

ENGINEERING STATEMENT

This Engineering Statement supports this application to modify construction permit 0000129740 for K22OP-D, Channel 22, Facility ID 181925, licensed to the Applicant herein.

Proposed Facility

The proposed facility was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 1.00 km
Profile point spacing: 0.30 km

The station is projected to move to a site that is owned by the parent company of the Applicant, and the Station can be constructed before the permit will expire.

It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

Digital TV and Class A Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., “*de minimis*”) based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Low Power TV and TV Translator Station Protection

The proposed facility causes less than 2.0% interference to surrounding low power licenses and construction permits (i.e., “*de minimis*”) based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Environment Effect

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.