

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
TV TRANSLATOR STATION K14KO (FACILITY ID 32328)
PORTALES, NEW MEXICO
CH 14 0.88 KW

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station K14KO. Station K14KO is licensed (BLTT-20050927AHI) to operate on analog channel 14 with an Andrew ABBP10H3-HTO-32/55 non-directional maximum (visual) effective radiated power (ERP) of 4.4 kW and an antenna height above mean sea level (RCAMSL) of 1455.5 meters.

Proposed Facilities

This application proposes digital operation on the current channel (14), at the current transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 34-15-08 N, 103-14-20 W. An Andrew ABBP10H3-HTO-32/55 antenna, with a maximum ERP of 0.88 kW and antenna RCAMSL of 1455.5 meters is proposed. The FCC Tower Registration number for the existing 223.4 meter (733 foot) structure is 1225246.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As shown on the map the licensed analog contour is completely encompassed by the proposed digital contour.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use

of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The K14KO facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. Based on a worst case vertical relative field value of 1.0, a maximum ERP of 0.88 kilowatts, and an antenna center of radiation height above ground level of 215.5 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0006 milliwatt per square centimeter (mW/cm^2), or 0.19 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.32 \text{ mW}/\text{cm}^2$ for TV channel 14). Therefore, the facility complies with the FCC's RF emission rules.

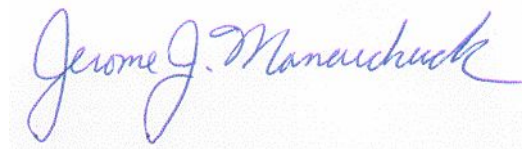
Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect to control access to the site. In the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such

¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second*

measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.

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.

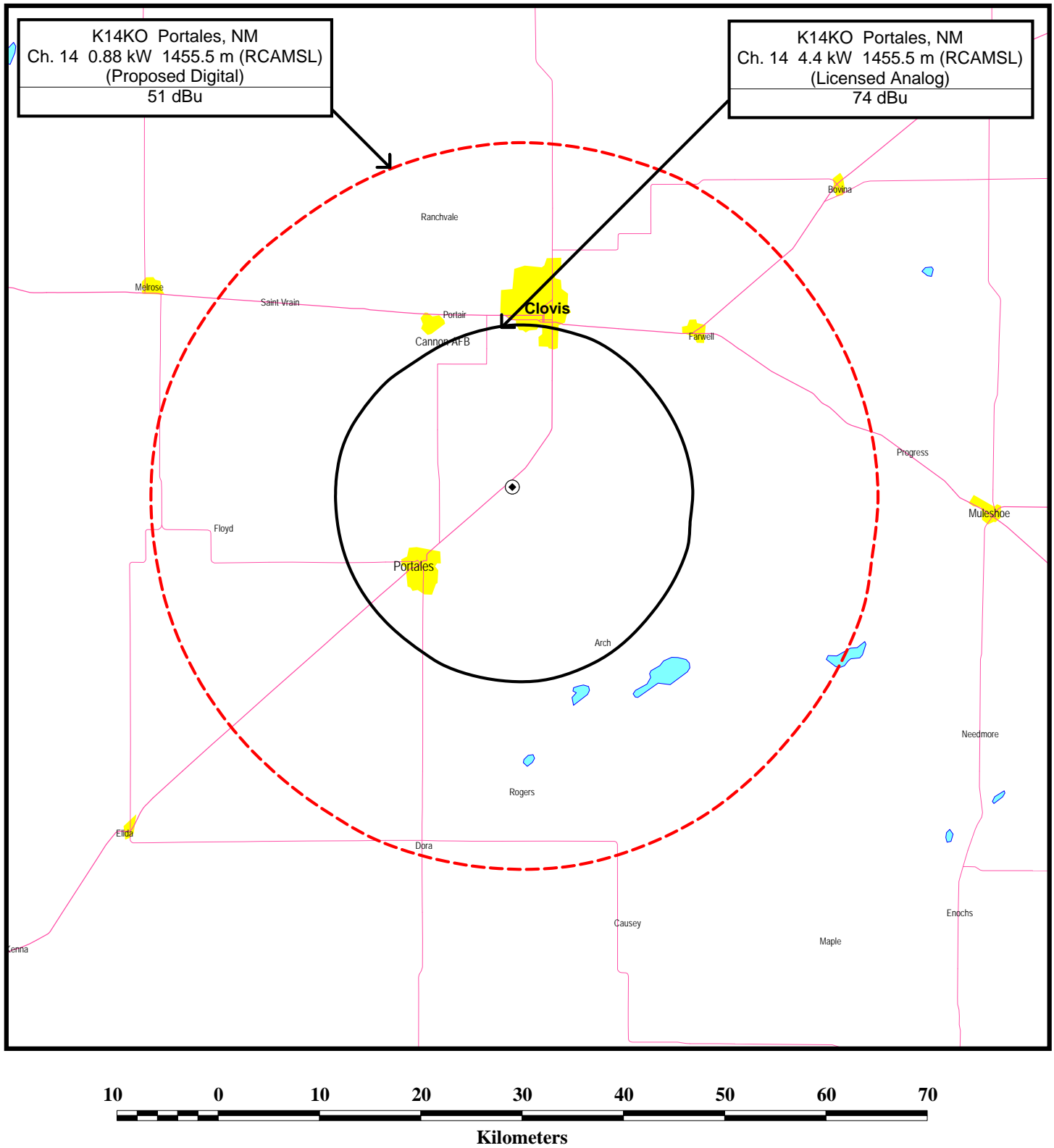


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

TV TRANSLATOR STATION K14KO
PORTALES, NEW MEXICO

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