

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

K39JV – OPELOUSAS, LOUISIANA
FACILITY ID: 47721

DIGITAL NETWORKS – SOUTHEAST, LLC

OCTOBER 2020

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10.1.2020

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REQUEST FOR SPECIAL TEMPORARY AUTHORITY

The following engineering statement and attached exhibits have been prepared for **Digital Networks-Southeast, LLC** ("Southeast"), licensee of analog low power television station K39JV at Opelousas, Louisiana, and applicant for a construction permit for displacement of the facility from channel 39 to channel 14.¹ This STA request specifies the same technical parameters that are specified in the pending construction permit application filed this date, and assigned LMS File No. 0000123647.

K39JV is licensed on channel 39, a now out of core channel, and as a result of the Commission's spectrum repack, went silent on October 3, 2019. Southeast has been diligently seeking a solution since that time, and has only recently been able to assemble one that would comply with the Commission's rules at a site for which reasonable site assurance has been made available. Southeast is in possession of the equipment and manpower to complete the installation of this facility in accordance with the technical parameters herein specified. As a result, Southeast respectfully requests expedited processing of this STA request in order to preserve the license.

The proposed facility would operate with a maximum effective radiated power of 2.0 kW at a center of radiation of 33.2 meters above mean sea level utilizing a composite directional antenna. This composite antenna consists of two Kathrein-Scala PR-TV antennas, one of which is oriented at 105 degrees true, and the other at 320 degrees true. Equal power division is to be employed between the constituent elements of the array.

¹ The Facility ID for K39JV at Opelousas, Louisiana is 47721.

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The proposed technical parameters would result in a 51 dBu F(50,90) contour that overlaps the licensed 74 dBu F(50,50) service contour. Additionally, the proposed site is located within 30 miles of the licensed site. Exhibit E-1 is an illustration of a comparison between the service contours and the site location radius.

Exhibit E-2 is the TVStudy output for the proposed technical parameters, which as was previously stated, are identical to those specified in the pending construction permit application. This interference study was run at a cell resolution of 1.0 kilometer, and a profile spacing of 1.0 kilometer. As is indicated in this study, no outgoing interference failures are identified. Additionally, the proposed facility would be located at a significant distance from the closest FCC monitoring station, the Table Rock receiving zone, and the West Virginia quiet zone. It is respectfully suggested that a duration of this STA be 30 days in length.

The proposed technical parameters would not result in a significant environmental impact, and are exempt from environmental processing. The antenna structure to be utilized is registered with the Commission, and the addition of the proposed antenna would not increase the existing environmental impact already present. Additionally, the proposed technical parameters would not result in human exposure to radiofrequency radiation in excess of the applicable safety standards. Using the equations in Appendix A of *OET Bulletin 65*, the calculated power density at ground level based on a downward relative field of 0.3 is $7.67 \mu\text{W}/\text{cm}^2$, which complies with the uncontrolled environment condition of the Commission's safety standard. The addition of the proposed STA facility does not cause the aggregate power density at the site to exceed the uncontrolled environment condition of the Commission's applicable safety standards.

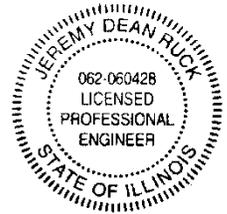
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Southeast certifies that it will coordinate with all other users of the site to ensure that workers and other persons are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power output or cessation of operation as necessary to protect persons at the site.

The preceding statement, and attached exhibits, have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2021

Jeremy D. Ruck, PE
October 1, 2020

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K39JV.X
PROPOSED
Latitude: 30-24-16.70 N
Longitude: 091-50-15.30 W
ERP: 2.00 kW
Channel: 14
Frequency: 473.0 MHz
AMSL Height: 33.2 m
Horiz. Pattern: Directional
Prop Model: None

K39JV
BLTT-20071011ABI
Latitude: 30-36-41.60 N
Longitude: 092-08-24.30 W
ERP: 15.90 kW
Channel: 39Z
Frequency: 623.0 MHz
AMSL Height: 152.2 m
Horiz. Pattern: Omni
Prop Model: None

Jeremy Ruck & Associates, Inc.

- Proposed K39JV 51 dBu F(50,90) Contour
- Licensed 74 dBu F(50,50) Contour
- Proposed Site 30-mile Radius

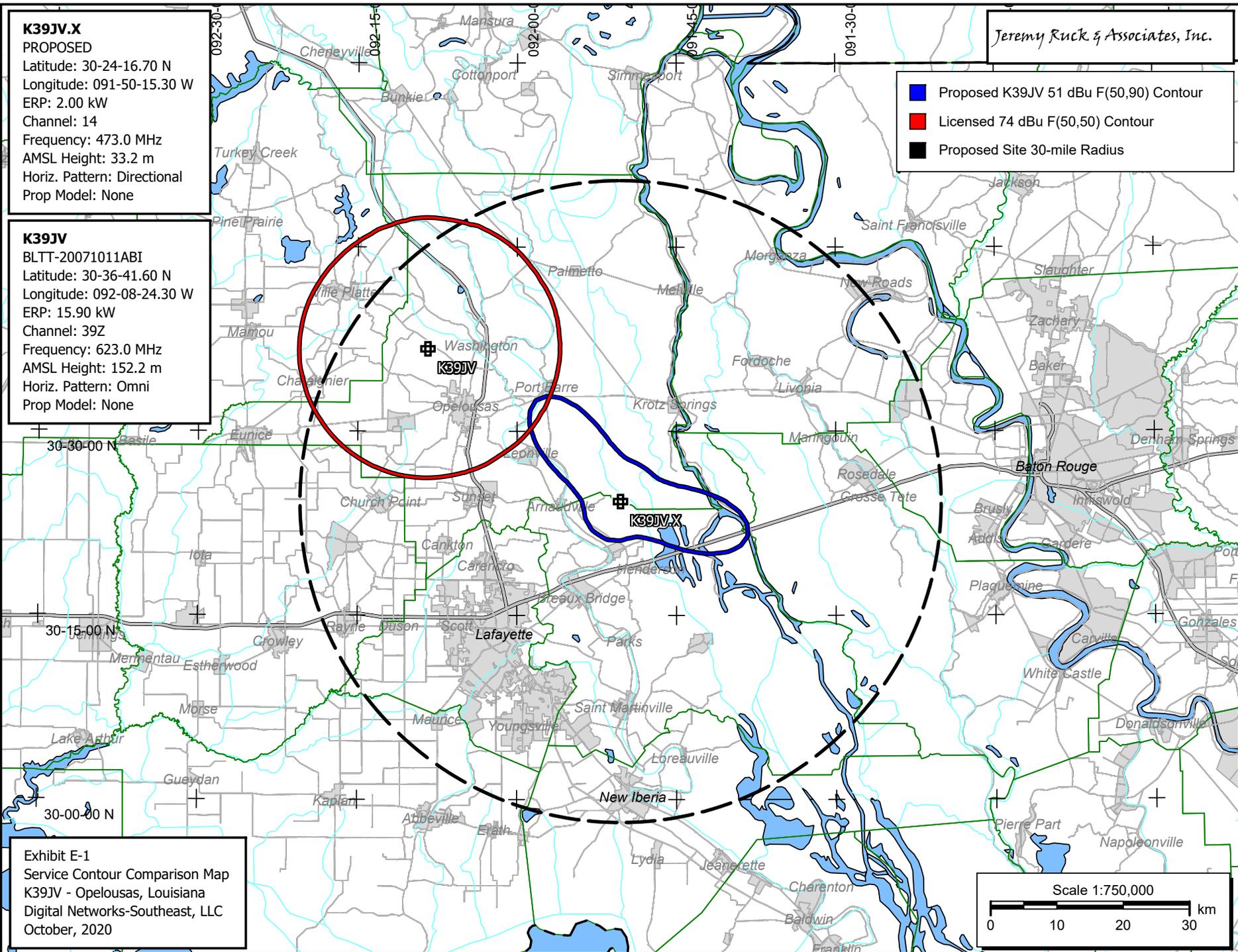


Exhibit E-1
Service Contour Comparison Map
K39JV - Opelousas, Louisiana
Digital Networks-Southeast, LLC
October, 2020

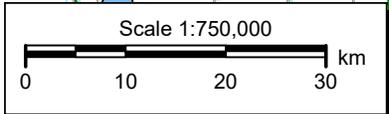


Exhibit E-2 - TVStudy Interference Study

tvstudy v2.2.5 (4uoc83)

Database: 127.0.0.1, Study: K39JV DISP CH 14 ASRN 1284466 COR 33.2 m AMSL 2 kW ERP PR-TV x2 105,320, Model: Longley-Rice
Start: 2020.10.01 14:45:51

Study created: 2020.10.01 14:45:51

Study build station data: LMS TV 2020-10-01

Proposal: K39JV D14 LD LIC OPELOUSAS, LA
File number: BLTT20071011ABI
Facility ID: 47721
Station data: User record
Record ID: 31
Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	K14OK-D	D14	LD	CP	EL DORADO, AR	BNPDTL20100428ACK	321.6 km
No	WFGX	D14	DT	LIC	FORT WALTON BEACH, FL	BLANK0000121010	402.1
No	KPNB-LD	D14	LD	LIC	BATON ROUGE, LA	BLDTL20100111ADP	67.7
Yes	KLAF-LD	D14	LD	LIC	LAFAYETTE, LA	BLANK0000081306	29.7
No	KYHT-LD	D14	LD	CP	LAKE CHARLES, LA	BLANK0000054614	107.6
No	W14EH-D	D14	LD	CP	GREENVILLE, MS	BLANK0000036284	341.7
No	WDBD	D14	DT	LIC	JACKSON, MS	BLANK0000064020	244.0
No	W14DV-D	D14	LD	CP	PURVIS, MS	BNPDTL20100510AFA	250.1
No	NEW	D14	LD	APP	BEAUMONT, TX	BNPDTL20090825AYS	212.9
No	NEW	D14	LD	APP	BEAUMONT, TX	BNPDTL20090825AQZ	212.9
No	K14TB-D	D14	LD	CP	COLLEGE STATION, TX	BLANK0000116855	423.4
No	KVQT-LD	D14	LD	CP	HOUSTON, TX	BLANK0000053657	365.5
No	KIBN-LD	D14	LD	LIC	LUFKIN, TX	BLANK0000001197	299.1
No	K14QT-D	D14	LD	LIC	TEXARKANA, TX	BLANK0000081887	397.7
No	WNOL-TV	D15	DT	LIC	NEW ORLEANS, LA	BLCDT20121019AAR	187.6
No	WNTZ-TV	D15	DT	LIC	NATCHEZ, MS	BLANK0000071605	141.2
No	KFDM	D15	DT	LIC	BEAUMONT, TX	BLANK0000063111	207.7

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D14
Mask: Full Service
Latitude: 30 24 16.70 N (NAD83)
Longitude: 91 50 15.30 W
Height AMSL: 33.2 m
HAAT: 28.2 m
Peak ERP: 2.00 kW
Antenna: SCA PR-TV x2 1@105 1@320 0.0 deg
Elev Pattn: Generic

48.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.034 kW	28.8 m	8.2 km
45.0	0.019	27.3	7.1
90.0	0.814	28.4	18.3
135.0	0.068	30.3	9.8
180.0	0.014	28.2	6.7
225.0	0.016	27.5	6.9
270.0	0.014	26.8	6.6
315.0	1.77	28.2	21.9

Distance to Canadian border: 1495.3 km

Distance to Mexican border: 700.3 km

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Exhibit E-2 - TVStudy Interference Study

Conditions at FCC monitoring station: Kingsville TX
 Bearing: 242.2 degrees Distance: 674.0 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
 Bearing: 315.3 degrees Distance: 1622.0 km

No land mobile station failures found

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%

Interference to BLANK0000081306 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	KLAF-LD	D14	LD	LIC	LAFAYETTE, LA	BLANK0000081306				
Undesireds:	K39JV	D14	LD	LIC	OPELOUSAS, LA	BLTT20071011ABI	29.7 km			
	KYHT-LD	D14	LD	CP	LAKE CHARLES, LA	BLANK0000054614	84.7			
	Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
	3408.8	410,378	3408.8	410,378	3382.7	407,738	3185.8	403,402	5.82	1.06
Undesired			Total IX		Unique IX, before		Unique IX, after			
	K39JV D14 LD LIC	196.9		4,336		196.9		4,336		
	KYHT-LD D14 LD CP	26.1		2,640		26.1		2,640		

Interference to proposal scenario 1
 30.92% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	K39JV	D14	LD	LIC	OPELOUSAS, LA	BLTT20071011ABI				
Undesireds:	KLAF-LD	D14	LD	LIC	LAFAYETTE, LA	BLANK0000081306	29.7 km			
	Service area		Terrain-limited		IX-free		Percent IX			
	448.8	8,206	448.8	8,206	328.8	5,669	26.73	30.92		
Undesired			Total IX		Unique IX		Prct Unique IX			
	KLAF-LD D14 LD LIC	120.0		2,537		120.0		2,537		26.73 30.92

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