

TECHNICAL SUMMARY  
STA REQUEST  
SPECIAL DISPLACEMENT WINDOW  
APPLICATION FOR CONSTRUCTION PERMIT  
LMS FILE NO. 0000054108  
LOW POWER DIGITAL STATION KNTL-LP  
LAUGHLIN, NEVADA  
CHANNEL 35 15 KW (ND)

1. The instant application is for an STA to operate with the facilities set forth in the KNTL-LP's pending special displacement window application, LMS File No. 0000054108. Specifically, it is proposed to operate KNTL-LP on "in core" channel 35 using a full service emission mask (F) with a nondirectional antenna maximum effective radiated power (ERP) of 15 kW using an ERI model ALP8L1-HSO-35 horizontally polarized directional antenna. The antenna radiation center height will be 1478 m AMSL. There will be no change in the overall structure height (no ASRN).

2. Eligibility: KNTL-LP received a 120 day letter from T-Mobile indicating that the current KNTL-LP operation would likely interfere with its new 600 MHz band license. Therefore, pursuant to the FCC's Public Notice dated June 14, 2017 entitled "*Incentive Auction Task Force and Media Bureau Set Forth Tools Available to LPTV/Translator Stations Displaced Prior to the Special Displacement Window*" (DA 17-584, MB Docket No. 16-306, GN Docket No. 12-268), KNTL-LP is eligible to submit this STA to operate with the facilities set forth in its pending displacement application for channel 35.

3. Interference Compliance: As indicated in the attached *TVStudy* analysis, KNTL-LP's proposed channel 35 displacement operation meets the FCC's interference protection requirements with respect to all protected facilities based on both the pre-transition and post-transition allocation environments. A cell size of 1.0 km and a profile resolution of 0.1 points/km were utilized for the *TVStudy* analysis.

4. RFR Compliance: As this is a complex broadcast antenna farm with multiple towers and users, measurements will be made to substantiate compliance with the FCC's RFR exposure limits. Furthermore, access to the transmitting site will be restricted and appropriately markets with RFR warning signs. Also, a formal RFR protection protocol will be implemented in the event that workers or other authorized personnel enter the restricted

area or climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to RFR exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.