

Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 301</b></p>	Approved by OMB 3060-0027 (April 2009)  FOR FCC USE ONLY
<p><b>APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION</b></p> <p>Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. - 20100408ABO

**Section I - General Information**

1.	Legal Name of the Applicant BLUESTONE LICENSE HOLDINGS INC.		
	Mailing Address 675 THIRD AVENUE SUITE 2521		
	City NEW YORK	State or Country (if foreign address) NY	ZIP Code 10017 -
	Telephone Number (include area code) 2127107771	E-Mail Address (if available) RBONGARTEN@BONTENMEDIA.COM	
	FCC Registration Number: 0010338895	Call Sign KRCR-TV	Facility ID Number 8291
2.	Contact Representative (if other than Applicant) EVE R. POGORILER, ESQ.		Firm or Company Name COVINGTON & BURLING LLP
	Mailing Address 1201 PENNSYLVANIA AVE., NW		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20004 -
	Telephone Number (include area code) 2026625345	E-Mail Address (if available) EPOGORILER@COV.COM	
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Other AMENDMENT TO PENDING APPLICATION <input type="radio"/> N/A (Fee Required)		
4.	<p><b>Application Purpose</b></p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="radio"/> New station   <input type="radio"/> Major Modification of construction permit  <input type="radio"/> Minor Modification of construction permit  <input type="radio"/> Major Amendment to pending application                      (a) File number of original construction permit:                       (b) Service Type:                       (c) DTV Type:                       (d) Community of License:                      City: REDDING                      (e) Facility Type                 </div> <div style="width: 48%;"> <input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments  <input type="radio"/> Major Change in licensed facility  <input type="radio"/> Minor Change in licensed facility  <input checked="" type="radio"/> Minor Amendment to pending application                      BPCDT-20100408ABO    <input type="checkbox"/> NA  <input type="radio"/> AM    <input type="radio"/> FM    <input type="radio"/> TV    <input checked="" type="radio"/> DTV    <input type="radio"/> DTS  <input type="radio"/> Pre-Transition    <input checked="" type="radio"/> Post-Transition    <input type="radio"/> Both                      State: CA  <input checked="" type="radio"/> Main    <input type="radio"/> Auxiliary                 </div> </div> <p style="text-align: right;">[Exhibit 1]</p> <p>If an amendment, <b>submit as an Exhibit</b> a listing by Section and Question Number the portions of the pending application that are being revised.</p>		

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be**

submitted for each question for which a "No" response is provided.

**Section II - Legal**

<p>1. <b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>2. <b>Parties to the Application.</b>                  a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.                  [Enter Parties/Owners Information]                  _____                  _____</p> <p>(2) Citizenship.                  (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's <b>equity/debt plus</b> standard, etc.                  (4) Percentage of votes.                  (5) Percentage of total assets (equity plus debt).</p>	
<p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No  <input checked="" type="radio"/> N/A                  See Explanation in [Exhibit 2]</p>
<p>3. <b>Other Authorizations.</b> List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p>	<p><input type="checkbox"/> N/A                  [Exhibit 3]</p>
<p>4. <b>Multiple Ownership.</b></p>	
<p>a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?                  If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No                  [Exhibit 4]</p>
<p>b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.                  Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).                  All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No                  [Exhibit 5]</p>
<p>c. Applicant certifies that the proposed facility:                  (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;                  (2) complies with the Commission's policies relating to future ownership interests; and                  (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No                  See Explanation in [Exhibit 6]</p>

	<p>d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. § 121-201), and holds:</p> <p>(1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or</p> <p>(2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or</p> <p>(3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?</p> <p>All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p>See Explanation in [Exhibit 7]</p>
5.	<p><b>Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <p>a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or</p> <p>b. any pending broadcast application in which character issues have been raised.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 8]</p>
6.	<p><b>Adverse Findings.</b> Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 9]</p>
7.	<p><b>Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 10]</p>
8.	<p><b>Program Service Certification.</b> Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
9.	<p><b>Local Public Notice.</b> Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
10.	<p><b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p> <p><b>An exhibit is required unless this question is inapplicable.</b></p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p> <p>[Exhibit 11]</p>
11.	<p><b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
12.	<p><b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p>
13.	<p><b>Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.</b> If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p>

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing RANDALL D. BONGARTEN	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date 5/13/2010

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

<b>SECTION III-D - DTV Engineering</b>	
<b>Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.</b>	
<p><b>Pre-Transition Certification Checklist:</b> An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p><b>Post-Transition Expedited Processing.</b> An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must <b>submit the Exhibit</b> called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

<b>SECTION III-D - DTV Engineering</b>	
<b>TECHNICAL SPECIFICATIONS</b>	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
<b>TECH BOX</b>	
1.	Channel Number:

	DTV 7 Analog TV, if any										
2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III										
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 40 Minutes 36 Seconds 10 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 122 Minutes 39 Seconds 0 <input checked="" type="radio"/> West <input type="radio"/> East										
4.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA										
5.	Antenna Location Site Elevation Above Mean Sea Level:										1892 meters
6.	Overall Tower Height Above Ground Level:										31 meters
7.	Height of Radiation Center Above Ground Level:										23 meters
8.	Height of Radiation Center Above Average Terrain :										1095 meters
9.	Maximum Effective Radiated Power (average power):										84 kW
10.	Antenna Specifications:  a. Manufacturer ERI Model EMT10V4-CSCX-7  b. Electrical Beam Tilt: 1 degrees <input type="checkbox"/> Not Applicable  c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). <span style="float:right">[Exhibit 43]</span>  d. Polarization: <input type="radio"/> Horizontal <input checked="" type="radio"/> Circular <input type="radio"/> Elliptical  e. Directional Antenna Relative Field Values: <input type="checkbox"/> Not applicable (Nondirectional)  [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]										
<b>10e. Directional Antenna Relative Field Values</b>											
[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]											
e. Directional Antenna Relative Field Values:											
Rotation (Degrees): <input checked="" type="checkbox"/> No Rotation											
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	0.138	10	0.267	20	0.414	30	0.564	40	0.701	50	0.814
60	0.895	70	0.948	80	0.975	90	0.985	100	0.988	110	0.987
120	0.988	130	0.993	140	0.998	150	1	160	0.993	170	0.968
180	0.92	190	0.841	200	0.731	210	0.597	220	0.447	230	0.296
240	0.162	250	0.067	260	0.03	270	0.037	280	0.051	290	0.06
300	0.064	310	0.061	320	0.053	330	0.04	340	0.03	350	0.054
Additional											

	Azimuths	
	<a href="#">Relative Field Polar Plot</a>	
	If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. <b>Exhibit required.</b>	[Exhibit 44]
11.	Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if <b>Certification Checklist</b> Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616?  If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.	<input checked="" type="radio"/> Yes <input type="radio"/> No  [Exhibit 45]
12.	If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if <b>Certification Checklist</b> item 3 is answered "No.")	[Exhibit 46]
13.	<b>Environmental Protection Act. Submit in an Exhibit</b> the following: If <b>Certification Checklist</b> Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.  By checking "Yes" to <b>Certification Checklist</b> Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.  If <b>Certification Checklist</b> Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.	[Exhibit 47]
<b>PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.</b>		

### SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOSEPH M. DAVIS, P.E.		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 5/12/2010	
Mailing Address CHESAPEAKE RF CONSULTANTS, LLC 11993 KAHNS ROAD			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20112 -
Telephone Number (include area code) 7036509600		E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**Exhibits**

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**Exhibit 1**

**Description:** AMENDED SECTIONS

SECTION III-D ENGINEERING TECH-BOX ITEMS 6, 7, 8, 9, AND 10 ARE CHANGED, AND ALL ENGINEERING EXHIBITS ARE REVISED. WITH THIS AMENDMENT, A WAIVER OF 73.622(F)(7) IS NO LONGER NEEDED.

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**Attachment 1**

Description
<a href="#">Exhibit In Support Of Amendment To Application For Digital Construction Permit</a>

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**Attachment 44**

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**Attachment 47**

Description
<a href="#">KRCR-TV Engineering Exhibits amended 05-12-2010</a>

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**Exhibit In Support Of  
Amendment To Application For Digital Construction Permit**

**KRCR-TV, Redding, CA**

This application amends a pending application for construction permit<sup>1</sup> in order to specify the use of a directional antenna. KRCR-TV, Redding, CA (“the Station”) seeks to replace its currently-authorized nondirectional antenna in order to improve service to the public. Grant of this application would be in the public interest because it would enable the Station to provide ABC Network service to sizeable “white” and “gray” areas. It also would improve the reliability of the Station’s service, because malfunctions of the currently-authorized, 32-year-old antenna have resulted in periodic, brief transmission problems. Finally, grant of this application would enable the Station to improve service to certain viewers who lost service from KRCR-TV following the digital transition.

As noted above, antenna malfunctions have resulted in periodic transmission problems. The transmitter site is located on a mountaintop and prone to heavy snow and ice accumulations. (A picture showing winter conditions at the transmitter site is attached hereto.) Uneven ice buildup is causing standing wave reflections and high reflected power on the antenna, resulting in a degraded signal. Moreover, if the reflections reach a critical value, the transmitter will shut down as a self-protection measure, and the Station is then required to operate the transmitter in reduced power mode until the icing conditions stabilize or the ice naturally sloughs off. Transmissions have ceased completely for periods ranging from several seconds to two minutes, and reduced power operations have lasted for up to 12 hours. These problems pose a serious challenge to the Station’s ability to serve its viewers because winter conditions can make the transmitter site very difficult to access as late as July or early August, with severe conditions resuming again as early as September.

The proposed modification would enhance localism. As the attached Engineering Exhibit illustrates, the service gains resulting from the proposal would be concentrated in the Chico-Redding Designated Market Area (“DMA”), the Station’s home market. Any service losses resulting from the proposal would occur outside the Station’s market.<sup>2</sup> Further, as described in the Engineering Exhibit:

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<sup>1</sup> See FCC File No. BPCDT-20100408ABO. The pending application seeks authorization to operate permanently using the nondirectional facilities currently authorized with Special Temporary Authority (“STA”) in FCC File No. BEDSTA-20100111AES.

<sup>2</sup> The Commission discounts service losses to viewers outside a station’s DMA. For example, it has granted a station authorization to relocate its transmitter in a case where the gains from the proposal would be in the station’s DMA while the losses would chiefly occur outside of the DMA. See FCC File No. BPCDT-20090521ADA. See also *Public Notice: DTV Channel Election: First Round Conflict Decision Extension and Guidelines for Interference Conflict Analysis*; 20 FCC Rcd. 13415, at 3 (2005) (citing as a factor in interference agreement acceptability “where the interference occurs (*e.g.*, whether it is outside the affected station’s (continued...))

- The out-of-market viewers in the predicted contour loss area will continue to be well served. As noted in the Engineering Exhibit at 4-5 and Figure 6, the vast majority of the population in the contour loss area – 92.4 percent – is served by five or more DTV stations.
- The proposal would improve service in the gain areas substantially, with 23 percent of the proposal’s service gains being provided to viewers in white or gray areas. Indeed, 97.2 percent of the gain population currently is served by only three or fewer services. *See* Engineering Exhibit at 4-5.
- Due to terrain blocking, the vast majority of viewers in the predicted ABC Network contour loss areas do not actually receive the Station’s signal, with the result that, ultimately, only 231 persons would lose ABC Network service. *See* Engineering Exhibit at 5 and Figure 8. Moreover, the ABC Network service loss population is not located within the Station’s DMA.
- By contrast, the proposed facility would enable the Station to provide first ABC Network service to a substantial population: 29,791 persons, the majority of whom are located within the Station’s DMA. *See* Engineering Exhibit at 5-6 and Figure 7.

Grant of this application also would improve service to certain of KRCR’s viewers who lost service following the digital transition. While the operations pursuant to the STA described in footnote 1 have substantially resolved these reception problems, the directional antenna (and the fact that the antenna has circular polarization) would enable the Station to increase power and signal penetration in the populated areas that experienced the most significant service losses following the digital transition. Thus, the facilities sought herein should facilitate the Station’s continued efforts to enhance its service and aid any viewers who may have lost service, while obviating the need for the FCC to act on the Station’s pending request for waiver of maximum power/height limits set forth in Section 73.622(f)(7).<sup>3</sup> Moreover, the Station believes that the circular polarization of the new antenna will improve the Station’s ability to provide a robust mobile DTV signal to viewers.

Grant of this application would serve the public interest. It would enable the Station to expand local digital television service substantially, providing robust service to many white and gray areas and other areas that are not well-served. It would provide a first ABC Network service to a significant population, and enhance service to viewing areas that experienced service losses following KRCR’s digital transition. Given the number of alternative

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DMA)"); *Letter from Barbara A. Kreisman, Chief, Video Division, Media Bureau, to Michael E. Carosella, Qualcomm Inc.*, 22 FCC Rcd. 3831, at 4 (Feb. 23, 2007) (approving mobile service activation where “almost all of [the predicated interference] area is outside the [station’s home] DMA; in fact, only 0.22% of the population within the DMA is predicted to receive interference.”).

<sup>3</sup>*See* FCC File No. BPCDT-20100408ABO.

services in the loss area and the existence of terrain-shielding from the Station's signal, the proposal would not result in any significant service losses to viewers in the predicted contour loss area. In light of these benefits and the problems noted above with respect to the current antenna's reliability, the Station respectfully requests prompt action on this request.

