Station KTVA-DT • DTV Channel 28 • Anchorage, Alaska

FCC Form 301 §III-D, Question 12

The location of the 47.1 dBu F(50,90) City Grade field strength contour for the proposed operation has been determined in accordance with the procedures specified in Section 73.625(b) of the FCC Rules and is plotted on the map of accompanying Exhibit 42B. As shown, 39.7% of Anchorage Borough, the community to be served, is encompassed by this contour. The City of Anchorage and Anchorage Borough (a county equivalent) are coextensive, occupying a land area of more than 5,000 square kilometers. The existing KTVA(TV) tower, which is also proposed to be used by KTVA-DT, is located in the most populated area of Anchorage, the Anchorage Bowl region, and 47.1 dBu service would be provided to 99.2% of Anchorage Borough population, with only 2,083 of the Borough's 260,283 persons (as based on the 2000 U.S. Census) located outside the contour. The Anchorage Borough land area falling outside the proposed KTVA-DT coverage contour primarily consists of the Chugach State Park and the Chugach State Forest, which accounts for the lack of population existing in that region. Thus, if a waiver of Section 73.625(b) is deemed necessary by Commission staff, it is respectfully requested.

Also shown on the map of Exhibit 42B are the locations of the Anchorage and Kenai FCC Monitoring Facilities. Section 73.1030(c)(1) of the FCC Rules specifies that "[a]pplications for stations (except mobile stations) which will produce on any frequency a direct wave fundamental strength of greater than 10 mV/m in the authorized bandwidth of service ... at the referenced [FCC Monitoring Facility] coordinates, may be examined to determine the extent of possible interference." Using standard methods, the 24.8 mV/m F(50,90) contour of the proposed facility is calculated to extend to the Anchorage Monitoring Facility. The effect to the Kenai Monitoring Facility would be well under 10 mV/m, since it is located outside the proposed KTVA-DT City Grade (0.23 mV/m) contour. While it is believed that the newly established Kenai Monitoring Facility is due to replace the Anchorage Monitoring Facility, the applicant is amenable to further discussions of this matter with Commission staff, as may be appropriate. Because of the unique characteristics of Digital Television Service emissions, and its operation in the UHF television spectrum, it appears that any potential effect to the Anchorage Monitoring Facility either would not materialize or could be mitigated.

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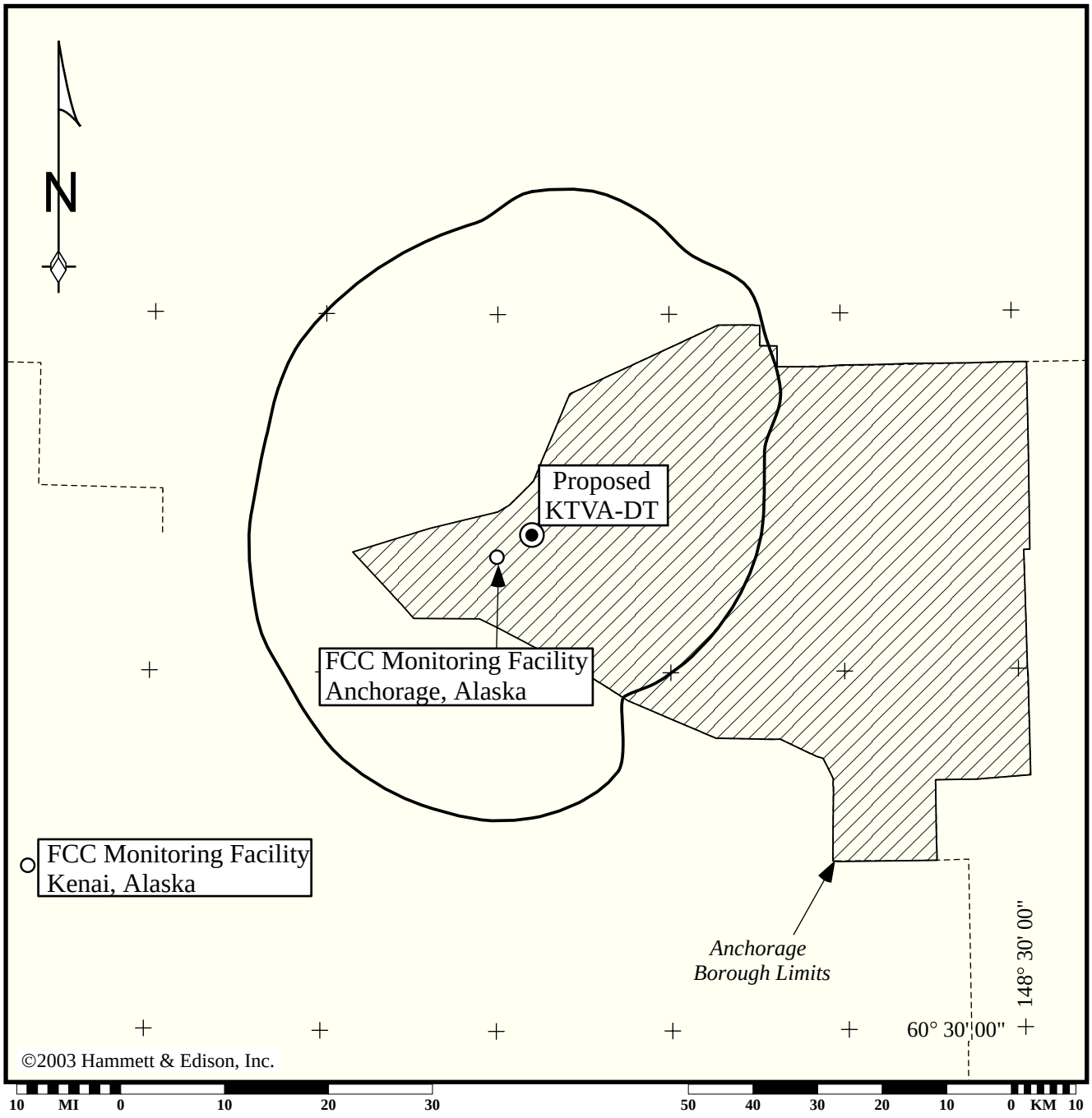
Proposed F(50,90) 47.1 dBu City Grade Coverage
99.2% Population, 39.7% Area (2000 U.S. Census)



Lambert conformal conic map projection. Geographic coordinate marks shown at 30-minute increments. City and borough limits shown taken from U.S. Census Bureau TIGER/Line 2000 data.