

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of EQUITY BROADCASTING CORPORATION, in support of its amendment to its Application for Construction Permit BNPTTL-20000831BOB to operate a new Low Power Television Station on Channel 53 in Globe, Arizona. The purpose of this amendment is to provide additional terrain analysis with respect to its waiver request.

The proposed site is located within 75 miles of the reference coordinates of Phoenix, Arizona, in apparent violation of the geographic restrictions stated in the Public Notice announcing the LPTV filing window (released May 1, 2000). However, the Commission indicated that it would consider a waiver of the restrictions in cases where the proposed facility is "completely shielded by terrain barriers from the applicable television market cities...".

Globe is located more than 120 kilometers from the Phoenix area. The area in and around Globe is shielded from the market television stations' signals, and even rooftop receive antennas do not provide adequate relief from poor reception. Indeed, a number of full-power Phoenix television stations operate translators in the Globe area in order to provide service to the community. KTVK (Channel 3 in Phoenix) operates K57BO; KPHO-TV (Channel 5 in Phoenix) operates K59CI; KAET (Channel 8 in Phoenix) operates K67AB; and, KPNX (Channel 12 in Phoenix) operates K61FB in Globe.

EXHIBIT A

Exhibit B is a map upon which the 74 dbμ signal of the proposed Channel 53 LPTV station is plotted in relation to the Phoenix area. The coverage is based on a Longley-Rice analysis of the signal propagation. As shown, the coverage is primarily contained within an area significantly removed from Phoenix. Indeed, no signal penetrates the area surrounding Phoenix, Arizona.

Exhibit C is a map upon which the terrain between Globe and Phoenix is highlighted. The orange and white areas to the west of the proposed site indicate that extremely high terrain exists between the site and Phoenix.

Exhibit D is a terrain profile from the proposed LPTV site to the reference coordinates of Phoenix. As is clearly shown, a "wall of terrain" exists between the site and Phoenix.

As a result, a waiver of the geographic restriction to the Phoenix market is requested based on the above terrain shielding argument.

The referenced application is part of Auction No. 81, Grouping Number M62. Based on the following studies, it is believed that the Channel 53 application in Globe can be extricated from the group.

We began with a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit E. The study is based on contour protection

EXHIBIT A

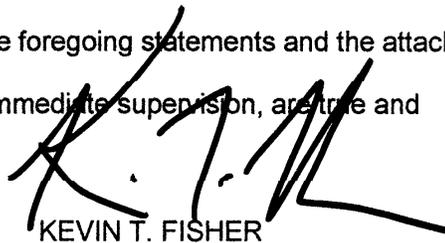
requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to two applications for a new LPTV facility on Channel 38 in Globe.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than Equity's proposed Channel 53 facility) already is predicted to exist (also known as "masking"). The results of these studies are summarized in Exhibit F. They conclude that the facility proposed herein causes no interference to any of the stations of concern.

In addition, Equity is willing to accept predicted interference to its Globe facility from any of the other applications appearing in Auction No. 81, Grouping Number M62. By accepting this interference situation, and because the instant proposal does not cause interference to any facility in the MX group (as shown above), it is requested that Equity's application be removed from the auction and subsequently granted.

EXHIBIT A

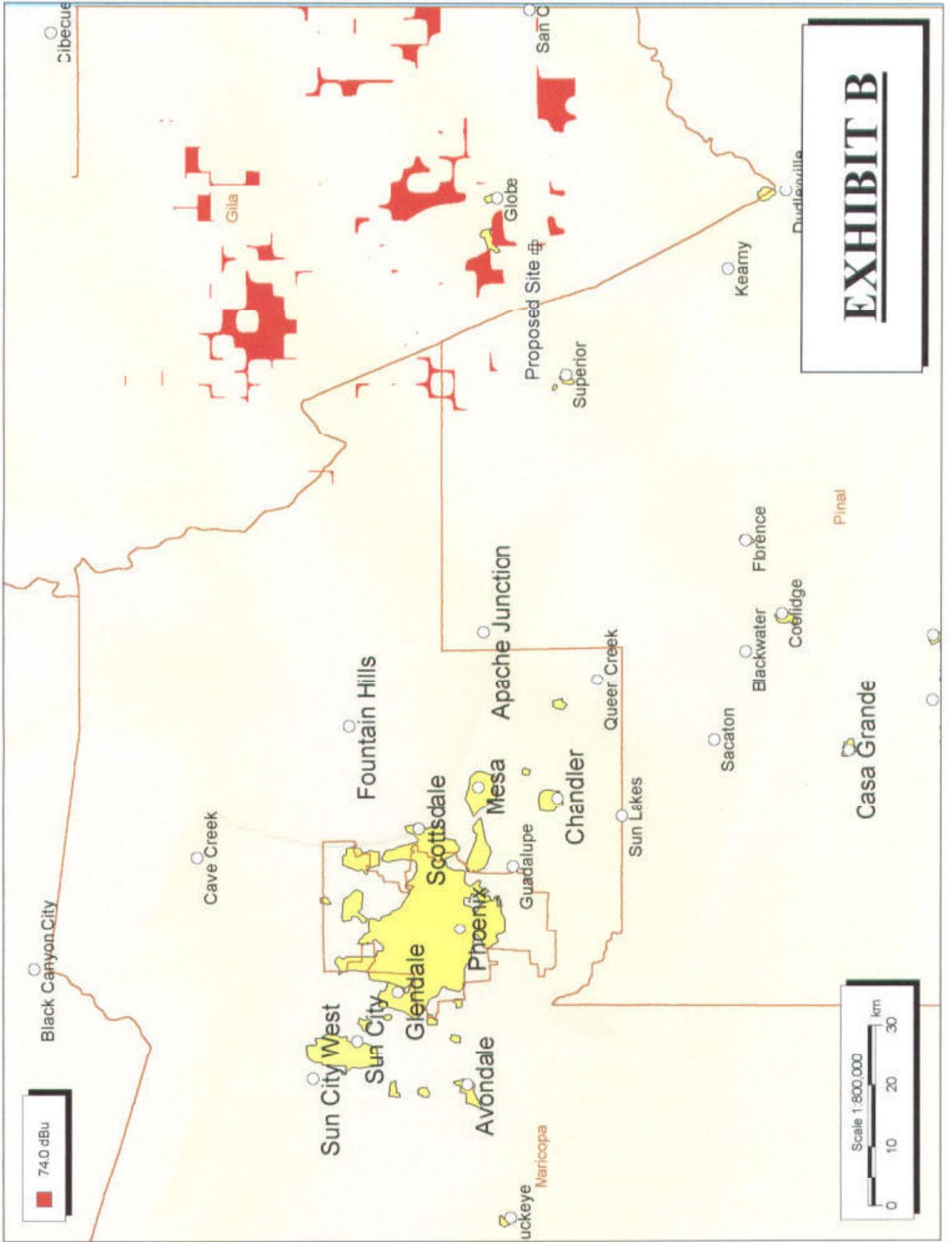
I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



Handwritten signature of Kevin T. Fisher in black ink, consisting of stylized initials and a surname.

KEVIN T. FISHER

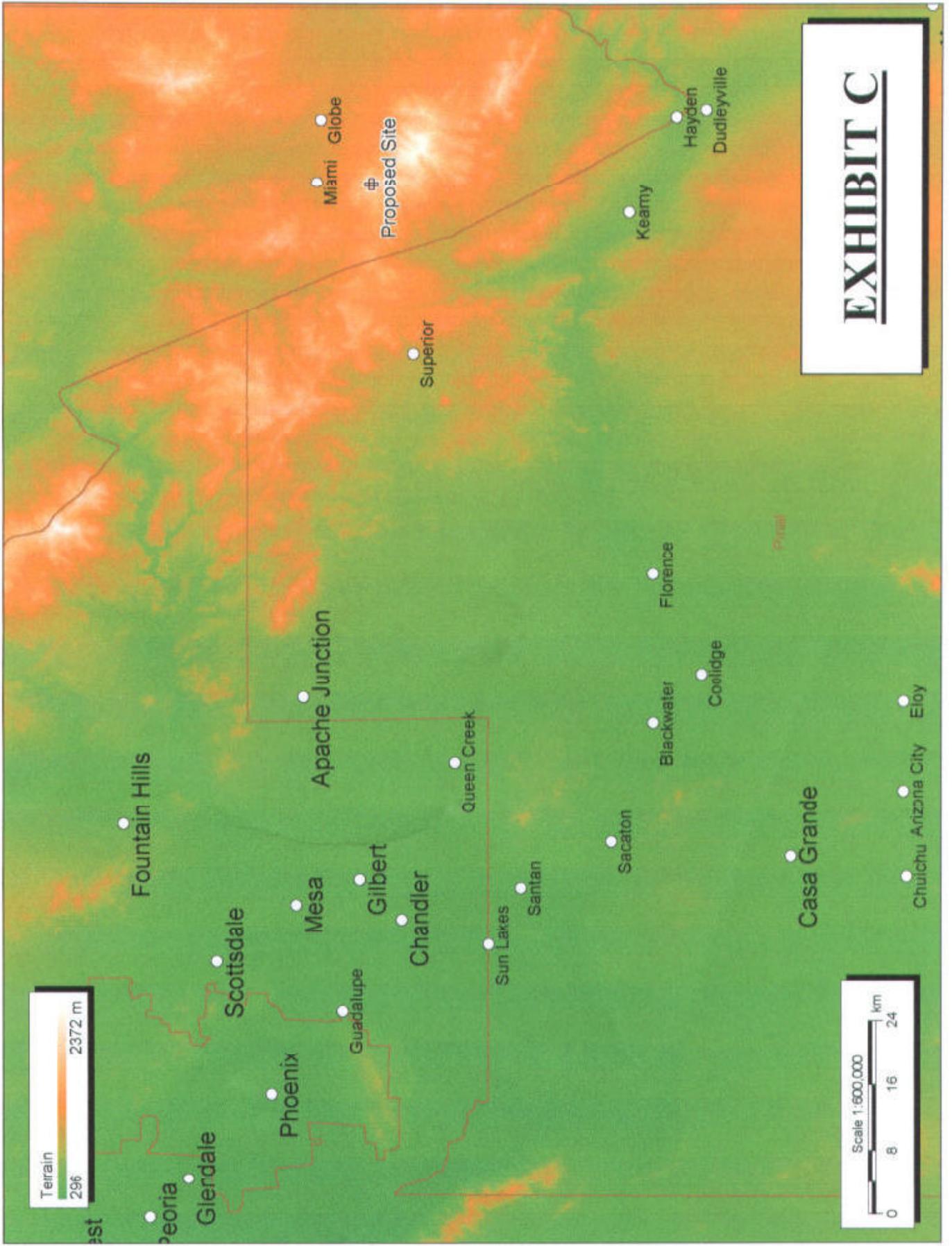
September 17, 2003



74.0 dBU

Scale 1:800,000  
0 10 20 30 km

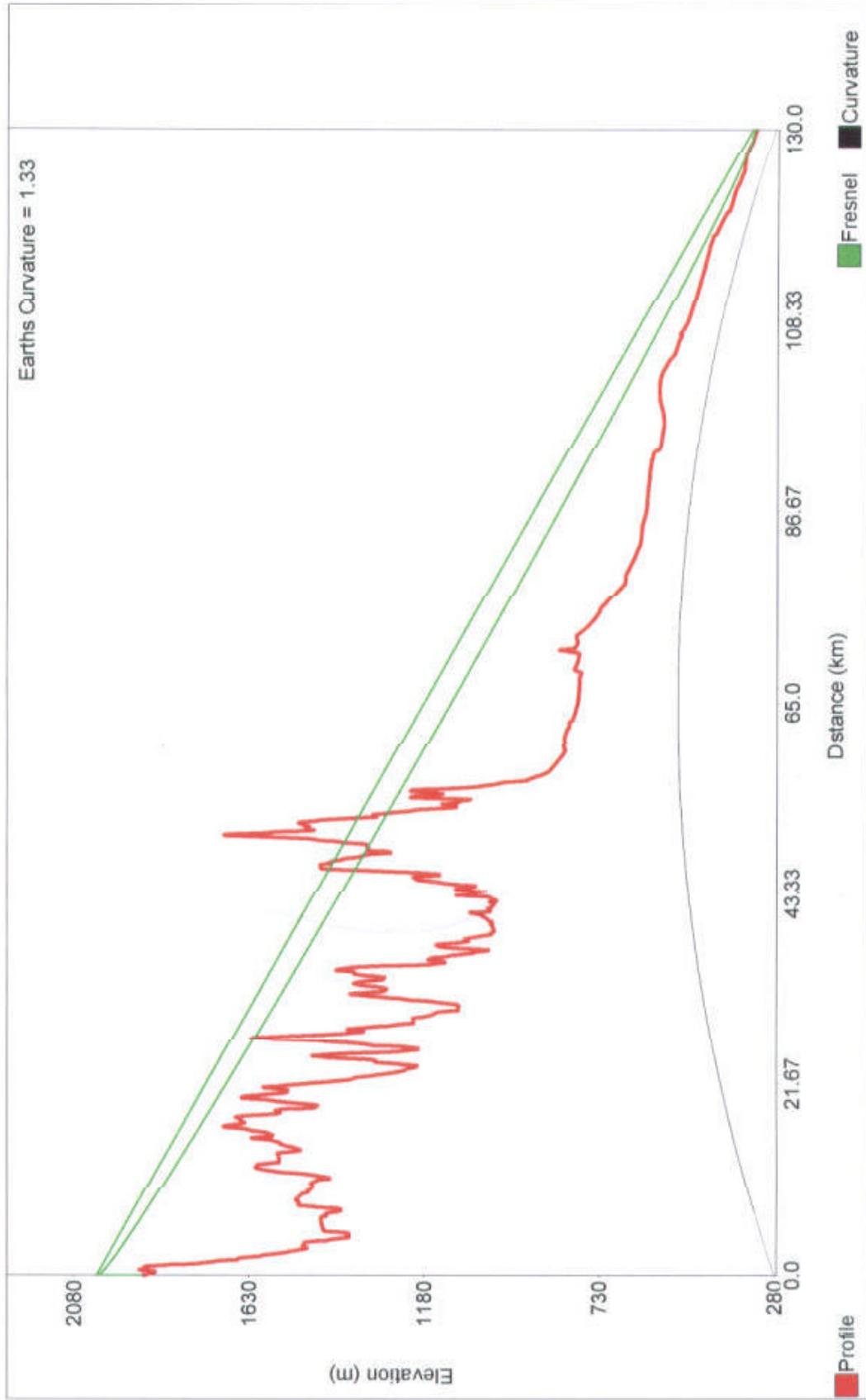
**EXHIBIT B**



# EXHIBIT C

# RADIAL FROM PROPOSED GLOBE SITE THROUGH PHOENIX

EXHIBIT D



Starting Latitude: 33-20-20 N	End Latitude: 33-32-05.23 N	Distance: 130 km	Frequency = 707.5 MHz
Starting Longitude: 110-52-16 W	End Longitude: 112-14-58.03 W	Bearing: 280 deg	Fresnel Zone: 0.6
Transmitter Height (AG) = 117.8 m	Transmitter Elevation = 1902.2 m		
Receiver Height (AG) = 10.0 m	Receiver Elevation = 329.4 m		

SMITH AND FISHER

EXHIBIT E

PROPOSED LPTV STATION  
CH. 53 - GLOBE AZ

REFERENCE 33 20 20 N LPTV Pwr = 3 kW, HAMS L COR= 2020 M DISPLAY DATES DATA 09-06-03  
110 52 16 W SEARCH 09-12-03  
..... Channel 53+, 704 MHz .....

Call	Channel	Location	Dist	Azi	FCC	Margin
NEW	AP 38+	Globe-miami	AZ 0.00	0.0	> 045.61	-45.61
NEW*	AP 38Z	Globe	AR 11.60	66.2	> 027.89	-15.86
KPPX-D*	LI 52	Tolleson	AZ 110.74	270.1	> 102.29	8.45
NEW*	AP 53+	Flagstaff	AZ 190.02	342.2	> 194.95	9.88
KDTP	LI 39Z	Phoenix	AZ 110.92	270.0	> 096.15	14.78
NEW	AP 53N	Flagstaff	AZ 233.59	357.6	> 218.29	15.30
K53DL	LI 53-	Duncan	AZ 153.76	108.7	> 132.61	21.15
NEW	AP 53+	Flagstaff	AZ 221.27	342.7	> 184.94	36.33
K53GF*	LI 53Z	Phoenix	AZ 110.92	270.0	> 065.23	45.70
K52EU	LI 52N	Fort Apache	AZ 81.43	35.0	> 022.02	59.41
K54EQ	LI 54N	Fort Apache	AZ 81.43	35.0	> 022.02	59.41
NEW	AP 53Z	Prescott	AZ 199.85	310.3	> 140.33	59.52

\* Actual radials antenna height and directional patterns used (if any)

EXHIBIT F

INTERFERENCE SUMMARY

PROPOSED LOW POWER TELEVISION STATION  
CHANNEL 53 - GLOBE, ARIZONA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
NEW-T BNPTTL-20000831ANT	Appl.	Globe, Arizona	38	14,384	0	0
NEW-T BNPTTL-20000823ABB	Appl.	Globe, Arizona	38	16,983	0	0