TECHNICAL EXHIBIT
FOR A NEW DIGITAL REPLACEMENT TRANSLATOR
FOR STATION KTLM(DT)
DONNA, TEXAS
CH 43 15 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an application for a new digital replacement translator for digital television (DTV) station KTLM at Rio Grande City, Texas. Station KTLM is authorized to operate on digital channel 40, with a non-directional antenna effective radiated power (ERP) of 365 kilowatts (kW) and an antenna radiation center height above average terrain (HAAT) of 577 meters.[1]

The applicant is the licensee of a full-service television station that experienced a loss of service affecting former analog viewers located east of Rio Grande City after it transitioned to its final, post-transition DTV facility. KTLM has received numerous complaints from viewers in the area to be covered by the proposed translator of difficulties with reception of the station's post-transition digital signal. Figure 1 is data collected from the University of Texas-Pan American, tabulating the complaint call data received for stations in the market. This independent call data shows that KTLM is clearly the station receiving most complaints. The applicant proposes to construct a replacement digital translator facility to help alleviate these digital reception issues.

Proposed Facilities

This application proposes digital operation on channel 43 with a directional antenna maximum ERP of 15 kW and an antenna radiation center height above mean sea level (RCAMSL) of 92 meters (see Figure 1). The proposed coordinates are (NAD27):

26° 14' 03" North Latitude
98° 01' 59" West Longitude

[1] See BMPCDT-20090304ABG, BLCDT-20090617AAK

The site is 69 kilometers southeast of the main DTV site. The antenna structure registration number is 1052964. Figure 2 shows the proposed antenna azimuthal pattern.

Figure 3 is a map showing the licensed KTLM(DT) 41 dBu (digital) coverage contour as well as the proposed digital translator 51 dBu contour. The contour of the requested facility will not extend beyond the service area of the applicant's former. The applicant accordingly is eligible to receive a permit to construct the requested facility.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending DTV, Class A, digital Class A, LPTV displacement applications or any licensed or authorized LPTV or translator stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a standard 1 kilometer grid and 1 kilometer terrain distance increment, and 2000 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments).

The applicant recognizes the proposal is secondary to other 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.

Mexican Coordination

The proposed site is 19 kilometers from the U.S./Mexican border. The proposal appears to be short spaced with two Mexican assignments:

CH 42, Rio Bravo, Tamaulipas, Mexico (analog repeater for XHRBT), *short by 19 km*
CH 57, Matamoros, Tamaulipas, Mexico, *short by 28 km*

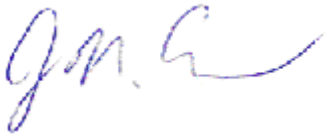
Interference studies were made with respect to these two stations. As facilities were not known, they were assumed to be maximized. No predicted interference was found to be outside of the U.S. Coordination with Cofetel (Mexico) is respectfully requested.

Radiofrequency Electromagnetic Field Exposure

The proposed digital 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 68.3 meters above ground level. The proposed maximum ERP is 15 kW. Based on a conservative downward relative field of 0.5, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 2% of the FCC's recommended limit of 0.43 mW/cm^2 for channel 43 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 station is 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.



Jonathan N. Edwards

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201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

April 29, 2010

Figure 1

Calls to the UTPA Call Center regarding **reception problems** for a **specific station**

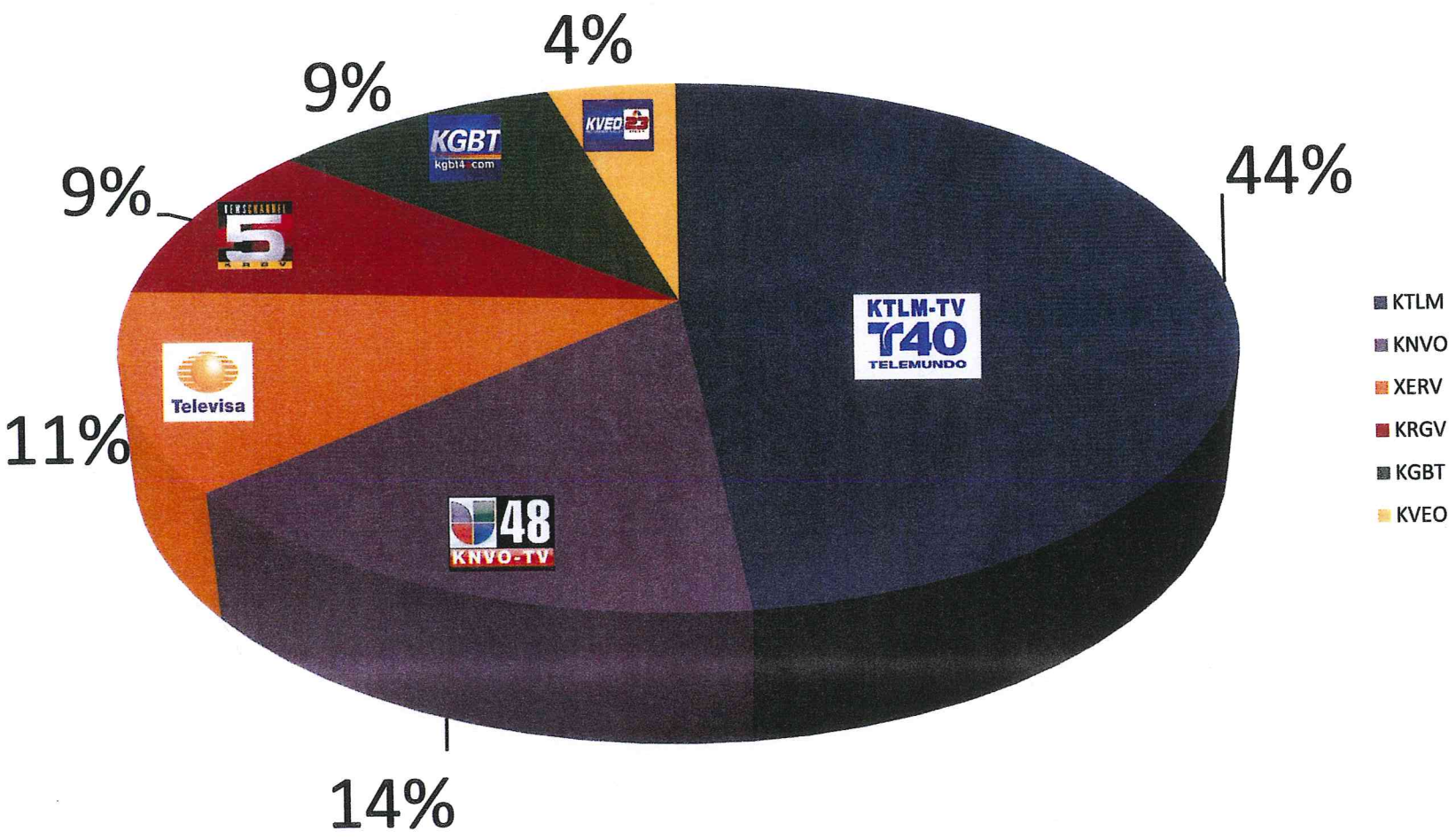

Figure 1

Digital Transition Service Center: Incoming Phone Calls Final Report

The University of Texas-Pan American

June 12-16, 2009

Coupons					
	caller application completed on line				1045
	caller application rejected - already redeemed				122
	call application rejected - other reason				81
				Sub-T	1248
				Percent	29%
Converter Box					
	resolved converter box problem				453
	forwarded to 2-1-1 for fire fighter assistance				55
	provided number for free local installation				411
				Sub-T	919
				Percent	22%
Reception Problems					
	resolved reception problem				563
	need new antenna, or multiband antenna				143
	Suggested relocating antenna to attic or rooftop				269
	took information for station to return call				31
	Gave number of local professional installation of antenna				233
				Sub-T	1239
				Percent	29%
	Cannot receive this station				
	Call Letter	Network	Analog	Digital	
	KGBT	CBS	Ch 4	31	8.8% 57
	KVEO	NBC	Ch 23	24	4.0% 26
	KTLM	Telemundo	Ch 40	40	44.5% 287
	KLUJ	Ind	Ch 44	34	2.8% 18
	KNVO	Univision	Ch 48	49	12.2% 79
	KMBH	PBS	Ch 60	38	3.1% 20
	KRGV	ABC	Ch 5	13	9.6% 62
	XHRIO	FOX	Ch 2	49.3	3.4% 22
	XERV	Televisa	Ch 9	17	11.5% 74
				Sub-T	645
				Percent	15%
OTHER					
				Sub-T	187
				Percent	4%
				Total	4238

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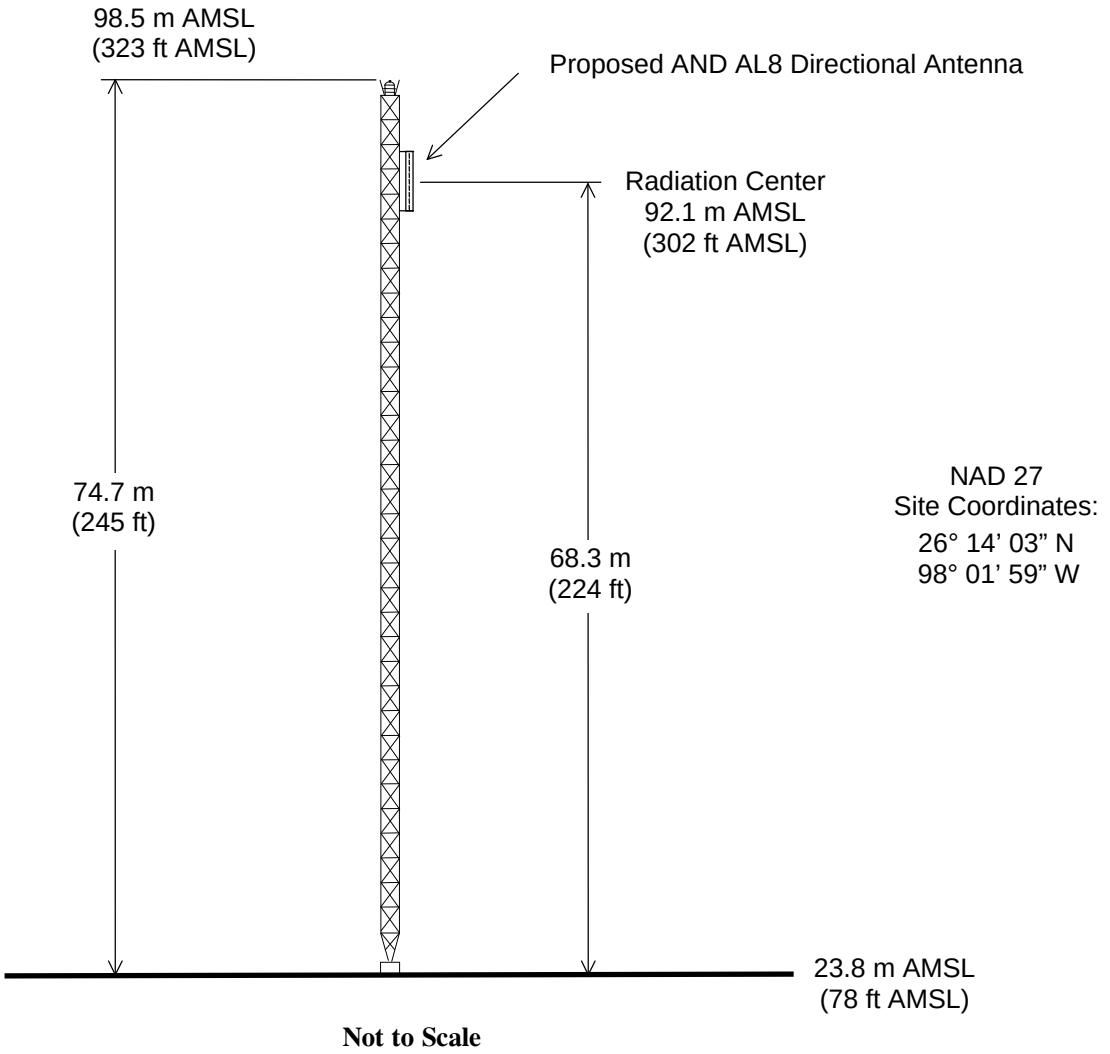


Not to Scale

ANTENNA AND SUPPORTING STRUCTURE

STATION KTLM-LD

DONNA, TEXAS

CH 43 15 KW (MAX-DA)

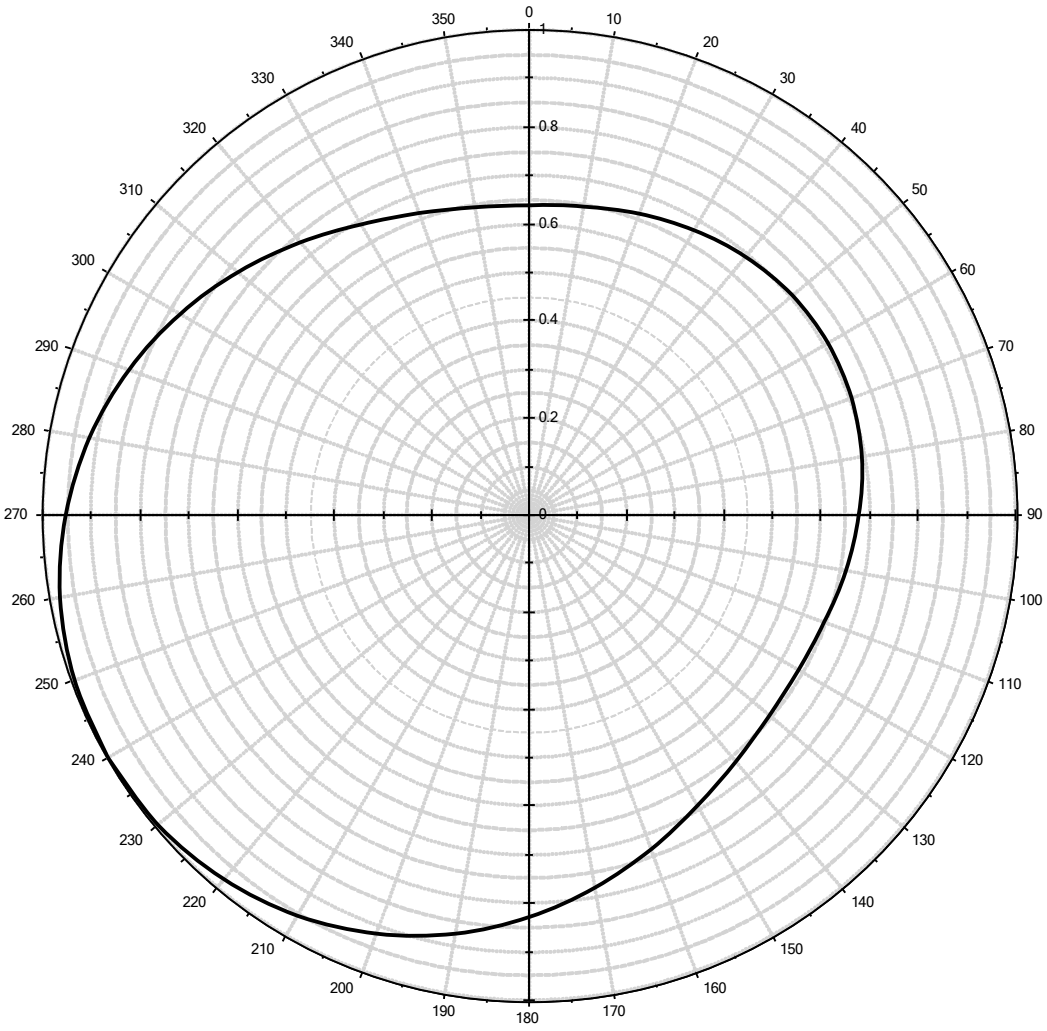
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

DA Inquiry

du Treil, Lundin, & Rackley, Inc., Sarasota, Florida

Antenna ID: 16352

Andrew AL8



Note: display reflects rotation of 240.00°

0°	1.000	***60°***	0.829	***120°***	0.639	***180°***	0.709	***240°***	0.639	***300°***	0.829
10°	0.995	***70°***	0.780	***130°***	0.646	***190°***	0.705	***250°***	0.644	***310°***	0.876
20°	0.979	***80°***	0.733	***140°***	0.661	***200°***	0.694	***260°***	0.662	***320°***	0.918
30°	0.953	***90°***	0.692	***150°***	0.678	***210°***	0.678	***270°***	0.692	***330°***	0.953
40°	0.918	***100°***	0.662	***160°***	0.694	***220°***	0.661	***280°***	0.733	***340°***	0.979
50°	0.876	***110°***	0.644	***170°***	0.705	***230°***	0.646	***290°***	0.780	***350°***	0.995

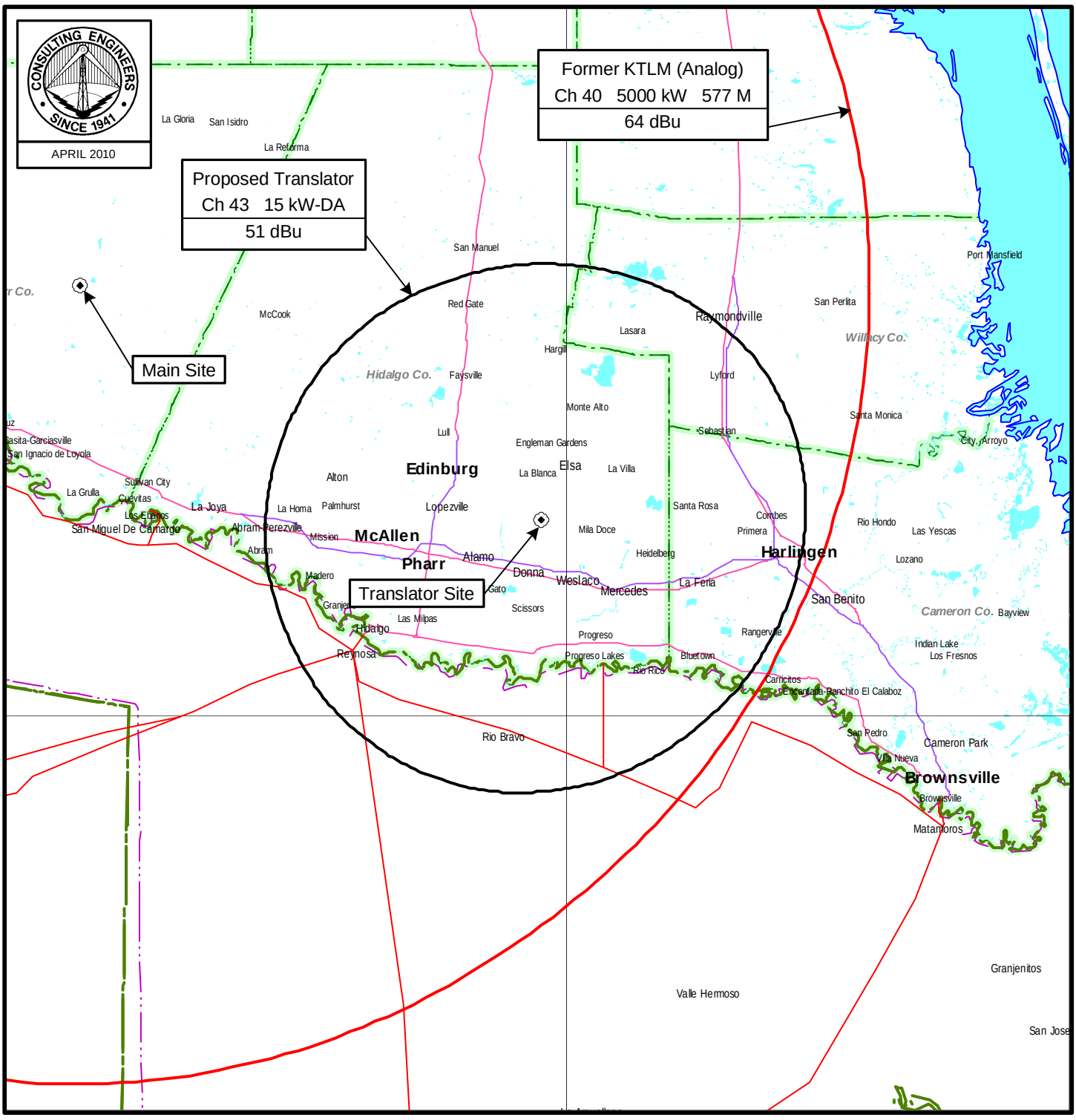
Antenna Make: AND

Antenna Model: AL8

Standard Pattern: Y

Last Change Date:

Figure 4



PREDICTED COVERAGE CONTOURS

STATION KTLM-LD

DONNA, TEXAS

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du Treil, Lundin & Rackley, Inc Sarasota, Florida