

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PACIFICA BROADCASTING COMPANY, licensee of KALO(TV), Channel 38 in Honolulu, Hawaii, in support of its Application for Construction Permit to operate with a post-transition DTV facility on Channel 38, its newly allotted channel.

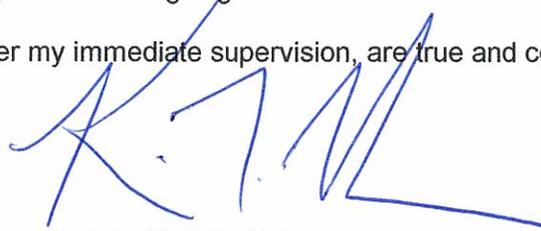
It is proposed to utilize the existing KALO Micro Communications antenna, which is mounted at the 12-meter level of an existing 61-meter tower. Exhibit B provides an elevation and azimuth pattern data for the existing antenna. Exhibit C is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 48 dBu service contour. An interference study is included in Exhibit D, and a power density calculation is provided in Exhibit E.

It is important to note that, while the proposed effective radiated power of 155 kw exceeds that allowable in Section 73.622(f)(8)(i) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (KGMV-DT, Channel 24 in Wailuku, Hawaii), as allowed in Section 73.622(f)(5) of the Rules.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the KALO-DT site. However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

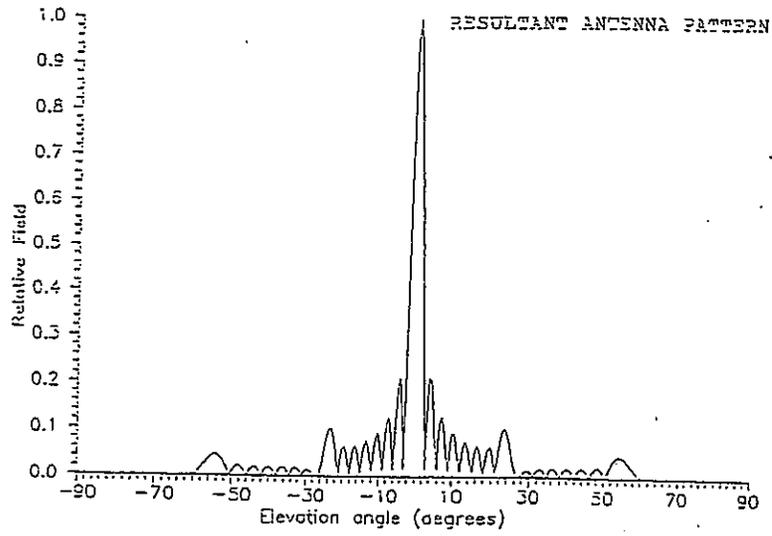
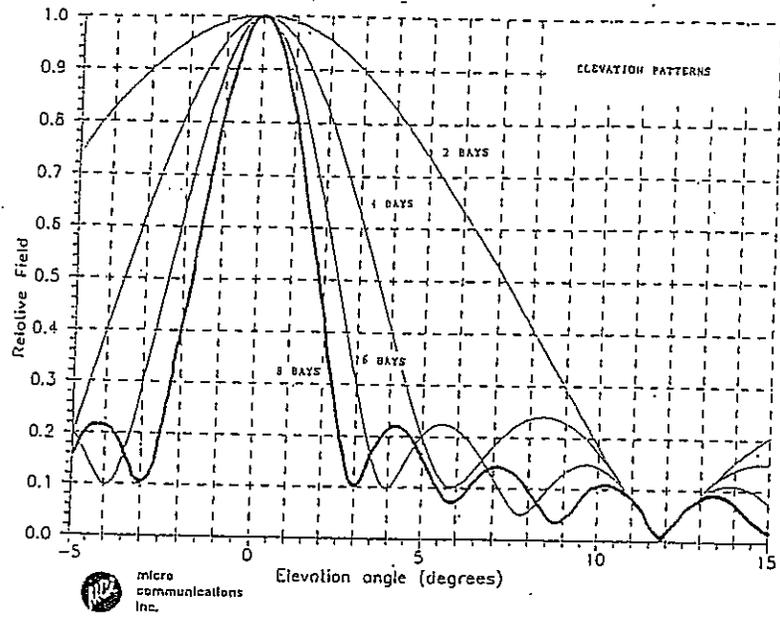
Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1218023 to this tower.

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.



KEVIN T. FISHER

December 10, 2008



8 BAY ELEVATION PATTERN

EXHIBIT B-1

ANTENNA ELEVATION PATTERN

PROPOSED KALO-DT

CHANNEL 38 - HONOLULU, HAWAII

SMITH AND FISHER



MICRO COMMUNICATIONS, INC.

Relative Azimuth Field

UHF BAND IV/V VERY NARROW CARDIOID PATTERN
MCI MODEL NO. 9555xx

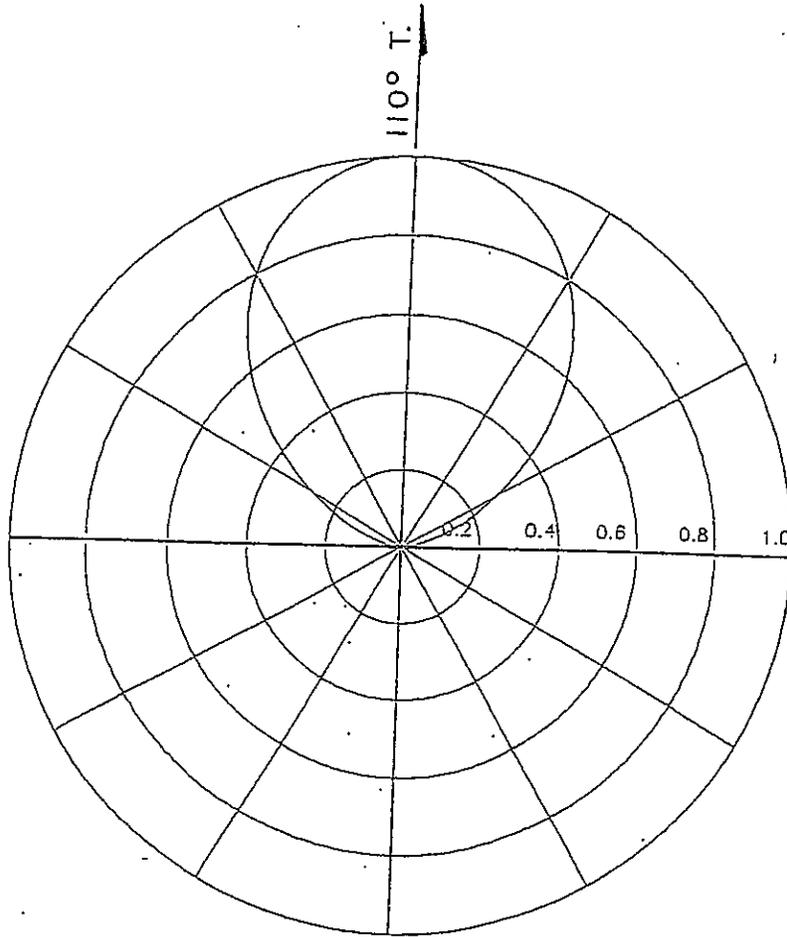


EXHIBIT B-2
ANTENNA AZIMUTH PATTERN
PROPOSED KALO-DT
CHANNEL 38 - HONOLULU, HAWAII
SMITH AND FISHER

ANTENNA RADIATION VALUES

PROPOSED KALO-DT
CHANNEL 38 - HONOLULU, HAWAII

<u>Azimuth</u> (° T)	<u>Relative</u> <u>Field</u>	<u>ERP</u> (dbk)	<u>Azimuth</u> (° T)	<u>Relative</u> <u>Field</u>	<u>ERP</u> (dbk)
0	0.01	-18.1	180	0.09	1.0
10	0.01	-18.1	190	0.02	-12.1
20	0.01	-18.1	200	0.01	-18.1
30	0.02	-12.1	210	0.01	-18.1
40	0.09	1.0	220	0.01	-18.1
50	0.22	8.7	230	0.01	-18.1
60	0.38	13.5	240	0.01	-18.1
70	0.56	16.9	250	0.01	-18.1
80	0.73	19.2	260	0.01	-18.1
90	0.87	20.7	270	0.01	-18.1
100	0.97	21.6	280	0.01	-18.1
110	1.00	21.9	290	0.01	-18.1
120	0.97	21.6	300	0.01	-18.1
130	0.87	20.7	310	0.01	-18.1
140	0.73	19.2	320	0.01	-18.1
150	0.56	16.9	330	0.01	-18.1
160	0.38	13.5	340	0.01	-18.1
170	0.22	8.7	350	0.01	-18.1

CONTOUR POPULATION

48 DBU : 859,769

41 DBU : 874,416

Smith and Fisher

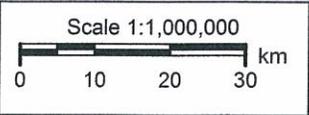
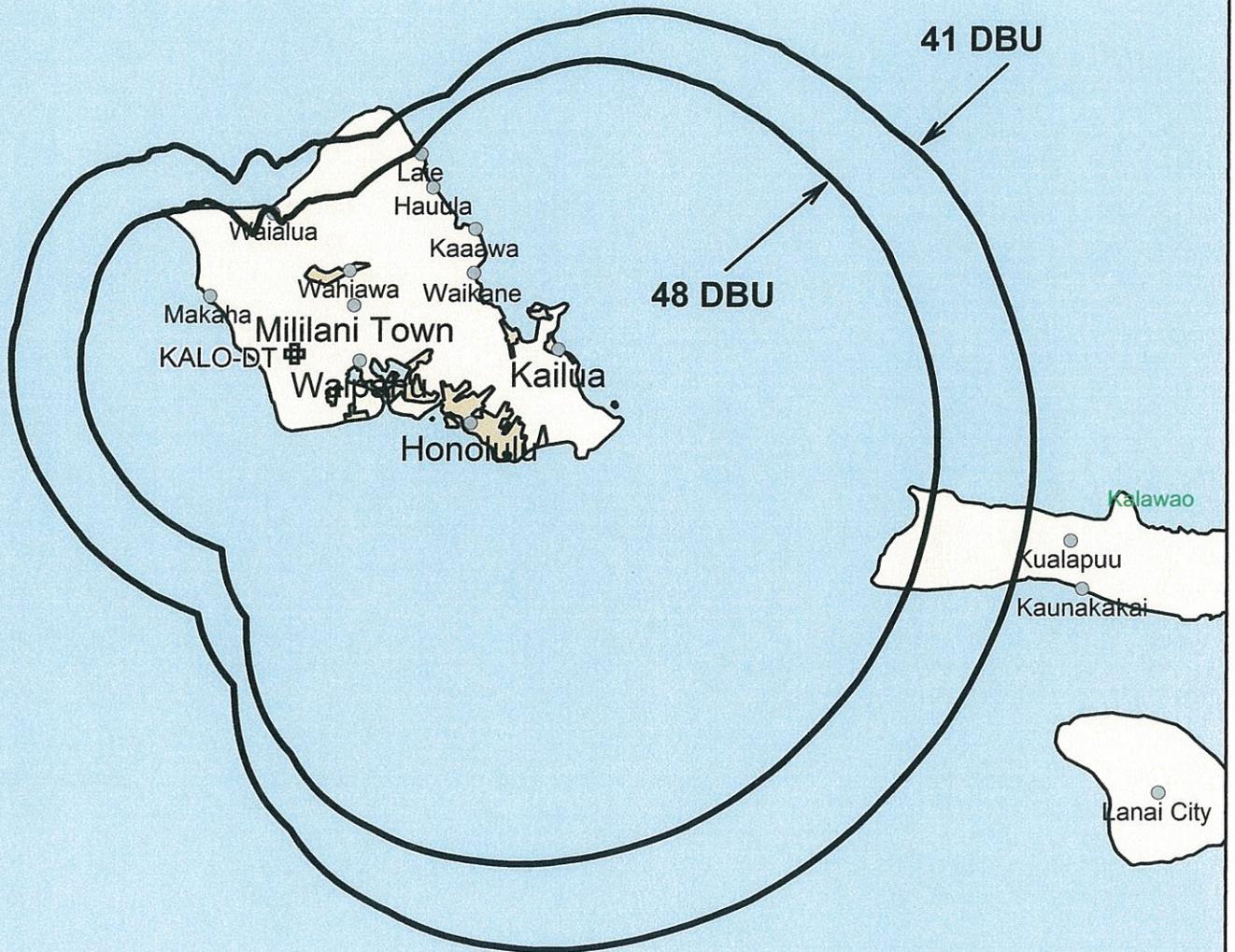


EXHIBIT C

PREDICTED SERVICE CONTOURS

**PROPOSED KALO-DT
CHANNEL 38 - HONOLULU, HAWAII**

SMITH AND FISHER

INTERFERENCE STUDY
PROPOSED KALO-DT
CHANNEL 38 – HONOLULU, HAWAII

The instant application specifies an ERP of 155 kw (directional) at 577 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KALO-DT to other pertinent stations are tabulated in Exhibit D-2.

As shown, the proposed KALO-DT facility would not contribute more than 0.5% interference to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KALO-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT D-2

INTERFERENCE STUDY SUMMARY

PROPOSED KALO-DT
CHANNEL 38 – HONOLULU, HAWAII

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From KALO-DT</u>	<u>%</u>
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[NO STATIONS AFFECTED]

POWER DENSITY CALCULATION
PROPOSED KALO-DT
CHANNEL 38 – HONOLULU, HAWAII

Because the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to the proposed facility. Employing the methods set forth in *OET Bulletin No. 65* and considering an ERP of 155 kw, an antenna radiation center of 12.2 meters above ground, and the vertical pattern of the MCI 955518 antenna, we calculate that maximum power density two meters above ground of 0.11 mw/cm^2 will occur 7 meters east-southeast of the base of the tower. Since this is only 5.5 percent of the 2.0 mw/cm^2 reference for RF exposure in controlled environments (*i.e.*, areas without public access) surrounding a facility operating on Channel 38 (614-620 MHz) and since the area is not accessible to the public (meaning that there are no uncontrolled areas), a grant of this application can be considered a minor environmental action with respect to public and occupational exposure to nonionizing electromagnetic radiation.

Further, the station owner will coordinate with other users of this site and take whatever corrective steps are necessary, such as power reduction or temporary cessation of operation, to ensure that workers operating in the vicinity of the antenna's aperture are not exposed to excessive nonionizing EMR.

In addition, on December 2, 2006, this firm conducted a power density measurement survey of the antenna farm atop Palikea Ridge. A copy of that report can be provided upon request. It concludes that all television facilities presently operating at the site combine to produce no more than 4 percent of the total RF environment at the site, and that the site presently meets the Commission's guidelines for human exposure to nonionizing electromagnetic radiation. The applicant will provide an updated measurement survey upon implementation of the facility proposed herein.