



Engineering Statement

Displacement of K47DG-D Proposed Channel 33 at Eureka, Nevada May 31, 2018

This Engineering Statement has been prepared on behalf of the Eureka County Television District (ECTD), licensee of Digital TV Translator Station K47DG-D at Eureka, Nevada. The statement was prepared in support of a Displacement Channel Window Filing for facilities as herein proposed.

The translator currently operates on channel 47, which is outside of the new post-incentive auction core television spectrum. Consequently, the licensee must cease its operations on channel 47 in order to clear the spectrum in the area to enable the commencement of wireless operations in the band prior to the completion of the Post-Incentive Auction Repacking.

The licensee proposes to move its operations to channel 33.

The parameters of the proposed facility are as follows:

Proposed Parameters:

Transmitter Location:	39-26-49.7 N 115-59-55.2 W (NAD 83)
Channel:	33
ERP:	0.3 KW
Emission Mask:	Stringent
Antenna Pattern:	Omni
Antenna Manufacturer:	Scala
Antenna Model:	SL-8
Antenna RCAGL:	15.25 Meters
Overall Structure AGL:	30.5 Meters
RCAMSL	2933.25 Meters



Interference Study:

An interference study was undertaken utilizing the FCC's TVStudy program to analyze the co-channel and adjacent channel interference scenarios for the new proposed channel of operation.

The results of the study indicated that no impermissible interference would result from the proposed operations.

Based upon the forgoing interference study, it is believed that the proposed facility can operate without any impermissible interference to other stations.

RF Exposure Study:

A study was conducted to determine compliance with the RF Radiation Maximum Permissible Exposure (MPE) limits of the proposed operation. The study was conducted using the methodology outlined in the FCC's OET Bulletin 65 regarding RF Radiation Compliance.

The study utilized the proposed antenna height of 15.25 meters AGL and a reference height of 2 meters AGL for the reference location. This yields a distance from the antenna of 13.25 meters.

The proposed antenna elevation pattern indicates that the downward radiation from the antenna from 20° to 90° below horizontal has a maximum relative field value of 0.2. This value was used in conjunction with the distance from the antenna and the prescribed formula from OET Bulletin 65 to determine a maximum predicted power density of 11.4 μ W/cm² at 2 meters above ground level near the base of the tower. The Maximum Permissible Exposure Level (MPE) for the Uncontrolled/General Population environment for Channel 33 is approximately 391.3 μ W/cm². Thus, the proposal is approximately 2.9% of the General Population MPE level and well within the allowable limit. It is noted that other existing radiators at the site will remain essentially unchanged with respect to their contribution of total power at the site and therefore the total contribution to permissible exposure remains essentially unchanged at this site.

Based upon the forgoing it is believed that the proposed facility is in compliance with the required RF Exposure limits.

The licensee and all station personnel and contractors are required to follow appropriate safety procedures before the commencement of any work on the tower or in close proximity to the antenna. These procedures including reducing power or turning off the transmitter before any work is undertaken at the site. The licensee in coordination with



any other users of the site must reduce power or cease operations as necessary to ensure workers having access to the site, tower, and antenna locations are not exposed to RF Radiation levels in excess of those prescribed by FCC Guidelines.

May 31, 2018

Dennis W. Wallace C.B.T.E.
Meintel, Sgrignoli, & Wallace, LLC
1282 Smallwood Drive
Suite 372
Waldorf, MD 20603
(202) 251-7589
dennis.wallace@mswDTV.com