

TECHNICAL EXHIBIT  
DIGITAL FLASH-CUT APPLICATION FOR  
TV TRANSLATOR STATION K38HR (FACILITY ID 59098)  
SANTA ROSA, NEW MEXICO  
CH 38 0.13 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station K38HR. Station K38HR is licensed to operate on analog channel 38 with a directional antenna maximum (visual) effective radiated power (ERP) of 0.631 kW and an antenna height above mean sea level (RCAMSL) of 1494 meters (BLTT-20040322AAK).

Proposed Facilities

This application proposes digital operation on the current channel (38), at the current transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 34-57-20 N, 104-40-53 W. A Scala (SCA), model 4DR-8-2HW, oriented at 180 degrees True, with a maximum ERP of 0.13 kW and antenna RCAMSL of 1494 meters is proposed. The existing 46.9 meter structure (154 feet) is registered with the FCC (ASRN: 1201958).

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV,

LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 2 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

#### Radiofrequency Electromagnetic Field Exposure

The proposed K38HR 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 32 meters above ground level. The proposed maximum ERP is 0.13 kW. Based on a conservative downward relative field value of 0.5, the calculated power density at a point 2 meters (6.6 feet) above ground level is  $0.012 \text{ mW/cm}^2$ , which is less than 5% of the FCC's recommended limit of  $0.41 \text{ mW/cm}^2$  for channel 38 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. 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.

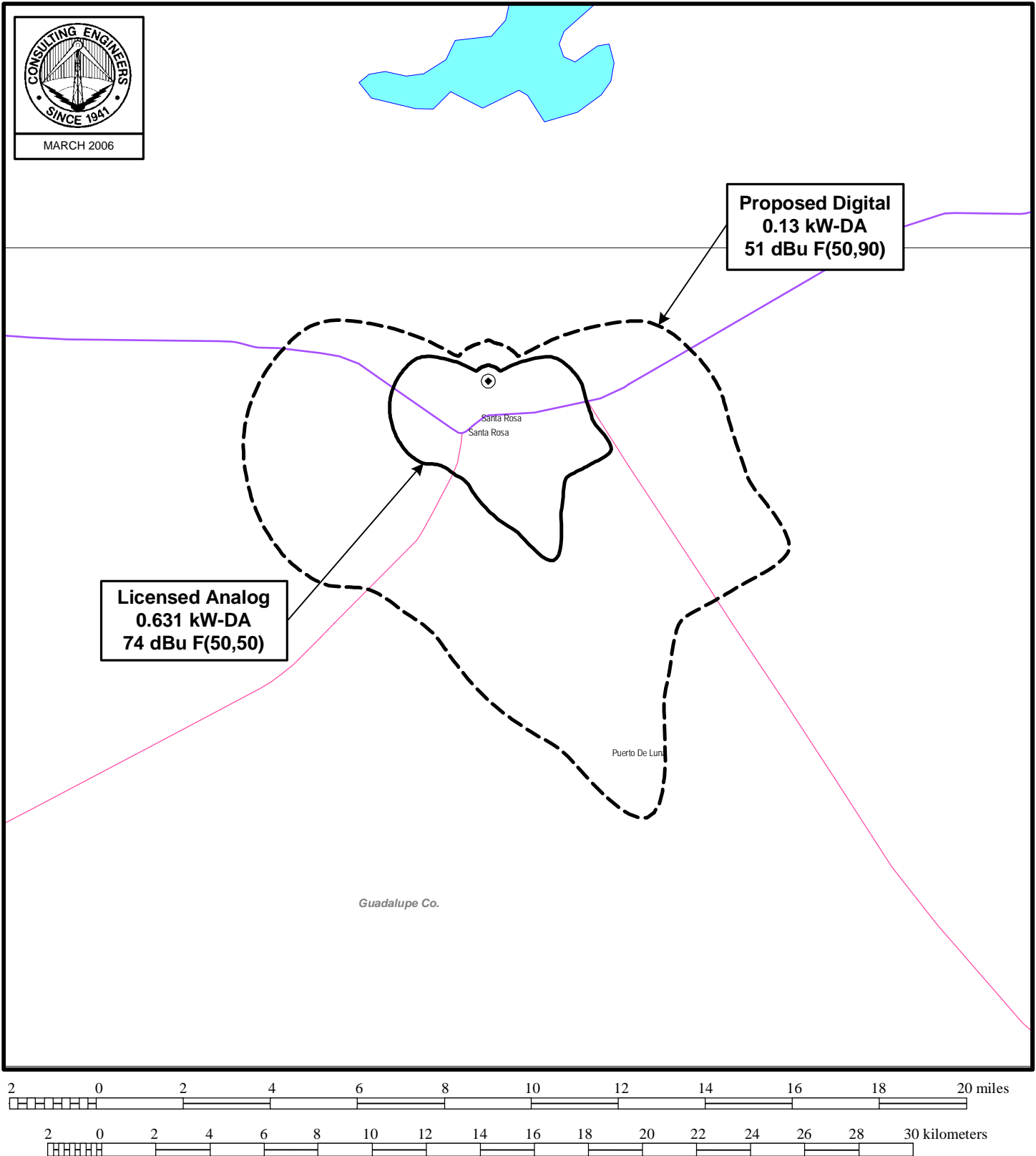


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Figure 1



## PREDICTED COVERAGE CONTOURS

STATION K38HR

SANTA ROSA, NEW MEXICO

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