

APPLICATION FOR MINOR
MODIFICATION TO A DTV BROADCAST
STATION CONSTRUCTION PERMIT
FCC FILE NO.: BPCDT-19991012ABD FOR A
POST DTV TRANSITION FACILITY
KMVT-DT
NEUHOFF FAMILY LIMITED PARTNERSHIP
TWIN FALLS, ID

KESSLER & GEHMAN ASSOCIATES, INC.
TELECOMMUNICATIONS CONSULTING ENGINEERS

20080311

Prepared by Ryan Wilhour

KGGA

507 N.W. 60th Street, Suite C
Gainesville, Florida 32607

KESSLER AND GEHMAN ASSOCIATES, INC.

ENGINEERING STATEMENT OF RYAN WILHOUR OF THE FIRM KESSLER AND
GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS IN CONNECTION WITH
AN APPLICATION FOR MINOR MODIFICATION TO A DTV BROADCAST STATION
CONSTRUCTION PERMIT FCC FILE NUMBER BPCDT-19991012ABD
FOR A POST DTV TRANSITION FACILITY
KMVT-DT
NEUHOFF FAMILY LIMITED PARTNERSHIP
TWIN FALLS, ID

PROCLAMATION OF ENGINEER

I, Ryan Wilhour, am an associate of Kessler and Gehman Associates, Inc. with offices in Gainesville, Florida. I am a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering.

This firm has been employed by Neuhoff Family Limited Partnership “NFLP” to prepare engineering studies and a minor modification application to FCC file number BPCDT-19991012ABD to conform to the post DTV transition table of allotments.

ATTACHED FIGURES

In carrying out the engineering studies the following attached figures were prepared:

1. Engineering Specifications (Exhibit E1)
2. Elevation drawing of the antenna system (Exhibit E2)
3. USGS 7.5 minute topographic quadrangle showing the proposed transmitter location and the coordinate lines (Exhibit E3)
4. Map showing the predicted DTV coverage contour relative to the allotted coverage contour. (Exhibit E4)
5. Allocation Analysis (Exhibit E5)
6. Environmental Impact/ RFR Hazard Analysis (Exhibit E6)

NARRATIVE

NFLP, licensee of KMVT-TV, Channel 11, and KMVT-DT, Channel 16, Twin Falls, Idaho, was awarded Channel 11 as its post-transition digital channel. NFLP proposes to operate its post-transition Channel 11 digital facility using the existing analog Channel 11 antenna and support structure. NFLP proposes to hot switch from its existing analog facility to the herein proposed digital facility on or before February 17, 2009 and shut down digital channel 16 just prior to or simultaneously with the activation of digital channel 11.

It is herein proposed to modify the above referenced construction permit to facilities which match the allotted site, channel, effective antenna height, and a best match for the combination of antenna pattern and ERP. The Commission designed the allotted coverage area based upon a theoretical antenna pattern; the proposed omni antenna is a close matched to the theoretical pattern. The proposed ERP is 2.5kW less than the allotted 16.4 kW facility to compensate for the pattern differences. Exhibit E5A and E5B demonstrate that the proposed ERP and contour distance does not exceed the allotted ERP or contour distance in any direction. Exhibit E4 demonstrates that the allotted and proposed facilities cover 157,587 and 157,528 people respectively which is a 99.96% population match according to 2000 Census data. Interference studies have not been prepared since the proposed facility will not cause interference to the post transition market beyond what the allotted facility would cause.

NFLP respectfully requests expedited treatment pursuant to Paragraph 140 of the December 31, 2007, Report and Order in MB Docket No. 07-91, FCC 07-228. This application is eligible for expedited processing because it demonstrates all three of the following requirements:

1. The application does not seek to expand the station's facilities beyond its final post-transition DTV Table Appendix B facilities;
2. The application specifies facilities that match or closely approximate the DTV Table Appendix B facilities (*i.e.*, the facilities are no more than five percent smaller than the facility specified in Appendix B with respect to predicted population) and;
3. The application is filed within 45 days of the effective date of the Report and Order.

ENVIRONMENTAL IMPACT/RFR HAZARD ANALYSIS

An analysis has been made of the human exposure to RFR using the calculation methodology described in OET Bulletin 65, Edition, 97-01. Exhibit E6 is a RFR study demonstrating compliance within 5% of the most restrictive permissible exposure at any location 2 meters above the ground. Exhibit E6 calculations were made using a frequency of 198 MHz, which is the lower edge of the proposed channel. To account for ground reflections, a coefficient of 1.6 was included in the calculations.

Pursuant to OET Bulletin 65 concerning multiple-user transmitter sites only those licensees whose transmitters produce power density levels greater than 5.0% of the exposure limit are considered significant contributors to RFR. Since the proposed operation is well within 5% of the most permissible exposure at any location 2 meters above the ground, it is not considered a significant contributor to RFR exposure. Thus, contributions to exposure from

KESSLER AND GEHMAN ASSOCIATES, INC.

other RF sources in the vicinity of KMVT-DT were not taken into account. The instant proposal complies with the FCC limits for human exposure to RF radiation and thus is excluded from further environmental processing.

DECLARATION OF ENGINEER

The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge. Executed on March 11, 2008.



Ryan Wilhour

A handwritten signature in blue ink that reads 'Ryan Wilhour'. The signature is written in a cursive, flowing style.

Consulting Engineer

KMVT-DT

TWIN FALLS, IDAHO

ENGINEERING SPECIFICATIONS

A. Transmitter Site (NAD 27)

North Latitude 42 ° 43 ' 47 "
West Longitude 114 ° 24 ' 52 "

Street Address or Location

On Flat Top Butte, 5 Miles East Of
Jerome, ID

B. Proposed Facility
DTV Channel

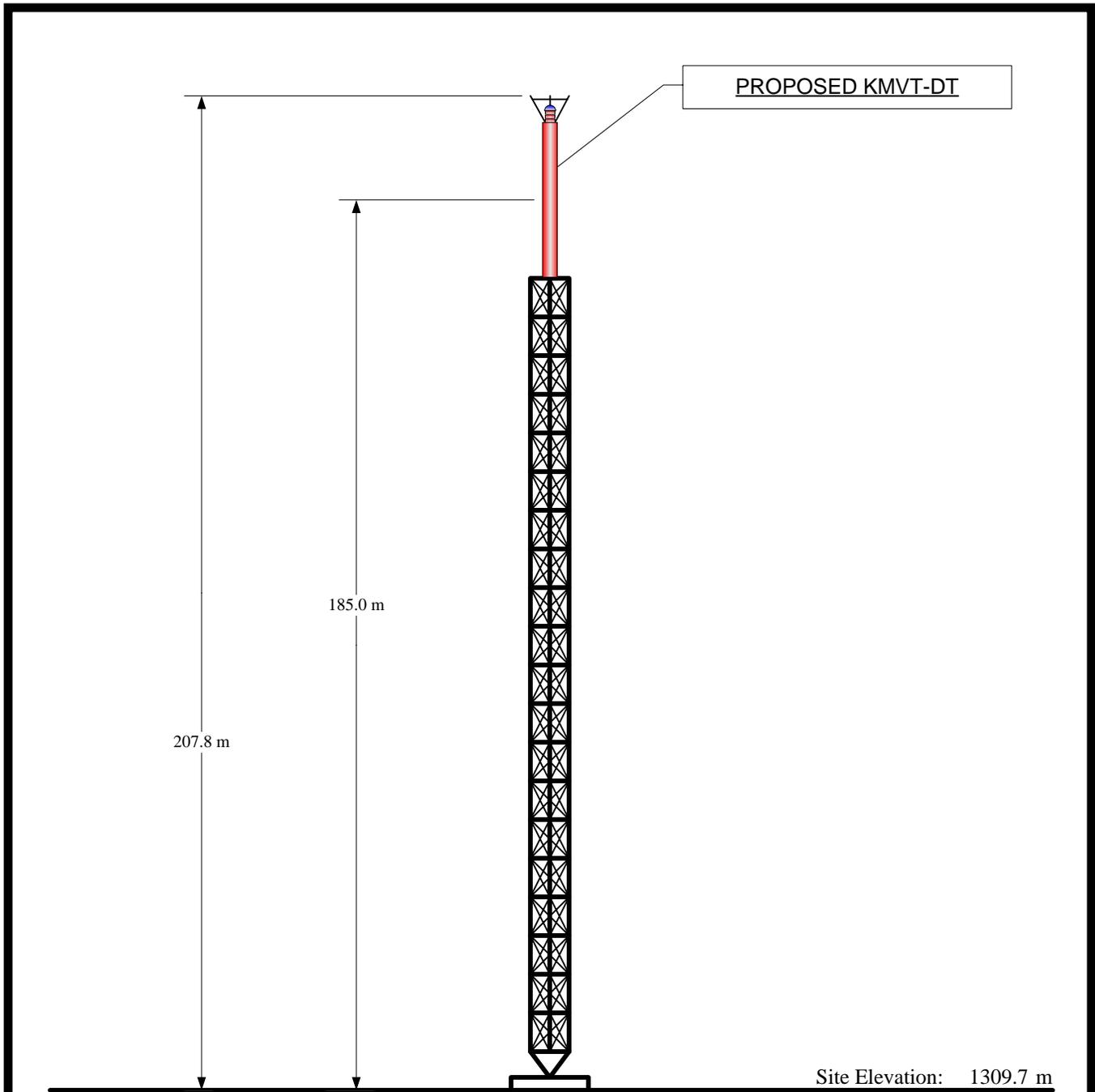
Number 11
Frequency 198 - 204 MHz

C. Elevations

Height of Site Above Mean Sea Level (AMSL) 1309.7 m
Overall Height of Structure Above Ground 207.8 m
(including all appurtenances)
Overall Height of Structure Above Mean Sea Level 1517.5 m
(including all appurtenances)
Effective Height of Antenna Above Ground 185.0 m
Effective Height of Antenna Above Average Terrain 323.0 m
Effective Height of Antenna Above Mean Sea Level 1497.7 m

D. Antenna Parameters – Horizontal Polarization

Maximum Effective Radiated Power 11.43 dBk
In Beam Maximum 13.9 kW



Overall Height AGL:	207.8 m
Overall Height AMSL:	1517.5 m
Radiation Center AGL:	185.0 m
Radiation Center AMSL:	1494.7 m
Radiation Center HAAT:	323 m
Average Terrain:	1172 m

NAD 27 Coordinates:

N. Latitude: 42° 43' 47"

W. Longitude: 114° 24' 52"

FCC Tower Registration Number: 1040035

FAA Aeronautical Study Number: 98-ANM-0006-OE

Site Elevation: 1309.7 m

NOTE: NOT TO SCALE

KESSLER & GEHMAN

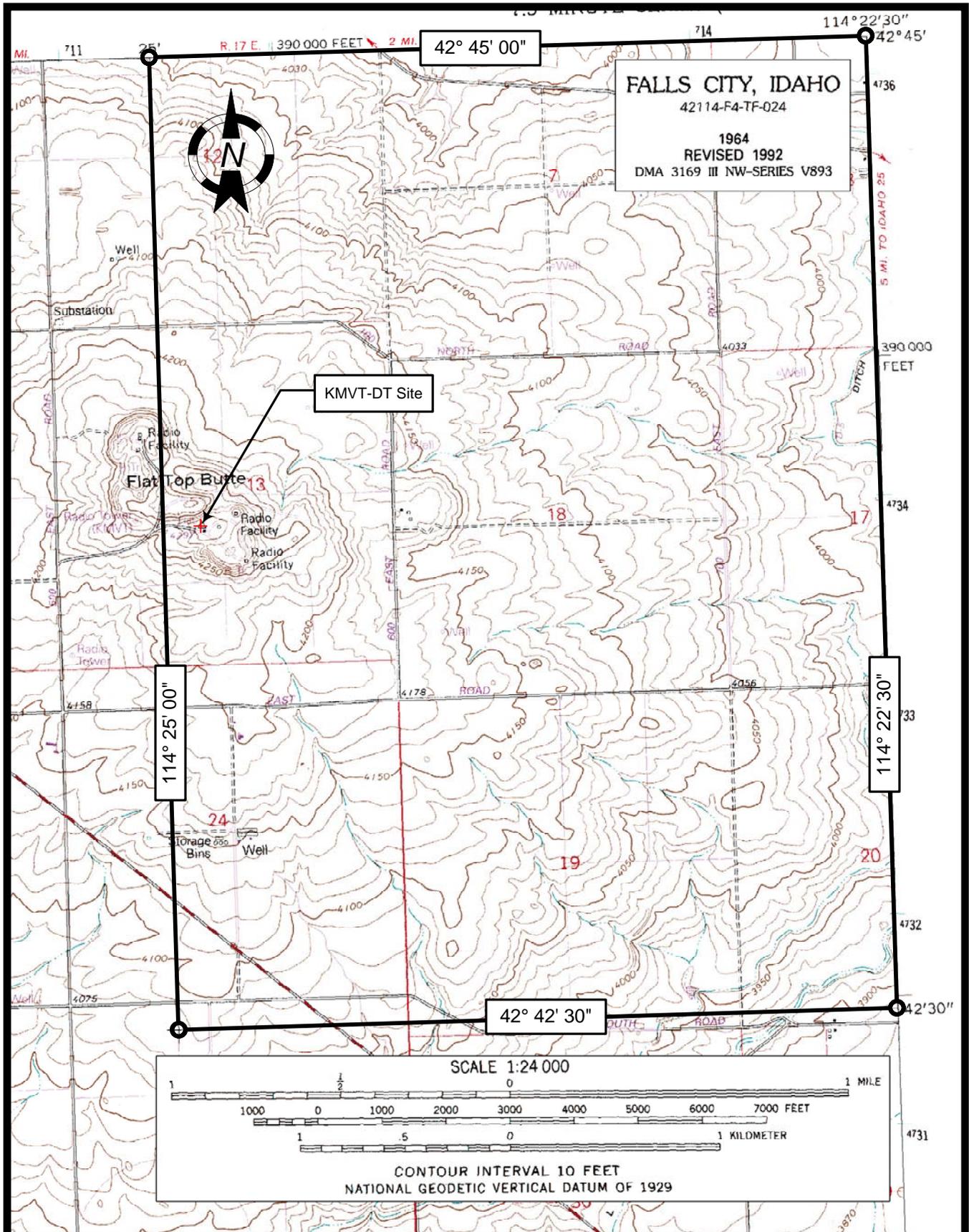
TELECOMMUNICATIONS CONSULTING ENGINEERS
507 N.W. 60th Street, Suite C
Gainesville, Florida 32607

KMVT-DT

TWIN FALLS, ID

20080311

EXHIBIT E2



KESSLER & GEHMAN

TELECOMMUNICATIONS CONSULTING ENGINEERS
 507 N.W. 60th Street, Suite C
 Gainesville, Florida 32607

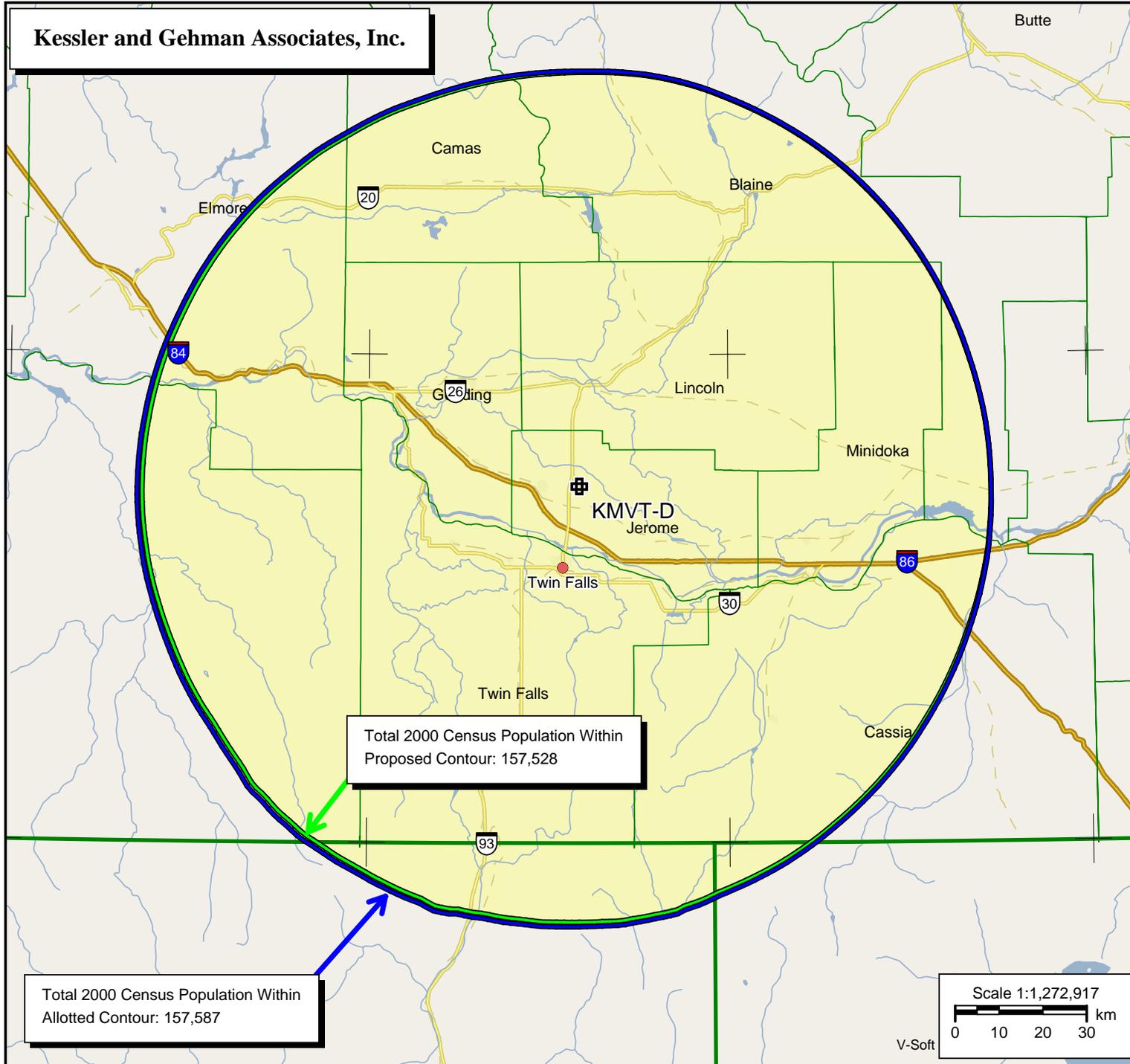
KVMT-DT

TWIN FALLS, ID

20080311

EXHIBIT E3

Kessler and Gehman Associates, Inc.



KMVT-D - Green
Proposed Facility
Latitude: 42-43-47 N
Longitude: 114-24-52 W
ERP: 13.90 kW
Channel: 11
AMSL Height: 1494.73 m
HAAT: 323.0 m
Horiz. Pattern: Omni

KMVT-D - Blue
App. B Allotted
Latitude: 42-43-48 N
Longitude: 114-24-52 W
ERP: 16.40 kW
Channel: 11
AMSL Height: 1494.73 m
HAAT: 323.0 m
Horiz. Pattern: Directional

Total 2000 Census Population Within
Proposed Contour: 157,528

Total 2000 Census Population Within
Allotted Contour: 157,587



Exhibit E4

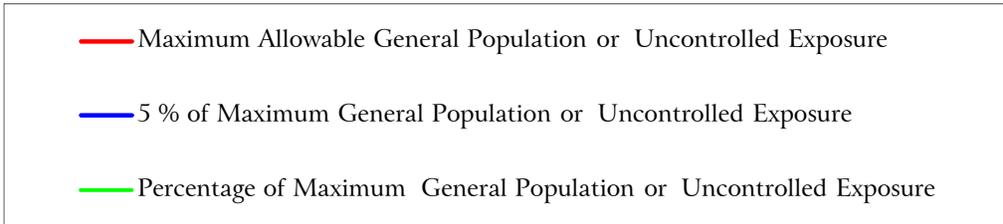
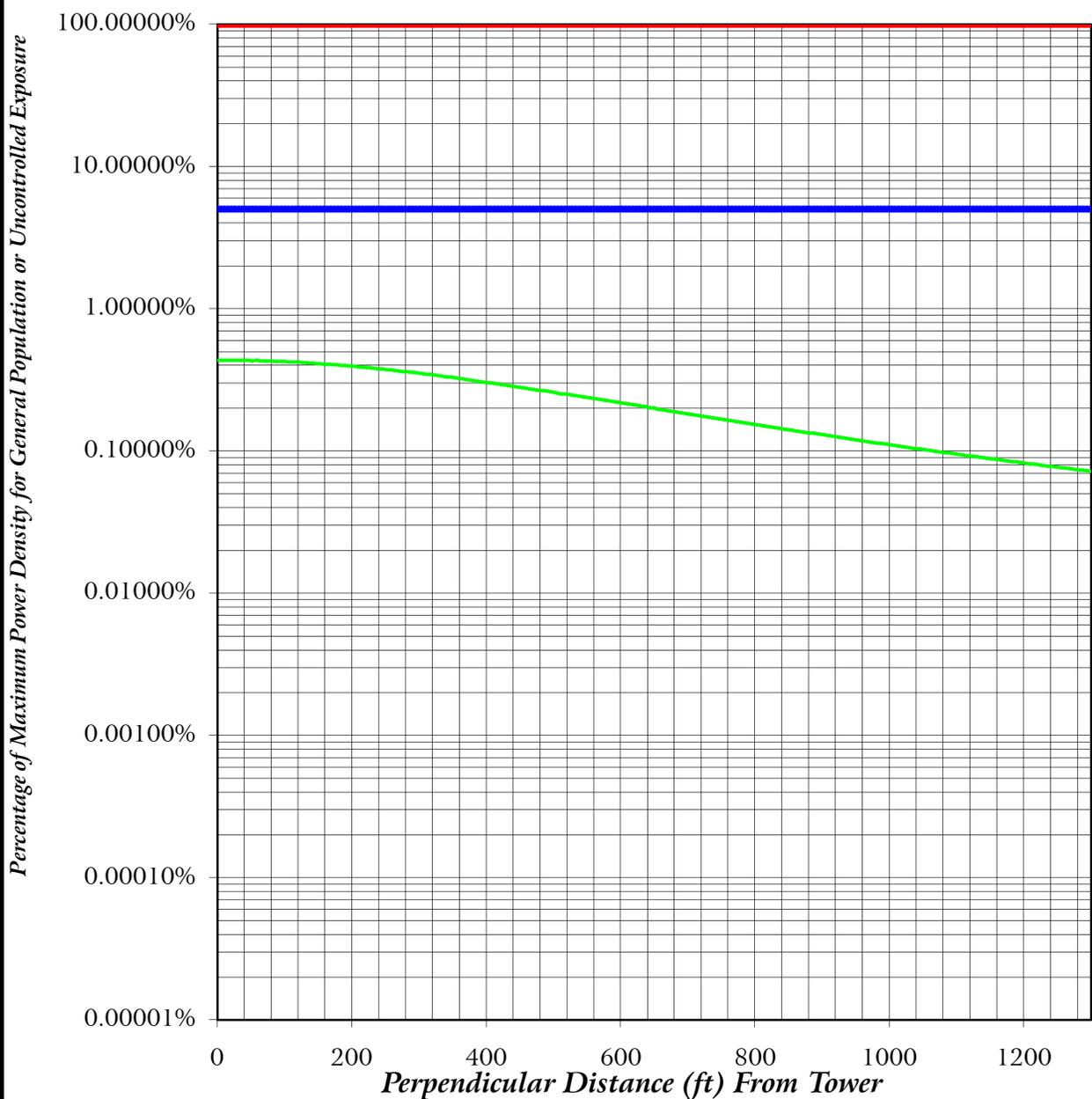
KMVT-DT
TWIN FALLS, IDAHO

AZIMUTH	<u>ALLOTTED</u> ERP (dBk)	<u>PROPOSED</u> ERP (dBK)	<u>Meets ERP Margin</u> BY (dB)
N000°E	11.592	11.430	0.162
N010°E	11.583	11.430	0.153
N020°E	11.574	11.430	0.144
N030°E	11.565	11.430	0.135
N040°E	11.574	11.430	0.144
N050°E	11.555	11.430	0.125
N060°E	11.527	11.430	0.097
N070°E	11.499	11.430	0.069
N080°E	11.471	11.430	0.041
N090°E	11.443	11.430	0.013
N100°E	11.546	11.430	0.116
N110°E	11.629	11.430	0.199
N120°E	11.712	11.430	0.282
N130°E	11.758	11.430	0.327
N140°E	11.821	11.430	0.391
N150°E	11.857	11.430	0.427
N160°E	11.893	11.430	0.463
N170°E	11.937	11.430	0.507
N180°E	11.991	11.430	0.561
N190°E	12.017	11.430	0.587
N200°E	12.061	11.430	0.631
N210°E	12.087	11.430	0.657
N220°E	12.131	11.430	0.701
N230°E	12.140	11.430	0.710
N240°E	12.114	11.430	0.683
N250°E	12.087	11.430	0.657
N260°E	12.061	11.430	0.631
N270°E	12.035	11.430	0.605
N280°E	11.982	11.430	0.552
N290°E	11.937	11.430	0.507
N300°E	11.911	11.430	0.481
N310°E	11.875	11.430	0.445
N320°E	11.839	11.430	0.409
N330°E	11.803	11.430	0.373
N340°E	11.758	11.430	0.327
N350°E	11.685	11.430	0.254

KMVT-DT
TWIN FALLS, IDAHO

<u>AZIMUTH</u>	<u>ALLOTTED</u> Distance to Contour	<u>PROPOSED</u> Distance to Contour	Meets Contour Threshold By (km)
N000°E	94.5 km	94.2 km	0.3
N010°E	95 km	94.7 km	0.3
N020°E	94.9 km	94.6 km	0.3
N030°E	94.7 km	94.4 km	0.3
N040°E	94.6 km	94.3 km	0.3
N050°E	94.3 km	94.1 km	0.2
N060°E	94 km	93.8 km	0.2
N070°E	93.7 km	93.5 km	0.2
N080°E	93.8 km	93.7 km	0.1
N090°E	93.8 km	93.8 km	0.0
N100°E	94.3 km	94.1 km	0.2
N110°E	94.6 km	94.2 km	0.4
N120°E	95.2 km	94.7 km	0.5
N130°E	96 km	95.4 km	0.6
N140°E	96.7 km	96 km	0.7
N150°E	97.7 km	96.9 km	0.8
N160°E	98.4 km	97.5 km	0.9
N170°E	99.9 km	99 km	0.9
N180°E	100.2 km	99.2 km	1.0
N190°E	100.7 km	99.6 km	1.1
N200°E	101.9 km	100.7 km	1.2
N210°E	101.6 km	100.4 km	1.2
N220°E	102.1 km	100.8 km	1.3
N230°E	101.2 km	99.9 km	1.3
N240°E	100.5 km	99.2 km	1.3
N250°E	100.5 km	99.3 km	1.2
N260°E	100.7 km	99.6 km	1.1
N270°E	100.7 km	99.6 km	1.1
N280°E	100.3 km	99.3 km	1.0
N290°E	99.7 km	98.8 km	0.9
N300°E	99.1 km	98.2 km	0.9
N310°E	98.3 km	97.5 km	0.8
N320°E	97.2 km	96.5 km	0.7
N330°E	96.1 km	95.5 km	0.6
N340°E	95.1 km	94.6 km	0.5
N350°E	94.7 km	94.3 km	0.4

FAR FIELD EXPOSURE TO RF EMISSIONS



METHODOLOGY AND EXPLANATION OF
ENVIRONMENTAL IMPACT / RADIO FREQUENCY RADIATION
HAZARD ANALYSIS

A theoretical analysis has been conducted of the human exposure to radio frequency radiation (“RFR”) using the calculation methodology described in *OET Bulletin 65, Edition 97-01*. The RFR analysis is conducted pursuant to the following methodology:

Terrain¹ extraction is compiled from the proposed tower site to radial lengths of 0.25 miles in 0.001 mile increments for 360 radials. The power density is calculated for each terrain point at 6 feet above ground level using the elevation and azimuth pattern of the proposed broadcast antenna. The power density calculations are conducted using the lower edge of the proposed channel frequency. To account for ground reflections, a coefficient of 1.6 was included in the calculation.

The resulting cylindrical polar analysis is then summarized into a coordinate plane graph using the following methodology:

Starting from the origin the maximum calculated RFR value is determined among the 360 degree radials for each 0.001 mile increment, the value is then converted into a percentage of the maximum allowable general population or uncontrolled exposure and plotted as a function of perpendicular distance from the tower.

¹ Terrain extraction is based upon a 3 arc second point spacing terrain database.