

EXHIBITS 6 AND 7
AMENDED MINOR MODIFICATION APPLICATION FOR LPTV KTXU-LP

KTXU-LP
FCC File No. BMPTTL-20011109AAI
Facility ID. No. 67198

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's amended application for minor modification to KTXU-LP (BMPTTL-20011109AAI, Facility ID. 67198).

This amended application addresses interference concerns voiced by the Commission with regard to Applicant's original application and complies with FCC minor modification requirements, namely that this amended application has overlapping Grade B (64dbu) contours with Applicant's current construction permit.

The proposed operational parameters for KTXU-LP are as follows:

Frequency Offset:	ZERO OFFSET
Antenna radiation center height above ground level:	150 meters
Maximum effective radiated power:	20 KW
Maximum ERP on Horizon	10.9 KW
Antenna type and model #:	SBP UP-12-SL
Antenna Orientation	50 Degrees
Transmitter Site	30-14-59 N 97-54-09 W

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, and 74.709. This study indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than NTSC Full-Power stations KXAN-TV, Channel 36, Austin Texas, KNCT, Channel 46, Belton, Texas, KEYE-TV, Channel 42, Austin, Texas, and KVUE-TV, Channel 24, Austin, Texas; and DTV facilities KHQB, Channel 38, Houston, Texas, and KVDA-DT, Channel 38, San Antonio, Texas. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no impermissible interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Section 74.705 and Section 74.706, based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power and DTV stations.**

Digital Proposed Rule Making

Applicant notes that DTV facility KNCT (Facility ID. 136915) has a pending application for Digital Rulemaking. KNCT's application seeks to move their Digital facilities to Channel 38. Applicant is not required to protect this proposed facility with this application. However, Applicant acknowledges that should KNCT's application for a Digital Rulemaking seeking to

shift their operations to Channel 38 be granted, Applicant's facility would cause impermissible interference to KNCT's facility, and Applicant must and will immediately cease operations on Channel 38.

DTV Facilities

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 73.703, with regard to the effect of the proposed station on the following DTV facilities:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KVDA-DT, CH 38 DALLAS, TX BPCDT-19991028ACQ CONSTRUCTION PERMIT	1,535,764	1,853 (0.1%)
KHWB, CH 38 HOUSTON, TX DTV ALLOCATION	3,777,276	0 (0.0%)
KHWB, CH 38 HOUSTON, TX BMPCDT-20000425AA CONSTRUCTION PERMIT MOD.	3,862,315	5 (0.0%)

As indicated in the above table, there will be virtually no interference caused by the operation of the proposed station to any DTV facilities and the deminimis interference caused by the proposed facility is far below the 0.5% level permitted for such calculations

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KXAN-TV, CH 36 AUSTIN, TX FILE NO. BLCT-19971202KF LICENSE	1,002,218	0 (0.0%)
KNCT, CH 46 BELTON, TX FILE NO. BLCT-2369 LICENSE	545,449	0 (0.0%)
KVUE-TV, CH24 AUSTIN, TX FILE NO. BLCT-2113 LICENSE	947,660	0 (0.0%)
KEYE-TV, CH 42 AUSTIN, TX FILE NO. BLCT-19831216KH LICENSE	871,417	0 (0.0%)

KEYE-TV, CH 42 AUSTIN, TX FILE NO. BPCT-19961211KG CONSTRUCTION PERMIT	919,831	0 (0.0%)
KEYE-TV, CH 42 AUSTIN, TX FILE NO. BPCT-20010205AAX APPLICATION	997,398	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause zero interference to existing NTSC facilities, construction permits or applications.

Land Mobile

There are no cochannel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 38 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 20 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.015 milliwatt per square centimeter (MW/CM²), or 3.7% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.408 MW/CM² for TV channel 38). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.