

TECHNICAL EXHIBIT
DIGITAL DISPLACEMENT RELIEF APPLICATION FOR
LPTV STATION K25FG
FACILITY ID 25355
ROSEBURG, OREGON
CH 28 15 KW

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a digital displacement relief application for LPTV station K25FG at Roseburg, Oregon (Facility ID: 25355).

Specifically, this displacement relief application proposes to modify the K25FG licensed operation by changing transmitter site location, changing channels and converting to digital. It is proposed to operate on digital channel 28 employing its Scala SL-8 directional antenna. The maximum directional effective radiated power will be 15 kW and the antenna radiation center above mean sea level will be 480.8 meters.

Displacement Relief Eligibility

The K25FG currently licensed facility on channel 25 is located 90.7 kilometers from the licensed, co-channel facility of full-power DTV station KVAL-DT on channel 25 at Eugene, OR (BLCDT-20070226AEB). According to Section 73.3572(a)(4)(iii) and 73.3572(a)(4)(iv)(A)(1) of FCC's rules, an LPTV station is eligible for displacement relief if it is located within 265 km from the coordinates of a co-channel DTV authorization or DTV allotment. Therefore, LPTV station K25FG is eligible for displacement relief.

Figure 1 depicts the licensed 74 dBu contour and herein proposed digital 51 dBu contour for K25FG. As indicated, the proposed 51 dBu contour overlaps a portion of the licensed 74 dBu contour.

Antenna Structure Registration

The FCC Tower Registration Number for the existing 53.2 meter (174.5 foot) structure is 1061121.

Response to Paragraph 11 (Interference)

A study has been conducted for the proposed facility using the procedures outlined in the OET Bulletin 69 Bulletin, a cell size of 1 kilometer, a distance terrain increment of 0.2 kilometer, and 1990 U.S. Census data. The results indicate that the proposed operation will not create prohibited interference to stations in the Land Mobile Radio Service (LMRS) or other existing, authorized or proposed NTSC or DTV full-power, LPTV, TV translator or Class A stations.

Environmental Considerations

The K25FG facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. As shown on Figure 2 (antenna vertical relative pattern), the maximum vertical relative field for depression angles towards the tower base (-60° to -90°) is less than 0.25. Therefore, using a vertical relative field value of 0.25, a maximum ERP of 15 kilowatts, and an antenna center of radiation height above ground level of 27 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0501 milliwatt per square centimeter (mW/cm²), 13.49% percent of the Commission's recommended limit of 0.3713 mW/cm² for TV channel 28 applicable to general population/uncontrolled exposure areas, and 2.7% of the Commission's recommended limit applicable to controlled exposure areas.

¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

Based on information from an agent of the applicant, the proposed site is a controlled site, as there is a perimeter fence which prevents the general public from approaching within 65 yards (59.4 meters) of the tower. The site is also marked with appropriate warning signs.

Using a vertical relative field value of 0.25, the calculated power density at 2 meters above ground level at the fence is 0.0078 milliwatts per square centimeter (mW/cm²), or 2.11% of the Commission's recommended limit for general population/uncontrolled exposure areas. Therefore, it is believed the proposed facility complies with the FCC's requirements with regard to radio frequency radiation exposure. Furthermore, as this is a multi-user site, an agreement will be in effect to control access to the site. In the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been addressed by the tower owner.

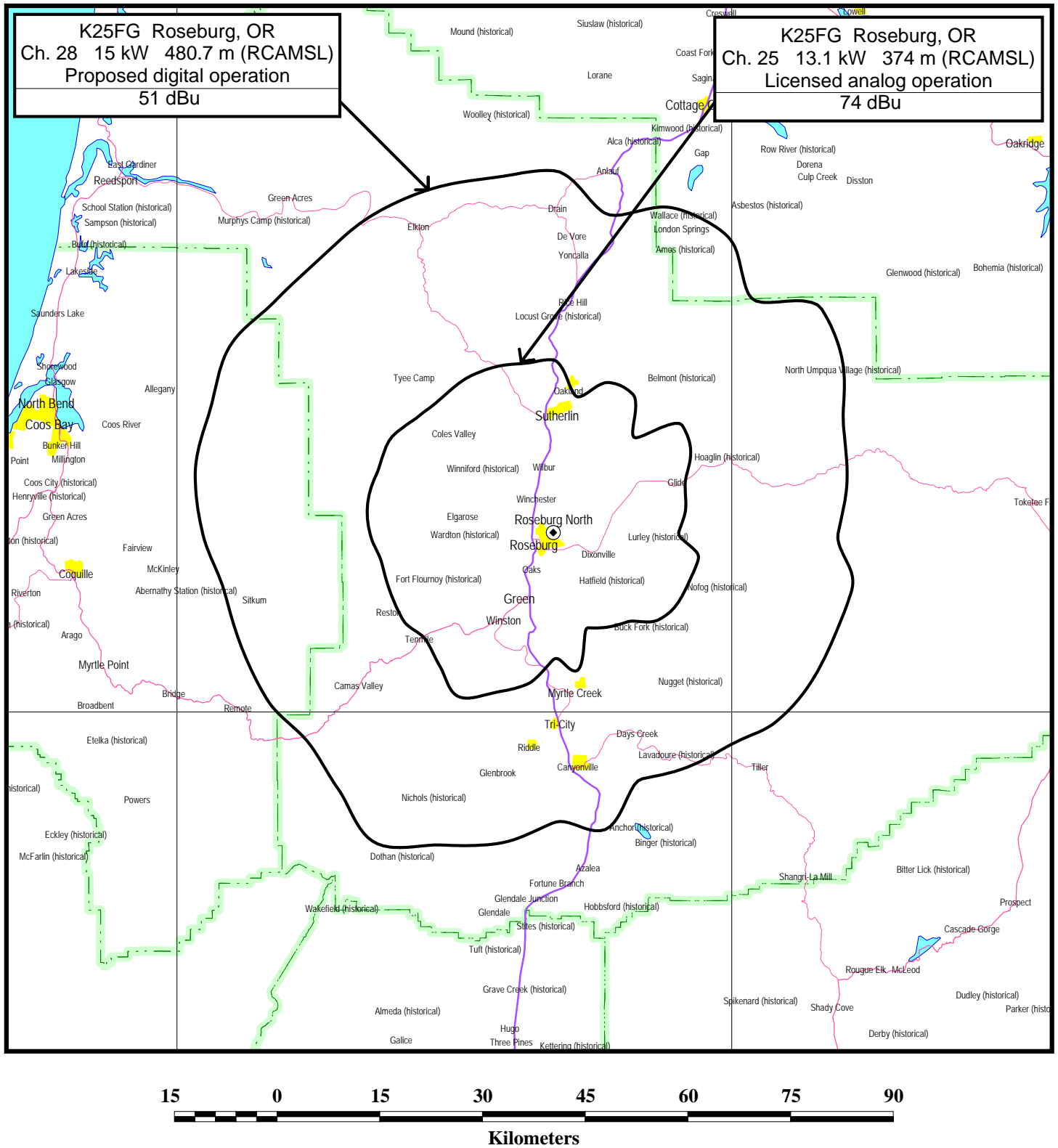
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.



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FCC PREDICTED COVERAGE CONTOURS

LPTV STATION K25FG
 ROSEBURG, OREGON
 CH 28 15 KW 480.7 M (RCAMSL)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 2

