

ALLOCATION AND INTERFERENCE STUDY  
PROPOSED KHCE-DT  
CHANNEL 16 - SAN ANTONIO, TEXAS  
[FURTHER AMENDMENT TO BPEDT-20000428ACF]

The Commission allotted Channel 16 to KHCE-DT with a nominal ERP of 50 kw at 261 meters above average terrain. The instant application specifies an ERP of 500 kw at 307 meters from a new site, which has been determined to be allowable under the FCC's *de minimis* standards with respect to various NTSC and DTV facilities.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by KHCE-DT, as proposed herein, to other pertinent stations are tabulated in Exhibit E-2.

As indicated, the proposed KHCE-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its present service area. This includes interference to the maximization application for KAVU-DT in Victoria, Texas.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT E-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KHCE-DT  
CHANNEL 16 - SAN ANTONIO, TEXAS  
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NTSC FACILITIES

| Call Sign | City, State        | Ch. | Grade B Population F(50,50) | INTERFERENCE LOSSES (POPULATION) |                            |              |                |                         |              |                |                      |                |     |
|-----------|--------------------|-----|-----------------------------|----------------------------------|----------------------------|--------------|----------------|-------------------------|--------------|----------------|----------------------|----------------|-----|
|           |                    |     |                             | NTSC Only                        | NTSC & DTV Without KHCE-DT | Unmasked DTV | % <sup>1</sup> | NTSC & DTV With KHCE-DT | Unmasked DTV | % <sup>1</sup> | KHCE-DT Contribution | % <sup>2</sup> |     |
| KEDT(TV)  | Corpus Christi, TX | 16  | 486,694                     | 0                                | 0                          | 0            | 0              | 0                       | 1,302        | 1,302          | 0.3                  | 1,302          | 0.2 |

DTV FACILITIES

| Call Sign       | City, State  | Ch. | NTSC/DTV <sup>3</sup> Grade B Pop. Longley-Rice | INTERFERENCE LOSSES (POPULATION) |                            |              |                |                         |              |                |                      |                |
|-----------------|--------------|-----|---|----------------------------------|----------------------------|--------------|----------------|-------------------------|--------------|----------------|----------------------|----------------|
|                 |              |     |   | NTSC Only                        | NTSC & DTV Without KHCE-DT | Unmasked DTV | % <sup>1</sup> | NTSC & DTV With KHCE-DT | Unmasked DTV | % <sup>1</sup> | KHCE-DT Contribution | % <sup>2</sup> |
| KAVU-DT (Appl.) | Victoria, TX | 15  | 325,443   | 1,091                            | 2,086                      | 995          | 0.3            | 8,364                   | 7,273        | 2.2            | 6,278                | 1.9            |

<sup>1</sup> Cannot exceed 10% of Grade B Population.  
<sup>2</sup> Cannot exceed 2% of Grade Population.  
<sup>3</sup> Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.