

**TECHNICAL STATEMENT
RE: MINOR MODIFICATION OF LICENSE
K34KJ-D 1.62 KW MERP 210 M HAAT CH. 34
HARBOR, OREGON**

CHANGE IN COMMUNITY OF LICENSE

The licensee of K34KJ-D is requesting a change in community of license from Crescent City, Etc., California to Harbor, Oregon. The LMS electronic application form does not currently enable an applicant to make a change in community of license and, therefore, the aforementioned change in community is being requested in this exhibit attachment per FCC staff instructions.¹ Accordingly, the present and proposed assignments are reflected in the following table:

<u>Community</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Crescent City, Etc., California	34	-----
Harbor, Oregon	-----	34

Aside from the additional minor modifications described below, the station will continue to transmit on Channel 34 at the same antenna location coordinates and radiation center height that are currently reflected in the underlying station license. A contour map that depicts the proposed 51 dBu service contour based on the new directional antenna pattern as compared to the present coverage area is provided in Figure 1. Since no change in frequency or antenna location is requested, the subject application is eligible for minor modification processing pursuant to Section 73.3572(a).

NEW TECHNICAL ANTENNA DATA AND OPERATING CONSTANTS

The licensee also seeks to replace the nondirectional antenna of K34KJ-D with a new directional composite antenna system and to reduce ERP to a maximum of 1.62 kW. The station's transmitter power output and out-of-channel emission mask will remain unchanged. An interference analysis was conducted using the OET-69 prediction methodology based on the standard analysis settings and it has been confirmed that the station will continue to comply with the interference protection rules governing digital low power television in 47 C.F.R. Part 74 - Subpart G.

ENVIRONMENTAL STATEMENT

This application is categorically excluded from environmental processing by Section 1.1306. Specifically, the criteria outlined in Section 1.1307(a) for certain types of facilities that may significantly affect the environment do not

¹ Licensing and Management System (LMS) - FCC Form 2100, Schedule C does not currently support changes in community of license for digital low power television stations.



apply in this case since the proposed replacement antenna for K34KJ-D will be co-located on an existing FCC registered broadcast tower that was constructed prior to March 16, 2001. It also proposes a facility that complies with the rules regarding human exposure to radio-frequency (RF) energy as set forth in Section 1.1307(b).

The maximum permissible exposure (MPE) limit set forth in Section 1.1310 for UHF Channel 34 is $393 \mu\text{W}/\text{cm}^2$ in areas where general exposure to the public is uncontrolled. For controlled occupational environments the limit is $1,967 \mu\text{W}/\text{cm}^2$. It is estimated that K34KJ-D, operating with the proposed modifications, will produce a maximum ground-level power density of $4.59 \mu\text{W}/\text{cm}^2$ based on the prediction methodology in FCC OET Bulletin No. 65, Edition 97-01 (OET-65). In making this determination a relative field value of 0.375 was assumed for the specified antenna, which represents the worst-case scenario for elevation angles greater than 23 degrees below the horizontal. A plot of the vertical plane relative field pattern is provided in Figure 2. Since the above power density contribution is not more than 5 percent of the aforementioned limits for general and occupational exposure, no additional documentation concerning ground level exposure compliance is required.

The transmitter site is situated in a remote area where the general public is not subject to exposure. The licensee shall follow the steps outlined in OET-65 to protect persons having access to the site, tower or antenna from exposure to RF fields in excess of the FCC guidelines. The licensee shall also reduce power or cease operation in coordination with other users of the site for this purpose.

Prepared by,

Scott Turpie
LOHNES & CULVER LLC
P.O. Box 881
Silver Spring, MD 20918-0881
(301)776-4488

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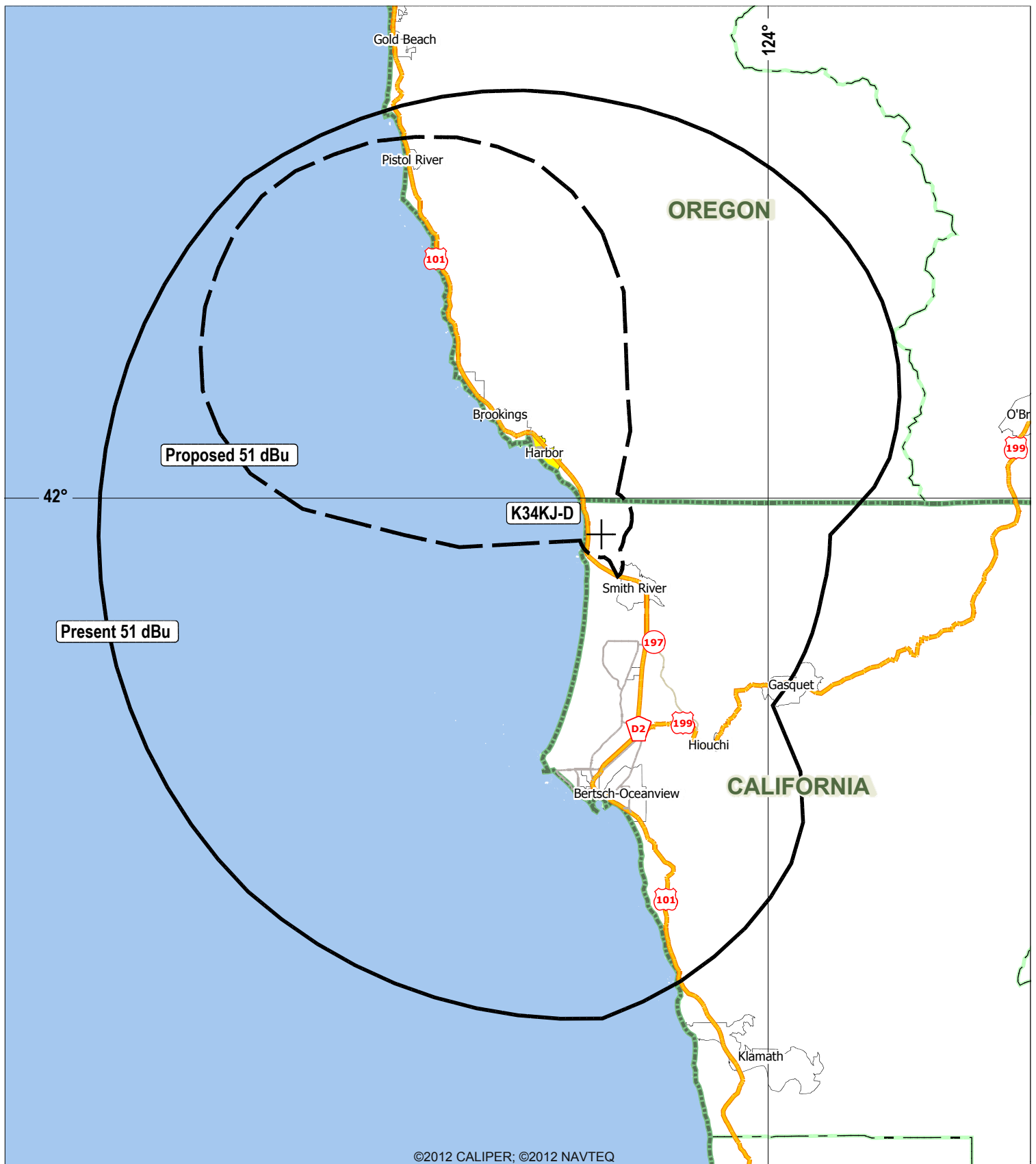
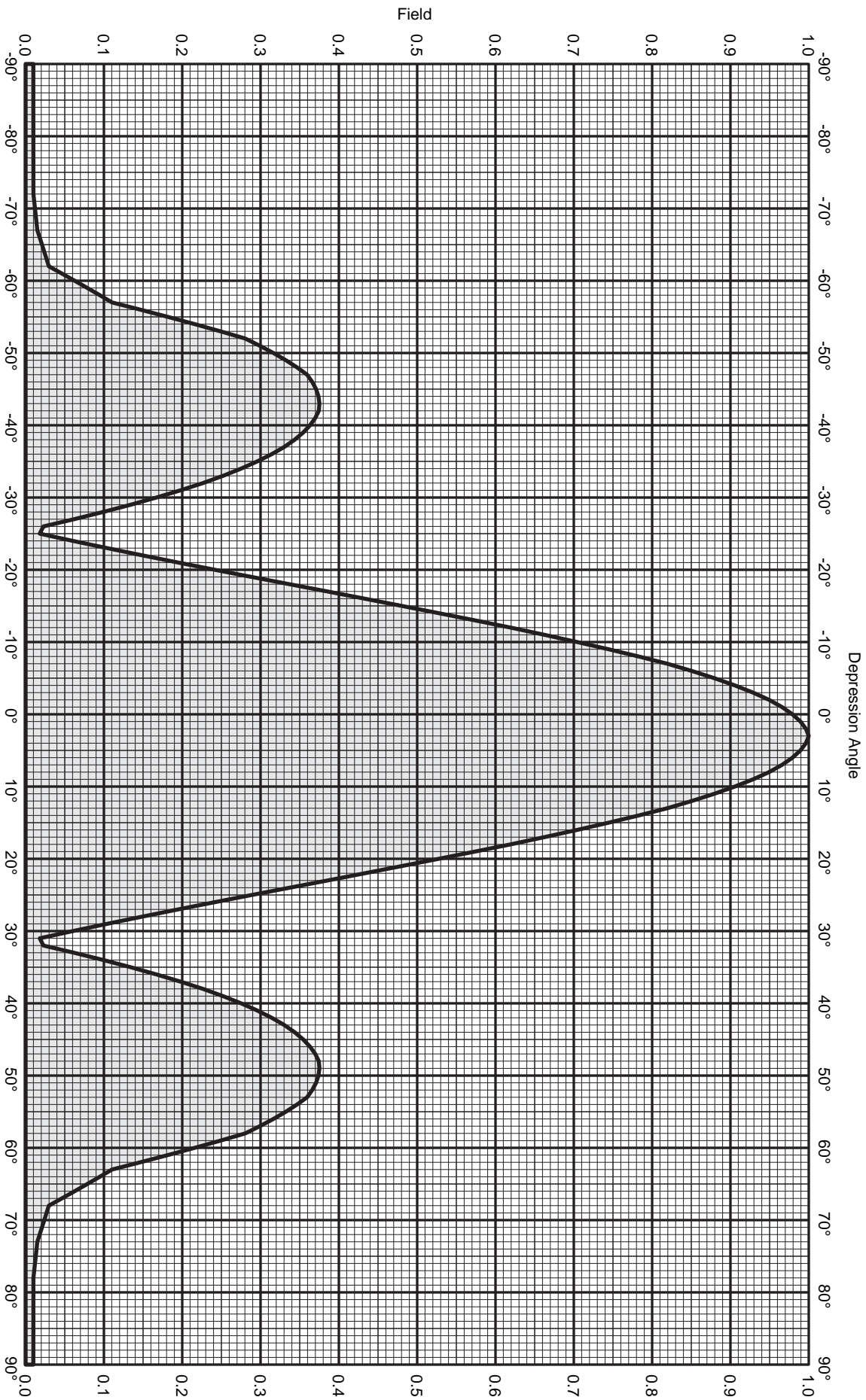


FIGURE 2



KATHREIN
SCALA DIVISION

Post Office Box 4580
Medford, OR 97501 (USA)
Phone: (541) 779-6500
Fax: (541) 779-3991
<http://www.kathrein-scala.com>

Two CL-1469B Log-periodic Antennas

Oriented at 320 degrees

Channel: 34

Gain: horizon 10.3 dBd, peak 10.5 dBd

Horizontal Polarization

2.5 deg dt

Vertical stacked 1.05 wavelength

Vertical plane Pattern