

**REQUEST UNDER SECTION 73.622(f)(5) FOR APPROVAL
OF INCREASED HEIGHT AND POWER**

This request is filed pursuant to Section 73.622(f)(5) of the rules and requests approval of ERP and antenna HAAT in excess of the technical facilities specified for the DTV allotment specified in Appendix B of the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order* in MM Docket 87-268 (FCC 98-24). Such a request may be granted upon a showing that the increased coverage area is needed to provide the geographic coverage comparable to the area served by the largest station within the market.

KUPN is within the Denver Designated Market Area and proposes to operate its Channel 23 digital operation with an antenna HAAT of 509 meters and with an ERP of 1000 kilowatts (Max-DA). The digital facilities of the three major network affiliates in the Denver DMA located on Lookout Mountain are comparable to each other and serve a substantially larger population than the proposed KUPN-DT facilities. For example, KCNC-DT (CBS) will provide a 48 dBu DTV noise limited contour over an area of 29,490 square kilometers, covering a 2000 Census population of 2,355,200 while KUPN-DT will cover an area of 29,190 square kilometers, serving a population of 1,018,000. Hence, the increased facilities are needed to provide comparable coverage.