

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS TELECASTING OF THE GULF COAST, L.P., licensee of Low Power Television Station KVVV-LP, Channel 53 in Houston, Texas, in support of this application for modification of Construction Permit BDISDTL-20101130AOZ, which authorizes digital operation on Channel 15. The purpose of this application is to specify operation with a full service mask filter and a wide cardioid antenna pattern. No change in site location or antenna height is proposed herein.

It is proposed to mount a standard MCI directional antenna at the 483-meter level of an existing 601-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the proposed 51 dBu contour encompasses a significant portion of the Grade A contours that obtain from the licensed KVVV-LP facility. Operating parameters for the proposed facility are tabulated in Exhibit C. An interference study is provided in Exhibit D, and a power density calculation follows as Exhibit E.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. In addition, the FCC has issued Antenna Structure Registration Number 1064696 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KYLE T. FISHER

November 23, 2011

CONTOUR POPULATIONS

51 DBU : 4,178,955

41 DBU : 4,511,985



EXHIBIT B

EXHIBIT C

PROPOSED OPERATING PARAMETERS

**PROPOSED KVVV-LD
CHANNEL 15 – HOUSTON, TEXAS
[MODIFICATION OF BDISDTL-20101130AOZ]**

Transmitter Power Output:	4.7 kW
Transmission Line Efficiency:	42.1%
Antenna Power Gain – Toward Horizon:	7.6
Antenna Power Gain – Main Lobe:	7.6
Effective Radiated Power – Toward Horizon:	15.0 kw
Effective Radiated Power – Main Lobe:	15.0 kw
Transmitter Make and Model:	Type-accepted
Transmission Line Make and Model:	Andrew MACX-350
Size and Type:	3-1/8" rigid
Length:	1775 feet
Antenna Make and Model:	MCI 955212
Orientation	55° T
Beam Tilt	None
Effective Height Above Ground:	483 meters
Effective Height Above Mean Sea Level:	506.4 meters

EXHIBIT D-1

LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED KVVV-LD
CHANNEL 15 – HOUSTON, TEXAS
[MODIFICATION OF BDISDTL-20101130AOZ]

We conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed KVVV-LD) already is predicted to exist (also known as "masking").

It is important to note that the applicant has specified use of a "full service" out-of-channel emission mask in order to take advantage of the d/u ratios that pertain to adjacent-channel interference relationships. A revised LPTV DTV elevation pattern, based on the new FCC Rules, has been applied to proposed facility for the referenced studies. The results of these studies are provided in Exhibit D-2. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed Channel 15 facility complies with the interference requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

INTERFERENCE SUMMARY

PROPOSED KVVV-LD
CHANNEL 15 – HOUSTON, TEXAS
[MODIFICATION OF BDISDTL-20101130AOZ]

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
KUVM-LD BDISDTL-20101105AAZ	App.	Missouri City, TX	14	2,930,189	18,343	0.6
KAVU-DT BLCDDT-20060627ABY	Lic.	Victoria, TX	15	316,601	1,384	0.4

POWER DENSITY CALCULATION

PROPOSED KVVV-LD
CHANNEL 15 – HOUSTON, TEXAS
[MODIFICATION OF BDISDTL-20101130AOZ]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Houston facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kw, an antenna radiation center 483 meters above ground, and the vertical pattern of the MCI antenna, maximum power density two meters above ground of 0.000021 mw/cm^2 is calculated to occur 324 meters northeast of the base of the tower. Since this is less than 0.1 percent of the 0.32 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 15 (476-482 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.