

**ENGINEERING STATEMENT**  
**OF**  
**BENJAMIN L. PIDEK, P.E.**  
**IN SUPPORT OF**  
**APPLICATION FOR CONSTRUCTION PERMIT**  
**FOR**  
**DIGITAL “FLASHCUT”**  
**K19CM**  
**FARMINGTON, NM**

**Background**

KOAT Hearst-Argyle Television, Inc. (KOAT) is the licensee of the analog television translator station K19CM, Ch. 19, (BLTT-20060511ABS, Facility ID. 53883) at Farmington, NM. In June 2011, KOAT applied for a construction permit to displace K19CM from Ch. 19 to Ch. 27 and “flashcut” to digital operation on Ch. 27 (BDISDTT-20110603AAI). KOAT now wishes to withdraw its displacement application. Instead, in the instant application, KOAT is applying for a construction permit to “flashcut” K19CM to digital operation on Ch. 19.

**Site and Tower**

The site will remain the same as that of the licensed facility as will the height of the antenna radiation center. The overall height of the tower (60.4m AGL) is less than that required for notification to the FAA and, further, the tower passes the TOWAIR program.

### **Antenna and Power**

KOAT is proposing to use a Scala SL-8 omni-directional antenna for the facility with a horizontally polarized ERP of 1.0 kW (no vertical polarization component).

### **Interference**

An interference study was conducted using the proposed parameters (including the use of the full-service mask) with software that emulates that used by the Commission. The results of the OET-69 analysis indicate that there are no domestic full-service DTV or Class A stations predicted to receive more than the allowable 0.5% new interference from the proposed K19CM Ch. 19 facility and, also, there are no analog or digital LPTV or translator stations predicted to receive more than the allowable 2% interference.

### **Environmental/RFR**

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation (RFR). Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; however, since the structure is existing, such conditions should not be an issue requiring further consideration as there will be no increase in height or change in width of the tower structure.

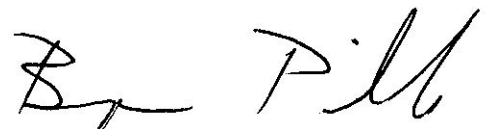
The location of the proposed construction is a multi-user site and it is assumed that the site is currently "in compliance" with FCC guidelines for human exposure to RFR (as defined in OET-65). The additional worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.003232 mW/cm<sup>2</sup>, which is less than 1% of the MPE for public exposure (0.34 mW/cm<sup>2</sup>) at Ch. 19 (503 MHz). The contribution to the overall RFR from the

proposed facility is negligible (less than 5%) and, therefore, the site will remain “in compliance” with FCC guidelines.

KOAT agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. Access to the site is restricted and appropriate signage warning of potential RFR hazards is posted.

### **Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



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Benjamin L. Pidek, P.E.  
March 23, 2012