

ENGINEERING STATEMENT  
RE DTV BROADCAST ENGINEERING DATA  
APPLICATION FOR CONSTRUCTION PERMIT  
ON BEHALF OF  
KEVN, INC.  
KIVV-DT, LEAD, SOUTH DAKOTA  
CHANNEL 5 9.2 KW ERP 561 METERS HAAT

MARCH 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 )

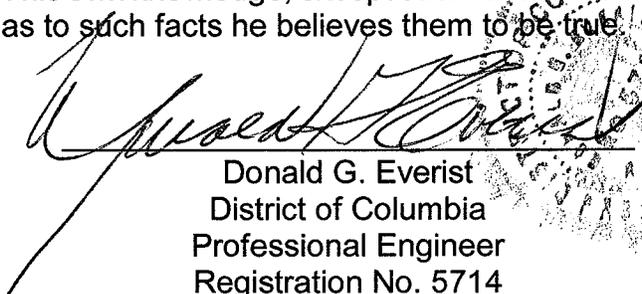
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of 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 his qualifications are a matter of record in the Federal Communications Commission;

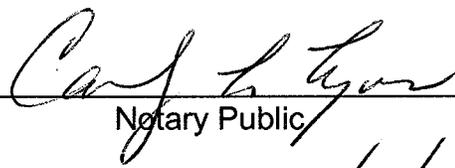
That the attached engineering report was prepared by him or under his supervision and direction and

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.

  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 14<sup>th</sup> day of March, 2008.



  
Notary Public

My Commission Expires: 2/28/2013



This engineering statement has been prepared in support of an application for outstanding construction permit on behalf of KEVN, Inc., licensee of KIVV-TV, Lead, South Dakota. The purpose of the application is to file for the facilities on the same channel as allotted in Appendix B<sup>1</sup> to sufficiently replicate the currently licensed Grade B service with the KIVV-DT post-transition facilities using 9.2 kW effective radiated power (“ERP”) non-directional in accordance with the provisions of Paragraph 151 of the Third Periodic Review Report and Order.<sup>2</sup>

KIVV-TV is licensed to operate on NTSC television Channel 5 with a maximum visual ERP of 100 kW and an antenna height above average terrain (“HAAT”) of 564 meters (1850 feet). KIVV-DT has been allocated DTV Channel 5 with facilities of 6.71 kW DA ERP and HAAT of 564 meters in the revised DTV Table of Allotments.<sup>3</sup> KIVV-DT, however, proposes to construct DTV facilities of 9.2 kW non-directional at a height above average terrain of 561 meters on its allotted and currently licensed analog Channel 5. These facilities essentially match the current Grade B contour.

#### Filing Freeze Waiver Request

An allocation study from the proposed site has been performed as the predicted F(50,90) 28 dBu contour of the proposed DTV facilities at the currently licensed KIVV-TV site are not

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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) Appendix B, Released March 6, 2008.

<sup>2</sup>“In the Matter of Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television”, MB Docket No. 07-91, Report & Order (FCC 07-228), Released December 31, 2007.

<sup>3</sup>Ibid.

expected to be entirely within the predicted F(50,90) 28 dBu contour of the KIVV-DT facilities in Appendix B. KIVV-DT intends to use its currently licensed non-directional antenna after the transition, and the proposed operation requests a sufficient non-directional ERP to replicate its current analog service area. Further, the proposed operation does not extend more than five miles beyond the KIVV-DT facilities in Appendix B as shown in Exhibit E-1 and does not exceed the 0.5% additional interference standard to any other station in Appendix B. Therefore, KIVV-DT requests a waiver of the DTV filing freeze<sup>4</sup> for rapid approval of minor expansion applications in accordance with Paragraph 151 of the Third Periodic Review Report and Order.<sup>5</sup>

The DTV antenna (currently the antenna for analog Channel 5) will continue to be located on the same tower as KIVV-TV operates with no changes in height or type.

There are no AM stations located within 3.2 km of the proposed KIVV-TV tower site. There are no FM and no other NTSC stations or full-service DTV facilities aside from KIVV-TV and KIVV-DT within 100 meters of the KIVV-TV tower site.

The TV antenna is top-mounted on the existing tower. The KIVV-DT antenna is located on an existing tower having a total overall structure height above ground of 194.4 meters (638 feet). The existing transmitter site is located at Terry Peak, South Dakota.

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<sup>4</sup>Public Notice entitled, "Freeze on the Filing of Certain TV and DTV Requests for Allotment of Service Area Changes", released August 3, 2004.

<sup>5</sup>Ibid.

Since there is no change in overall height, FAA airspace approval is not required. The antenna structure registration number of the existing tower is 1042277. Exhibit E-2 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: 44° 19' 30"

West Longitude: 103° 50' 14"

NAD-27

Equipment Data

Antenna: RCA, Model TF-6BM (or equivalent) antenna with 1.0° electrical beam tilt. The vertical plane pattern and other exhibits required by Section 73.625(c) are herein included as Exhibit E-3.

Transmission Line: 180 meters (590 ft) of RCA, Type EIA coaxial, 3-1/8", 75 ohm or equivalent

Power Data

Transmitter output	1.72 kW	2.37 dBk
Transmission line efficiency/loss	88.9%	0.51 dB
Input power to the antenna	1.53 kW	1.86 dBk
Antenna power gain, Main Lobe	6.00	7.78 dB
Effective Radiated Power, Maximum	9.20 kW	9.64 dBk

Elevation Data

Vertical dimension for Channel 5 antenna	25.3 meters 83 feet
Overall height above ground of the existing antenna structure (including beacon and lightning rod)	194.4 meters 638 feet
Center of radiation of Channel 5 antenna above ground	180 meters 590.6 feet
Elevation of site above mean sea level	2101 meters 6893 feet
Center of radiation of Channel 5 antenna above mean sea level	2281 meters 7483.6 feet
Overall height above mean sea level of existing tower and antenna (including beacon)	2295.4 meters 7531 feet
Antenna height above average terrain	561 meters

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

Coverage

The average elevation data for 3.2 to 16.1 km along each radial are based upon 3-second terrain data. The F(50,90) DTV coverage contour has been computed from reference to the propagation data for Channels 2-6, as published by the FCC in Figure 9 and Figure 9a, 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 0.54 to 0.75 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 I includes the distances to the 28 dBu and 35 dBu F(50,90) coverage contours, the average elevation 3.1 to 16.1 km, and the antenna height above average terrain for the eight radials. Exhibit E-4 is a plot of that coverage contour data.

#### Allocation

An allocation study from the proposed site has been performed. DTV Channel 5 at this location is fully spaced according to the separation distances of Section 73.623(d)(2). The site is 519 km from the closest point on the Canadian border, and therefore, outside the 400 km coordination zone. The allocation results and closest stations are shown in Table II. This study confirms that DTV Channel 5 with the facilities as proposed herein is ideally suited as an allotment channel at this location as it will cause no predicted interference to any existing or proposed post-transition station, either U.S. or Canadian.

#### Interference Analysis

A study of predicted interference caused by the proposed DTV service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (Revised 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/Intel 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.

The FCC Public Notice Dated August 10, 1998 entitled, "Additional Application Processing Guidelines for Digital Television", outlines the station selection criteria "culling distances" for considering potential interferers. There are no post-transition DTV stations to be considered according to these criteria. There are currently no potentially affected post-transition stations predicted to receive interference.

#### Population and Area Data

The population within the predicted DTV coverage contour was determined by employing the OET Bulletin 69 methodology and using the 2000 census data. The computer program established the 28 dBu service contour, ignoring terrain-blocked cells and determined the service

population by using the centroids for the pertinent census blocks. A population of 164,000 persons was determined in the service area of 46,370 square kilometers.

Other Licensed and Broadcast Facilities

No adverse technical effect is anticipated by the proposed DTV operation to any other FCC licensed facility. If required, the applicant will install filters or take other measures as necessary to resolve the problem.

FCC Rule, Section 1.1307

The proposed 9.2 kW horizontal operation will utilize an RCA, TF-6BM supertunstile antenna or the equivalent with a center of radiation above ground of 180 meters. The proposed antenna will continue to be top-mounted on the existing guyed, uniform, cross-section, steel lattice tower with an overall height of 194.4 meters AGL.

As previously indicated, there are no AM stations located within 3.2 km of the proposed tower site. According to the FCC data base, there are no other stations located within 100 meters of the site. The existing property for the existing tower is located on Terry Peak near Lead, South Dakota.

The proposed operation based upon the current OET Bulletin No. 65, Edition 97-01 dated August 1997 and Supplement A meets the provisions of the FCC radio frequency field ("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.

For DTV operation KIVV proposes to use a RCA, TF-6BM or equivalent antenna horizontally polarized (9.2 kW horizontal) with 1° electrical beam tilt with a radiation center of 180 meters above ground. The elevation pattern for this antenna shows a maximum relative field of 0.28 or less towards the ground (60° to 90° below the horizontal) in the vicinity of the tower. Using this relative field factor and the procedures prescribed in OET Bulletin 65 (Edition 97-01 and Supplement A), the maximum RFF resulting from the proposed operation is less than 0.8  $\mu\text{W}/\text{cm}^2$  two meters above ground. This is less than 0.4 percent of the 200  $\mu\text{W}/\text{cm}^2$  maximum human exposure to RFF recommended by the current FCC guidelines for the general population.

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.

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 proposed facilities are not located in an officially designated wilderness area.
- (a)(2) The proposed facilities are 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 proposed facilities are not located near any known Indian religious sites.
- (a)(6) The proposed facilities are not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing tower at an existing site will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) The existing tower lighting will remain unchanged.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin 65 (Edition 97-01) and Supplement A. Authorized personnel will be alerted to areas of the antennas where potential radiation levels are in excess of the FCC guidelines. A security fence with a locked gate precludes access to the tower site.

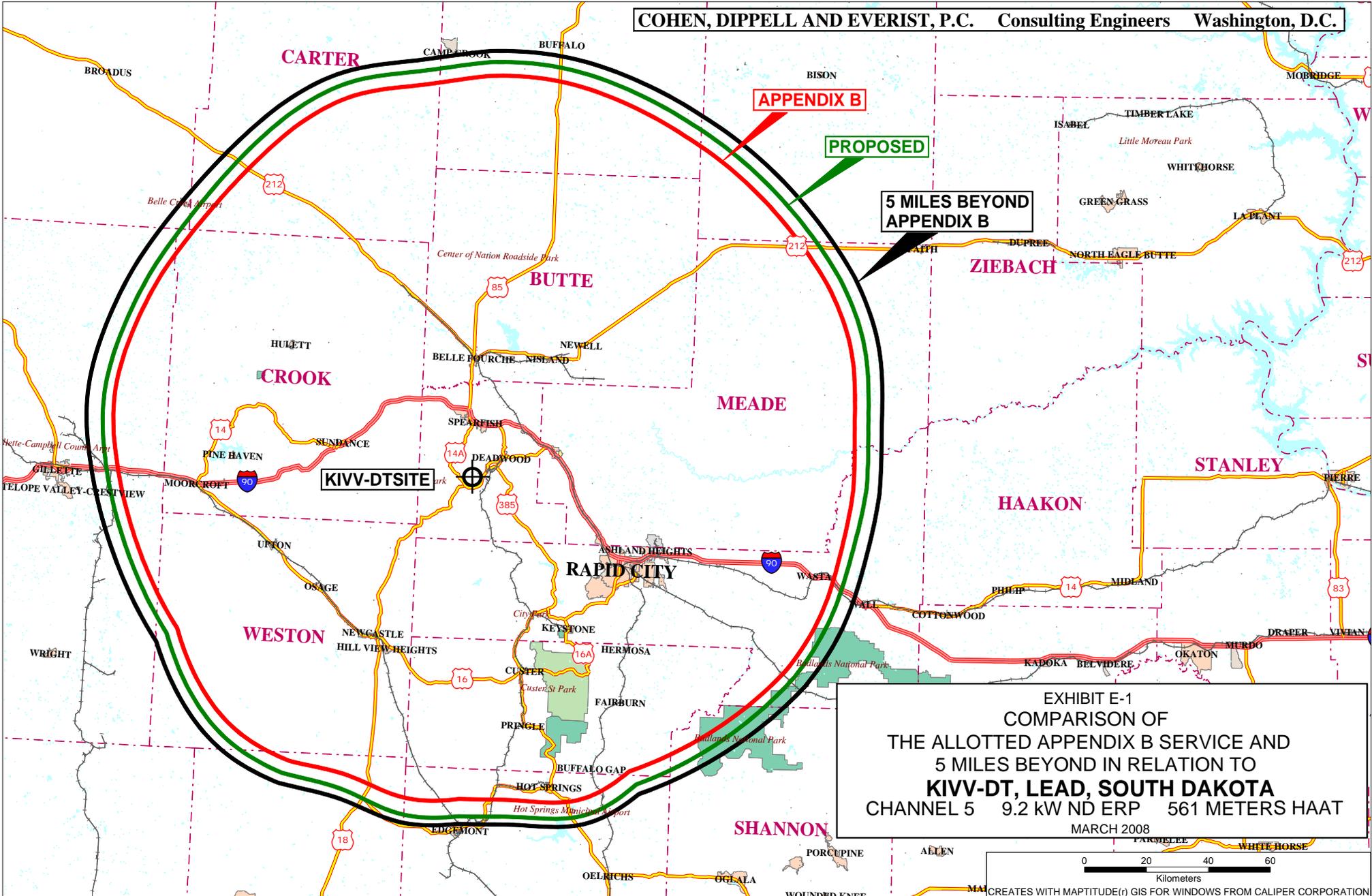
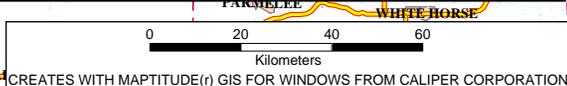
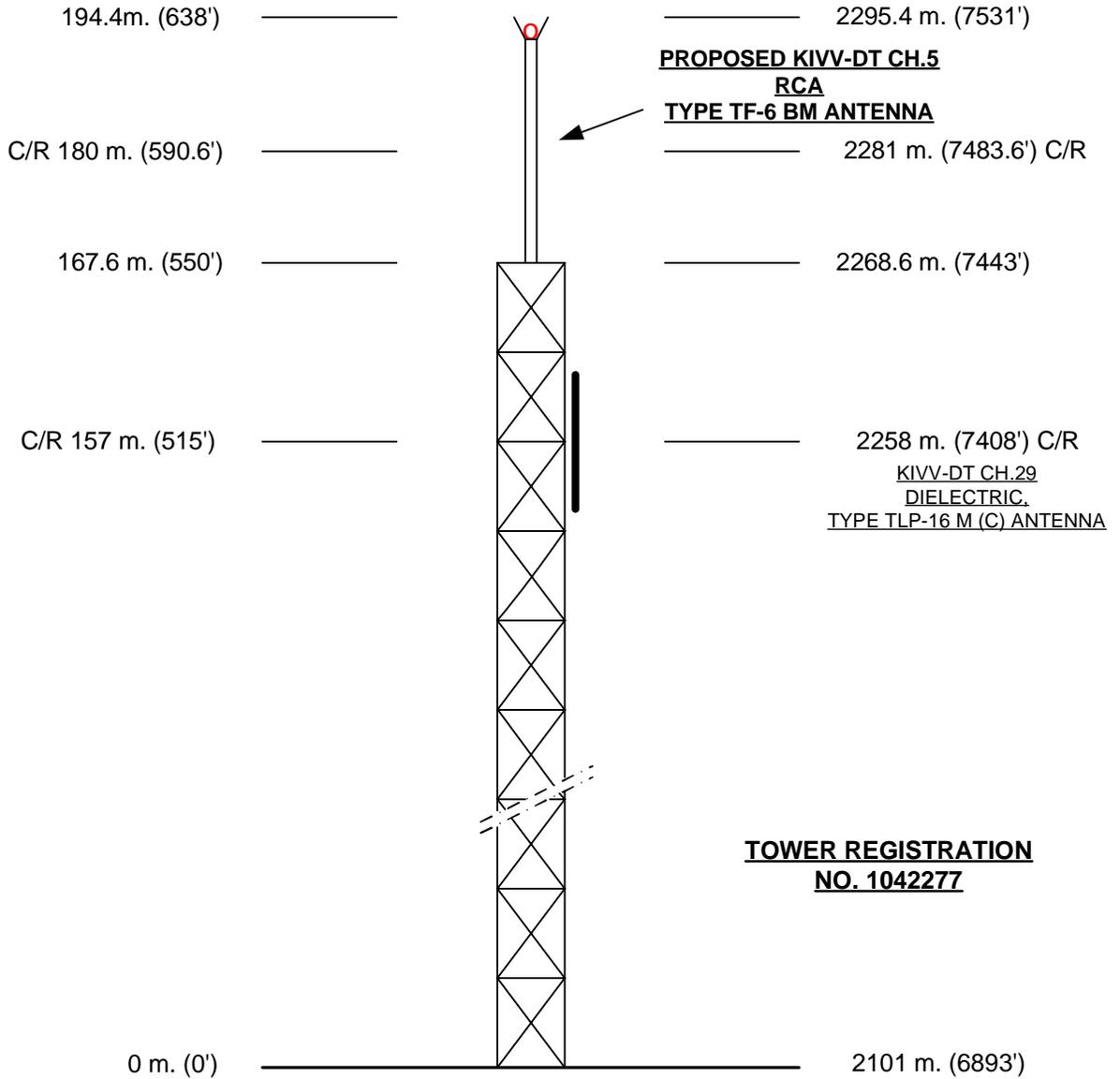


EXHIBIT E-1  
COMPARISON OF  
THE ALLOTTED APPENDIX B SERVICE AND  
5 MILES BEYOND IN RELATION TO  
**KIVV-DT, LEAD, SOUTH DAKOTA**  
CHANNEL 5 9.2 KW ND ERP 561 METERS HAAT  
MARCH 2008



ABOVE GROUND

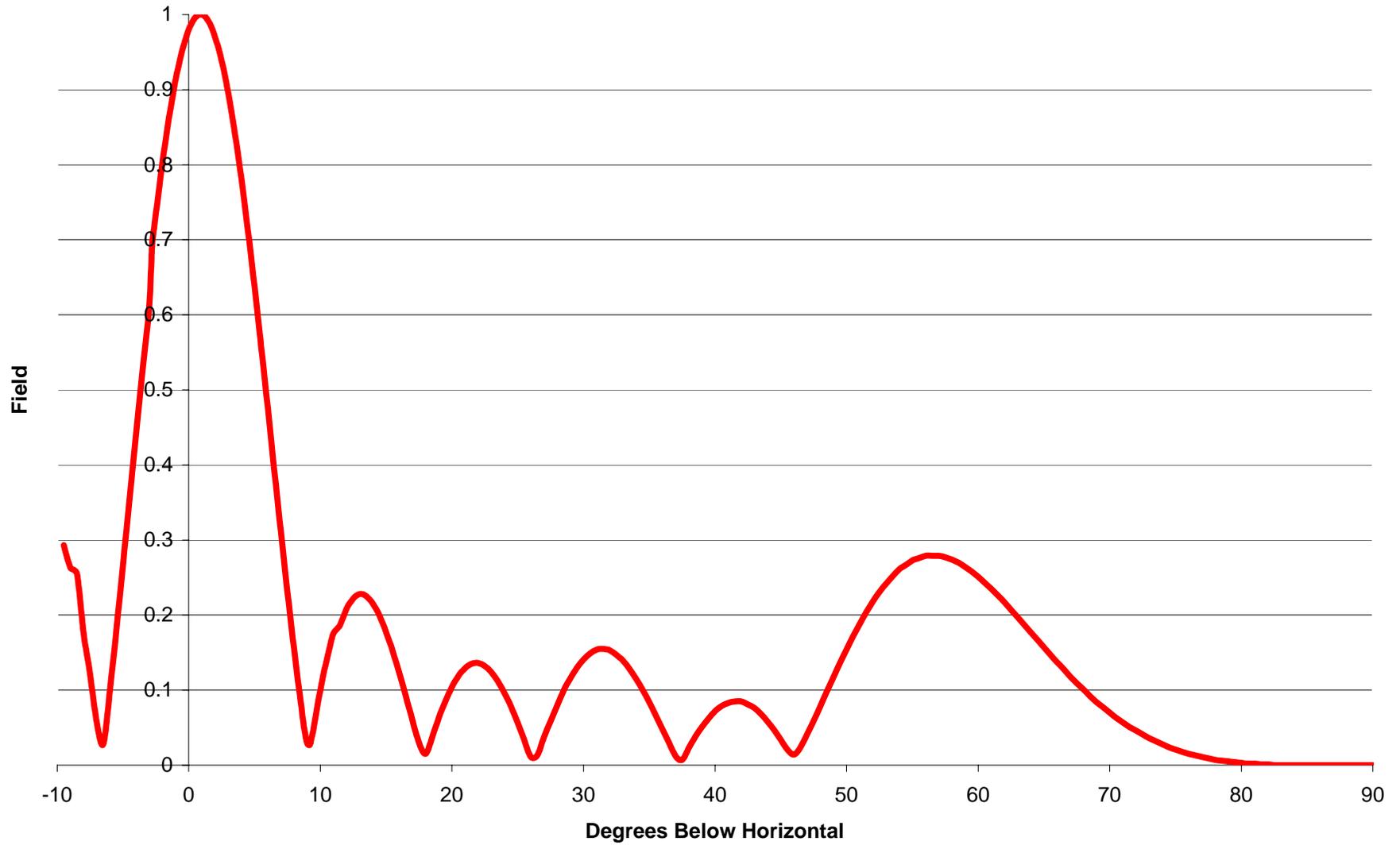
ABOVE MEAN SEA LEVEL



(NOT TO SCALE)

EXHIBIT E - 2  
VERTICAL SKETCH  
FOR  
**KIVV-DT, LEAD, SOUTH DAKOTA**  
MARCH 2008

### RCA TF-6 BM ELEVATION PATTERN



Cohen, Dippell and Everist, P.C.

TABLE I  
COMPUTED COVERAGE DATA  
FOR THE PROPOSED DTV OPERATION OF  
KIVV-DT, LEAD, SOUTH DAKOTA  
CHANNEL 5 9.2 KW 561 METERS HAAT  
MARCH 2008

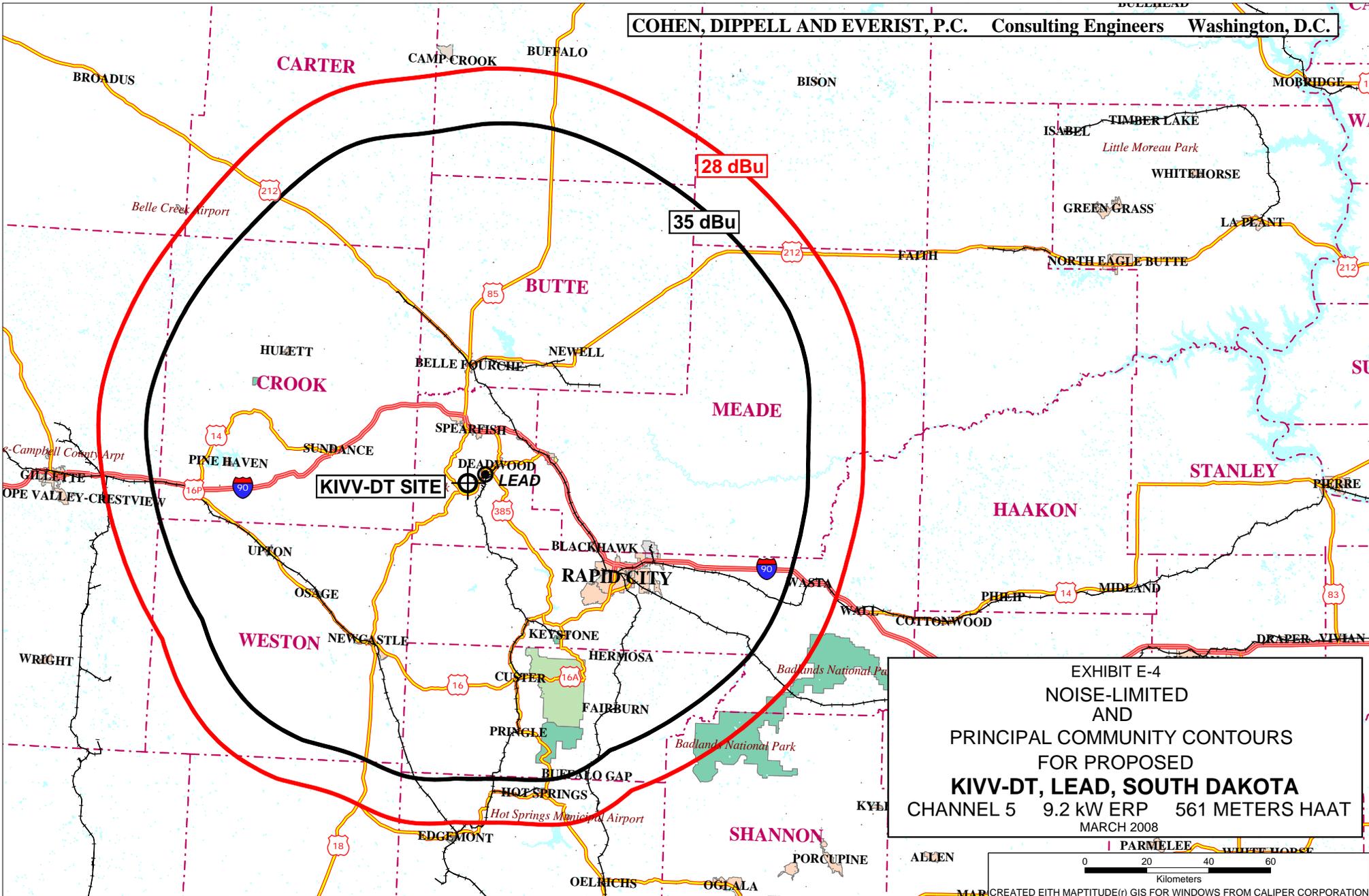
<u>Radial</u> <u>Bearing</u> N ° E, T	<u>Average*</u> <u>Elevation</u> <u>3.2 to 16.1 km</u>	<u>Effective</u> <u>Height</u> meters	<u>Depression</u> <u>Angle</u>	<u>ERP At</u> <u>Radio</u> <u>Horizon</u> kW	<u>Distance to Contour F(50,90)</u>	
	<u>meters</u>				<u>35 dBu</u> <u>City Grade</u> km	<u>28 dBu</u> <u>Noise-Limited</u> km
0	1556.3	724.7	0.746	9.2	115.8	133.7
45	1542.6	738.4	0.753	9.2	116.5	134.2
90	1672.6	608.4	0.683	9.2	109.5	127.1
135	1820.4	460.6	0.594	9.2	100.3	115.6
180	1901.5	379.5	0.540	9.2	95.5	109.6
225	1803.1	477.9	0.606	9.2	101.5	117.0
270	1781.9	499.1	0.619	9.2	103.1	118.7
315	1683.4	597.6	0.677	9.2	109.0	126.3
Average	1720	561				

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

DTV Channel 5 (76-82 MHz)  
Average Elevation 3.2 to 16.1 km 1720 meters AMSL  
Center of Radiation 2281 meters AMSL  
Antenna Height Above Average Terrain 561 meters  
Effective Radiated Power 9.2 kW (9.64 dBk) Max.

North Latitude: 44° 19' 30"  
West Longitude: 103° 50' 14"

(NAD-27)



Cohen, Dippell and Everist, P.C.

TABLE II  
SPACING AND PREDICTED INTERFERENCE FOR  
THE PROPOSED DTV OPERATION OF  
KIVV-DT, LEAD, SOUTH DAKOTA  
CHANNEL 5 9.2 KW 561 METERS HAAT  
MARCH 2008

<u>Post-Transition Station</u>	<u>Distance / Bearing</u>	<u>Longley-Rice Predicted Interference</u>
KHAS-DT Ch. 5 Hastings, NE (nearest co-channel)	606.2 km / 130.5° (fully spaced)	None
CKX-TV Ch. 5 Brandon, MB (nearest Canadian co-channel TV)	661.5 km / 24.7° (beyond coordination zone)	None
Ch. 5 DTV Allot. Weyburn, SK (nearest Canadian DTV allotment)	593.8 km / 0° (beyond coordination zone)	None
KPTW-DT Ch. 6 Casper, WY (nearest 1 <sup>st</sup> adjacent)	269.4 km / 230° (fully spaced)	None
K06JM-CA Ch. 6 Gillette, WY (nearest 1 <sup>st</sup> adj. Class A)	148.4 km 267.7° (no contour overlap)	None

Note: Channel 4 is not adjacent to Channel 5

**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 permit 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**

**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 \_\_\_\_\_ Analog TV, if any \_\_\_\_\_

2. Zone:  I  II  III

3. Antenna Location Coordinates: (NAD 27)

\_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ "  N  S Latitude  
 \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ "  E  W Longitude

4. Antenna Structure Registration Number: \_\_\_\_\_

Not applicable  FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: \_\_\_\_\_ meters

6. Overall Tower Height Above Ground Level: \_\_\_\_\_ meters

7. Height of Radiation Center Above Ground Level: \_\_\_\_\_ meters

8. Height of Radiation Center Above Average Terrain: \_\_\_\_\_ meters

9. Maximum Effective Radiated Power (average power): \_\_\_\_\_ kW

10. Antenna Specifications:

Manufacturer	Model
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a.  Not Applicable

b. Electrical Beam Tilt: \_\_\_\_\_ 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.

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

Exhibit No.

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

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.

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

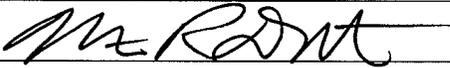
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in 'good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular 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 Martin R. Doczkat	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date March 14, 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
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

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).