

ENGINEERING STATEMENT  
RE DTV BROADCAST ENGINEERING DATA  
APPLICATION FOR MODIFICATION OF  
CONSTRUCTION PERMIT  
(FCC FILE NO. BPCDT-20080317AFI)  
ON BEHALF OF  
GRIFFIN TULSA II LICENSING, L.L.C.  
KQCW-DT, MUSKOGEE, OKLAHOMA  
CHANNEL 20 1000 KW ND ERP 498 METERS HAAT  
JUNE 2008

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

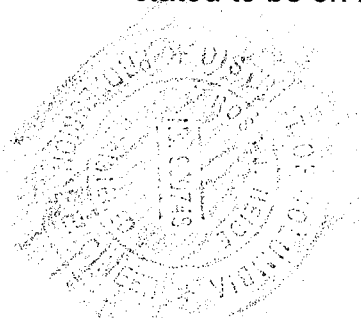
City of Washington            )  
  ) ss  
District of Columbia         )

Ross J. Heide, being duly sworn upon his oath, deposes and states that:

He is a graduate of the Massachusetts Institute of Technology in Operations Research and Management Science, a Registered Professional Engineer in the District of Columbia, and employed by Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



*Ross J. Heide*

Ross J. Heide  
District of Columbia  
Professional Engineer  
Registration No. PE900748

Subscribed and sworn to before me this 9<sup>th</sup> day of July, 2008.



*Carolyn L. Lyons*

Notary Public

My Commission Expires: 2/28/2013

This engineering statement has been prepared in support of an application for modification of the outstanding construction permit (FCC File No. BPCDT-20080317AFI) on behalf of Griffin Tulsa II Licensing, L.L.C., licensee of KQCW-TV, Muskogee, Oklahoma. The purpose of this application is to relocate to a tower in the direction to which most viewers orient their antenna. KQCW-DT herein proposes to use post-transition facilities of 1000 kW non-directional effective radiated power ("ERP") from a new side-mounted antenna at 498 meters height above average terrain ("HAAT").

KQCW-TV is licensed to operate on NTSC television Channel 19 with a maximum visual ERP of 5000 kW and a HAAT of 252 meters. KQCW-DT has been allocated DTV Channel 20 with facilities of 244.7 kW directional ERP and HAAT of 252 meters in the final DTV Table of Allotments.<sup>1</sup> KQCW-DT has been authorized in its outstanding construction permit (FCC File No. BPCDT-20080317AFI) to construct DTV facilities of 550 kW (non-directional antenna) at a HAAT of 252 meters. KQCW-DT proposes herein to modify these authorized DTV facilities to operate with 1000 kW (non-directional) at HAAT of 498 meters.

Lifting of the Application Filing Freeze June 20, 2008

An allocation study from the proposed site has been performed as the predicted F(50,90) 41 dBu contour of the proposed DTV facilities at the currently authorized site are not expected to be entirely within the predicted F(50,90) 41 dBu contour of the KQCW-DT facility in the final DTV

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<sup>1</sup>“In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service”, MM Docket 87-268, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order (FCC 08-72) Released March 6, 2008.

Table of Allotments in the Memorandum Opinion and Order. However, the proposed operation does not exceed the 0.5% additional interference standard to any potentially affected station in the final DTV Table of Allotments in the Memorandum Opinion and Order (see Table I).

The proposed operation is predicted to serve approximately 1,303,600 persons in an area of 41,570 square kilometers, which is approximately 130% of the population served by the KQCW-DT facility in the final DTV Table of Allotments in the Memorandum Opinion and Order and encompasses the predicted Grade B contour of the licensed analog operation of KQCW-TV.

There are no AM stations located within 32 km at the proposed KQCW tower site. There are three NCE-FM stations and four other post-transition full-service DTV stations within 500 meters of the proposed tower site. These stations are listed in table III.

The DTV antenna will be side-mounted on an existing tower having a total overall structure height above ground of 560.5 meters (1838.9 feet). The proposed transmitter site is located at 101st Street and 273<sup>rd</sup> Avenue in Oneta, Oklahoma. The registration number for the existing tower is 1011355.

Since there will be no change in overall height, FAA airspace approval is not required. Exhibit E-1 is a vertical sketch of the existing tower and the proposed transmitting antenna.

The geographic coordinates of the proposed site are as follows:

North Latitude: 36° 01' 15"

West Longitude: 95° 40' 32"

NAD-27

Equipment Data

Antenna: Dielectric, Model TFU-28DSC 03 (or equivalent) antenna with 0.50° electrical beam tilt. The vertical plane pattern and other exhibits required by Section 73.625(c) are herein included as Exhibit E-2.

Transmission Line: 490 meters (1608 ft) of Dielectric, Type EIA/DCA, 7-3/16" 75 ohm coaxial line (or equivalent)

Power Data

Transmitter output	59.02 kW	17.71 dBk
Total Transmission line efficiency/loss	70.6%	1.51 dB
Input power to the antenna	41.67 kW	16.20 dBk
Antenna power gain, Horizontal Polarization	24.0	13.8 dB
Vertical Polarization		
Maximum Effective Radiated Power		
Horizontal Polarization	1000 kW	30 dBk
Vertical Polarization		

Elevation Data

Vertical dimension for Channel 20 antenna	18.3 meters 60 feet
Overall height above ground of the existing antenna structure (including beacon and lightning rod)	560.5 meters 1838.9 feet
Center of radiation of Channel 20 antenna above ground	474.6 meters 1557 feet
Elevation of site above mean sea level	216.4 meters 710 feet

Center of radiation of Channel 20 antenna above mean sea level	691 meters 2267.1 feet
Overall height above mean sea level of existing tower and stacked antenna (including beacon)	776.9 meters 2548.9 feet
Antenna height above average terrain	498 meters

Note: Slight height differences may result due to conversion to metric.

#### Allocation

An allocation study from the proposed site has been performed since the proposed DTV facilities exceed that listed in Appendix B.

#### Interference Analysis

A study of predicted interference caused by the proposed KQCW-DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (February 6, 2004) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows XP platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, such as calculating new interference as total interference less baseline interference. Any variance effect is further reduced

when using ratios of calculated population values such as measuring the incremental population affected as a percent of the total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km<sup>2</sup> using 3-second terrain data sampled approximately every 1.0 km at one degree azimuth intervals with 2000 census centroids.

#### Coverage

The average elevation data for 3.2 to 16.1 km along each radial are based upon NGDC 3-second terrain data.

The F(50,90) DTV coverage contour has been computed from reference to the propagation data for Channels 14-69, as published by the FCC in Figure 10b and Figure 10c, Section 73.699 of the FCC Rules and Regulations.

Utilizing the formula in Section 73.625(b)(2) of the Rules for the effective heights, it is found that the depression angle,  $A_h$ , varies from 0.6 to 0.63 degrees. Since the relative vertical field is greater than 90% of the maximum at these depression angles, the maximum power was used in determining the distance to the DTV contour.

Table III includes the distances to the 48 and 41 dBu F(50,90) coverage contours, the average elevation 3.2 to 16.1 km, and the antenna heights above average terrain and the non-directional ERP of 1000 kW every 45 degrees beginning with true north. Exhibit E-3 provides the 48 and 41 dBu F(50,90) coverage contours on a map demonstrates that the community of license is covered by the F(50,90) 48 dBu contour.

FCC Rule, Section 1.1307

The proposed operation based upon the current OET Bulletin No. 65, Edition No. 97-01, dated August 1997 and Supplement A meets the provisions of the FCC RFF guidelines, and thus, complies with Section 1.1307 of the FCC Rules. Provisions will be made to reduce power or to terminate the transmitter emissions, as appropriate, when it is necessary for authorized personnel to be on the tower.

The following equations from OET Bulletin No. 65 have been used to calculate the predicted radiofrequency fields at 2 meters above ground at the base of the tower:

**Digital Television Broadcast Stations**

$$S = [(33.4)(F^2)(ERP^2)]/R^2$$

S = Power Density in Microwatts/sq. cm ( $\mu\text{W}/\text{cm}^2$ )

F = Relative Field Factor in the downward direction of interest ( $-60^\circ$  to  $-90^\circ$  elevation)

ERP = Power in Watts

R = Distance from 2 meters above ground to center of radiation in meters

The radio frequency field analysis of the existing site is calculated in Table II.

For the post-transition operation, KQCW-DT proposes to use a Dielectric, Type TFU-28DSC03 or equivalent antenna. The manufacturer's elevation pattern for this antenna indicates a maximum relative downward field of less than 0.038 towards the ground in the vicinity of the tower. Using this relative field factor and the procedures prescribed in OET Bulletin 65, the maximum RFF resulting from the proposed operation is less than  $0.22 \mu\text{W}/\text{cm}^2$ . This is less than 0.06% of the  $337 \mu\text{W}/\text{cm}^2$  maximum human exposure to RFF recommended by the current FCC guidelines for the general population.



The total contribution by the presumed post-transition DTV broadcast facilities and the addition of the proposed operation of KQCW-DT at 2 meters above ground level is expected to be less than 5.0% of the current FCC guidelines for maximum permissible exposure (“MPE”) for the general population/uncontrolled exposure.

Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

#### Environmental Assessment

An environmental assessment (“EA”) is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the licensee indicates:

- (a)(1) The existing tower is not located in an officially designated wilderness area.
- (a)(2) The existing tower is not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.

- (a)(5) The existing tower is not located near any known Indian religious sites.
- (a)(6) The existing tower is not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) It is not proposed to modify the tower lighting unless required by the FAA.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.

ABOVE MEAN SEA LEVEL

ABOVE GROUND

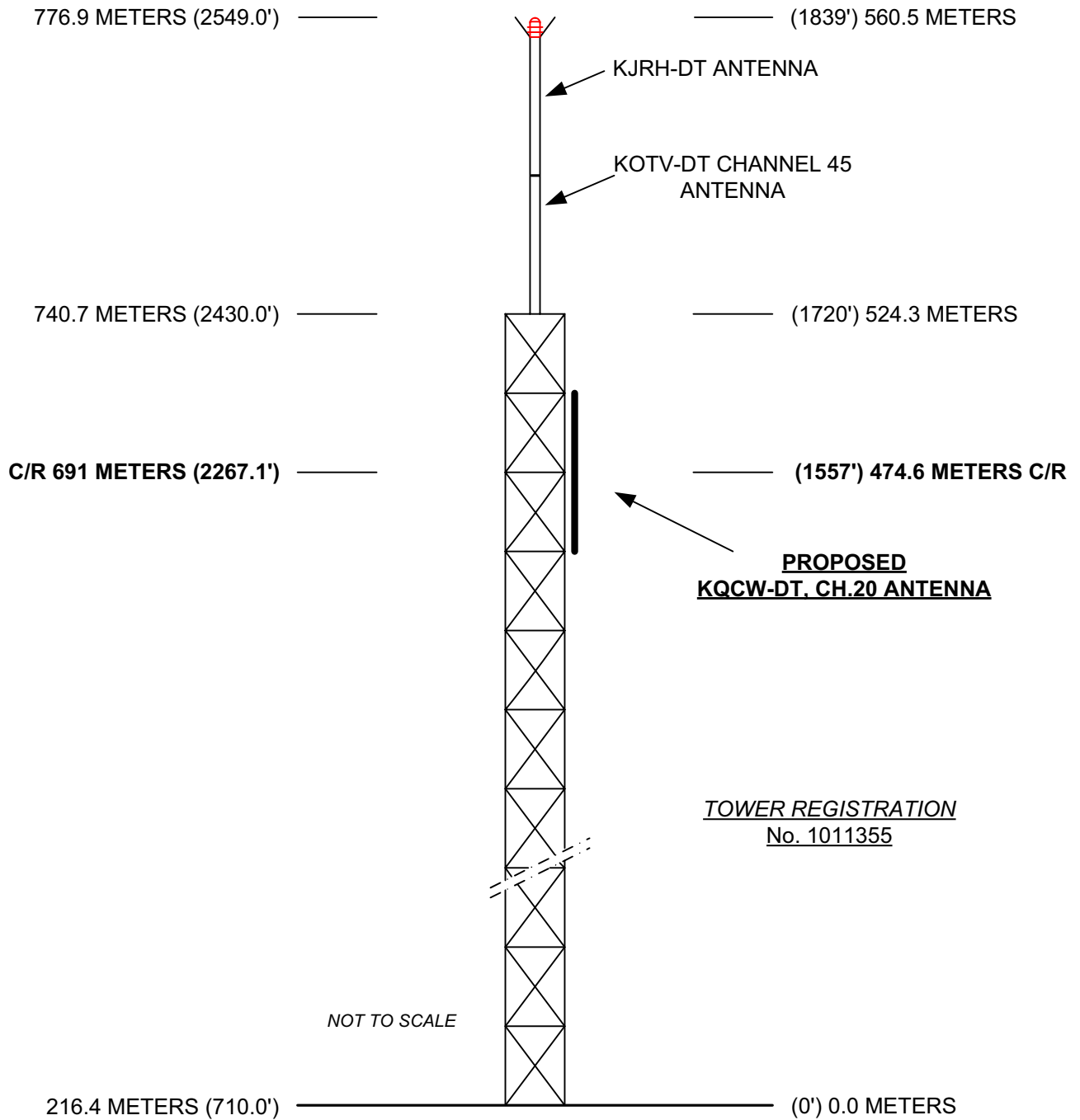


EXHIBIT E-1  
TOWER SKETCH  
**KQCW-DT, MUSKOGEE, OKLAHOMA**  
JUNE 2008

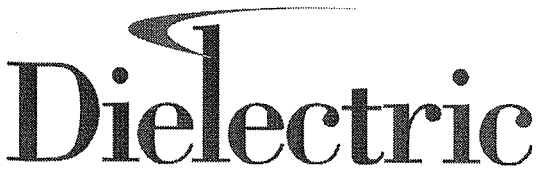
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TABLE I  
LONGLEY-RICE INTERFERENCE ANALYSIS  
FOR THE PROPOSED OPERATION  
ABOVE ITS ALLOTTED APPENDIX B FACILITIES AND  
IN RELATION TO OTHER ALLOTTED APPENDIX B FACILITIES  
AND OTHER POTENTIALLY AFFECTED STATIONS IN CDBS  
KQCW-DT, MUSKOGEE, OKLAHOMA  
CHANNEL 20 1000 KW ND ERP 498 METERS HAAT  
JUNE 2008

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>FCC File No.</u>	<u>Result</u>
21	KHBS	FORT SMITH AR	138.8	PLN	DTVPLN -DTVPLN60353	0.40%
21	KHBS-DT	FORT SMITH AR	138.8	LIC	BLCDT -20031121AMR	0.40%

**EXHIBIT E-2**

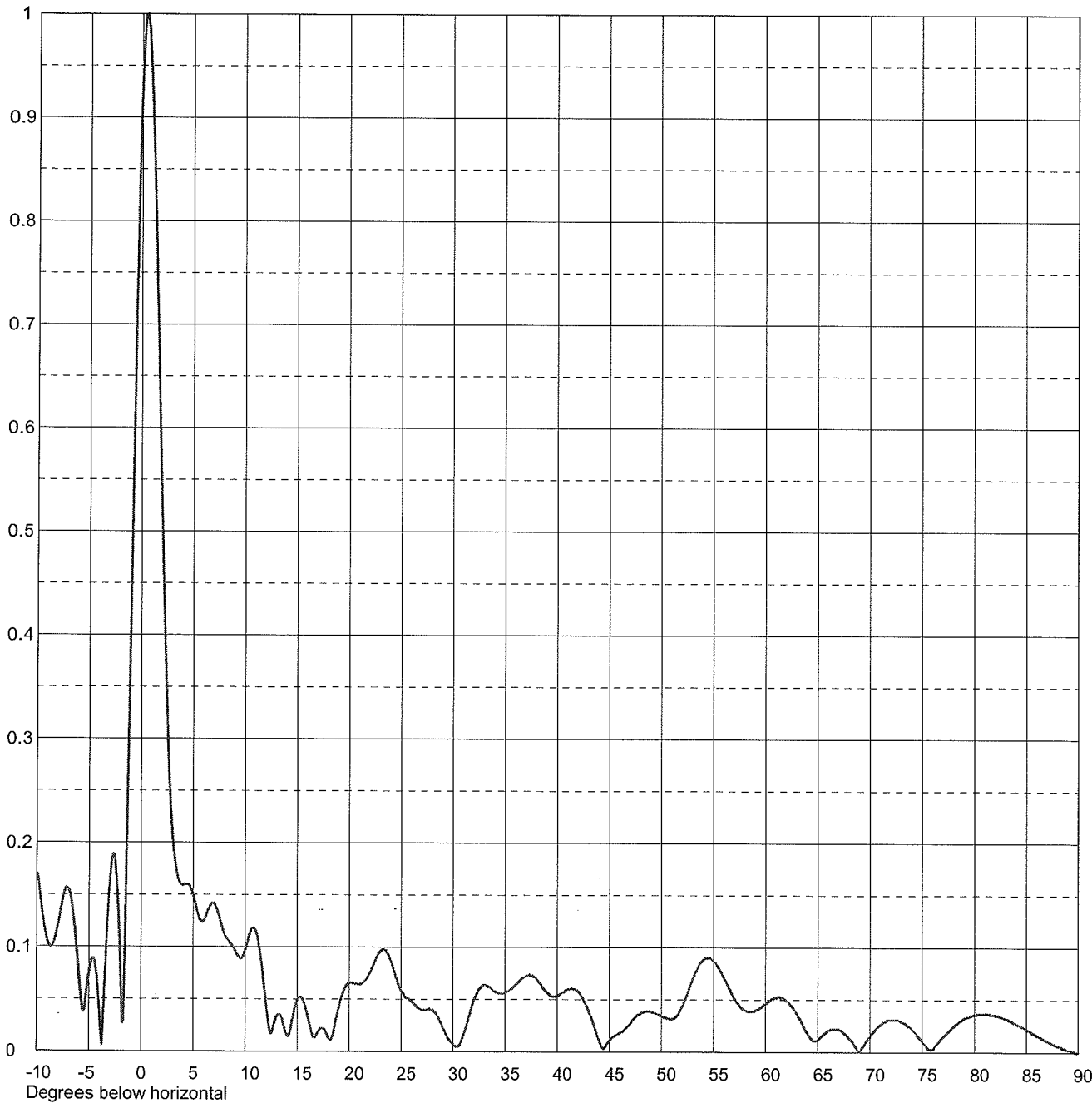
STANDARD ELEVATION PATTERN  
AVAILABLE UPON REQUEST  
JUNE 2008



Date	02 Jul 2008	
Call Letters	KQCW-DT	Channel 20
Location	Muskogee, OK	
Customer	Griffin	
Antenna Type	TFU-28DSC O3	

ELEVATION PATTERN

RMS Gain at Main Lobe	24.0 (13.80 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	20.6 (13.14 dB)	Frequency	509.00 MHz
Calculated / Measured	Calculated	Drawing #	28Q240050-90



Remarks:



## SYSTEM SUMMARY

### Antenna:

Type:	TFU-28DSC O3	ERP:	1000 kW	H Pol ( 30.00 dBk )
Channel:	20	RMS Gain*:	24.0	( 13.80 dB )
Location:	Muskogee, OK	Input Power:	41.67 kW	( 16.20 dBk )

### Transmission Line:

Type:	EIA Style Rigid TL	Attenuation:	1.51 dB
Size:	7-3/16" 75 ohm EHT	Efficiency:	70.6%
Length	1608 ft	490 m	

### Transmitter:

Average Power Required: 59.02 kW ( 17.71 dBk )

\* Gain is with respect to half wave dipole.

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TABLE II  
RFF ANALYSIS CONSIDERS STATIONS  
IN THE VICINITY OF THE PROPOSED OPERATION OF  
KQCW-DT, MUSKOGEE, OKLAHOMA  
JUNE 2008

<u>Call Sign</u>	<u>Status</u>	<u>Channel</u>	<u>Frequency</u> MHz	<u>ERP</u> kW	<u>RCAGL-2</u> meters	<u>Assumed</u> <u>Relative Field Value</u>	<u>RFF</u> $\mu\text{W}/\text{cm}^2$	<u>Uncontrolled</u> <u>MPE</u> $\mu\text{W}/\text{cm}^2$	<u>% Uncontrolled</u>
KOTV-DT	Proposed	45	656-662	840 (H)	530.6	0.06	0.36	437.3	0.08%
KJRH-DT	Expected	8	180-186	19.9 (H&V)	547.3	0.15	0.05	200	0.03%
KOED-DT	Expected	11	198-204	39 (H)	496.5	0.1	0.05	200	0.03%
KWHB-DT	Appendix B	47	668-674	50 (H)	432	0.2	0.36	445.3	0.08%
KNYD(FM)	Expected	213C	90.5	100 (H&V)	280	0.3	7.7	200	3.90%
KWGS(FM)	License	208C1	89.5	50 (H&V)	294	0.2	1.6	200	0.80%
KWTU(FM)	License	204C2	88.7	5 (H&V)	294	0.2	0.15	200	<u>0.08%</u>
Total									$\approx 5\%$

Note: The proposed Channel 20 contribution will be negligible. Therefore, the total RFF environment remains approximately 5%.



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TABLE III  
COMPUTED COVERAGE DATA  
FOR THE PROPOSED DTV OPERATION OF  
KQCW-DT, MUSKOGEE, OKLAHOMA  
CHANNEL 20 1000 KW 498 METERS HAAT  
JUNE 2008

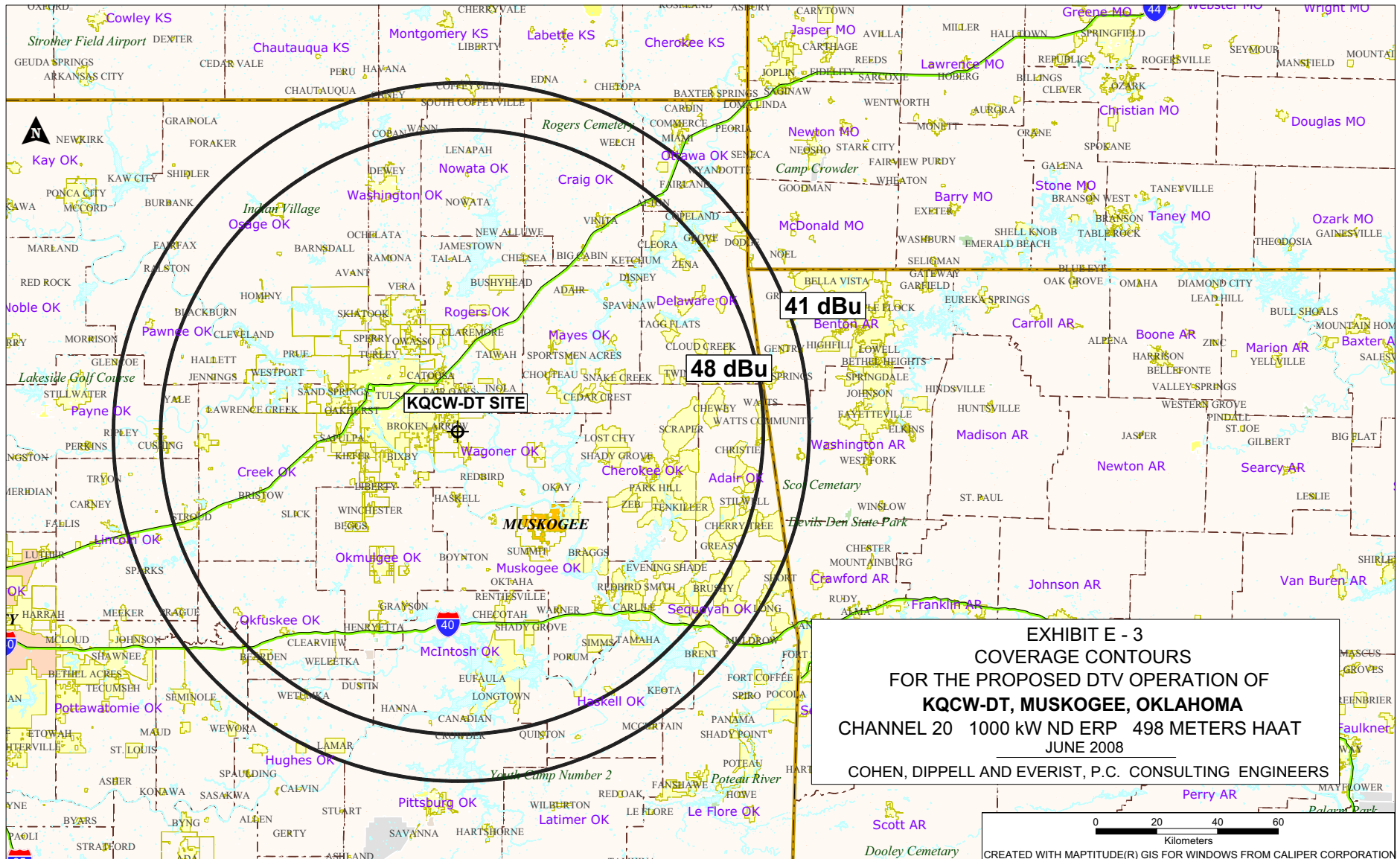
Radial Bearing N ° E, T	Average* Elevation 3.2 to 16.1 km meters	Effective Height meters	Depression Angle	ERP At Radio Horizon kW	Distance to Contour F(50,90)	
					48 dBu City Grade km	41 dBu Noise-Limited km
0	195.3	495.7	0.617	1000	98.8	114.2
45	175.4	515.6	0.629	1000	100.5	115.5
90	174.8	516.2	0.629	1000	100.5	115.6
135	188.2	502.8	0.621	1000	99.4	114.7
180	191.5	499.5	0.619	1000	99.1	114.5
225	196.9	494.1	0.616	1000	98.7	114.1
270	208.0	483.0	0.609	1000	97.8	113.3
315	213.8	477.2	0.605	1000	97.3	112.8
Average	193	498				

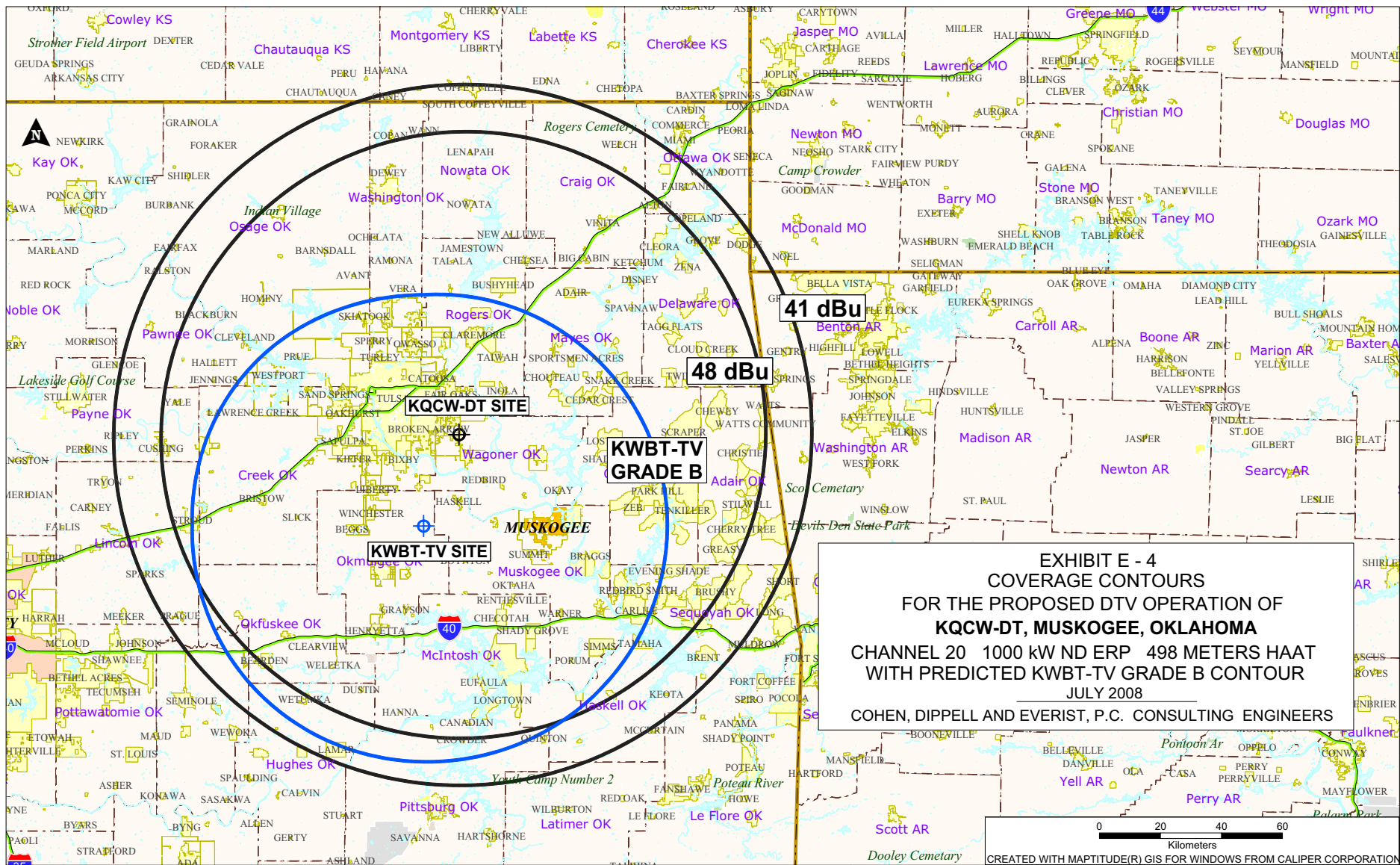
\*Based on data from FCC 3-second data base

DTV Channel 20 (506-512 MHz)  
Average Elevation 3.2 to 16.1 km 193 meters AMSL  
Center of Radiation 691 meters AMSL  
Antenna Height Above Average Terrain 498 meters  
Effective Radiated Power 1000 kW (30 dBk) Max.

North Latitude: 36° 01' 15"  
West Longitude: 95° 40' 32"

(NAD-27)





## SECTION III - D - DTV Engineering

Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

**Pre-Transition Certification Checklist:** An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction pen-nit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

**Post-Transition Expedited Processing.** An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:
    - (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
    - (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No
    - (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No
    - (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). ☐ Yes ☒ No  
☐ N/A
    - (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B. ☒ Yes ☐ No  
☐ N/A
  2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RIF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No
- Applicant must **submit the Exhibit** called for in Item 13.
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No
  4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No
  5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

## SECTION III - D DTV Engineering

KQCW-DT  
Maximization

**TECHNICAL SPECIFICATIONS** Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1. Channel Number: DTV 20 Analog TV, if any 19
2. Zone: ☐ I ☒ II ☐ III
3. Antenna Location Coordinates: (NAD 27)
- 36 ° 01 ' 15 " ☒ N ☐ S Latitude  
95 ° 40 ' 32 " ☐ E ☒ W Longitude
4. Antenna Structure Registration Number: 1011355
- ☐ Not applicable ☐ FAA Notification Filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level: 216.4 meters
6. Overall Tower Height Above Ground Level: 560.5 meters
7. Height of Radiation Center Above Ground Level: 474.6 meters
8. Height of Radiation Center Above Average Terrain: 498 meters
9. Maximum Effective Radiated Power (average power): 1000 kW
10. Antenna Specifications:
- a. 

Manufacturer	<u>Dielectric</u>	Model	<u>TFU-28DSC03</u>
--------------	-------------------	-------	--------------------
- b. Electrical Beam Tilt: 0.5 degrees ☐ Not Applicable
- c. Mechanical Beam Tilt: \_\_\_\_\_ degrees toward azimuth \_\_\_\_\_ degrees True ☒ Not Applicable
- Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No.  
**E-2**
- d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

e. Directional Antenna Relative Field Values:

☒

Not applicable (Nondirectional)

Rotation: \_\_\_\_\_

☐

No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616?

☒

Yes

☐

No

If "No," attach as an Exhibit justification therefore, including a summary of any related previously granted waivers.

Exhibit No.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No.

**E**

- a. If **Certification Checklist Item 2** is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

**PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.**

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

☐ Yes ☐ No ☐ N/A

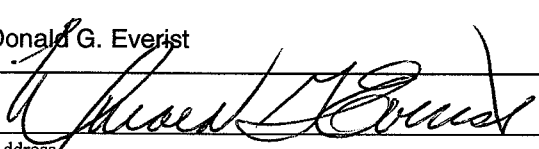
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in 'good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

### SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Donald G. Everist	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date June 19, 2008	
Mailing Address Cohen, Dippell and Everist, P.C, 1300 L Street, NW Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
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