

DELAWDER COMMUNICATIONS, INC.

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ENGINEERING REPORT

KSBS-LD, Denver, CA Digital Companion Channel Displacement Modification

EXHIBIT 12 - ENVIRONMENTAL STATEMENT

This proposal does not involve a site location specified under Section 1.1307(a) through (a)(8) of the FCC Rules.

All analog and digital LPTVs at this location combine to produce an ERP that is less than 115 kilowatts. Assuming: (a) a maximum ERP of 115 kilowatts (130 kW with aural carrier); (b) a relative field of less than 0.05 in the critical downward angles; and (c) a distance of 10 meters from the lowest antenna element to 2 meters above ground level, the maximum power density is calculated as follows:

$$S = 33.4 (F)(F)(ERP) / [(R)(R)]$$

Where, S equals power density in uW/cm²

F equals the relative field factor

ERP equals the effective radiate power in watts

R equals the distance in meters

$$= 33.4 (0.05)(0.05)(130,000) / [(10)(10)]$$

$$= 108.6 \text{ uW/cm}^2 \text{ (combined worst-case for all LPTVs at this site)}$$

108.6 uW/cm² represents less than the uncontrolled power density limit (371.3 uW/cm² for channel 28). (This site supports LPTVs located within the UHF TV spectrum.) The electromagnetic radiation from this proposed operation will not produce a value in excess of the radiation standard. The electromagnetic radiation from the proposed operation will not combine with other facilities on or near the structure to produce a significant change in value.

If this is a structure that may support various other operations, the applicant will cooperate with the other operators in establishing a plan for work done on the structure in close proximity to the existing antenna.