9223 N. Manning Ave.
Kansas City, MO 64157
816-792-2913

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KIIN proposes to operate its post transition DTV facilities using an antenna it currently uses for analog transmission. It is an omni directional antenna with a field value of 1.0 at all azimuth angles. The FCC appendix B antenna record for KIIN indicates only some azimuths with a field value of 1.0 and other azimuths at very close to the value of 1.0 and not less than .98. Technically, assuming that KIIN operates with the omnidirectional antenna, the ERP compared with FCC Appendix B antenna, would be 0.11 dB higher and some increase in coverage would be possible but far less than the 5 mile factor the FCC staff may consider in evaluating the proposed DTV facilities. Therefore, KIIN requests a waiver to the "expansion freeze" and rapid processing of this DTV construction permit based upon the FCC 3rd Periodic Report and Order three criteria of 1) use of an existing antenna, 2) the expansion of coverage is less than 5 miles, and 3) the result causes less than 0.5% additional interference to allotted facilities.

Attached is a coverage map indicating the 36 dBu F (50,90) contours of the transmission facilities with the Appendix B antenna pattern and with the existing analog antenna. The red contour indicates the allocated facilities while the green contour indicates the facilities using the analog antenna. The red contour can just barely be seen underneath the green contour. From the map it is quite obvious the coverage expansion is minimal and well short of the 5 miles coverage expansion limit.

One other minor item is to correct the NAD 27 coordinates so that consistency is achieved between the ASRN tower coordinates and the CDBS. The longitude "seconds" coordinates have been changed to reflect a change of 1 second.

The following exhibit address the possible issue of increasing interference beyond the "0.5% additional interference" indicated in the FCC rules. Based upon the evaluation done below, no new interference (i.e. interference above 0.5% the amount allocated in Appendix B using the 2000 census) is expected to occur.

In evaluating the proposed facility for KIIN-DT, an evaluation of possible interference according to FCC rules for post transition operation was conducted.

PROPOSED STATION EVALUATION TO POSSIBLE INTERFERENCE CRITERIA

Proposed facility does not interfere with FCC Monitoring Stations

Proposed facility does not interfere with West Virginia quiet zone

Proposed facility does not interfere with Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

There are spacing and/or contour concerns with full service, digital, and Class A stations.

An evaluation according to OET-69 is presented to support this proposed facility. In evaluating the proposed facility for KIIN-DT, an outgoing interference study was executed using the OET-69 Longley

Rice Methodology using a signal resolution of 2 km and a terrain spacing increment of 1.0 km with an ERP of 17.8 kW. The following FCC allocation facilities were considered in the study:

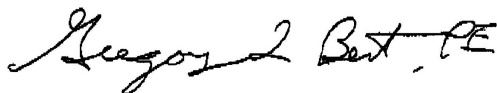
Call Sign	City	State	Distance	Bearing
KDIN-D.R (11)	DES MOINES	IA	189.3	273.7
WHO-D.R (13)	DES MOINES	IA	189.4	274.4
WBBM-D.R (12)	CHICAGO	IL	308.5	85.5
WREXTV-D.R (13)	ROCKFORD	IL	185.5	69.1
KEYC-D.R (12)	MANKATO	MN	351.4	315.5
KRCG-D.R (12)	JEFFERSON CITY	MO	342.4	191.0

Each of the above stations was evaluated for incoming interference using the OET-69 Longley Rice methodology. The following table identifies the actual percentage interference from the incoming interference analyses.

Call Sign	Percentage Interference
KDIN-D.R (11)	0.0 %
WHO-D.R (13)	0.0 %
WBBM-D.R (12)	0.1 %
WREXTV-D.R (13)	0.0 %
KEYC-D.R (12)	0.1 %
KRCG-D.R (12)	0.0 %

Should you have any questions concerning this analysis, please contact me and I will be happy to help.

Sincerely,



President
Attachment

