

EXHIBIT 8
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INTERFERENCE CONSIDERATIONS
Panhandle Telecasting Co.
Clovis, NM

The 46 dBu contour for the proposed facilities overlaps the protected 74 dBu contour for the facilities authorized by the construction permit (BNPTT-20000831BWS) for new LPTV station K29FW - Plainview, Texas, which is authorized to operate on Channel 29. The original K29FW "short form" application was included in the same MX Group (M38) as the facilities proposed in the "short form" application for the proposed new station in Clovis. The underlying "long form" application for the K29FW construction permit severed the K29FW application from this MX group by agreeing to accept interference from all other applicants in this MX Group. Figure 8.0 is a map exhibit showing the K29FW 74 dBu contour in relation to the 46 dBu contour for the facilities originally specified in the Clovis "short form" application and the 46 dBu contour for the facilities proposed in the attached "long form" application. As can be seen from an examination of this figure, the facilities proposed in the attached application will not increase the area of overlap presently caused to K29FW by the proposed "short form" application facilities. Thus, this prohibited contour overlap should not be an impediment to the grant of the attached application.

The facilities proposed in the attached application fail to provide the contour protection required by Section 74.705 of the FCC Rules to K14KO - Portales, New Mexico, which operates on Channel 14. Detailed studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to K14KO from the proposed Channel 29 operating facilities. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows

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98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268 and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the "FLR" program faithfully reproduces the results obtained by the FCC in their implementation of this program.

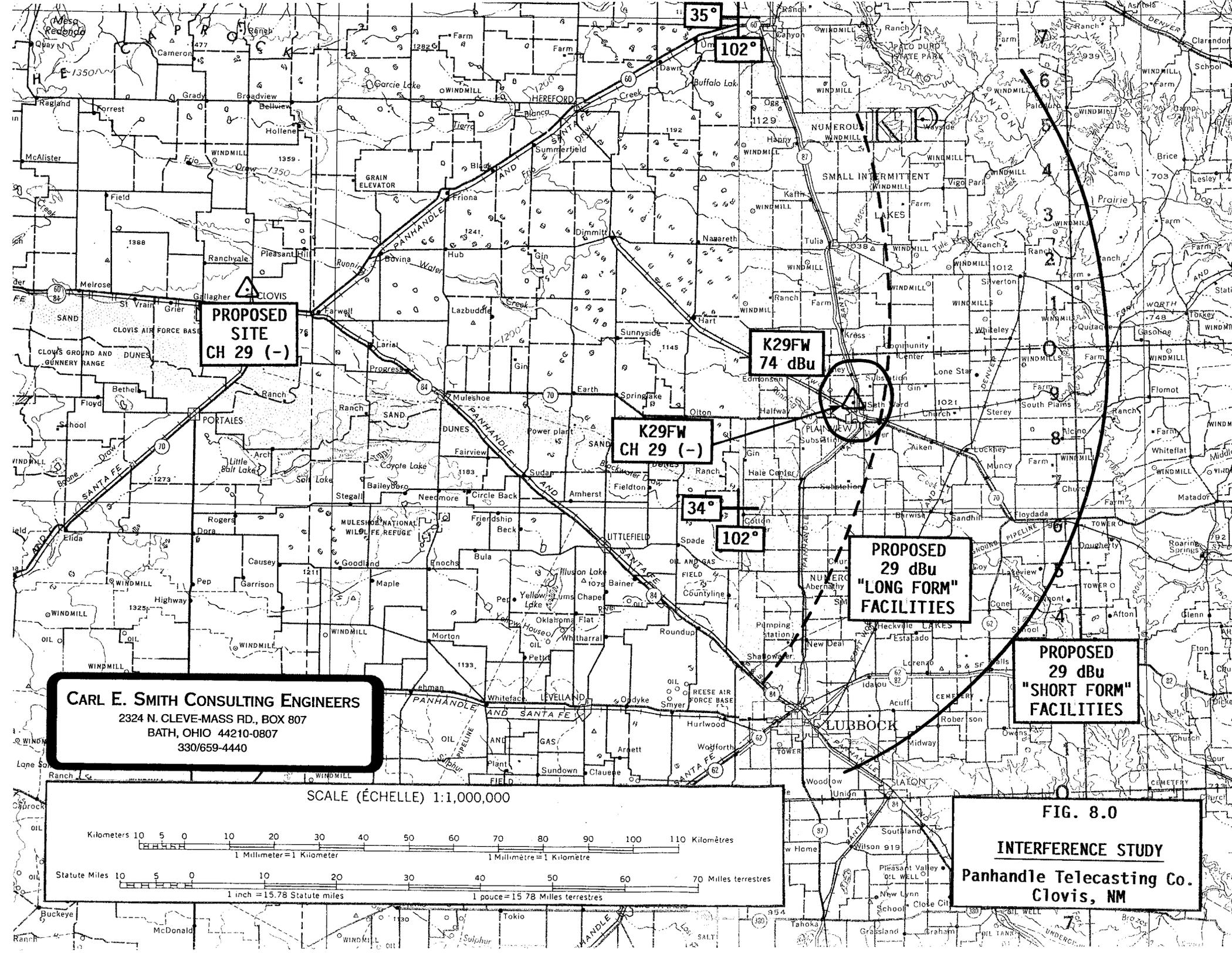
In conducting these interference studies for K14KO, a 1 kilometer cell size and population data extracted from the 2000 U.S. Census were utilized. Interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the NTSC Service population for K14KO below the value which occurs when the same station's DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

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The results of these studies for K14KO are tabulated in Table 8.1. This table contains a complete listing of the stations which were included in this study and the facilities which were considered for each station included in this study. It also contains the output of the "FLR" program both with and without the proposed Clovis operating facilities.

As shown by this data, the proposed Clovis operating facilities are not predicted to cause any interference to K14KO. Based on this information, it is obvious that the Channel 29 operating facilities proposed in the attached application will not result in any new interference to K14KO, in spite of the prohibited contour overlap which would occur. This OET 69 analysis to K14KO serves as the basis for the certification in response to Question 13 of Section III of FCC Form 346 that the proposed facilities protect all facilities as required by Section 74.705 of the FCC Rules.

If it is deemed to be necessary, a waiver of Section 74.705 of the FCC Rules is respectfully requested with regard to this situation to permit the attached application to be granted in spite of this prohibited contour overlap with K14KO.



**PROPOSED SITE
CH 29 (-)**

**K29FW
74 dBu**

**K29FW
CH 29 (-)**

**PROPOSED
29 dBu
"LONG FORM"
FACILITIES**

**PROPOSED
29 dBu
"SHORT FORM"
FACILITIES**

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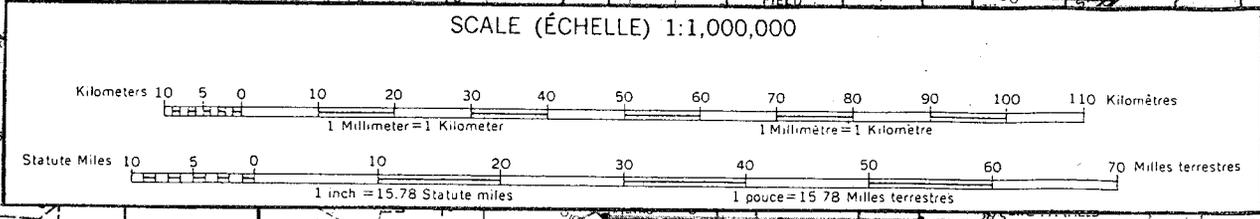


FIG. 8.0
INTERFERENCE STUDY
Panhandle Telecasting Co.
Clovis, NM

TABLE 8.1

OET 69 INTERFERENCE STUDIES
K14KO - PORTALES, NM
 Panhandle Telecasting Co.
 Clovis, NM

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
K14KO	Portales, NM	14	NTSC	Licensed	BLTT-20050927AHI

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
K16CX	Clovis, NM	16	NTSC	Licensed	BLTT-20040420AAS
KAZB-LP	Clovis, NM	22	NTSC	CP	BNPTTL-20000829AFL
K15GG	Fort Sumner, NM	15	NTSC	CP	BNPTTL-20000823ABG
K28BA	San Jon, NM	28	NTSC	Licensed	BLTT-19860515IA
K21GO	Tucumcari, NM	21	NTSC	CP	BNPTTL-20000829AUL
KCIT	Amarillo, TX	14	NTSC	Licensed	BLCT-19890130KK
KPTF	Farwell, TX	18	NTSC	Licensed	BLCT-20010405ADB
K29GE	Littlefield, TX	29	NTSC	CP	BNPTT-20000831ARC
KUPT-LP	Lubbock, TX	14	NTSC	CP	BPTTL-20050726ARH
K29FW	Plainview, TX	29	NTSC	CP	BNPTTL-20000831BWS
NEW	Clovis, NM	29	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	36813	1266.8
not affected by terrain losses	36813	1266.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

TABLE 8.1 (cont'd)

OET 69 INTERFERENCE STUDIES
K14KO - PORTALES, NM

STUDY RESULTS WITH PROPOSED FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	36813	1266.8
not affected by terrain losses	36813	1266.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

SUMMARY OF STUDY RESULTS

	<u>Without Proposed Facilities</u>	<u>With Proposed Facilities</u>	<u>Increase/(Decrease)</u>
NTSC Service	36,813	36,813	0