

EXHIBIT 12
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NONIONIZING RADIATION COMPLIANCE
Journal Broadcast Corporation
Twin Falls, ID

The proposed KSAW-LP digital facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. This facility will operate with a maximum average visual effective radiated power of 15 kilowatts using a Jampro JUHD-5/3(15) directional antenna with its center of radiation located 33.5 meters above ground level on an existing 55.5 meter tower. This tower presently supports the antennas for KIPT(TV) - Twin Falls, Idaho and its paired DTV station KIPT-DT. There are numerous other broadcast facilities located within 315 meters of the tower that will support this antenna.

Table 12.0 and Figure 12.0 present the vertical radiation pattern for this antenna, which was supplied by the manufacturer. Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (15 kilowatts) for the expression $[0.4ERP_v + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Using this vertical radiation pattern in conjunction with this equation yields a predicted worst case maximum power density of $3.60 \mu\text{W}/\text{cm}^2$ at two meters above ground level, which will occur at a depression angle of 76° below horizontal and at a horizontal distance of 7.9 meters from the base of this tower. Since the permitted power density for uncontrolled exposure on Channel 51 is $461.3 \mu\text{W}/\text{cm}^2$, this amounts to only 0.78% of the permitted level

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for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed KSAW-LP digital facilities are excluded from environmental processing under this standard and need not be considered in conjunction with other co-located or nearby facilities in evaluating compliance with this standard.

KSAW-LP, in conjunction with these other co-located and nearby stations, will continue to take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, by one or more of these stations, when work becomes necessary in areas on this tower where the total power density levels are in excess of the permitted level for controlled exposure.

TABLE 12.0

KSAW-LP VERTICAL RADIATION PATTERN

Journal Broadcast Corporation
Twin Falls, ID



6340 Sky Creek Drive
Sacramento, California 95828 USA

Telephone (916) 383-1177
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Elevation Pattern Tabulation

ELEVATION PATTERN TABULATION

RELATIVE FIELD VS ELEVATION ANGLE

<u>ELEVATION</u> <u>ANGLE</u>	<u>RELATIVE</u> <u>FIELD</u>	<u>ELEVATION</u> <u>ANGLE</u>	<u>RELATIVE</u> <u>FIELD</u>	<u>ELEVATION</u> <u>ANGLE</u>	<u>RELATIVE</u> <u>FIELD</u>
10	0.146	-26	0.114	-61	0.030
9	0.212	-27	0.132	-62	0.021
8	0.229	-28	0.129	-63	0.012
7	0.174	-29	0.106	-64	0.002
6	0.045	-30	0.070	-65	0.010
5	0.148	-31	0.077	-66	0.021
4	0.376	-32	0.069	-67	0.033
3	0.611	-33	0.064	-68	0.044
2	0.810	-34	0.047	-69	0.052
1	0.953	-35	0.033	-70	0.062
0	1.000	-36	0.016	-71	0.071
-1	0.953	-37	0.002	-72	0.073
-2	0.810	-38	0.017	-73	0.060
-3	0.611	-39	0.026	-74	0.078
-4	0.376	-40	0.032	-75	0.083
-5	0.148	-41	0.031	-76	0.087
-6	0.045	-42	0.026	-77	0.081
-7	0.174	-43	0.016	-78	0.083
-8	0.229	-44	0.005	-79	0.076
-9	0.212	-45	0.006	-80	0.077
-10	0.146	-46	0.017	-81	0.078
-11	0.051	-47	0.025	-82	0.069
-12	0.041	-48	0.029	-83	0.069
-13	0.109	-49	0.032	-84	0.070
-14	0.140	-50	0.028	-85	0.060
-15	0.131	-51	0.021	-86	0.060
-16	0.090	-52	0.012	-87	0.060
-17	0.030	-53	0.001	-88	0.060
-18	0.034	-54	0.010	-89	0.050
-19	0.084	-55	0.020	-90	0.050
-20	0.111	-56	0.027		
-21	0.109	-57	0.033		
-22	0.081	-58	0.037		
-23	0.033	-59	0.037		
-24	0.024	-60	0.035		
-25	0.078				

Customer: Journal Broadcast Group
Channel: 51

Model: JUHD-5/3 (15)
Description: UHF Panel Antenna
-0 ° Beam Tilt, 0% Null Fill

FIG. 12.0

KSAW-LP VERTICAL RADIATION PATTERN

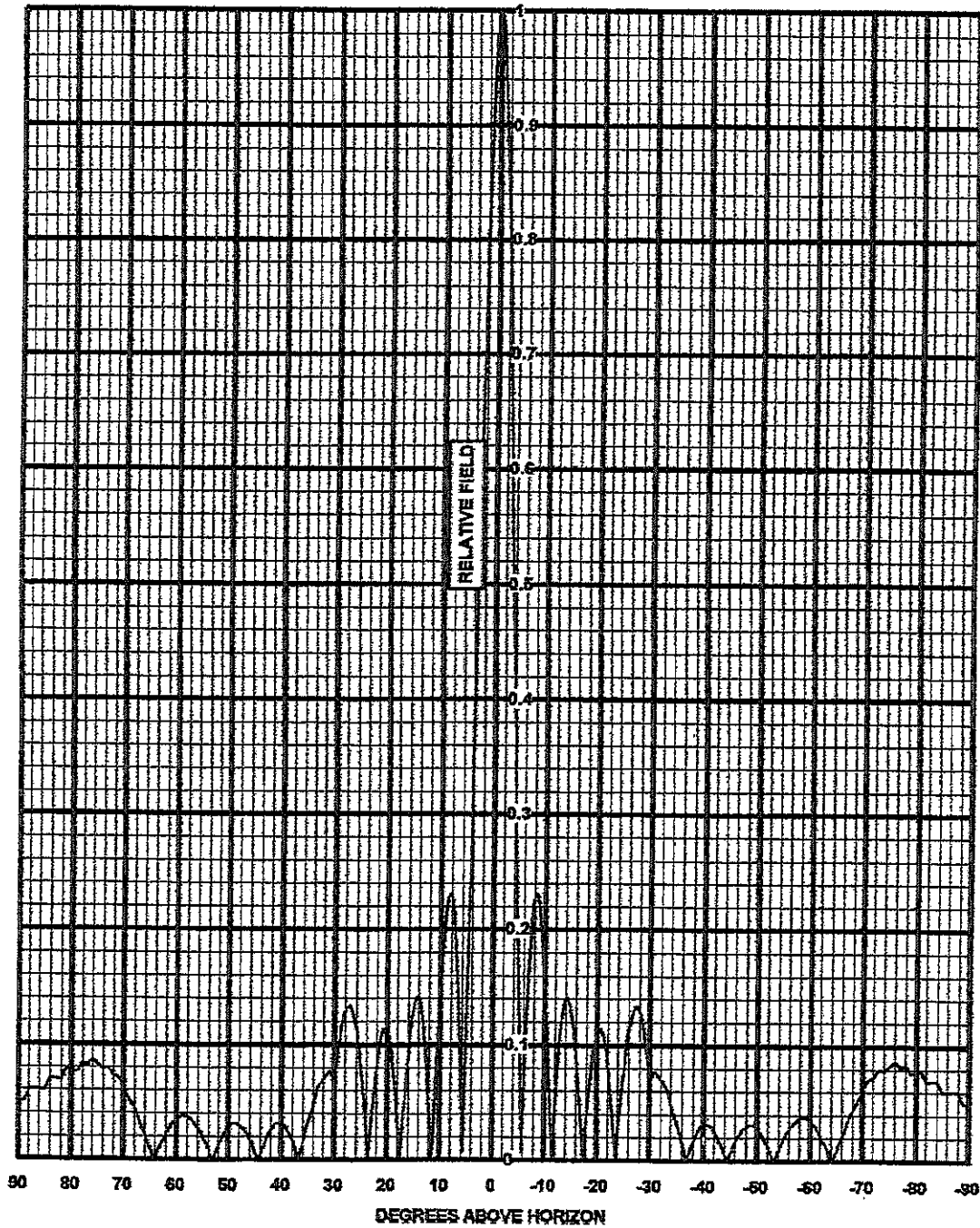
Journal Broadcast Corporation
Twin Falls, ID



6340 Sky Creek Drive
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Telephone (916) 383-1177
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COMPUTED ELEVATION PATTERN



Customer: Journal Broadcast Group
Channel: 51

Model: JUHD-5/3 (15)
Description: UHF Panel Antenna
-0 ° Beam Tilt, 0% Null Fill