

EXHIBITS 6 AND 7

Interference & Environmental Analysis For
Minor Modification of A Licensed Facility
FCC File No. BLTTL-20031203AEV
Facility ID. No. 52923

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for a minor modification to Applicant's licensed facility - K31GL. The proposed modified operational parameters for K31GL are as follows:

Channel	31
Frequency Offset:	PLUS OFFSET
Antenna radiation center height above ground level:	330 meters
Maximum effective radiated power:	150 KW
Antenna type and model #:	ANT ACB16CR
Antenna Orientation	345
Transmitter Site	32-35-20.51 N 96-58-11.98 W
Tower Registration No.	1055009

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, 74.708 and 74.709. This study indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than the NTSC Full-Power, DTV and LPTV facilities contained in the tables listed below. However, based upon the provisions of OET 69, the proposed facility's operation complies with the FCC's interference criteria towards the aforementioned stations. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no prohibited interference will be caused by the operation of the proposed facility. Accordingly, applicant requests a waiver of Section 74.705, Section 74.706, and Section 74.707 based upon the results of the OET 69 analysis.

LPTV KGSW, Keene, TX (File NO. BPTTL20040526ASV) recently filed a displacement application seeking to move broadcast operations from channel 46 to channel 31. The facility proposed for KGSW is predicted to receive 2.5% interference from K31GL's present operations. Accordingly, KGSW, by its application, has agreed to accept a 2.5% level of interference from K31GL's operations, This present application is predicted to cause the same 2.5% level of interference to KGSW. As the proposed facility for K31GL will cause NO additional interference to KGSW beyond that which KGSW has already agreed to accept, this application complies with the Commission's interference standards.

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KMPX, CH 29 Decatur, TX FILE NO. BMLCT-20030623ADR LICENSE	3,719,291	0 (0.0%)
KMPX, CH 29 Decatur, TX FILE NO. BMPCT-20031121AOP CONSTRUCTION PERMIT MOD	4,053,158	0 (0.0%)
KDFI, CH 27 DALLAS, TX FILE NO. BLCT-20010720ACB LICENSE	4,040,803	0 (0.0%)
KDFI, CH 27 DALLAS, TX FILE NO. BMPCT-20020613AAN CONSTRUCTION PERMIT	4,040,271	0 (0.0%)
KDAF, CH 33 DALLAS, TX FILE NO. BLCT-20000821ACP LICENSE	4,019,521	0 (0.0%)
KXTX-TV, CH 39 DALLAS, TX FILE NO. BLCT-19970905KE LICENSE	4,070,267	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BLCT-20030602BGW LICENSE	4,053,348	0 (0.0%)
KCEB, CH 38 LONGVIEW, TX FILE NO. BPCT-20040521AGY APPLICATION	468,552	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause zero interference to existing NTSC facilities or construction permits.

DTV Facilities

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 74.706, with regard to the effect of the proposed station on the following DTV facilities:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KDAF, CH 32 DALLAS, TX DTV ALLOTMENT	4,059,264	0 (0.0%)
KDAF, CH 32 DALLAS, TX FILE NO. BPCDT-19990225KF CONSTRUCTION PERMIT	4,195,803	0 (0.0%)
KFXK-DT CH 31 LONGVIEW, TX FILE NO. BPCDT-19991027ACM CONSTRUCTION PERMIT	739,888	0 (0.0%)
KOET-DT CH 31 EUFAULA, OK FILE NO. BMPEDT-20021015AB CONSTRUCTION PERMIT MOD	550,162	0 (0.0%)
KMPX, CH 30 DECATUR, TX DTV ALLOTMENT	3,737,820	0 (0.0%)
KMPX, CH 30 DECATUR, TX FILE NO. BPCDT-19991027ACM CONSTRUCTION PERMIT	4,208,868	0 (0.0%)
KFXK-DT CH 31 LONGVIEW, TX DTV ALLOTMENT	636,824	0 (0.0%)
KOET-DT CH 31 EUFAULA, OK DTV ALLOTMENT	597,532	0 (0.0%)
KMPX, CH 30 Decatur, TX FILE NO. BEDSTA-20040122AEZ D-STA	4,024,920	0 (0.0%)

As indicated in the above table, there will be no interference caused by the operation of the proposed station to any DTV facilities.

LPTV Facility

As noted in the introduction to this analysis, the proposed facility for K31GL will NOT cause any additional interference to the pending application for LPTV KGSW beyond the level of interference KGSW has already agreed to accept, namely, 2.5%.

LPTV STATION	FCC Service Population	Proposed Interference Population
KGSW, CH 31 KEENE, TX FILE NO. BPTTL-20040526ASV LPTV APPLICATION	42,142	1,063 (2.5%)

Land Mobile

There are no cochannel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 31 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 150 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.179 milliwatt per square centimeter (MW/CM²), or 46.8% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.382 MW/CM² for TV channel 31). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.