

**EXHIBITS 6 & 7**  
**APPLICATION FOR CONSTRUCTION PERMIT**

Applicant	Howard Mintz
Facility ID #	125128
File #	BNPTTL-20000807ABC
Location	Lufkin, TX
Channel	48-

This Technical Exhibit is attached to FCC Form 346 in support of this application's request for a construction permit for the Low Power Television Station referenced above. This application has been designated as a SINGLETON pursuant to correspondence received from the Federal Communications Commission dated April 18, 2003.

The proposed station is designed as follows:

Frequency Offset:	MINUS OFFSET
Antenna radiation center height above ground level:	130 meters
Maximum effective radiated power:	7.19 KW
Antenna type and model #:	Directional Scala 4DR-4S
Orientation:	80 degrees
Coordinates:	31-19-24 94-47-23
FCC Tower Registration No.	1053196

A study has been conducted using the provisions of sections 74.703, 74.705, 74.706, 74.707, 74.708 and 74.709 which indicates that the proposal will not create prohibited interference with other NTSC full power, DTV, Class A, Land Mobile, or LPTV facilities other than the Full Power NTSC facilities which is specified below. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations, and, accordingly, Applicant requests a waiver of Section 74.705.

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the facilities listed in the table below. As indicated in the table below, the operations of the proposed station will result in interference to 0 persons in the protected contours of the licenses and construction permit listed below.

<b>Protected NTSC Full-Power</b>	<b>FCC Service Population</b>	<b>Proposed Interference Population</b>
KETK-TV, CHANNEL 56 JACKSONVILLE, TX LICENSE BLCT-19870319KE	504,561	0 (0.0%)
KETK-TV, CHANNEL 56 JACKSONVILLE, TX CONSTRUCTION PERMIT BPCT-19960723LG	546,799	0 (0.0%)
KTBU, CHANNEL 55 CONROE, TX LICENSE BLCT-19980721KG	3,818,623	0 (0.0%)

As indicated in the above table, the proposed facility will cause zero interference to the KETK and KTBU.

#### Environmental Considerations

The proposed LPTV CH 48 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 7.19 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.007 milliwatt per square centimeter (MW/CM<sup>2</sup>), or 1.5 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.451 MW/CM<sup>2</sup> for TV channel 48). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.