

TECHNICAL STATEMENT
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
TELEVISION STATION KSTC-DT
MINNEAPOLIS-ST. PAUL, MINNESOTA
CHANNEL 44 205 KW 430 M

This Technical Statement was prepared in support of an application for modification of construction permit for Television Station KSTC-DT, Minneapolis-St. Paul, Minnesota. KSTC-DT holds a construction permit for operation on Channel 44 with a non-directional effective radiated power (ERP) of 1000 kW and an antenna height above average terrain of 430 m (See FCC File No. BMPCDT-20020306ABH). The purpose of the instant application is to authorize a reduction in ERP to 205 kW, with no other changes. The proposal complies with the FCC Filing Freeze for television stations since there is no extension of the predicted 41 dBu, f(50,90) service contour in an direction relative to the KSTC-DT construction permit facility.*

Environmental Considerations

With respect to the potential for human exposure to radio frequency (RF) radiation, calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground based on the following conservative assumptions, with the following results:

* See August 2004 Filing Freeze PN, DA 04-2446 (MB rel. Aug. 3, 2004).

Call Sign	Channel	Average ERP (kW)	Antenna Height (m)	Relative Field Factor	FCC Limit [†] (mW/cm ²)	Percentage of Limit
KSTC-DT	44	205	401	0.30	0.4353	0.9%

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 0.9% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing.

Calculated Service Population

As illustrated in the attached Figure 1, the proposed predicted 41 dBu, f(50,90) contour fully encompasses that of the KSTC-DT allotment facility. The service population of the proposed facility was calculated pursuant to the FCC Office of Engineering and Technology Bulletin No. 69 using 2000 Census data. Based on this analysis the calculated net service population of the proposed facility is 3,196,314. The “baseline” service population for the KSTC-DT allotment facility is 3,090,946.[‡] Therefore, the proposed facility provides service to 103% of the KSTC-DT baseline service population and it complies with the FCC “use-it-or-lose-it” criteria as outlined in the *Report and Order* in the Second Periodic Review in MB Docket No. 03-15, Released on September 7, 2004.



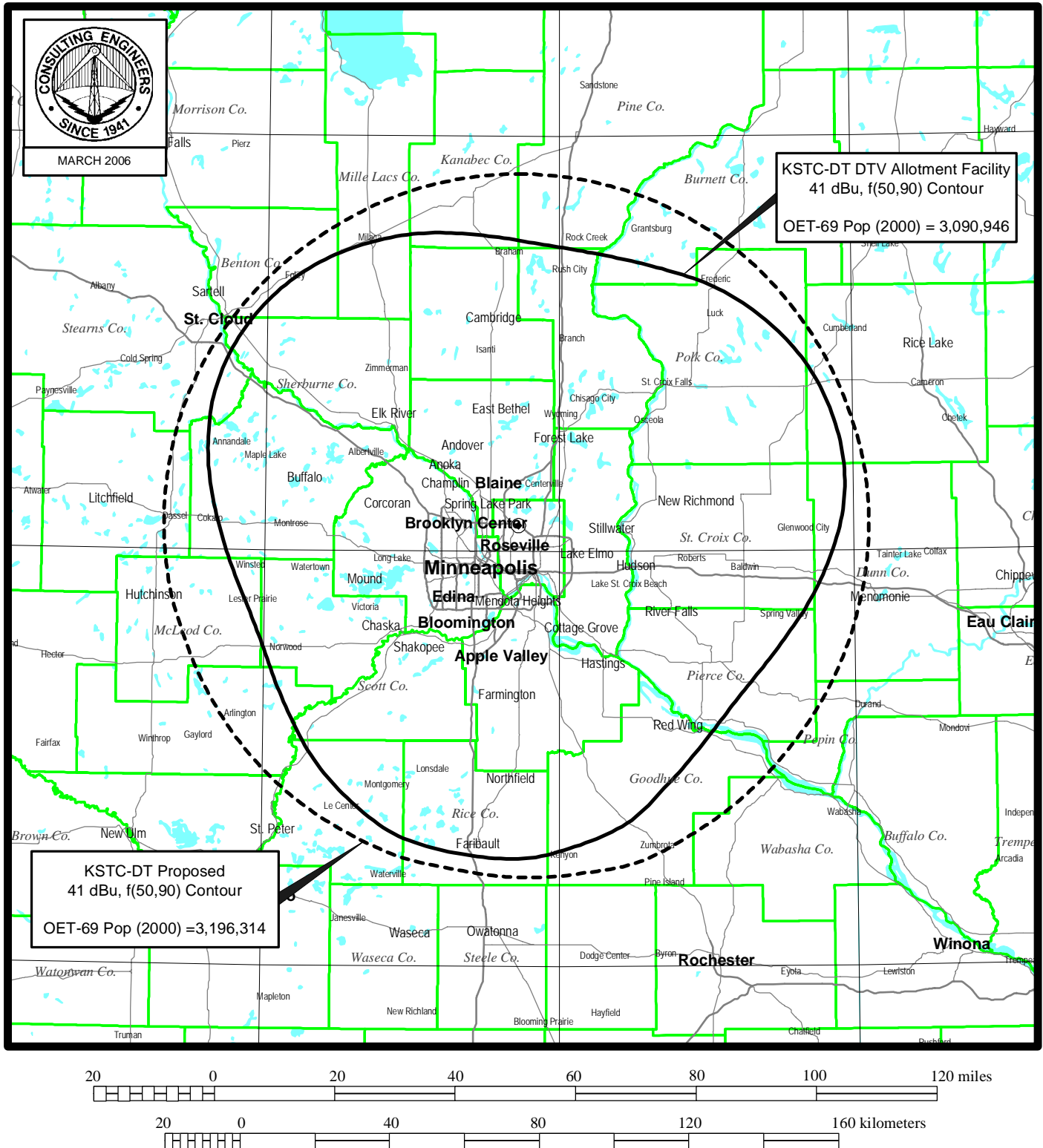
Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237

March 22, 2006

[†] for general population/uncontrolled environments

[‡] This population figure is the lesser of that of the analog or digital facilities from the FCC DTV Allotment Table II of the FCC Public Notice regarding the first round election filing deadline. See DA 04-3922, Released: December 21, 2004.



PREDICTED COVERAGE CONTOURS

TELEVISION STATION KSTC-DT
MINNEAPOLIS-ST. PAUL, MINNESOTA
CHANNEL 44 205 KW 430 M

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