

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

FCC FORM 301, EXHIBIT 43
ENVIRONMENTAL ASSESSMENT
APPLICATION FOR CONSTRUCTION PERMIT
PREPARED FOR
KIRO-TV HOLDINGS, INC.
STATION KIRO-DT
SEATTLE, WASHINGTON
CH 39 1,000 KW (MAX-DA, BT) 230 METERS

This engineering exhibit was prepared on behalf of KIRO-TV Holdings, Inc. (hereinafter KIRO-TV), licensee of station KIRO-DT, Seattle, Washington, in support of an FCC Form 301 application for construction permit

KIRO-DT is licensed (FCC File Number BLCDT-19991018ABB) for digital television (DTV) operation on channel 39 (620 to 626 megahertz (MHz)) with 603 kilowatts (kW) maximum average effective radiated power (ERP), horizontally polarized, 230 meters antenna radiation center height above average terrain (HAAT), from a site located at geographic coordinates 47° 38' 01" North Latitude, 122° 21' 20" West Longitude, referenced to 1927 North American Datum. The KIRO-DT antenna radiation center is 149 meters above ground level (AGL).

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

FCC Form 301, Exhibit 43
Station KIRO-DT, Seattle, Washington

Page 2

The instant application proposes to increase the KIRO-DT maximum average ERP to from 603 kW to 1,000 kW. No other changes to the licensed KIRO-DT facilities are requested.

Public access to the KIRO-DT antenna and supporting structure is restricted by a two-meter chain link fence, topped with barbed wire, which will encircle the KIRO-DT supporting structure.

An analysis has been made of the human exposure to RFR using the calculation methodology described in *OET Bulletin 65, Edition 97-01*, prepared by the FCC Office of Engineering and technology. A conservative vertical plane relative field factor of 0.1, obtained from the manufacturer's theoretical vertical plane radiation pattern for the existing KIRO-DT Dielectric Communications, type TFU-32DSC C164, transmitting antenna, was used in the calculation of the KIRO-DT power density. The KIRO-DT maximum average ERP of 1,000 kW was used in the calculation of the KIRO-DT power density. To account for ground reflections, a coefficient of 1.6 was included in the calculation. The KIRO-DT power density calculations reported herein were made at 620 MHz, the lower edge of the KIRO-DT channel.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.41 milliwatt per square centimeter (mW/cm²) at 620 MHz. The FCC MPE limit for occupational/controlled exposure is 2.07 mW/cm² at 620 MHz. At a reference point two meters AGL at the base of the KIRO-DT supporting structure, the calculated KIRO-DT power density is 0.015 mW/cm², which is 3.66 percent of the FCC MPE limit for general population/uncontrolled exposure, and 0.72 percent of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of *OET Bulletin 65, edition 97-01*, at multiple-user sites, only those licensees whose transmitters produce power density levels in excess of 5.0 percent of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RFR environment into compliance with FCC exposure limits. Since the KIRO-DT operation will contribute less than 5.0 percent of the most restrictive permissible exposure at any location on the ground at the multiple-user site, KIRO-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of KIRO-DT were not taken into account in this analysis.

While not a “significant contributor” to the exposure levels at any location on the ground, the KIRO-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the KIRO-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, KIRO-TV will take action necessary to prevent the overexposure of workers on the tower, including reducing KIRO-DT transmitter power or ceasing KIRO-DT operation completely. Additionally, KIRO-TV will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

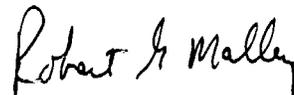
1. The KIRO-DT channel 39 DTV facility utilizes a existing antenna supporting structure located in a multiple use communications site.

2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting proposes to use an existing supporting structure and no change in the existing obstruction lighting is proposed.

3. Finally, with regard to RFR exposure concerns, the instant application complies with applicable FCC MPE limits.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 25, 2004.



Robert G. Mallery