Exhibit 35 – Statement A

NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Hawaii Public Television Foundation
KMEB(TV) Wailuku, Hawaii
Facility ID: 26428
Ch. 10 21.2 kW (MAX-DA) 747 m

Hawaii Public Television Foundation ("*HPTF*") is the licensee of analog television station KMEB(TV), Channel 10, Wailuku, Hawaii (see BMLET-154). *HPTF* has a pending application to construct the post-transition digital facility for KMEB(TV) on Channel 10 (BMPEDT-20080421AAR). With the lifting of the filing freeze[1], *HPTF* herein proposes to amend its pending application to specify a maximized post-transition operation for KMEB(TV) from an existing tower. The proposed facility will become operational following the Congressionally mandated shut down of all full service analog television stations on February 17, 2009.

Exhibit 35 - Figure 1 provides a map depicting the service contour for the proposed facility along with principal community coverage contour. As demonstrated therein, the principal community of Wailuku, Hawaii is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission's Rules. The proposed facility is predicted to provide interference free service to 154,627 persons, which is 118.0 percent of the 131,000 persons that are predicted to receive interference free service from the Appendix B facility[2].

The location proposed for KMEB(TV)'s post-transition facility is the currently proposed KMEB(TV) analog site at Ulupalakua Ranch,[3] some 12.1 km from the Appendix B reference site. The use of the Ulupalakua Ranch site is due to circumstances beyond the control of the applicant; the licensed common transmitter site will not be available for use. Under a cooperative arrangement with a private landowner, *HPTF* anticipates that an antenna support structure at Ulupalakua Ranch will be available for utilization by KMEB(DT) and other affected television stations. *HPTF* herein seeks a Construction Permit to specify a digital post-transition facility at the Ulupalakua Ranch supporting structure.

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[1] See *Public Notice*, Commission Lifts The Freeze On The Filing Of Maximization Applications And Petitions For Digital Channel Substitutions, Effective Immediately, DA 08-1213, Released May 30, 2008.
[2] See *Memorandum Opinion And Order On Reconsideration of the Seventh Report and Order and Eighth Report And Order*, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, FCC 08-72, Released March 6, 2008
[3] See BPET-20070321AAE.

The proposed tower structure's overall height will be 60.7 meters above ground level. Since the proposed structure passes the FCC's TOWAIR program, notification to the FAA and commensurate FCC Antenna Structure Registration is not required. Based on information provided by a representative of the applicant, formal coordination is currently underway between the FCC and the United States Fish and Wildlife Service for the necessary NEPA certification for the site. Thus, an answer of "no" has been entered for question 2 of FCC Form 340. Once the certification has been completed, an amendment to the instant application will be filed.

The proposed KMEB(TV) operation will employ an antenna in common with Hi-Band VHF stations KAII-TV (Channel 7) and KMAU(TV) (Channel 12), both licensed to Wailuku, HI. All three stations are "satellite" stations and plan to flash-cut to digital operation on their Hi-Band VHF analog channels. The proposed panel-type transmitting antenna, Dielectric model THA-P2SP-4H/8H-1-B, is directional in the horizontal plane. Four levels (bays) of panels will be used, each level consisting of two panels. Electrical beamtilt of 1.7 degrees will be employed. The effective radiated power ("ERP") for KMEB(TV) will be 21.2 kilowatts maximum, horizontally polarized.

The reason for employing an antenna that is directional in the horizontal plane is the need to maximize coverage over the populated areas of the Hawaiian Islands while minimizing the power that would be wasted over the Pacific Ocean or in the direction of the Haleakala volcano[4]. The two areas of maxima are oriented at 150° T, toward the "Big" Island of Hawaii, and 300° T, toward the islands of Molokai and Oahu. The minima, to the northeast and southwest, incorporate suppression levels of 40 and 15 dB below the maxima, respectively. This exceeds the 10 dB maximum suppression specified in §73.685(e) for a directional VHF station. A waiver of §73.685(e) is respectfully requested on behalf of *HPTF* for the reasons described above. The suppression is <u>not</u> required to provide interference protection to other stations.

Exhibit 35 – Figure 2 supplies the antenna's horizontal plane pattern. Tabulated relative field data is supplied in the accompanying FCC Form 340 Section VII – DTV Engineering "Tech Box" Item 10e.

[4] to minimize the amount of energy radiated out over the Pacific Ocean and to minimize signal reflections off of the terrain, which rises quickly to the northeast of the proposed transmitter site.

Pursuant to §73.684(d), the calculated average terrain elevation and associated antenna height above average terrain ("HAAT") have been truncated along the 180, 225, and 270 degree radials due to the proximity of the site to the Pacific Ocean. Only the part of each radial extending from 3.2 kilometers to the outermost portion of land area covered by the radial is included in the calculation.

Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, post-transition interference studies were performed in accordance with the methods set forth in the Commission's OET Bulletin No 69 ("OET-69"). The results of the studies indicate that no new interference in excess of the 0.5% limit established in the Commission's Third Periodic Review[5] is caused to affected stations by the post-transition KMEB(TV) operation. A summary of the post-transition interference study is provided in the attached **Exhibit 35 - Table I**.

The proposed KMEB(TV) digital Channel 10 site is located more than 400 km from the nearest point on an international border and does not require international coordination. The nearest FCC monitoring station is Waipahu, HI at a distance of 188 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM stations located within 3.2 km of the existing tower site.

KMEB operates as a satellite station of KHET. The KHET main studio location is in Honolulu, HI, beyond the area specified in §73.1125(a). There is no separate main studio for KMEB. To the extent necessary, continued waiver of §73.1125(a) is requested to permit continued operation of KMEB on a noncommercial educational basis at Wailuku, Hawaii as a satellite station with a main studio not located in the city of license or other location as specified in §73.1125(a).

[5] See *Report and Order*, Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

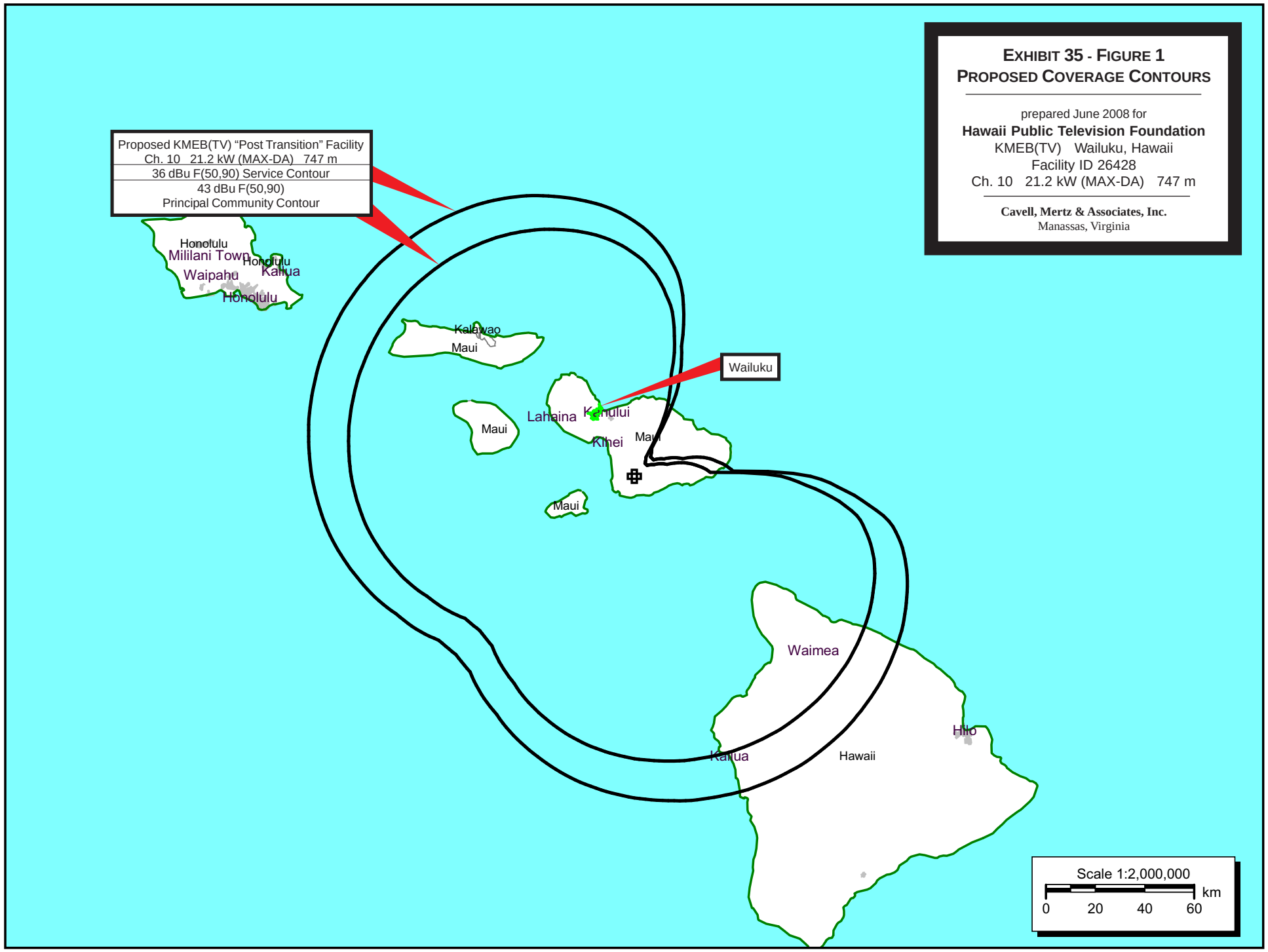
EXHIBIT 35 - FIGURE 1
PROPOSED COVERAGE CONTOURS
prepared June 2008 for
Hawaii Public Television Foundation
KMEB(TV) Wailuku, Hawaii
Facility ID 26428
Ch. 10 21.2 kW (MAX-DA) 747 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Proposed KMEB(TV) "Post Transition" Facility
Ch. 10 21.2 kW (MAX-DA) 747 m
36 dBu F(50,90) Service Contour
43 dBu F(50,90)
Principal Community Contour
Honolulu
Mililani Town
Honolulu
Waipahu
Kailua
Honolulu
Kalawao
Maui
Wailuku
Lahaina
Kahului
Maui
Kihei
Maui
Maui
Waimea
Hilo
Kailua
Hawaii
Scale 1:2,000,000
km
0
20
40
60

Dielectric

EXHIBIT 35 - FIGURE 2
ANTENNA HORIZONTAL PLANE RADIATION PATTERN

prepared June 2008 for
Hawaii Public Television Foundation
KMEB(TV) Wailuku, Hawaii
Facility ID 26428
Ch. 10 21.2 kW (MAX-DA) 747 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposal Number	C-00447		
Date	28-Jun-06		
Call Letters	KMEB	Channel	10
Location	Haleakala, Maui, HI		
Customer	Maui LLC		
Antenna Type	THA-P2SP-4H/8H-1-B		

AZIMUTH PATTERN

Gain	2.50	(3.98 dB)	
Calculated / Measured	Calculated		
Frequency	195.00 MHz		
Drawing #	THA-P2SP-1950		

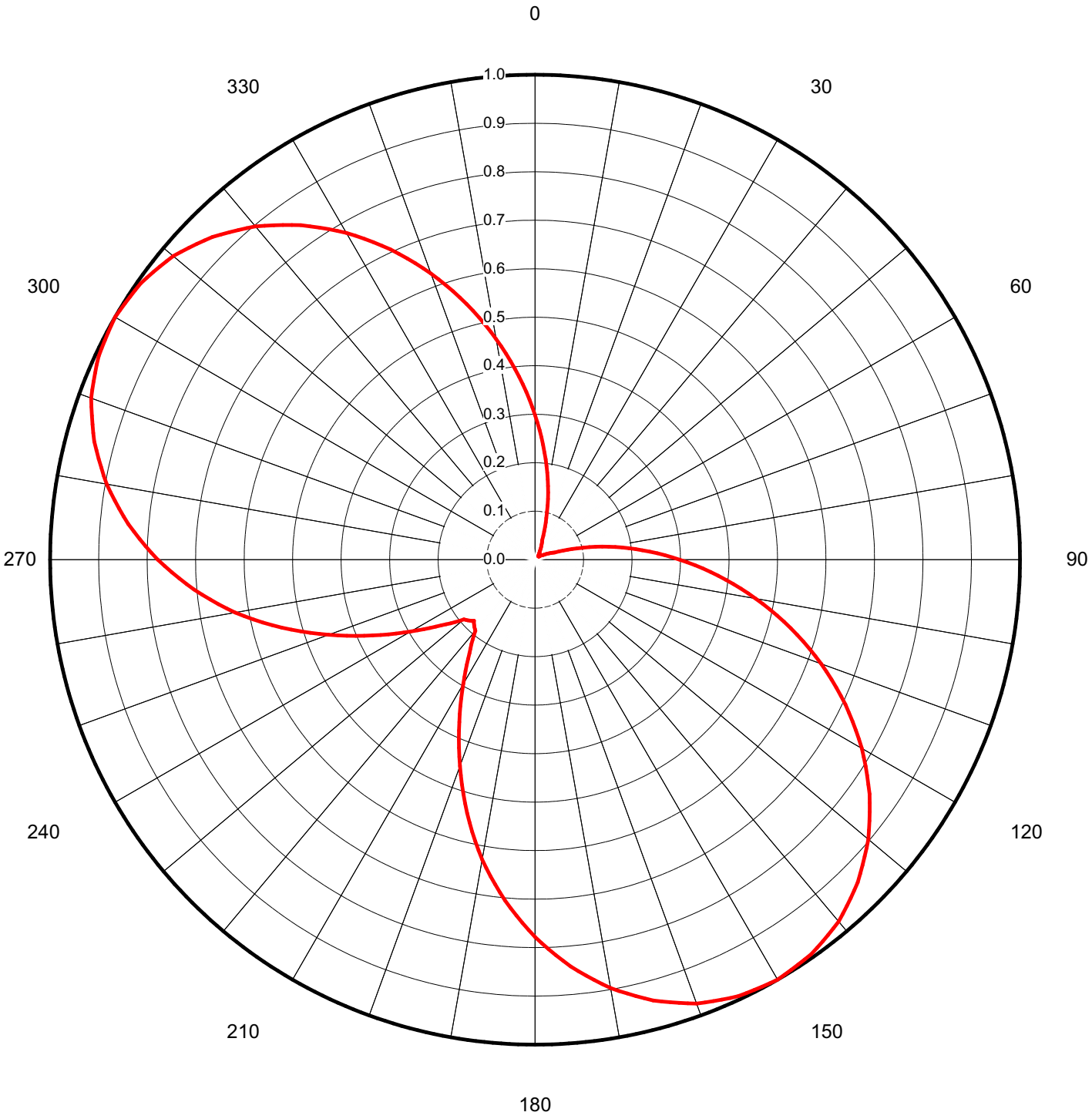

Exhibit 35 - Table I

INTERFERENCE STUDY RESULTS

prepared for

Hawaii Public Television Foundation

KMEB(TV) Wailuku, Hawaii

Facility Id: 26428

Ch. 10 21.2 kW (MAX-DA) 747 m

Channel	Affected Station	City, State	File Number	7th R&O Table Baseline (2000 Census)	Calculated Baseline (2000 Census)	Interference Population 7th R&O facility (2000 Census)	Interference Population with Proposal (2000 Census)	New Interference Population	New Interference Percentage
9	KGMD-TV	Hilo, HI	Reference	79,000			--- No Interference ---		
9	KGMD-TV	Hilo, HI	BMPCDT-20080317AGQ	79,000			--- No Interference ---		
9	KGMB(TV)	Honolulu, HI	Reference	826,000			--- No Interference ---		
10	KALO(TV)	Honolulu, HI	BPEDT-20000501AFZ	812,000	813,803	63,194	53,331	-9,863	-1.212 %
10	KALO(TV)	Honolulu, HI	Reference	812,000	809,013	69,664	71,124	1,460	0.181 %
11	KHAW-TV	Hilo, HI	Reference	78,000			--- No Interference ---		
11	KHAW-TV	Hilo, HI	BPCDT-20080317AHO	78,000			--- No Interference ---		
11	KHET(TV)	Honolulu, HI	Reference	862,000	862,056	0	87	87	0.010 %
11	KHET(TV)	Honolulu, HI	BPEDT-20080401AZJ	862,000	866,929	0	70	70	0.008 %