

Exhibit 34 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Capital of Texas Public Telecommunications Council
KLRU-DT Austin, Texas
Facility ID 8564
Ch. 22 700 kW 376 m

Capital of Texas Public Telecommunications Council (“*Capital*”) is the licensee of analog station KLRU(TV) Channel 18, Austin, Texas (file number BLET-19790424KG). *Capital* has been granted a Construction Permit (BPEDT-19980528KE) for the paired KLRU-DT, Channel 22, and has filed an application (BMPEDT-20000501AIT) to modify that Construction Permit. *Capital* herewith submits a minor amendment to that application, which was previously amended in April, 2002.

The pending application specifies a site located 0.33 km from the licensed KLRU analog Channel 18 facility with an effective radiated power (“ERP”) of 700 kW and an antenna height above average terrain (“HAAT”) of 388 meters. The proposed KLRU-DT facility will employ a new tower structure to be erected 0.07 km from the licensed KLRU Channel 18 facility. The new tower structure (FCC ASR number 1234758), which has not yet been constructed, will also be employed by KVUE-TV (analog Ch. 24, DTV Ch. 33) and KEYE-TV (analog Ch. 42, DTV Ch. 43), both of Austin, Texas. The proposed KLRU-DT facility will operate with 700 kW with an antenna HAAT of 376 meters. There are no AM stations within 3.2 kilometers of the proposed transmitter site, based on information contained within the Commission’s database.

The DTV reference ERP and HAAT of 66.7 kW and 335 meters, respectively, for KLRU-DT have been established under **Appendix B** of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268, FCC 98-315, released December 18, 1998 (“*SMO&O*”), per §73.622(f)(1) of the Commission’s Rules. The proposed KLRU-DT facility will operate with a non-directional ERP of 700 kW at 376 meters HAAT. The proposed ERP/HAAT combination thus exceeds the reference ERP/HAAT. Accordingly, as required by §73.622(f)(5), a study was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed KLRU-DT facility.

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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")¹. The interference study examined the change in interference as experienced by other stations that would result from the proposed facility.

All stations considered in this study are listed in **Exhibit 34 - Table I**. The results of the interference study, also summarized in **Exhibit 34 - Table I**, indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits to all pertinent NTSC and DTV stations and allotments.

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, or are existing Low Power Television (LPTV) stations that are eligible for Class A status,² the instant proposal causes contour overlap only to KPLE-LP (CP), Ch. 22, Killeen, Texas, 84.1 km distant. KPLE-LP is licensed as a Class A facility on Channel 31, which is not impacted by the instant proposal. According to the FCC's database, no application to convert the KPLE-LP Channel 22 CP to Class A status has been filed. Furthermore, that Construction Permit is displaced from Channel 22 by the allotment of Channel 22 to KLRU-DT, therefore, interference to KPLE-LP on Channel 22 need not be considered. The proposed KLRU-DT facility does not cause prohibited contour overlap to any other Class A facility.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 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.

²See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

Exhibit 34 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
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 KLRU-DT Austin, Texas
 Facility ID 8564
 Ch. 22 700 kW 376 m

DTV Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference --- ("2 percent" test)</u>		<u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
KXAN-DT (Ref 158.2 kW)	Austin, TX 21	0.6	1,084,000	1,086,028	1,084,454	1,574	0.15	0.05
KXAN-DT (APP 700 kW)	Austin, TX 21	0.6	1,084,000	1,307,821	1,307,538	283	0.03	0.00
KETK-DT (Ref 101.2 kW)	Jacksonville, TX 22	305.7	553,000	553,085	552,971	114	0.02	0.01
KETK-DT (CP 1000 kW)	Jacksonville, TX 22	305.7	553,000	819,132	819,066	66	0.01	0.00
KAUZ-DT (Ref 1000 kW)	Wichita Falls, TX 22	402.9	----- no interference caused by proposal -----					
KAUZ-DT (CP 200 kW)	Wichita Falls, TX 22	402.9	----- Checklist Application --- no interference caused by proposal -----					
KAKW-DT (Ref 50 kW)	Killeen, TX 23	119.1	----- evaluation not required, KAKW-DT was ordered to DTV Channel 13 (MM Docket 00-103)----- (CP Granted BPCDT - 19991027ADJ)					

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NTSC Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- (“2 percent” test)</u>		<u>---Total Interference--- from DTV only (“10 percent” test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
KXAM-TV (LIC)	Llano, TX 14	83.1	286,412	105,461	105,461	0	0.00	13,581	4.74
KLRU(TV) (LIC)	Austin, TX 14	0.1		----- no interference caused by proposal -----					
KLRU(TV) (App)	Austin, TX 14	0.4		----- no interference caused by proposal -----					
KLTJ(TV) (LIC)	Galveston, TX 22		272.8	3,696,126	3,694,500	3,692,804	1,696	0.05	3,322 0.09
KHCE(TV) (CP)	San Antonio, TX 23	122.5	1,444,228	1,414,715	1,414,715	0	0.00	2,551	0.18
KHCE(TV) (LIC)	San Antonio, TX 23	125.4	1,366,018	1,353,635	1,353,635	0	0.00	4,388	0.32
KVUE-TV (LIC)	Austin, TX 24	0.1		----- no interference caused by proposal -----					
KXXV(TV) (LIC)	Waco, TX 25	122.1	718,975	594,296	594,296	0	0.00	333	0.05
KABB(TV) (LIC)	San Antonio, TX 29	122.9		----- no interference caused by proposal -----					

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- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour
 - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
 - (3) Service population after reduction from terrain and interference losses, considering proposal
 - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.
 - (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
 - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
 - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
 - (8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

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*"