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**Engineering Statement
Displacement of K48MA-D
Channel 36 at Rainier, OR
March 2018**

This Engineering Statement has been prepared on behalf of Rural Oregon Wireles Television, Inc. ("ROWT"), licensee of digital TV translator station K48MA-D at Rainier, Oregon. This material has been prepared in connection with a displacement application.

I. Background

The translator currently operates on a channel above Channel 36, which will be the highest channel remaining for terrestrial television broadcasting per the results of the 2017 spectrum auction. Accordingly, ROWT is filing this displacement application during the Commission's Special Displacement Window, which is scheduled for April 10 to May 15, 2018.

II. Interference Study

Study has been made of all cochannel and adjacent-channel facilities in the vicinity of the proposed operation, including a detailed Longley-Rice interference study to demonstrate that the proposed operation will not cause interference to any authorized or pending proposed facilities. This study was performed using the Commission's TVStudy software.

The results of this study indicate that the proposed facility is predicted to cause zero additional interference to any of the listed stations. Based on the foregoing interference study, it is believed that the proposed facility can operate without risk of objectionable interference to other stations.

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Study created: 2018.03.29 14:59:24

Study build station data: LMS TV 2018-03-28 (108)

Proposal: K48MA-D D36 LD LIC RAINIER, OR
File number: RAIN36
Facility ID: 130928
Station data: User record
Record ID: 540
Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KORK-CD	D35	DC	LIC	PORTLAND, OR	BLANK0000001496	71.6 km
No	K35CR-D	D35	LD	LIC	TILLAMOOK, ETC., OR	BLDTL20130220AAR	126.6
No	K35LQ-D	D35	LD	CP	CENTERVILLE, WA	BNPDTL20100513ADW	159.2
No	K35HU-D	D35	LD	LIC	GRAYS RIVER, WA	BLDTT20111031AEM	63.0
No	KDHW-CD	D35	DC	LIC	YAKIMA, WA	BLDTA20100902AED	184.0
No	K36LI-D	D36	LD	CP	ASTORIA, OR	BNPDTL201003224ACB	93.3
No	K36BX-D	D36	LD	LIC	COOS BAY, OR	BLDTL20100402ACG	324.0
No	K50CT-D	D36	LD	APP	COTTAGE GROVE, OR	BLANK00000029358	265.5
No	K36FG-D	D36	LD	LIC	HOOD RIVER, ETC., OR	BLDTT20091125AAU	108.9
No	K36DP-D	D36	LD	LIC	PENDLETON, OR	BLDTT20120621ABZ	295.6
Yes	KKEI-CD	D36	DC	CP	PORTLAND, OR	BLANK00000027188	71.6
No	K36GU-D	D36	LD	LIC	ROCKAWAY BEACH, OR	BLDTT20110808ACE	96.1
No	KTCW	D36	DT	CP	ROSEBURG, OR	BLANK00000034586	331.1
No	K36JZ-D	D36	LD	LIC	ROSEBURG, OR	BLDTL20140221ACK	331.6
No	KJWY-LD	D36	LD	LIC	SALEM, OR	BLDTL20130730ALY	133.6
No	K36EW-D	D36	DC	LIC	COLLEGE PLACE, WA	BLDTA20090401AWP	345.9
No	K44EN-D	D36	LD	APP	METHOW, WA	BLANK00000030029	300.7
No	KBWU-LD	D36	LD	LIC	RICHLAND, ETC., WA	BLDTL20080701AEM	286.7
Yes	KZJO	D36	DT	CP	SEATTLE, WA	BLANK00000025375	166.7
No	KSKN	D36	DT	LIC	SPOKANE, WA	BLANK00000001266	450.8
Yes	KEVE-LD	D36	LD	LIC	VANCOUVER, WA	BLDTL20101028ABP	71.9
No	K36KY-D	D36	LD	LIC	WENATCHEE, WA	BLANK00000010595	237.0
No	KWYT-LP	D36	LD	APP	YAKIMA, WA	BLANK00000029321	185.5

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D36
Mask: Stringent
Latitude: 46 9 45.40 N (NAD83)
Longitude: 122 51 9.40 W
Height AMSL: 399.0 m
HAAT: 0.0 m
Peak ERP: 0.500 kW
Antenna: SCA-1X1KBBU (ID 20717) 240.0 deg
Elev Pattn: Generic

50.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.001 kW	173.8 m	7.7 km
45.0	0.003	59.1	5.7
90.0	0.000	165.6	4.5
135.0	0.001	105.9	5.8
180.0	0.036	299.5	23.3
225.0	0.414	317.4	36.7
270.0	0.245	376.4	35.7
315.0	0.004	323.6	13.8

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 228 m

Proposal 25.86 dBu contour does not cross Canadian border
Distance to Canadian border: 235.0 km

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Distance to Mexican border: 1577.1 km

Conditions at FCC monitoring station: Ferndale WA
Bearing: 4.0 degrees Distance: 311.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 108.8 degrees Distance: 1571.0 km

Study cell size: 1.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

---- Below is IX received by proposal RAIN36 ----

Proposal receives 3.79% interference from scenario 1
No IX check failures found.

III. Technical Facility

Continued operation is proposed at the current transmitter site on Mount Brynion, using a Kathrein broadband antenna (1X1KBBU), with an ERP of 500 watts.

IV. RF Exposure Study

The power density calculations shown below were made using the techniques outlined in OET Bulletin No. 65. "Ground level" calculations in this report have been made at a reference height of 2 meters above ground to provide a worst-case estimate of exposure for persons standing on the ground in the vicinity of the tower. The equation shown below was used to calculate the ground level power density figures from each antenna.

$$S(\mu W / cm^2) = \frac{33.40981 \times AdjERP(Watts)}{D^2}$$

Where: *AdjERP(Watts)* is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

D is the distance in meters from the center of radiation to the calculation point.

Power density levels produced by the proposed facility were calculated for an elevation of 2 meters above ground (13 meters below the antenna radiation center). The worst case power density levels occur at depression angles between 45 and 90 degrees below the horizontal. The calculations in this report assume a worst-case relative field value of 0.200 at these angles, based on the manufacturer's vertical plane pattern for the horizontally-polarized Kathrein 1-level broadband

antenna proposed in this application. This relative field value yields a worst-case adjusted average effective radiated power of 20 watts at depression angles between 45 and 90 degrees below the horizontal. Assuming this power and the shortest distance between the antenna radiation center and 2 meters above ground level (i.e. straight down), the highest calculated power density from the proposed antenna alone occurs at the base of the antenna support structure. At this point the power density from the proposed facility is calculated to be $4.0 \mu\text{W}/\text{cm}^2$, which is 1.0% of $401.3 \mu\text{W}/\text{cm}^2$ (the FCC maximum for uncontrolled environments at the Channel 36 frequency).

Pursuant to OET Bulletin No. 65, all station personnel and contractors are required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken. The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency exposure in excess of FCC guidelines.

March 29, 2018

Erik C. Swanson, P.E.