

KVPX-LP Ch. 28 Las Vegas Allocation Study

Allocation Considerations

A detailed interference study has been conducted to demonstrate that the proposed operation of KVPX-LP will not cause interference to K28CS Ch. 28- Pahrump, K28EA Ch 28N Washington, or KELV-LP Ch. 27N Las Vegas; and will not cause in excess of 2% additional interference to digital television stations or allotments (in particular, first-adjacent KFBT-DT Ch. 29 Las Vegas).

The time-shared "HDTV" computer program offered by the National Telecommunications and Information Administration's *TA Services* in Boulder, Colorado was employed as the method for coverage and interference protection. The HDTV computer program has been developed in close coordination with the Commission's OET staff, and utilizes similar methodology as the computer program used by the Commission to develop the DTV Table of Allotments. Predictions included "clipping" the extent of protected coverage as specified under §73.623(c)(2) at the Grade B contour distance for analog stations, at the 74 dBu contour distance for UHF translators, and at the DTV coverage contour distance for DTV assignments per §73.625(b). It is believed that the HDTV program offered by *TA Services* is compliant with the FCC's OET Bulletin 69 Longley-Rice Methodology for Evaluating TV Coverage and Interference ("OET-69"), July 2, 1997.

Study was made using the KVPX-LP technical facility described herein. The results indicate that the proposed KVPX-LP facility is not predicted to cause interference to K28CS, K28EA, or KFBT-DT.

The results indicate that the proposed KVPX-LP facility is predicted to cause interference to 4 persons who presently receive service from KELV-LP. This figure is less than 0.01% of the 718,000 persons served by KELV-LP. Commission policy considers this figure to round to zero percent.

Like the KVPX-LP facility authorized in BPTTL-20030708ABX, the proposed KVPX-LP facility is on a first-adjacent-channel to, and located at the same transmitter site, as KELV-LP. Consequently, the ratio of the signal strengths of the two stations will remain constant, effectively eliminating the opportunity for interference between the two stations.

Therefore, this proposal is believed to comply with all Commission allocation requirements with respect to existing TV stations, DTV stations, LPTV stations, Class A stations, and TV translators. Waiver of §74.706 and §74.707 is respectfully requested to the extent required with respect to K28CS, K28EA, KELV-LP and KFBT-DT.