

TECHNICAL EXHIBIT
DIGITAL FLASH CUT APPLICATION
STATION K07QC (FACILITY ID 5302)
DRIGGS, IDAHO
CH 7 0.3 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an application to “flash-cut” to digital for TV translator station K07QC. Station K07QC is licensed to operate on analog channel 7 with a directional antenna maximum (visual) effective radiated power (ERP) of 0.047 kW and an antenna height above mean sea level (RCAMSL) of 3032 meters (BLTTV-19800723IF).

Proposed Facilities

This application proposes to flash-cut to digital mode on channel 7 using the licensed antenna and the licensed transmitter site. The site coordinates as well as elevation and antenna data for the licensed operation were found to be incorrect and are being corrected herein. The corrected coordinates are (NAD27): 43-47-17 N, 110-56-07 W. A Kathrein/Scala (SCA), array of two skewed HDCA-5 antennas is proposed with a maximum ERP of 0.3 kW. The corrected antenna RCAMSL is 2985 meters and the corrected overall height of the structure is 11 meters. Antenna structure registration is not necessary.

Figure 1 is a map showing the licensed and proposed coverage contours. As is apparent on the map, the proposed 48 dBu digital contour will have some common contour overlap with the licensed 68 dBu contour.

Allocation Considerations

The proposed K07QC operation meets the FCC's interference standards to pertinent LPTV, Class A and DTV facilities using the procedures outlined in the FCC's OET-69 Bulletin and a standard 1 kilometer cell size and 1 kilometer terrain distance increment.

The results of the interference analyses are summarized in Figure 2. For the studies, only the worst-case interference scenario was shown for each station. Detailed studies for any stations that were not predicted to receive any interference (i.e., no scenarios were generated) were not included.

The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation. If necessary, a waiver of the FCC rules is respectfully requested based on use of the FCC's OET-69 Bulletin.

Radiofrequency Electromagnetic Field Exposure

The proposed facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 11 meters above ground level. The maximum proposed ERP is 0.3 kW. A relative field value of 0.25 was assumed for the directional antenna's downward radiation. The calculated power density at a point 2 meters (6.6 feet) above ground will not exceed 0.0095 mW/cm^2 . This is less than 5% of the FCC's recommended limit of 0.2 mW/cm^2 for channel 7 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this is a multi-user site, an agreement will control site access. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

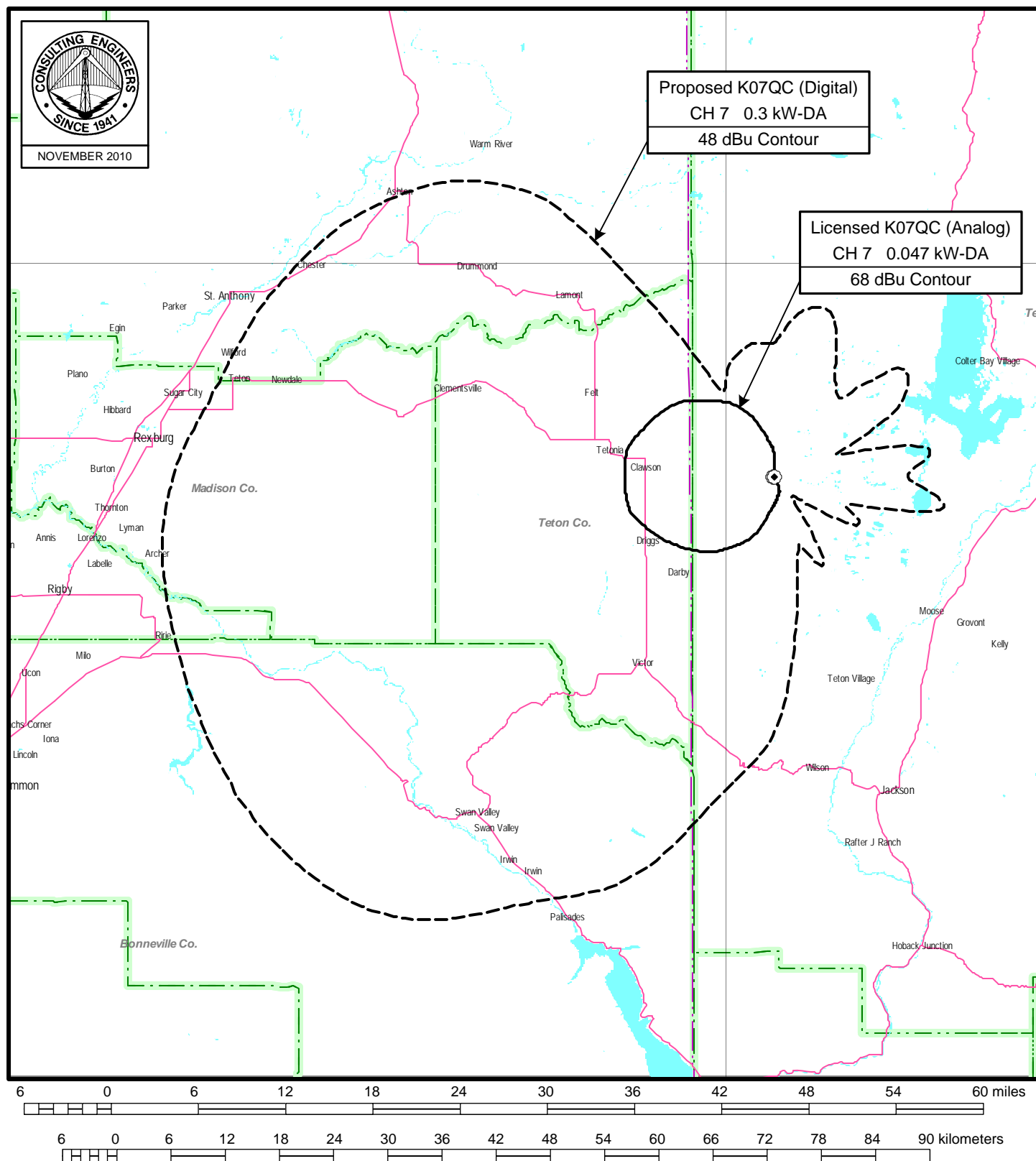


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November 10, 2010

Figure 1



PREDICTED COVERAGE CONTOURS

STATION K07QC

DRIGGS, IDAHO

CH 7 0.3 kW (MAX-DA)

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Percent allowed new interference: 0.500
 Percent allowed new interference to non Class A LPTV: 2.000
 TW Census data selected 2000
 Data Base Selected
 /export/home/cdbs/pt_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 11-04-2010 Time: 17:16:14
 Record Selected for Analysis

K07QC USERRECORD-01 DRIGGS ID US
 Channel 07 ERP 0.3 kW HAAT 490. m RCAMSL 02985 m STRINGENT MASK
 Latitude 043-47-17 Longitude 0110-56-07
 Status APP Zone 2 Border Site number: 01
 Dir Antenna Make usr Model 000000000K07QC Beam tilt N Ref Azimuth 0.
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 1.0 km/side
 Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station
 Service Class = LD
 Maximum height/power limits not checked

Site number	1		
Azimuth	ERP	HAAT	48.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	0.001	468.7	14.3
45.0	0.007	203.4	18.4
90.0	0.007	138.8	14.9
135.0	0.001	33.0	4.0
180.0	0.033	333.4	31.0
225.0	0.249	889.7	65.6
270.0	0.222	1002.1	66.3
315.0	0.021	854.0	46.3

Contour Overlap to Proposed Station

Station
 K07QC 7 DRIGGS ID BLTTV19800723IF

Station inside contour of Digital LPTV station
 K07QC 7 DRIGGS ID USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations
 Proposed facility OK toward West Virginia quiet zone
 Proposed facility OK toward Table Mountain
 Proposed facility is beyond the Canadian coordination distance
 Proposed facility is beyond the Mexican coordination distance
 Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Proposed Station	Call	City/State	ARN
07	K07QC	DRIGGS	ID	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
07	KTVB	BOISE ID	414.4	LIC	BLCDT	-20090612AJF
	Proposal	causes no interference				
07	KTVB	BOISE ID	414.4	CP	BPCDT	-20090623ABE
	Proposal	causes no interference				
07	K07VI	CHALLIS ID	269.3	LIC	BLTTV	-19931025IB
	Proposal	causes no interference				
07	K07YU-D	DINGLE, ETC. ID	165.6	CP	BDCCDVL	-20061030ABQ
	Proposal	causes no interference				
07	K07SZ	ELK BEND ID	270.4	LIC	BLTTV	-19840904IA
	Proposal	causes no interference				
07	K07BK	GRACE, ETC. ID	142.3	LIC	BLTTV	-19821116IC
	Proposal	causes no interference				
07	NEW	INKOM ID	149.7	APP	BNPDTV	-20100921AEA
	Proposal	causes no interference				
07	K07NO	INKOM, ETC. ID	149.7	APP	BSTA	-20090408APA
	Proposal	causes no interference				
07	K07NO	INKOM, ETC. ID	150.2	LIC	BLTTV	-4589
	Proposal	causes no interference				
07	K07XM-D	MINK CREEK ID	182.4	LIC	BLDTV	-20090811ABX
	Proposal	causes no interference				
07	K07PV	SALMON, ETC. ID	251.1	LIC	BLTTV	-19781217IR
	Proposal	causes no interference				
07	K07KD	CHECKERBOARD, ETC. MT	312.8	LIC	BLTTV	-3855
	Proposed	station is beyond the site to nearest cell evaluation distance				
07	K07WJ	COLSTRIP MT	412.3	LIC	BLTTV	-19970407JB
	Proposed	station is beyond the site to nearest cell evaluation distance				
07	K07LE	GALLATIN RIVER, ETC. MT	169.1	LIC	BLTTV	-19820322IF
	Proposal	causes no interference				
07	K07OC	GRASSHOPPER, ETC. MT	253.3	LIC	BLTTV	-4922
	Proposal	causes no interference				
07	KRTV	GREAT FALLS MT	417.4	CP MOD	BMPCDT	-20060706ADV
	Proposed	station is beyond the site to nearest cell evaluation distance				
07	K07WC	HARLOWTON & SHAWMUT MT	298.2	LIC	BLTTV	-19950418IE
	Proposal	causes no interference				
07	K07VK	LENNEP & MARTINSDALE MT	300.6	LIC	BLTTV	-19931029IQ
	Proposal	causes no interference				
07	DK07TR	NO.CHEYENNE IND. RES MT	384.2		BLTTV	-19870825IM
	Proposal	causes no interference				
07	K07WP	ROUNDUP MT	351.0	LIC	BLTTV	-19960822IA
	Proposal	causes no interference				
07	K07EJ-D	TOWNSEND MT	280.9	LIC	BLDTV	-20090803ACI
	Proposal	causes no interference				
07	DK07CU	VIRGINIA CITY MT	184.1	APP	BSTA	-20081218AFB
	Proposal	causes no interference				
07	K07NU	WHITE SULPHUR SPRING MT	301.9	LIC	BLTTV	-19790720IB
	Proposal	causes no interference				
07	K07LT	COALVILLE UT	320.6	LIC	BLTTV	-4308
	Proposed	station is beyond the site to nearest cell evaluation distance				
07	K07NV	HANNA, ETC. UT	378.5	LIC	BLTTV	-4772
	Proposed	station is beyond the site to nearest cell evaluation distance				
07	K07US	SAMAK UT	351.8	LIC	BLTTV	-19900109IE
	Proposed	station is beyond the site to nearest cell evaluation distance				

07	K07VL	UTAHN UT	393.4	LIC	BLTTV	-19950405IA
		Proposed station is beyond the site to nearest cell evaluation distance				
07	K07CY	VERNAL, ETC. UT	409.1	LIC	BLTTV	-3805
		Proposed station is beyond the site to nearest cell evaluation distance				
07	K07HM	BIG PINEY, ETC. WY	158.8	LIC	BLTTV	-1123
		Proposal causes no interference				
07	K07QA	CLARK, ETC. WY	193.0	LIC	BLTTV	-19810318JQ
		Proposal causes no interference				
07	K07GG	CLARKS FORK, ETC. WY	160.6	LIC	BLTTV	-1263
		Proposal causes no interference				
07	K07NI	JEFFREY CITY WY	286.9	LIC	BLTTV	-19941223JI
		Proposal causes no interference				
07	KGWL-TV	LANDER WY	204.3	LIC	BLCDD	-20080915ABT
		Proposal causes no interference				
07	K07SU	MANDERSON, ETC. WY	244.8	LIC	BLTTV	-19830419IC
		Proposal causes no interference				
07	K07RS	NORTH FORK, ETC. WY	160.4	LIC	BLTTV	-19830314IE
		Proposal causes no interference				
07	K07UZ	RIVERTON, ETC. WY	218.2	LIC	BLTTV	-19940606IK
		Proposal causes no interference				
07	KJCW	SHERIDAN WY	318.1	CP	BPCDD	-20080618ACM
		Proposal causes no interference				
07	K09XK-D	SHERIDAN, ETC. WY	318.4	LIC	BLTTV	-19840116IA
		Proposal causes no interference				
07	DK07KS	SOUTH PARK WY	47.1	LIC	BLTTV	-3969
		Proposal causes no interference				
07	K07PB	THAYNE, ETC. WY	85.7	LIC	BLTTV	-19790108IK
		Proposal causes no interference				
07	K07RT	WOOD RIVER, ETC. WY	163.2	LIC	BLTTV	-19830314IH
		Proposal causes no interference				
08	KIFI-TV	IDAHO FALLS ID	142.5	CP	BPCDD	-20080222ADD
08	K08EZ-D	MINK CREEK ID	182.4	LIC	BLDDTV	-20090811ABY
		Proposed station is beyond the site to nearest cell evaluation distance				
08	KUSM-TV	BOZEMAN MT	209.6	LIC	BLEDD	-20050926ALC
		Proposed station is beyond the site to nearest cell evaluation distance				
08	K08JR	LAKETOWN, ETC. UT	213.3	LIC	BLTTV	-19810721IG
		Proposed station is beyond the site to nearest cell evaluation distance				
08	K06KT	CLARKS FORK, ETC. WY	160.3	APP	BMJPTTV	-20100129ADC
		Proposed station is beyond the site to nearest cell evaluation distance				
08	K06KT	CLARKS FORK, ETC. WY	160.3	APP	BSTA	-20100129ADF
		Proposed station is beyond the site to nearest cell evaluation distance				

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Analysis of Interference to Affected Station 42

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
08	KIFI-TV	IDAHO FALLS ID	BPCDT	-20080222ADD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
08	KUSM-TV	BOZEMAN MT	280.1	LIC	BLEDT	-20050926ALC
08	KCWC-DT	LANDER WY	336.8	LIC	BLEDT	-20070226AEY
07	K07QC	DRIGGS ID	142.5	APP	USERRECORD-01	

Total scenarios = 1

Result key:	1		
Scenario	1	Affected station	42

Before Analysis

Results for: 8A ID IDAHO FALLS BPCDT 20080222ADD CP

HAAT 464.0 m, ATV ERP 63.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	273400	46287.3
not affected by terrain losses	269416	41275.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 8A ID IDAHO FALLS BPCDT 20080222ADD CP

HAAT 464.0 m, ATV ERP 63.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	273400	46287.3
not affected by terrain losses	269416	41275.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	8	15.9
lost to ATV IX only	8	15.9
lost to all IX	8	15.9

Potential Interfering Stations Included in above Scenario 1

7A ID DRIGGS USERRECORD01 APP

Percent new IX = 0.0030%

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Analysis of Interference to Affected Station 48

Analysis of current record

Channel	Call	City/State	Application Ref. No.
07	K07QC	DRIGGS ID	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
07	K07BK	GRACE, ETC. ID	142.3	LIC	BLTTV -19821116IC
07	NEW	INKOM ID	149.7	APP	BNPDTV -20100921AEA
07	K07NO	INKOM, ETC. ID	149.7	APP	BSTA -20090408APA
07	K07NO	INKOM, ETC. ID	150.2	LIC	BLTTV -4589
07	K07LE	GALLATIN RIVER, ETC. MT	169.1	LIC	BLTTV -19820322IF
07	KGWL-TV	LANDER WY	204.3	LIC	BLCDT -20080915ABT
07	K07RS	NORTH FORK, ETC. WY	160.4	LIC	BLTTV -19830314IE
07	KJCW	SHERIDAN WY	318.1	CP	BPCDT -20080618ACM
07	DK07KS	SOUTH PARK WY	47.1	LIC	BLTTV -3969
07	K07PB	THAYNE, ETC. WY	85.7	LIC	BLTTV -19790108IK
07	K07RT	WOOD RIVER, ETC. WY	163.2	LIC	BLTTV -19830314IH

Total scenarios = 1

Result key:

2

Scenario 1 Affected station 48

Before Analysis

Results for: 7A ID DRIGGS			USERRECORD01	APP
HAAT 490.0 m, ATV ERP 0.3 kW				
	POPULATION	AREA (sq km)		
within Noise Limited Contour	10774	4753.7		
not affected by terrain losses	9835	3974.8		
lost to NTSC IX	0	0.0		
lost to additional IX by ATV	0	0.0		
lost to ATV IX only	0	0.0		
lost to all IX	0	0.0		

Potential Interfering Stations Included in above Scenario 1

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED