



Respectfully submitted,

EDUCATIONAL MEDIA FOUNDATION

By: 

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### Analysis of predicted interference to KHJK from the application of K278CR (ARN 0000097724)

In response to the application of Centro Cristiano de Vida Eterna (CCVE) to modify the orientation of the coverage of K278CR Houston TX, FCC ID Number 148295 (see ARN 0000097724), I used RadioSoft Comstudy 2.2 software to analyze the potential impact of the application to station KHJK La Porte TX, FCC ID Number 48676, owned and operated by Educational Media Foundation (EMF).

Figure 1 shows a population scattergram of the area surrounding the K278CR license and application, the 60 dBu contours for each, as well as the 60 and 45 dBu F(50,50) contours for KHJK. This map clearly shows the location of the translator as between the 60 and 45 dBu contours of KHJK, and that the proposed modification does not decrease the number of people who are potential recipients of interference:

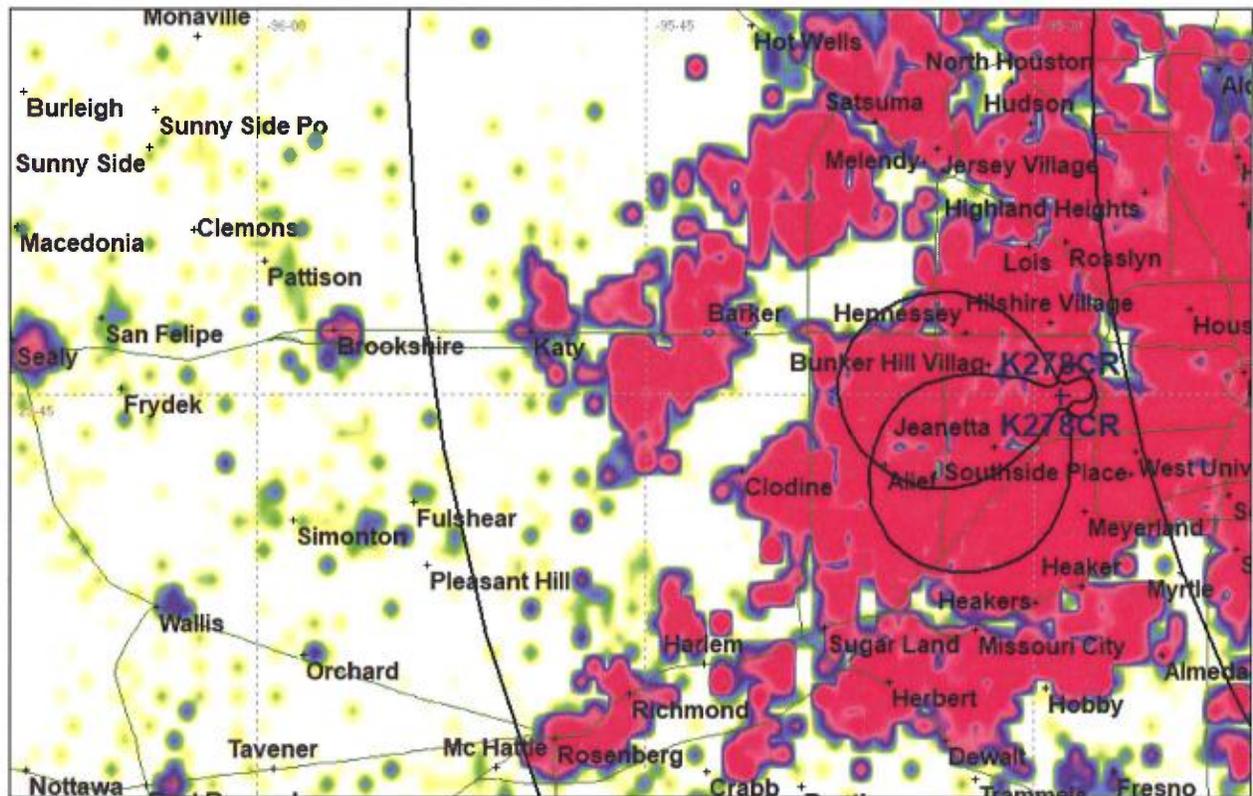


Figure 1

Using the ITU model (which allows for adjacent-channel interference calculations), I created Figure 2, which shows the same area and a Longley-Rice analysis of potential interference. The red area is where the interfering K278CR signal is 40 dBu stronger than that of KHJK, yellow is 20 dBu, and blue is 10 dBu higher.

The areas of predicted interference are described in Table 1:

Interference Ratio	Geographic area	Impacted population
≥ 40 dBu	6.81 km <sup>2</sup>	4,941
≥ 20 dBu	48.92 km <sup>2</sup>	84,932
≥ 10 dBu	285.99 km <sup>2</sup>	403,154

Table 1

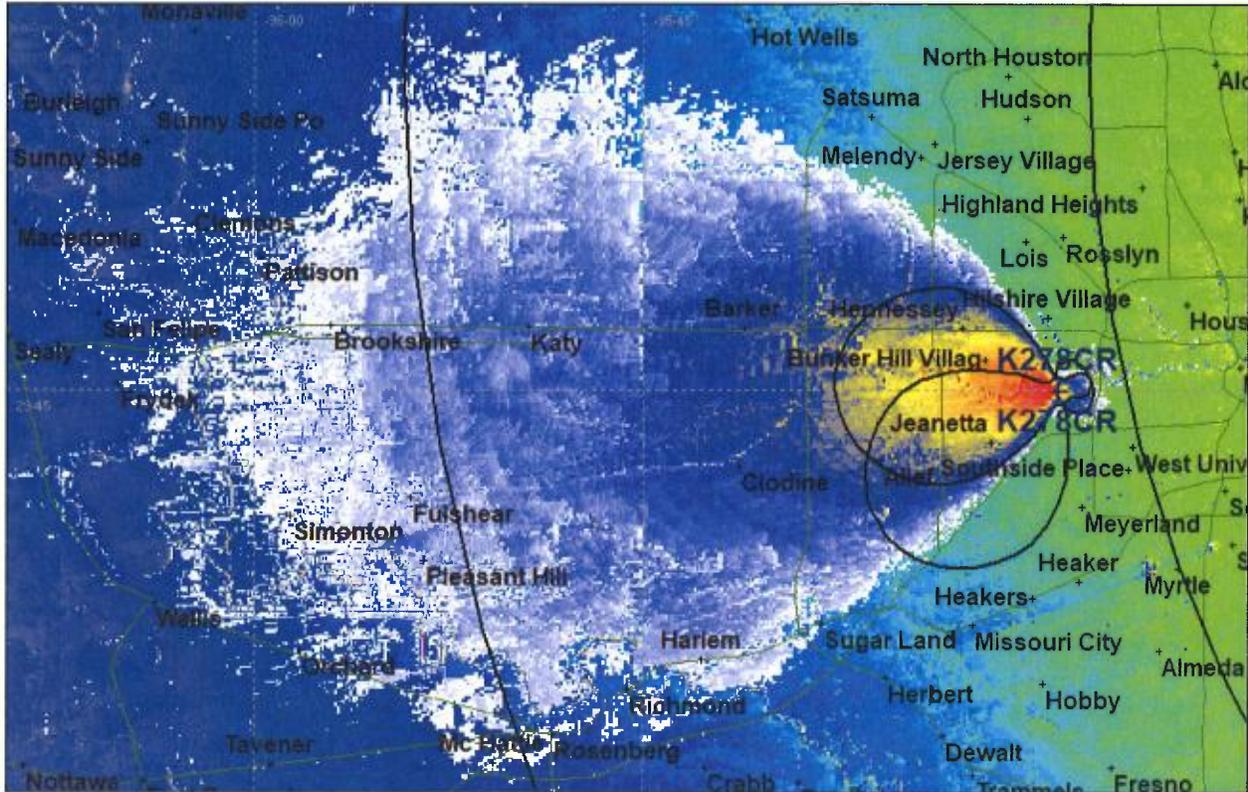


Figure 2

The former (licensed) operation of K278CR has proven to have indeed resulted in real-world interference to KHJK as demonstrated by EMF in previous filings.

Figure 3 gives the same evaluation for the recent application of K278CR:

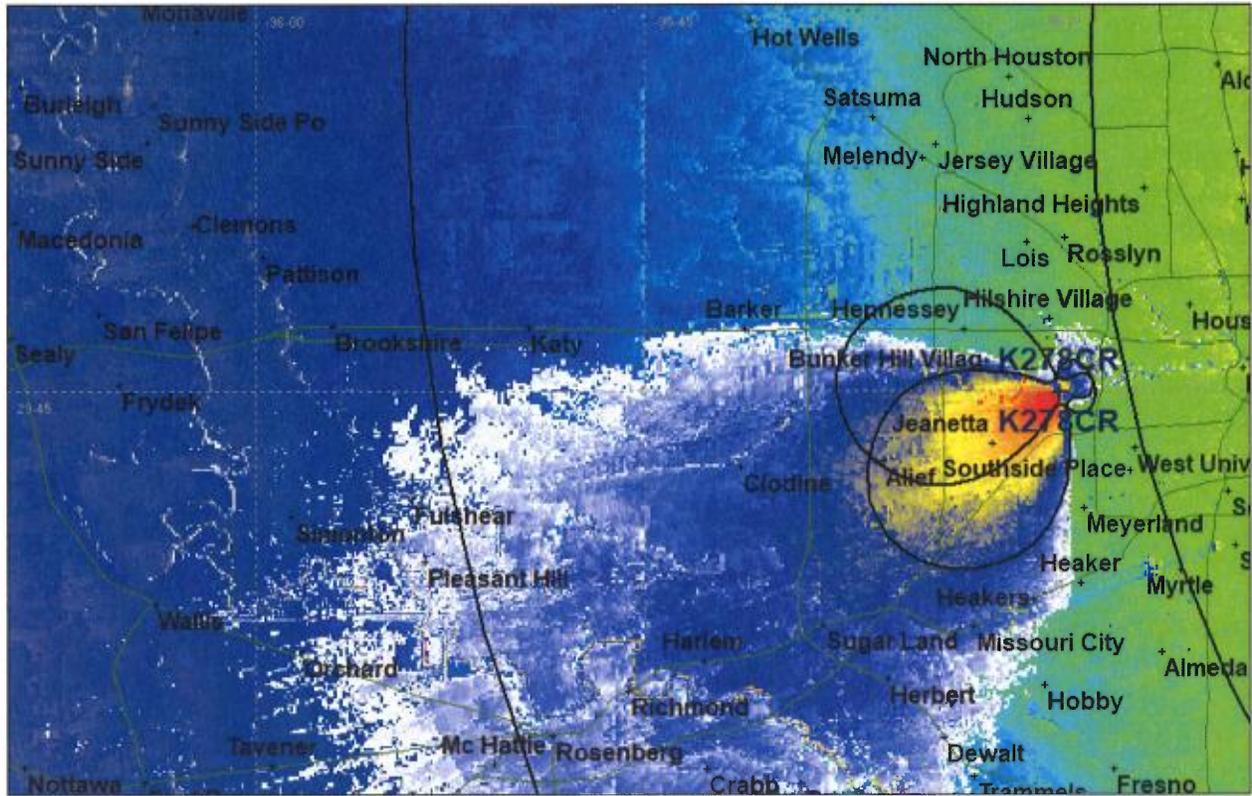


Figure 3

The affected areas and population values are given in Table 2, as well as the increase in affected population as compared to the licensed operation:

Interference Ratio	Geographic area	Impacted population	Population increase
≥ 40 dBu	6.72 km <sup>2</sup>	5,136	195
≥ 20 dBu	48.29 km <sup>2</sup>	134,270	49,338
≥ 10 dBu	285.95 km <sup>2</sup>	562,295	159,141

Table 2

This analysis makes clear that the proposed changes to K278CR do NOT improve the predicted interference to KHJK; indeed, these changes would INCREASE the potential for interference.

Therefore, EMF urges the Commission to dismiss the K278CR application under discussion, since it only exacerbates the previously existing interference.

Sam Wallington  
 Vice President of Operations and Engineering  
 Educational Media Foundation

**CERTIFICATE OF SERVICE**

I, Rhea Lytle, a legal secretary with the law firm of Wilkinson Barker Knauer, LLP, hereby certify that on this 27th day of January, 2020, I served copies of the foregoing "**Supplement to Petition to Deny**" on the following via first-class United States mail, postage prepaid:

Dan J. Alpert  
The Law Offices of Dan J. Alpert  
2120 21<sup>st</sup> Rd. N.  
Arlington, VA 22201

By e-mail: [audiodivisionpleadings@fcc.gov](mailto:audiodivisionpleadings@fcc.gov)

A handwritten signature in cursive script that reads "Rhea Lytle". The signature is written in black ink and is positioned above a horizontal line.

Rhea Lytle