



**STATEMENT OF JOHN E. HIDLE, P.E.  
IN SUPPORT OF AN APPLICATION FOR  
AN AUXILIARY CONSTRUCTION PERMIT FOR  
KMPH-TV - VISALIA, CALIFORNIA  
DTV - CH. 28 - 219 kW - 763 m HAAT**

Prepared for: KMPH Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

**GENERAL**

This office has been authorized by KMPH Licensee, LLC, licensee of KMPH-TV, channel 28, facility ID number 51488, licensed to Visalia, California, to prepare this statement, FCC Form 2100, its technical sections, and the associated exhibits in support of an application for an auxiliary construction permit. The applicant proposes to utilize KMPH-TV's former licensed facility, file number BLCDDT-20030204AGN, as its auxiliary broadcast facility. The formerly licensed Andrew model TW-22H4-ESC1-28H elliptically polarized directional transmitting antenna's center of radiation remains at a height of 115 meters above ground, and 763 meters above average terrain. The ERP is 219 kW.

**PREDICTED COVERAGE CONTOURS**

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and

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antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 1 shows the predicted Noise Limited (40.14 dBu) contour for the licensed facility and the proposed auxiliary facility, and additionally the proposed principal community (48 dBu) contour which completely encompasses the principal community of license, Visalia, California.

**BLANKETING AND INTERMODULATION INTERFERENCE**

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the KMPH-TV site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

**RADIO FREQUENCY IMPACT, SAFETY & STATEMENT OF COMPLIANCE**

The formerly licensed KMPH-TV facility was previously evaluated for human exposure according to methodology set forth in OET Bulletin 65. The resulting power density attributable to the facility is  $1.440 \mu\text{W}/\text{cm}^2$  which for an "uncontrolled environment" is 0.39% of the maximum permitted exposure limit for the general population.

Therefore, pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed facility would not exceed 5% of the uncontrolled and controlled exposure limits, the proposal's power density contribution is considered insignificant. Further, the Applicant will continue to cooperate/coordinate with other site users and reduce power and/or cease

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operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

**SUMMARY**

The instant application for an auxiliary construction permit proposes for KMPH-TV to utilize its formerly licensed facility, file number BLCDT-20030204AGN, at its formerly authorized position at 115 meters above ground level, 763 meters Height Above Average Terrain (HAAT) and 219 kW ERP as its auxiliary facility. It is submitted that the application described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement, FCC Form 2100, its technical sections, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: November 8, 2023

