

TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
LPTV STATION KWHS-LP
FACILITY ID 74501
COLORADO SPRINGS, COLORADO
CH 51 150 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared on behalf of Le Sea Broadcasting Corporation in support of an application for construction permit for LPTV station KWHS-LP at Colorado Springs, Colorado (Facility ID: 74501). Station KWHS-LP is currently licensed (BLTTL-19950825IG) to operate on channel 51 with a directional antenna maximum effective radiated power (ERP) of 13.6 kilowatts and an antenna radiation center height above mean sea level (RCAMSL) of 2866 meters. It is proposed to modify the licensed operation by correcting the site coordinates, changing the directional antenna system, increasing the maximum directional ERP, and increasing the antenna RCAMSL. No other changes are proposed, including no change in channel (51), frequency offset, (none), or community of license (Colorado Springs). As detailed below, this application is considered a "minor change" in facilities pursuant to Section 73.3572.

Proposed Operation

LPTV station KWHS-LP proposes to operate at the following site coordinates, N 38° 44' 43", W 104° 51' 39" (NAD27). It is proposed to operate on channel 51 (692-698 MHz) employing an ERI ALP12M8-HSOC-51 directional "omnioid" type antenna with a main lobe orientation of 160 degrees true. The maximum ERP will be 150 kilowatts at any horizontal or vertical angle. The antenna radiation center height above mean sea level will be at 2899 meters.

Minor Change Application

Figure 1 depicts the licensed and herein proposed 74 dBu contours for KWHS-LP. As indicated, the proposed 74 dBu

completely encompasses the licensed 74 dBu contour. Therefore, the proposed modification is considered a "minor change" in facilities pursuant to Section 73.3572.

Response to Paragraph 6 - Antenna Structure Registration Number

Station KWHS-LP proposes to side-mount an ERI ALP12M8-HSOC-51 directional antenna at the 30.5 meter level on an existing 94.4 meter tower. The FCC Tower Registration Number for the existing tower is 1025328.

Response to Paragraph 13 - TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed KWHS-LP operation will not create prohibited interference to other existing, authorized or proposed TV broadcast analog (NTSC) full-power stations. Interference calculations for the proposed KWHS-LP operation are summarized below.

Protected TV Station	Service Population	Proposed Interference Population
KCEC-TV, NTSC Ch. 50 Denver, CO LIC (BLCT-20030102AAY)	1,898,368	54 (0.003%)

Response to Paragraph 13 - DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed KWHS-LP operation on channel 51 complies with the FCC's 0.5% interference threshold criteria to all allotted, proposed or actual DTV operating facilities on channels 50 and 51.¹

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km and a distance terrain increment of 0.1 was employed. A Sun based processor computer system was employed.

Protected DTV Station	Service Population	Proposed Interference Population
KCEC-DT, DTV Ch. 51 Denver, CO CP (BPCDT-19991029ACN)	1,877,602	8,065 (0.43%)

Response to Paragraph 13 - LPTV/TV Translator, Class A Station Protection

A study has been conducted using the provisions of Sections 74.707 and 74.708 which indicates that the KWHS-LP proposal will not create prohibited interference to other existing, authorized or proposed LPTV, TV Translator and Class A stations. Interference calculations for the proposed KWHS-LP operation are summarized below.

Protected LPTV/Class A Station	Service Population	Proposed Interference Population
K51HS, LPTV Digital Ch. 51 Anton, CO BDFCDIT-20060310AGN)	--	0 (0.00%)
K51HS, LPTV Analog Ch. 51 Anton, CO (BLTT-20051221AOZ)	--	0 (0.00%)
K51CL, LPTV Ch. 51 Deora, CO (BLTT-19880621III)	--	0 (0.00%)
K51DI, LPTV Ch. 51 Waunita, CO (BLTT-19900305JD)	--	0 (0.00%)
K51DM, LPTV Ch. 51 Antonito, NM (BLTT-19911220JK)	--	0 (0.00%)

Environmental Considerations

The proposed KWHS-LP television facilities were evaluated in terms of potential radiofrequency radiation

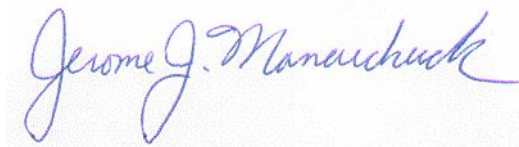
exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". The calculated power density at the base of the tower was calculated using the appropriate equation of the Bulletin.

Figure 2 depicts the vertical pattern data for the proposed directional antenna. Using a conservative vertical relative field value of 0.18 at depression angles towards the tower base (-60° to -90° elevation), a maximum visual ERP 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 0.1036 milliwatts per square centimeter (mW/cm^2), or 4.47 percent of the Commission's recommended limit applicable to occupational controlled exposure areas ($2.32 \text{ mW}/\text{cm}^2$ for TV channel 51) and 22.4 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.46 \text{ mW}/\text{cm}^2$ for TV channel 51). Based on information provided by an agent of the applicant, and the certifications made by other licensees on the tower, it is presumed that this site can be considered controlled. It is located in a remote location which is not accessible by the general population, and there are appropriate RF warnings posted at the site. Therefore, it is believed the site complies with the FCC's rules regarding radiofrequency radiation exposure, as the calculated power density does not exceed 5% of the recommended limit applicable to occupational controlled exposure areas. However, if necessary, measurements will be made to show compliance.

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.

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 provided to the FCC by the tower owner as part of the tower registration process.

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

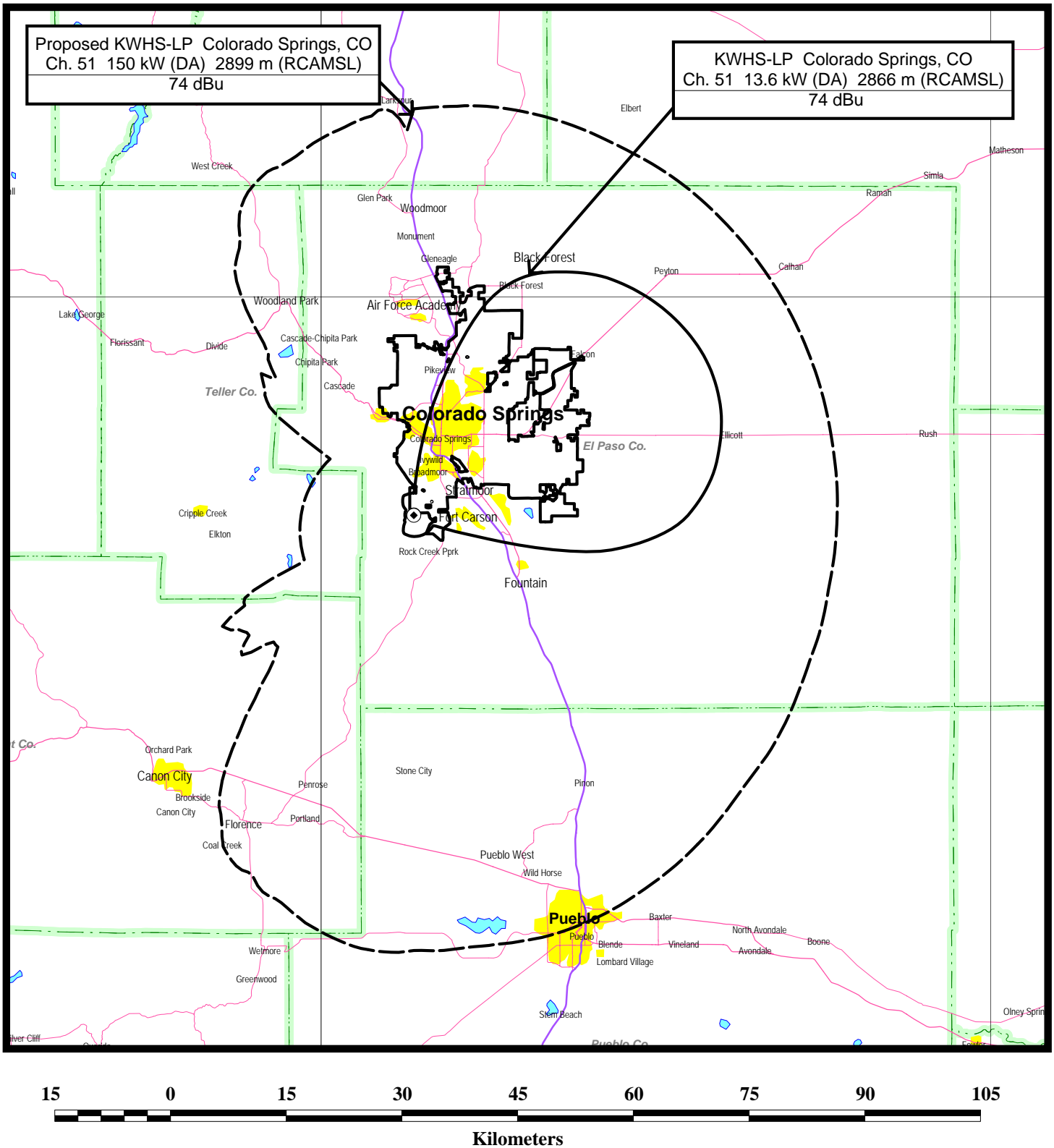


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

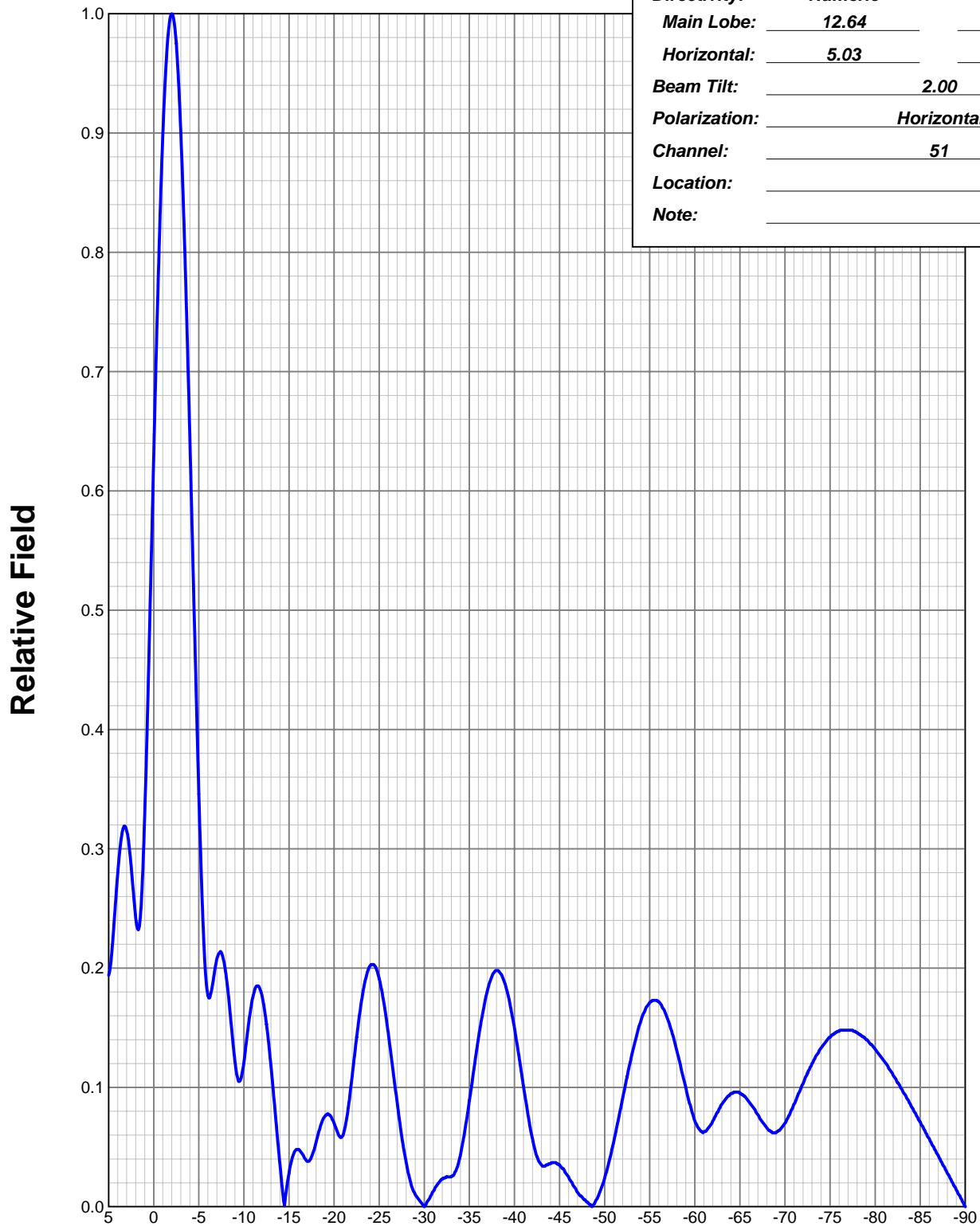
LPTV STATION KWHS-LP
COLORADO SPRINGS, COLORADO
CH 51 150 kW (DA) 2899 M (RCAMSL)

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



ELEVATION PATTERN

Type:	ALP12M8	
Directivity:	Numeric	dBd
Main Lobe:	12.64	11.02
Horizontal:	5.03	7.02
Beam Tilt:	2.00	
Polarization:	Horizontal	
Channel:	51	
Location:		
Note:		



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