

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
LPTV STATION KPXG-LP (FACILITY ID 69792)
PORTLAND, OREGON
CH 42 15 KW-ND

Technical Narrative

This Technical Exhibit supports a flash-cut digital application for low power television (LPTV) station KPXG-LP at Portland, Oregon (Facility ID 69792). Station KPXG-LP is licensed to operate on analog channel 54 with a non-directional antenna visual effective radiated power (ERP) of 105 kW and an antenna height above mean sea level (RCAMSL) of 599.5 meters (BLTTL-20040901ACK). Station KPXG-LP is authorized (CP, BPTTL-20050901ABW) to operate on analog channel 42 with a directional antenna maximum (visual) ERP of 100 kW and an RCAMSL of 599.5 meters. The FCC antenna structure registration number is 1204059 and the site coordinates are 45-31-21, 122-44-45 (NAD-27).

Proposed Facilities

This application proposes digital operation on the current channel (42), at the current transmitter site, and at the same antenna height. A Dielectric model TUF-O4-10/40H-1-T non-directional (ND) antenna system will be used. The proposed DTV ERP is 15 kW and antenna RCAMSL remains 599.5 meters AMSL.

Figure 1 is a map showing the authorized 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 1 kilometer grid, 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, less than 2% to LPTV analog and DTV 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.

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.

The KPXG-LP site is 305 kilometers from the closest point of the US-Canada border. Figure 2 is a map showing the predicted co-channel analog (NTSC) and DTV interfering contours for the proposed KPXG-LP operation. The predicted 30.2 dBu F(50,10) contour is for interference to co-channel Canadian analog allotments. The predicted 12.4 dBu F(50,10) contour is for interference to co-channel Canadian DTV allotments. As shown, the predicted interfering contours do not overlap Canadian land area.

Radiofrequency Electromagnetic Field Exposure

The proposed KPXG-LP 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 257.2 meters above ground level. The proposed maximum ERP is 15 kW. Based on a downward relative field of 0.25, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 1% of the FCC's recommended limit of 0.43 mW/cm^2 for channel 42 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.

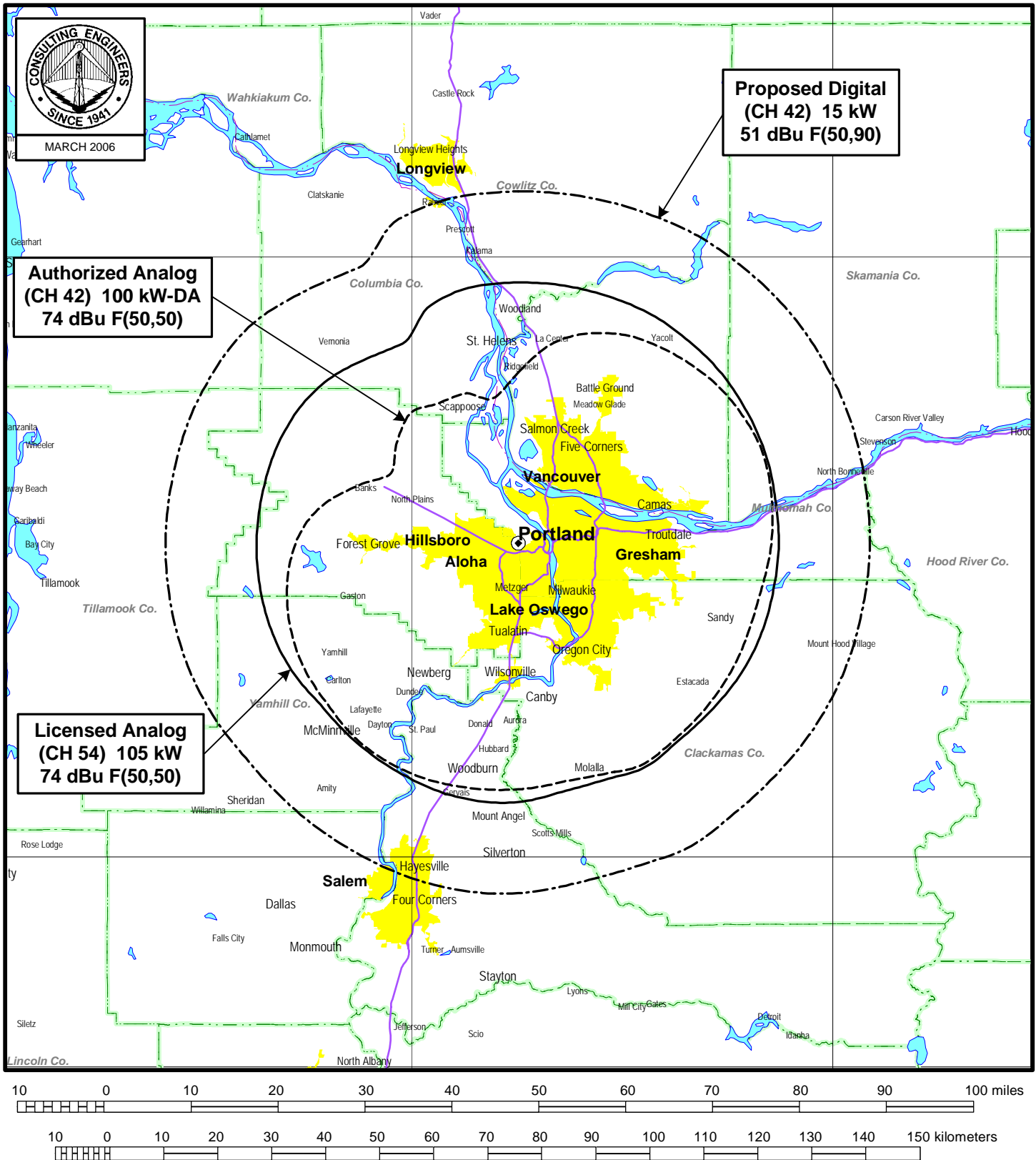
It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.



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Figure 1



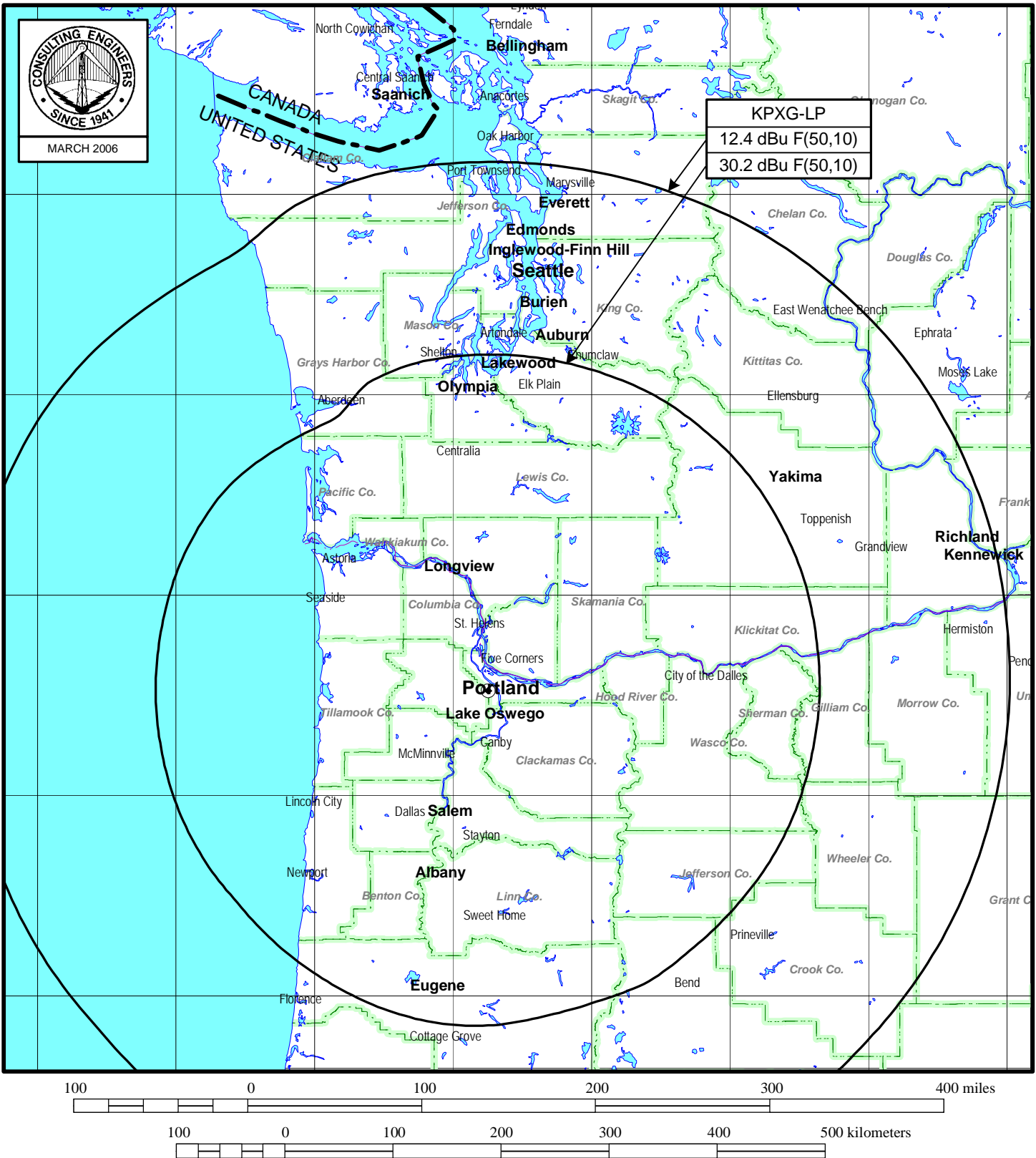
PREDICTED COVERAGE CONTOURS

STATION KPXG-LP

PORTLAND, OREGON

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Figure 2



PREDICTED CANADA INTERFERING CONTOUR MAP

STATION KPXG-LP
PORTLAND, OREGON
CH 42 15 KW

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