

TECHNICAL EXHIBIT

Displacement Application for Modification
of Digital Television Translator Station
prepared for

Rocky Mountain Public Media, Inc.
K46JO-D Del Norte, Colorado
Facility ID 167427
CH 46 (digital) .25 kW

Rocky Mountain Public Media, Inc (formerly Rocky Mountain Public Broadcasting, Inc) is the licensee of digital television translator station K46JO-D, Channel 46, Del Norte, Colorado, File BLDTT20101006AAZ, Facility ID 167427. K46JO-D is being displaced and is hereby applying during the Special Displacement Window for a new digital channel (35).

As proposed herein K46JO-D will operate at its existing antenna location on Channel 35. The current antenna is a Scala 4DR-4S UHF directional antenna. It will be replaced with the same model antenna having an identical pattern and orientation but a different frequency range covering the new channel. The antenna will be mounted on the existing unregistered tower. The replacement antenna will be located at the same height as the current antenna.

Contour Overlap

The antenna location, pattern and orientation on the new channel will remain unchanged, thereby insuring that there will be contour overlap with the displaced facility.

Interference Analysis, International Coordination, etc.

The results of evaluating the proposed facility for interference using the FCC TV Study program indicate that the station will comply with the FCC's interference protection requirements. These results also indicate that the station complies with the FCC's requirements for international coordination, FCC monitoring station protection, and AM transmitter protection. The proposed facility is well outside the range for coordination with the NTIA regarding the Table Mountain Quiet Zone. The TV Study results are attached to this exhibit.

Environmental Considerations

The proposed facility was evaluated for human exposure to RF energy using the procedures described in FCC OET Bulletin Number 65. Based on OET-65 equations and using .3

as the relative field strength in a downward direction¹, the calculated signal density near the tower at two meters above ground level attributable to the proposed facility is 1.30 uW/cm², which is 0.33% of the general population/uncontrolled maximum permitted exposure limit. Thus, the public will not be exposed to RF levels attributable to the proposed facility in excess of the FCC's guidelines. The applicant will reduce power or cease operation to protect workers having access to the tower. There will be no change in overall structure height. Thus the proposed facility is categorically excluded from environmental processing.

Exhibit prepared by:

J.B. Schoedler Associates, LLC
Denver, Colorado
303-725-9043
jschoedler@usa.net

¹ The elevation pattern for a Scala 4DR-4S antenna shows $\leq .3$ relative field value from 30 to 90 degrees below horizontal.

Study created: 2018.04.25 16:26:50

Study build station data: LMS TV 2018-04-19

Proposal: K46JO-D D35 (D46) LD LIC DEL NORTE, CO
File number: BLDTT20101006AAZ
Facility ID: 167427
Station data: LMS TV 2018-04-19
Record ID: 2503fla7772348d98096cf6212b6c0ea
Country: U.S.

Build options:
Protect pre-transition records not on baseline channel
Protect baseline records from LPTV

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KSPK-LP	N28-	TX	LIC	WALSENBURG, CO	BLTTTL20050315AGL	125.1 km
No	K28GE-D	N28+	TX	LIC	WOODLAND PARK, CO	BLTTTL19991203AAV	178.1
No	K28ER	N28+	TX	LIC	DULCE & LUMBERTON, NM	BLTT19970421JC	100.3
No	K34LM-D	D34	LD	CP	ASPEN, CO	BNPDTL20091028ABN	180.0
No	KWGN-TV	D34	DT	LIC	DENVER, CO	BLCDDT20091209ACA	244.8
No	KTLP-LP	N34z	TX	LIC	PUEBLO, CO	BLTTTL20100505AHF	166.4
No	K51DI-D	D34	LD	APP	SARGENTS, CO	BLANK0000034297	91.6
No	K34GI	N34+	TX	LIC	TRINIDAD, CO	BLTTTL20050613ABW	160.0
No	K34GI	D34	LD	CP	TRINIDAD, CO	BDFCDTL20090824ACG	160.0
No	KFNM-LD	D34	LD	LIC	FARMINGTON, NM	BLANK0000007539	207.3
No	K35IX-D	D35	LD	LIC	BASALT, CO	BLDTT20091221ABH	200.6
No	K35LU-D	D35	LD	CP	BURLINGTON, CO	BNPDTL20100514AFS	377.1
No	K35CH-D	D35	LD	LIC	CORTEZ, MANCOS, ETC, CO	BLDTT20090522ABN	171.5
No	K35LJ-D	D35	LD	LIC	CRESTED BUTTE, CO	BLDTT20120522ADQ	150.6
No	KCNC-TV	D35	DT	LIC	DENVER, CO	BLCDDT20090611AAQ	244.7
No	KREZ-LD	D35	LD	APP	DURANGO, CO	BLANK0000051726	153.3
No	K43AB-D	D35	LD	APP	GRAND JUNCTION, CO	BLANK0000052948	233.5
No	K35DZ-D	D35	LD	LIC	LA JUNTA, CO	BLDTT20130124AEN	236.1
No	K35JS-D	D35	LD	LIC	LAMAR, CO	BLDTT20110509ADE	336.3
No	K40DP-D	D35	LD	APP	LAS ANIMAS, CO	BLANK0000052163	267.0
No	KNME-TV	D35	DT	LIC	ALBUQUERQUE, NM	BLEDT20030218BNH	274.2
No	K35FP	D35	LD	LIC	TUCUMCARI, NM	BLANK0000001694	362.6
No	K36JB-D	D36	LD	LIC	CRIPPLE CREEK, CO	BLDTT20100108AAS	150.4
No	KDVR	D36	DT	CP	DENVER, CO	BLANK0000025684	244.3
No	KDVR	D36	DT	APP	DENVER, CO	BLANK0000034058	244.3
No	KDVR	D36	DT	BL	DENVER, CO	DTVBL126	244.3
No	K36IH-D	D36	LD	LIC	IGNACIO, CO	BLDTT20101007AAT	122.6
No	K36LX-D	D36	LD	LIC	JACKS CABIN, CO	BLDTT20120420AAO	139.0
No	K36GQ-D	D36	LD	LIC	PARLIN, CO	BLDTL20100527AFW	100.2
No	K48CU	D36	LD	CP	PUEBLO, CO	BDISDTT20120413AAF	161.1
No	KASY-TV	D36	DT	CP	ALBUQUERQUE, NM	BLANK0000028107	274.2
No	KASY-TV	D36	DT	BL	ALBUQUERQUE, NM	DTVBL55049	274.2
No	K36LF-D	D36	LD	LIC	TAOS, NM	BLDTT20110725ADT	154.9
No	K36KD-D	D36	LD	LIC	TIERRA AMARILLA, NM	BLDTT20111102ACA	91.9
No	KENY-LP	N39-	TX	LIC	ALAMOSA, CO	BLTTTL20050318ACO	40.3
No	K43GT	N43z	TX	LIC	PAGOSA SPRINGS, CO	BLTT20040213AFR	92.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D35
Mask: Stringent
Latitude: 37 40 30.00 N (NAD83)
Longitude: 106 14 32.10 W
Height AMSL: 2393.0 m
HAAT: 0.0 m
Peak ERP: 0.203 kW
Antenna: (replication) 0.0 deg
Elev Pattn: Generic

50.8 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.000 kW	30.0 m	2.1 km
45.0	0.000	49.9	2.4
90.0	0.002	53.8	5.2
135.0	0.000	51.0	2.2
180.0	0.000	-14.4	3.1
225.0	0.072	-190.7	8.8
270.0	0.203	-11.5	11.4
315.0	0.074	-59.9	8.9

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: -11 m

Distance to Canadian border: 1258.7 km

Distance to Mexican border: 655.3 km

Conditions at FCC monitoring station: Douglas AZ

Bearing: 205.4 degrees Distance: 753.8 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 17.4 degrees Distance: 289.1 km

ERP: 0.000104 kW Field strength: -69.2 dBu, 0.0 mV/m

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%

No IX check failures found.