

TECHNICAL SUMMARY  
MINOR CHANGE APPLICATION FOR CONSTRUCTION PERMIT  
STATION KMCC DTS2  
LAUGHLIN, NEVADA  
CHANNEL 32 4.5 KW (DA) 557 m

1. This is a minor change application for the DTS2 operation of KMCC at Laughlin, Nevada (facility ID 41237). It is proposed to relocate the KMCC DTS2 operation to an adjacent tower within the antenna farm from which it operates, increase the RCAMSL from 1331.4 meters to 1341 meters and decrease the directional antenna maximum ERP from 5 kW to 4.5 kW. No other changes in KMCC's authorized technical facilities are proposed, including no change in the current directional antenna system (PSI model PSILP8SL-32) or orientation (40 degrees). As indicated by Figure 1, there will be no extension of the licensed noise-limited service contour (NLSC) resulting from the proposed operation. Therefore, the proposed operation complies with the FCC's limitations on minor change applications implemented on April 5, 2013 by FCC Public Notice (DA 13-618). There will also be no change in the overall structure height of the existing tower (ASRN 1020486).

2. As indicated by the attached FCC *TVStudy* analysis, the proposed KMCC DTS2 operation complies with the 0.5 percent interference criteria to all pertinent facilities. The proposal also complies with the coverage requirements applicable to DTS stations set forth in Section 73.626. Therefore, it is believed that the proposed facilities comply with the technical requirements applicable to DTS stations.

3. RFR Compliance: The proposed facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna will be located 24 meters above ground level. The total DTV ERP is 4.4 kW (horizontal polarization). A conservative vertical plane relative field value of 0.1 is presumed for the antenna's downward radiation in both the horizontal and vertical planes of polarization (for angles below 60 degrees downward, see attached antenna data which was excerpted from BPCDT-20111209DNR). The calculated power density at a point 2 meters above ground level is  $3.0 \text{ uW/cm}^2$  which is only 0.8% of the FCC's recommended limit of  $387.3 \text{ uW/cm}^2$  for channel 32 for an uncontrolled environment. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with RFR warning signs. Also, as this is a multi-user site, a formal RFR protection protocol is in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to RFR exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.