



ENGINEERING STATEMENT

In support of an

Application for Construction Permit

For Digital Channel 9

KTSM El Paso, TX

20 kW ERP 577 m HAAT

PURPOSE

MARSAND, INC. has been retained by Comcorp of El Paso License Corp. (the "Licensee") Licensee of KTSM analog Channel 9 of El Paso, TX (the "Station"), to prepare this engineering statement in support of this instant Application for Construction Permit (CP) for post-transition digital service on Channel 9. The Licensee currently operates the paired transitional digital Channel 16 facility under the license BLCDDT-20050914ABZ. The Federal Communications Commission (the "Commission") established Channel 9 for the station's post-transition operation in "Appendix B" allotment (Seventh Report and Order in MB Docket No. 87-258). Under this instant proposal, the Licensee seeks authorization for post-transitional digital operation on Channel 9.

DISCUSSION

The Licensee proposes to use the existing, top mount analog Channel 9 antenna which it shares with KVIA CH7. The antenna manufacturer's specifications can be found in the Appendix. The Licensee also proposes to modify a portion of its analog transmitter and add a new RF filter for digital service. The proposed facility is located at the existing analog site. Since the predicted 36 dBu F(50,90) contour of the proposed digital facilities would fall outside of the predicted DTV F(50,90) service grade contour of the allotted digital facility specified in Appendix B (see **Figure 1**), the Licensee requests a waiver of the DTV Filing Freeze as permitted in Paragraph 151 of the Third Periodic Review Report and Order. The predicted

contour of the proposed digital facility does not extend more than 5 miles in any azimuth more than the predicted contour of the allotted facility in Appendix B. The tabulated distance to contours is included in the Appendix and labeled “Contour Comparison – Proposed vs. Appendix B”. Furthermore, an interference study using the TV Process by Techware (a software program which is familiar to the Commission that is written in Fortran and run on a Sun Microsystems workstation and employs the methods outlined in the OET 69 Bulletin), confirms that the proposed facility would not exceed 0.5% new interference to any other station listed in Appendix B. The study results are listed in the Appendix. A summary of the interference study is included below in **Table 1**.

Stations Potentially Affected by Proposal	Interference	
	Existing	New
KGUN CH9 Tucson, AZ	(see Note 2)	
KNMD-DT CH9 Santa Fe, NM	(see Note 2)	
KWES-TV CH9 Odessa, TX	0.00 %	0.00%
KOVT CH10 Silver City, NM	(see Note 2)	
Notes:		
1. Proposed station is beyond the site to nearest cell.		
2. Proposal causes no interference		

Table 1

The calculated F(50,90) 43 dBu contour would encompass the principal community, El Paso, TX, entirely as shown in **Figure 1**. Also shown in **Figure 1** is the F(50,90) 36 dBu contour.

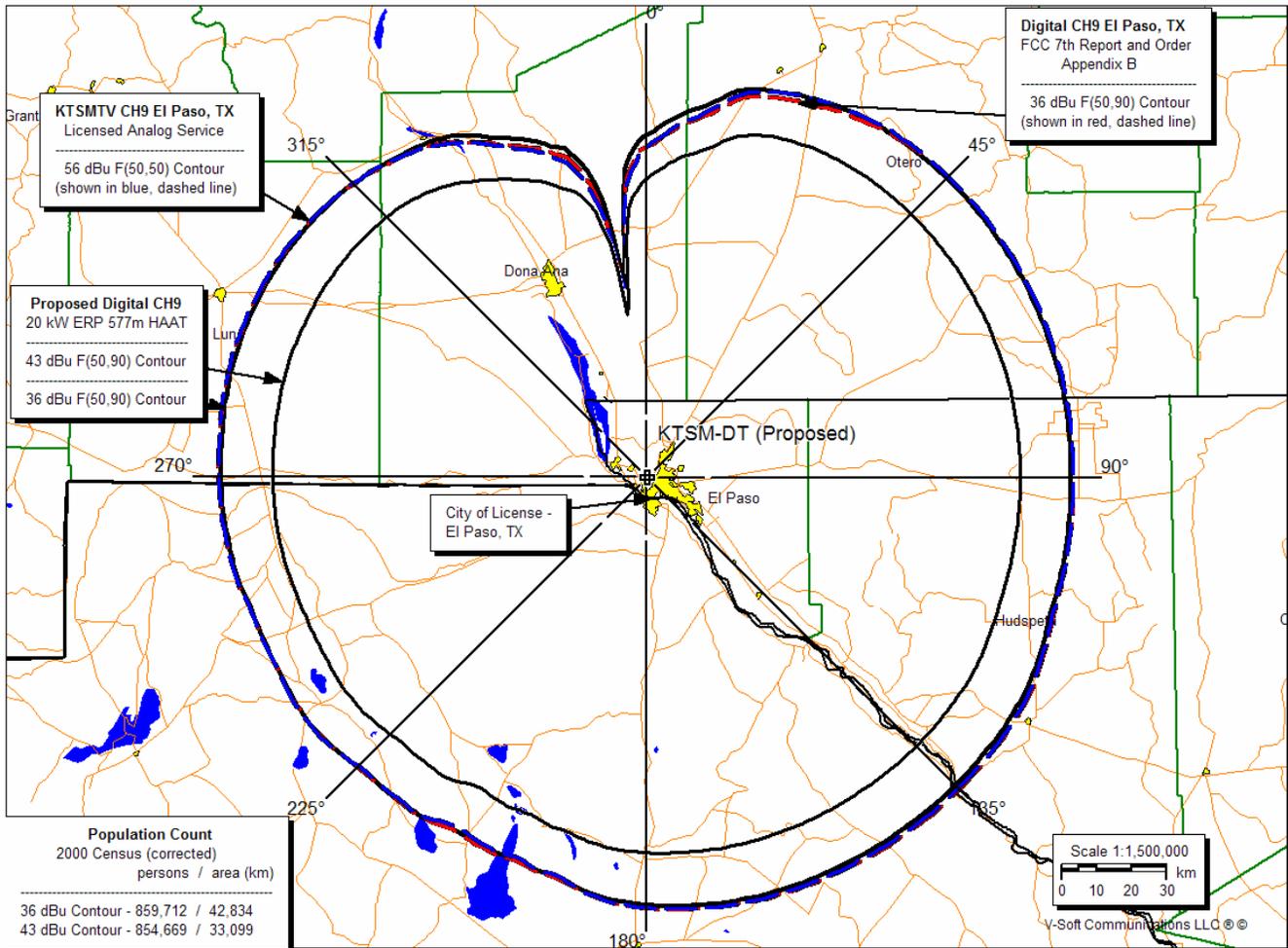


Figure 1

A population study under the 36 dBu contour predicts service to 859,712 people which is more than 100% of the population specified in the new DTV Table Appendix B. These figures are derived using the corrected 2000 Census.

Even though the proposed radiation center above ground and physical location remains unchanged from that of the analog facilities, the new height above average terrain (HAAT) is 577 m and is less than the 582 m that specified in the DTV Table Appendix B. This is due to the differences in terrain data. The terrain data source used to calculate the HAAT in this proposal is a digital form of the USGS 3 second NAD83 terrain database and is assumed to be more accurate.

The proposal is clear of any FCC monitoring stations, quiet zones, and Table Mountain. It is also further than 3.2 km from the nearest AM station. However, the proposal is 4.5 km from the Mexican Border, and, if required, international coordination is requested.

RF Radiation Exposure Statement

The requirements of Section 73.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy are met under this instant application for the post-transition digital television facility proposed herein.

The proposed KTSM-DT facility utilizes the existing analog top mount antenna located on an existing, multi-use tower structure (ASR 1051409) located on Ranger Peak in El Paso, TX. The site is restricted access. The station agrees to maintain full compliance with the safety precautions to workers on the tower (controlled) and the general public (uncontrolled) by reducing or removing radiated power during the time of construction or maintenance on or near the antenna. The station also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from Radiofrequency Electromagnetic exposure in excess of FCC guidelines.

Table 2 shows the calculations of RF level 2m above ground level for the General Public / Uncontrolled (GP/U) would not exceed 5% of the Maximum Permissible Exposure (MPE) limit. The calculations are shown in the Appendix. The proposed facility is therefore a negligible contributor to the RF environment at all ground level locations and is excluded from the routine environmental evaluation pursuant to Section 1.1307(b) of the FCC Rules.

Call Letters	Channel / Frequency	Distance from RCAGL to 2 m AGL	Worst Case Downward Radiation (Relative Field)	Calculated Power Density (uW/cm ²)	GP/U MPE (uW/cm ²)	Percentage of GP/U MPE
KTSM-DT	CH9 186-192 MHz	100 m	0.20	2.67	200	1.3 %

Table 2

CONCLUSION

It is respectfully requested that the Commission grant this request for CP for the proposed transmission facility as indicated in the Tech Box of the accompanying Instant Application Form 301.

DECLARATION

Matthew A. Sanderford, Jr., P.E., declares and states that he is a graduate Electrical Engineer with a Bachelor of Science Degree in Electrical Engineering from the University of Texas at El Paso, a Licensed Professional Engineer in the State of Texas, and his qualifications are known to the Federal Communications Commission, and that he is President of MARSAND, INC., a Registered Professional Engineering firm in the State of Texas, and that firm has been retained by the Licensee, to perform the engineering support as contained in this report.

All facts contained herein are true of his own knowledge except where stated to be on information or belief provided by the Licensee, and as to those facts, he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct.



Matthew A. Sanderford, Jr., P.E.

President - MARSAND, INC.

Executed this 16th day of June, 2008

State of Texas

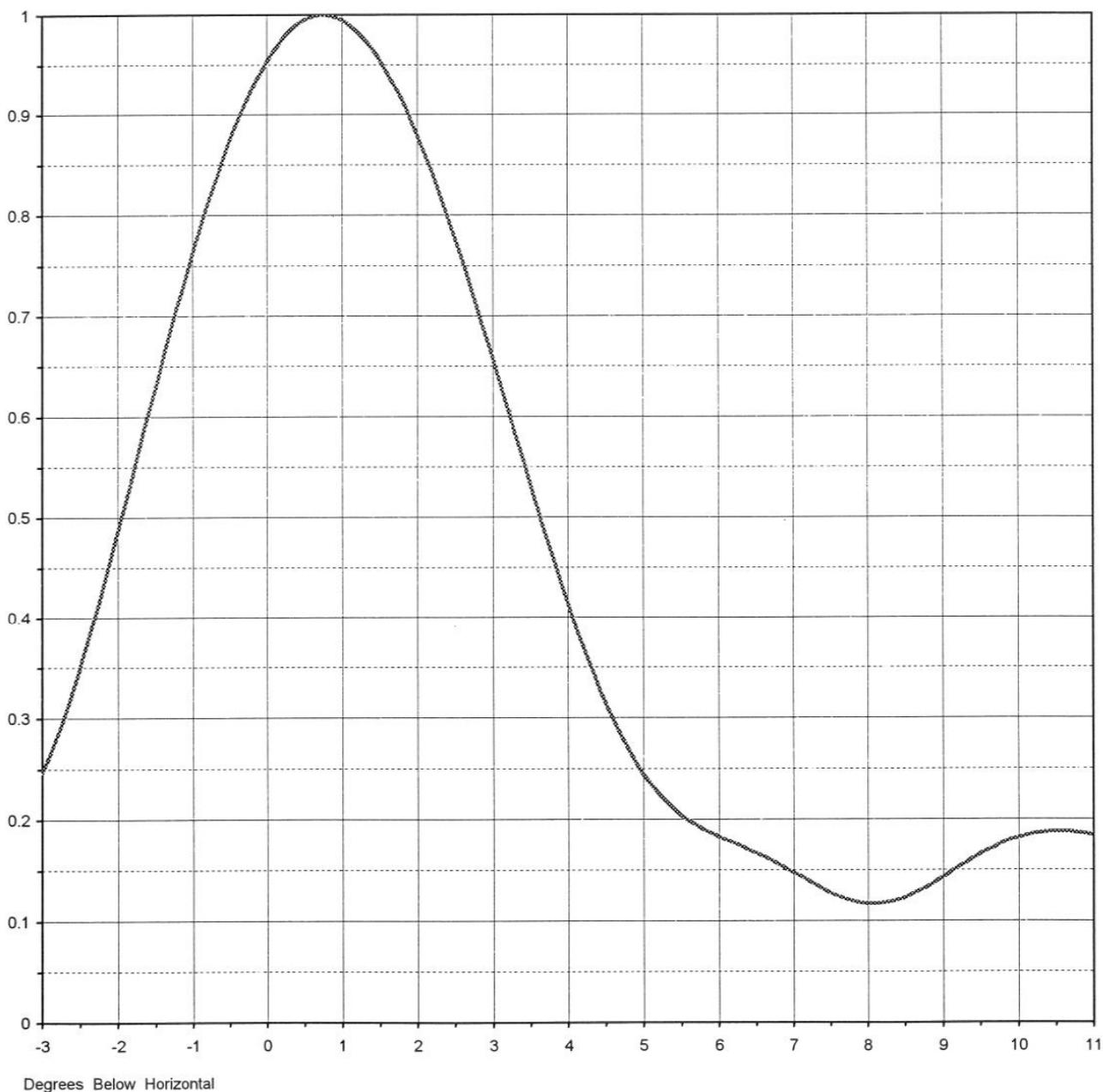
Appendix



Proposal Number **DCA-7564**
Date **25-Sep-00**
Call Letters **KVIA-DT** Channel **9**
Location **EL PASO, TX**
Customer **KVIA-TV**
Antenna Type **TF-12BH(S)**

ELEVATION PATTERN

RMS Gain at Main Lobe	10.00 (10.00 dB)	Beam Tilt	0.75 deg
RMS Gain at Horizontal	9.10 (9.59 dB)	Frequency	189.00 MHz
Calculated / Measured	Calculated	Drawing #	12S100075

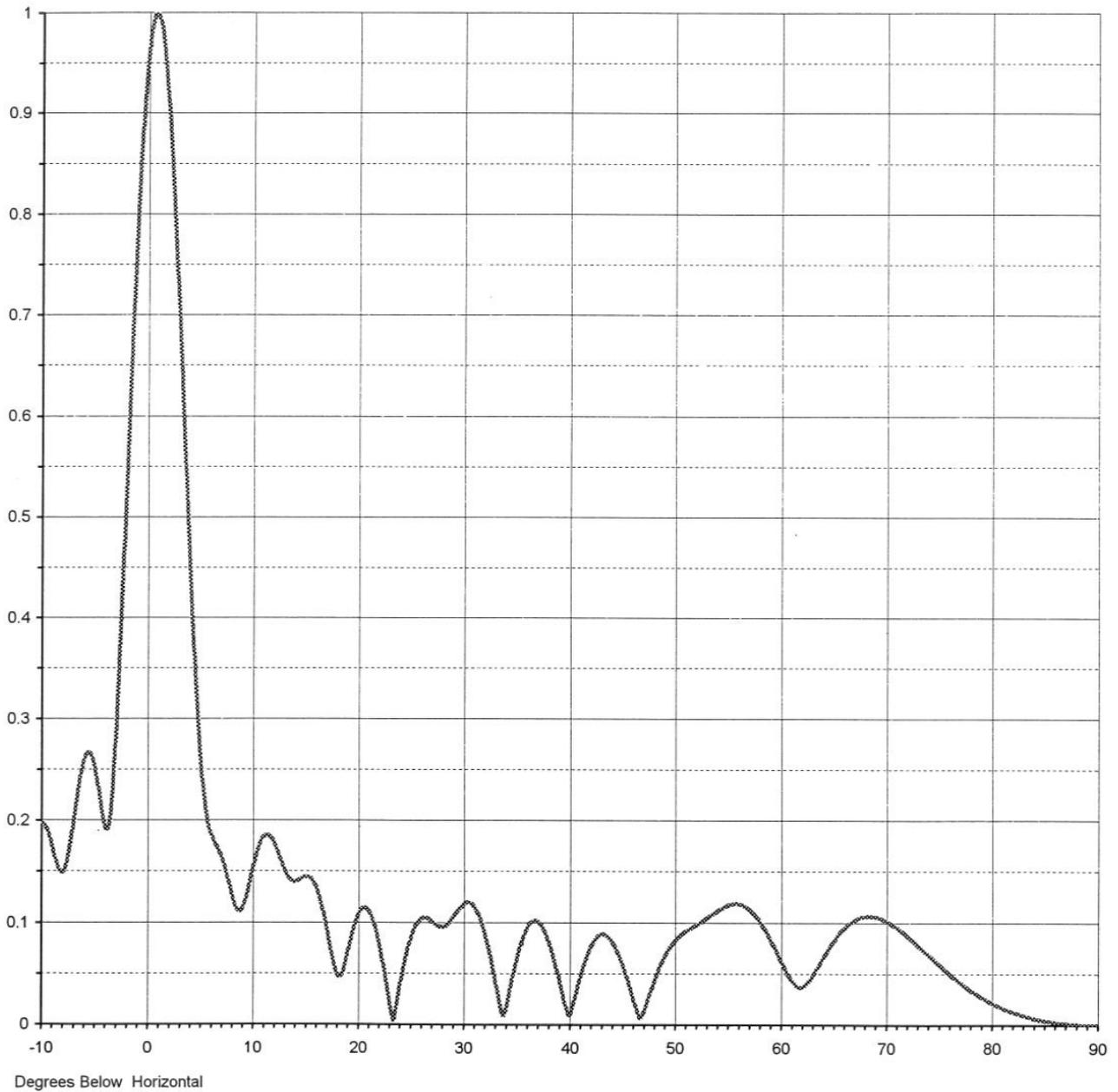




Proposal Number **DCA-7564**
Date **25-Sep-00**
Call Letters **KVIA-DT** Channel **9**
Location **EL PASO, TX**
Customer **KVIA-TV**
Antenna Type **TF-12BH(S)**

ELEVATION PATTERN

RMS Gain at Main Lobe	10.00 (10.00 dB)	Beam Tilt	0.75 deg
RMS Gain at Horizontal	9.10 (9.59 dB)	Frequency	189.00 MHz
Calculated / Measured	Calculated	Drawing #	12S100075-90





Proposal Number **DCA-7564**
 Date **25-Sep-00**
 Call Letters **KVIA-DT** Channel **9**
 Location **EL PASO, TX**
 Customer **KVIA-TV**
 Antenna Type **TF-12BH(S)**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **12S100075-90**

Angle	Field										
-10.0	0.182	2.4	0.801	10.6	0.188	30.5	0.062	51.0	0.152	71.5	0.042
-9.5	0.203	2.6	0.756	10.8	0.188	31.0	0.032	51.5	0.151	72.0	0.037
-9.0	0.205	2.8	0.708	11.0	0.186	31.5	0.011	52.0	0.146	72.5	0.033
-8.5	0.192	3.0	0.659	11.5	0.176	32.0	0.036	52.5	0.139	73.0	0.029
-8.0	0.172	3.2	0.609	12.0	0.164	32.5	0.064	53.0	0.128	73.5	0.026
-7.5	0.161	3.4	0.559	12.5	0.154	33.0	0.087	53.5	0.115	74.0	0.023
-7.0	0.173	3.6	0.509	13.0	0.152	33.5	0.103	54.0	0.099	74.5	0.021
-6.5	0.205	3.8	0.461	13.5	0.155	34.0	0.110	54.5	0.083	75.0	0.019
-6.0	0.241	4.0	0.416	14.0	0.159	34.5	0.109	55.0	0.067	75.5	0.017
-5.5	0.266	4.2	0.373	14.5	0.158	35.0	0.099	55.5	0.057	76.0	0.015
-5.0	0.270	4.4	0.334	15.0	0.148	35.5	0.082	56.0	0.057	76.5	0.014
-4.5	0.253	4.6	0.300	15.5	0.128	36.0	0.059	56.5	0.067	77.0	0.012
-4.0	0.221	4.8	0.270	16.0	0.100	36.5	0.032	57.0	0.083	77.5	0.011
-3.5	0.204	5.0	0.245	16.5	0.069	37.0	0.008	57.5	0.101	78.0	0.010
-3.0	0.246	5.2	0.226	17.0	0.047	37.5	0.028	58.0	0.120	78.5	0.009
-2.8	0.282	5.4	0.211	17.5	0.056	38.0	0.053	58.5	0.137	79.0	0.008
-2.6	0.326	5.6	0.199	18.0	0.082	38.5	0.075	59.0	0.153	79.5	0.007
-2.4	0.375	5.8	0.190	18.5	0.106	39.0	0.091	59.5	0.167	80.0	0.006
-2.2	0.429	6.0	0.183	19.0	0.121	39.5	0.101	60.0	0.177	80.5	0.005
-2.0	0.485	6.2	0.177	19.5	0.125	40.0	0.103	60.5	0.186	81.0	0.005
-1.8	0.542	6.4	0.170	20.0	0.116	40.5	0.099	61.0	0.191	81.5	0.004
-1.6	0.600	6.6	0.164	20.5	0.095	41.0	0.088	61.5	0.194	82.0	0.003
-1.4	0.656	6.8	0.156	21.0	0.066	41.5	0.072	62.0	0.195	82.5	0.003
-1.2	0.710	7.0	0.148	21.5	0.032	42.0	0.052	62.5	0.193	83.0	0.002
-1.0	0.762	7.2	0.140	22.0	0.007	42.5	0.030	63.0	0.189	83.5	0.002
-0.8	0.810	7.4	0.132	22.5	0.041	43.0	0.009	63.5	0.183	84.0	0.002
-0.6	0.853	7.6	0.125	23.0	0.072	43.5	0.021	64.0	0.176	84.5	0.001
-0.4	0.892	7.8	0.120	23.5	0.095	44.0	0.043	64.5	0.166	85.0	0.001
-0.2	0.926	8.0	0.117	24.0	0.110	44.5	0.063	65.0	0.156	85.5	0.001
0.0	0.953	8.2	0.118	24.5	0.117	45.0	0.080	65.5	0.146	86.0	0.001
0.2	0.975	8.4	0.121	25.0	0.116	45.5	0.094	66.0	0.136	86.5	0.000
0.4	0.990	8.6	0.127	25.5	0.112	46.0	0.105	66.5	0.125	87.0	0.000
0.6	0.998	8.8	0.134	26.0	0.107	46.5	0.113	67.0	0.115	87.5	0.000
0.8	1.000	9.0	0.143	26.5	0.107	47.0	0.119	67.5	0.104	88.0	0.000
1.0	0.995	9.2	0.153	27.0	0.111	47.5	0.123	68.0	0.094	88.5	0.000
1.2	0.984	9.4	0.162	27.5	0.118	48.0	0.128	68.5	0.085	89.0	0.000
1.4	0.967	9.6	0.170	28.0	0.124	48.5	0.133	69.0	0.076	89.5	0.000
1.6	0.943	9.8	0.173	28.5	0.126	49.0	0.138	69.5	0.068	90.0	0.000
1.8	0.915	10.0	0.180	29.0	0.121	49.5	0.143	70.0	0.060		
2.0	0.881	10.2	0.184	29.5	0.108	50.0	0.148	70.5	0.054		
2.2	0.843	10.4	0.187	30.0	0.088	50.5	0.151	71.0	0.048		

<u>Effective Radiated Power Calculations for DTV</u>			
Call letters:	KTSM-DT	Date:	6/14/2008
Location:	EI Paso, TX		
Channel:	9A		
Frequency:	189 MHz Mid-Band	Pilot Freq:	186.31
Antenna:	Dielectric TF-12BH(S)		
Transmitter Power Output (TPO):	2.3 kW avg.		3.63 dBk
Filter Loss:			0.4 dB
TPO into Xmsn Line:	2.1 kW		3.23 dBk
Transmission Line:			
Loss per 100 ft.:	0.066 dB Vert	0.066 dB Hor	
Line Length:	300 ft. Vert	30 ft. Hor	
Total Line Loss:			-0.22 dB
Antenna Input Power:	2.00 kW		3.01 dBk
Efficiency:	95.1086 %		
Elevation Antenna Gain -			
<i>Horizontal -</i>			
<i>Hor. Polarization -</i>	9.10 Gain		9.59 dB
Maximum -			
Hor. Polarization -	10.00 Gain		10.00 dB
Azimuthal Antenna Gain -			
Hor. Polarization -	1.00 Gain		0.00 dB
Horizontal ERP -			
<i>Horizontal Polarization:</i>	18.2 kW		12.6 dBk
Maximum ERP -			
Horizontal Polarization:	20.0 kW		13.01 dBk

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**UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
ANTENNA STRUCTURE REGISTRATION**



OWNER: PINNACLE TOWERS LLC

FCC Registration Number (FRN): 0006156111

ATTN: REGULATORY DEPARTMENT PINNACLE TOWERS LLC 2000 CORPORATE DRIVE CANONSBURG, PA 15317	Antenna Structure Registration Number 1051409
	Issue Date 01-30-2008
Location of Antenna Structure RANGER PEAK EL PASO, TX	Ground Elevation (AMSL) 1716.0 meters
	Overall Height Above Ground (AGL) 113.1 meters
Latitude 31-48-18.4 N	Longitude 106-28-59.5 W
NAD83	Overall Height Above Mean Sea Level (AMSL) 1829.1 meters
Painting and Lighting Requirements: FAA Chapters 3, 4, 5, 13 Paint and Light in Accordance with FAA Circular Number 70/7460-1J	
Conditions:	

This registration is effective upon completion of the described antenna structure and notification to the Commission. **YOU MUST NOTIFY THE COMMISSION WITHIN 24 HOURS OF COMPLETION OF CONSTRUCTION OR CANCELLATION OF YOUR PROJECT, please file FCC Form 854.** To file electronically, connect to the antenna structure registration system by pointing your web browser to <http://wireless.fcc.gov/antenna>. Electronic filing is recommended. You may also file manually by submitting a paper copy of FCC Form 854. Use purpose code "NT" for notification of completion of construction; use purpose code "CA" to cancel your registration.

The Antenna Structure Registration is not an authorization to construct radio facilities or transmit radio signals. It is necessary that all radio equipment on this structure be covered by a valid FCC license or construction permit.

You must immediately provide a copy of this Registration to all tenant licensees and permittees sited on the structure described on this Registration (although not required, you may want to use Certified Mail to obtain proof of receipt), and display your Registration Number at the site. See reverse for important information about the Commission's Antenna Structure Registration rules.

FCC 854R
August 2007

You must comply with all applicable FCC obstruction marking and lighting requirements, as set forth in Part 17 of the Commission's Rules (47 C.F.R. Part 17). These rules include, but are not limited to:

- **Posting the Registration Number:** The Antenna Structure Registration Number must be displayed in a conspicuous place so that it is readily visible near the base of the antenna structure. Materials used to display the Registration Number must be weather-resistant and of sufficient size to be easily seen at the base of the antenna structure. Exceptions exist for certain historic structures. See 47 C.F.R. 17.4(g)-(h).
- **Inspecting lights and equipment:** The obstruction lighting must be observed at least every 24 hours in order to detect any outages or malfunctions. Lighting equipment, indicators, and associated devices must be inspected at least once every three months.
- **Reporting outages and malfunctions:** When any top steady-burning light or a flashing light (in any position) burns out or malfunctions, the outage must be reported to the nearest FAA Flight Service Station, unless corrected within 30 minutes. The FAA must again be notified when the light is restored. The owner must also maintain a log of these outages and malfunctions.
- **Maintaining assigned painting:** The antenna structure must be repainted as often as necessary to maintain good visibility.
- **Complying with environmental rules:** If you certified that grant of this registration would not have a significant environmental impact, you must nevertheless maintain all pertinent records and be ready to provide documentation supporting this certification and compliance with the rules, in the event that such information is requested by the Commission pursuant to 47 C.F.R. 1.1307(d).
- **Updating information:** The owner must notify the FCC of proposed modifications to this structure; of any change in ownership; or, within 30 days of dismantlement of the structure.

Copies of the Code of Federal Regulations (which contain the FCC's antenna structure registration rules, 47 C.F.R. Part 17) are available from the Government Printing Office (GPO). To purchase CFR volumes, call (202) 512-1800. For GPO Customer Service, call (202) 512-1803. For additional FCC information, consult the Antenna Homepage on the internet at <http://wireless.fcc.gov/antenna> or call (877) 480-3201 (TTY 717-338-2824).

Radio Frequency Radiation Human Exposure Calculations

Call letters: **KTSM-DT** Date: **6/14/2008**
 City of License: **El Paso, TX**
 Channel: **9A**

Reference:

FCC Rules Section 73.1307(b) & 73.1310
OET Bulletin No. 65 Edition 97-01, August, 1997
OET Bulletin No. 56

DTV Average Power **20,000 W ERP**

Typical relative field factor in the downward direction: **0.20**
 (conservative estimate)

Antenna Radiation Center Above Ground Level (RCAGL): **102.0 m**

Occupational/Controlled (O/C) Exposure

Highest Calculated Power Density: **2.57 $\mu\text{W}/\text{cm}^2$**

Maximum Permissible Exposure (MPE) for this Channel -

Frequency (middle of the band): **189 MHz**
 MPE O/C Limit (6 minutes average): **1.0 mW/cm^2**
 Percentage of MPE O/C Limit: **0.26 %**

General Population/Uncontrolled (GP/U) Exposure

Typical height of a person's head standing at ground level: **2 m**

Distance from head height to antenna radiation center: **100.0 m**

Highest Calculated Power Density: **2.67 $\mu\text{W}/\text{cm}^2$**

Maximum Permissible Exposure (MPE) for this Channel -

Frequency (middle of the band): **189 MHz**
 MPE GP/U Limit (30 minutes average): **0.2 mW/cm^2**
 Percentage of MPE GP/U Limit: **1.34 %**

Contour Comparison - Proposed vs. Appendix B			
36 dBu F(50,90) Contours - 3 second US Terrain			
	Proposed	Appendix B	
Bearing	Facility	Allotted Facility	Difference
(deg)	Distance (km)	Distance (km)	(km)
0	96.8	93.4	3.4
1	97.8	94.3	3.5
2	99	95.3	3.7
3	100.2	96.7	3.5
4	101.4	98	3.4
5	102.5	99.1	3.4
6	103.5	100.2	3.3
7	104.3	101.1	3.2
8	105.2	102.1	3.1
9	106.3	103.2	3.1
10	107.4	104.4	3
11	108.9	105.9	3
12	110.7	107.7	3
13	111.8	109.1	2.7
14	112.7	110.3	2.4
15	113.4	111.2	2.2
16	113.8	111.8	2
17	114.3	112.3	2
18	114.7	112.8	1.9
19	115.1	113.2	1.9
20	115.5	113.7	1.8
21	115.8	114.1	1.7
22	116.2	114.5	1.7
23	116.5	114.9	1.6
24	116.7	115.2	1.5
25	117	115.6	1.4
26	117.3	115.9	1.4
27	117.6	116.3	1.3
28	117.8	116.7	1.1
29	118	117	1
30	118.2	117.3	0.9
31	118.4	117.6	0.8
32	118.6	117.9	0.7
33	118.7	118.2	0.5
34	118.9	118.4	0.5
35	119	118.6	0.4
36	119	118.9	0.1
37	119.1	119.1	0
38	119.2	119.3	-0.1
39	119.3	119.5	-0.2
40	119.4	119.7	-0.3

41	119.4	119.8	-0.4
42	119.5	119.9	-0.4
43	119.5	120	-0.5
44	119.6	120	-0.4
45	119.6	120.1	-0.5
46	119.6	120.1	-0.5
47	119.7	120.2	-0.5
48	119.7	120.2	-0.5
49	119.7	120.3	-0.6
50	119.7	120.3	-0.6
51	119.7	120.3	-0.6
52	119.7	120.3	-0.6
53	119.7	120.3	-0.6
54	119.7	120.3	-0.6
55	119.8	120.4	-0.6
56	119.8	120.4	-0.6
57	119.8	120.4	-0.6
58	119.8	120.4	-0.6
59	119.8	120.4	-0.6
60	119.8	120.4	-0.6
61	119.8	120.4	-0.6
62	119.8	120.4	-0.6
63	119.8	120.4	-0.6
64	119.8	120.4	-0.6
65	119.8	120.4	-0.6
66	119.8	120.4	-0.6
67	119.8	120.4	-0.6
68	119.8	120.4	-0.6
69	119.8	120.4	-0.6
70	119.8	120.4	-0.6
71	119.8	120.4	-0.6
72	119.8	120.4	-0.6
73	119.8	120.4	-0.6
74	119.9	120.5	-0.6
75	119.9	120.5	-0.6
76	119.8	120.4	-0.6
77	119.8	120.4	-0.6
78	119.8	120.4	-0.6
79	119.8	120.4	-0.6
80	119.8	120.4	-0.6
81	119.8	120.4	-0.6
82	119.8	120.3	-0.5
83	119.7	120.3	-0.6
84	119.7	120.3	-0.6
85	119.7	120.3	-0.6
86	119.7	120.3	-0.6
87	119.7	120.3	-0.6
88	119.7	120.3	-0.6
89	119.7	120.3	-0.6
90	119.7	120.3	-0.6

91	119.7	120.3	-0.6
92	119.7	120.3	-0.6
93	119.7	120.3	-0.6
94	119.7	120.4	-0.7
95	119.7	120.4	-0.7
96	119.7	120.4	-0.7
97	119.7	120.4	-0.7
98	119.8	120.5	-0.7
99	119.8	120.5	-0.7
100	119.8	120.5	-0.7
101	119.8	120.5	-0.7
102	119.9	120.6	-0.7
103	119.9	120.6	-0.7
104	119.9	120.7	-0.8
105	119.9	120.7	-0.8
106	119.9	120.8	-0.9
107	120	120.8	-0.8
108	120	120.9	-0.9
109	120.2	121.1	-0.9
110	120.5	121.4	-0.9
111	120.7	121.7	-1
112	120.9	122	-1.1
113	121.2	122.2	-1
114	121.4	122.6	-1.2
115	121.7	122.8	-1.1
116	121.9	123.1	-1.2
117	122.1	123.4	-1.3
118	122.4	123.6	-1.2
119	122.6	123.9	-1.3
120	122.7	124	-1.3
121	122.8	124.1	-1.3
122	122.8	124.2	-1.4
123	122.8	124.3	-1.5
124	122.9	124.3	-1.4
125	122.9	124.4	-1.5
126	122.9	124.4	-1.5
127	122.9	124.5	-1.6
128	123	124.5	-1.5
129	123	124.5	-1.5
130	123	124.6	-1.6
131	123	124.6	-1.6
132	123	124.6	-1.6
133	123	124.6	-1.6
134	123	124.6	-1.6
135	123	124.6	-1.6
136	123	124.6	-1.6
137	123	124.6	-1.6
138	123	124.6	-1.6
139	122.9	124.5	-1.6
140	122.9	124.5	-1.6

141	122.9	124.5	-1.6
142	122.9	124.4	-1.5
143	122.8	124.4	-1.6
144	122.8	124.3	-1.5
145	122.8	124.3	-1.5
146	122.7	124.3	-1.6
147	122.7	124.2	-1.5
148	122.7	124.2	-1.5
149	122.7	124.1	-1.4
150	122.6	124.1	-1.5
151	122.6	124	-1.4
152	122.6	124	-1.4
153	122.6	124	-1.4
154	122.5	123.9	-1.4
155	122.5	123.9	-1.4
156	122.5	123.9	-1.4
157	122.5	123.8	-1.3
158	122.5	123.8	-1.3
159	122.5	123.8	-1.3
160	122.4	123.7	-1.3
161	122.4	123.7	-1.3
162	122.4	123.7	-1.3
163	122.4	123.6	-1.2
164	122.3	123.6	-1.3
165	122.3	123.5	-1.2
166	122.2	123.5	-1.3
167	122.2	123.4	-1.2
168	122.1	123.3	-1.2
169	122	123.2	-1.2
170	122	123.1	-1.1
171	121.9	123	-1.1
172	121.8	122.9	-1.1
173	121.7	122.7	-1
174	121.5	122.6	-1.1
175	121.4	122.5	-1.1
176	121.3	122.3	-1
177	121.2	122.2	-1
178	121.1	122.1	-1
179	121	121.9	-0.9
180	120.8	121.7	-0.9
181	120.6	121.5	-0.9
182	120.4	121.2	-0.8
183	120.1	120.9	-0.8
184	119.9	120.6	-0.7
185	119.7	120.4	-0.7
186	119.3	120	-0.7
187	118.8	119.4	-0.6
188	118.3	118.8	-0.5
189	117.8	118.2	-0.4
190	117	117.4	-0.4

191	116.4	116.8	-0.4
192	115.8	116.2	-0.4
193	115.4	115.8	-0.4
194	115.3	115.6	-0.3
195	115.3	115.7	-0.4
196	115	115.4	-0.4
197	114.7	115	-0.3
198	114.2	114.6	-0.4
199	114	114.4	-0.4
200	114.1	114.5	-0.4
201	114	114.3	-0.3
202	114.1	114.5	-0.4
203	114.2	114.5	-0.3
204	114	114.3	-0.3
205	113.9	114.2	-0.3
206	113.7	114	-0.3
207	113.4	113.7	-0.3
208	113.3	113.6	-0.3
209	113.3	113.6	-0.3
210	113.6	113.9	-0.3
211	113.9	114.2	-0.3
212	114.4	114.6	-0.2
213	114.8	115	-0.2
214	115	115.1	-0.1
215	115.1	115.2	-0.1
216	115	115.2	-0.2
217	114.9	115	-0.1
218	114.9	115	-0.1
219	115.1	115.1	0
220	115.1	115.1	0
221	115	115	0
222	114.9	115	-0.1
223	115	115.1	-0.1
224	115.3	115.3	0
225	115.5	115.5	0
226	115.7	115.7	0
227	116.1	116	0.1
228	116.4	116.4	0
229	116.8	116.7	0.1
230	117.1	117.1	0
231	117.4	117.4	0
232	117.6	117.5	0.1
233	117.7	117.7	0
234	117.8	117.8	0
235	117.9	117.9	0
236	117.9	118	-0.1
237	117.9	118	-0.1
238	117.8	117.9	-0.1
239	117.7	117.8	-0.1
240	117.6	117.7	-0.1

241	117.5	117.6	-0.1
242	117.4	117.5	-0.1
243	117.4	117.5	-0.1
244	117.4	117.5	-0.1
245	117.4	117.6	-0.2
246	117.4	117.6	-0.2
247	117.5	117.7	-0.2
248	117.5	117.7	-0.2
249	117.6	117.8	-0.2
250	117.6	117.9	-0.3
251	117.7	117.9	-0.2
252	117.8	118.1	-0.3
253	118.1	118.3	-0.2
254	118.4	118.8	-0.4
255	118.8	119.1	-0.3
256	119	119.4	-0.4
257	119.1	119.5	-0.4
258	119.2	119.7	-0.5
259	119.3	119.8	-0.5
260	119.4	119.9	-0.5
261	119.5	120	-0.5
262	119.6	120.1	-0.5
263	119.7	120.2	-0.5
264	119.8	120.4	-0.6
265	119.9	120.5	-0.6
266	120	120.6	-0.6
267	120	120.7	-0.7
268	120	120.7	-0.7
269	120.1	120.8	-0.7
270	120.2	120.9	-0.7
271	120.3	121	-0.7
272	120.3	121	-0.7
273	120.4	121	-0.6
274	120.4	121.1	-0.7
275	120.4	121.1	-0.7
276	120.5	121.2	-0.7
277	120.6	121.2	-0.6
278	120.7	121.4	-0.7
279	120.8	121.5	-0.7
280	120.9	121.6	-0.7
281	120.9	121.6	-0.7
282	121	121.6	-0.6
283	121	121.7	-0.7
284	121.1	121.7	-0.6
285	121.1	121.7	-0.6
286	121.1	121.8	-0.7
287	121.1	121.7	-0.6
288	121.1	121.7	-0.6
289	121.1	121.6	-0.5
290	121	121.6	-0.6

291	121	121.5	-0.5
292	120.9	121.5	-0.6
293	120.9	121.4	-0.5
294	120.8	121.3	-0.5
295	120.7	121.2	-0.5
296	120.6	121.1	-0.5
297	120.5	121	-0.5
298	120.4	120.9	-0.5
299	120.3	120.8	-0.5
300	120.2	120.7	-0.5
301	120.1	120.6	-0.5
302	120	120.4	-0.4
303	119.8	120.3	-0.5
304	119.7	120.1	-0.4
305	119.5	119.9	-0.4
306	119.3	119.7	-0.4
307	119.1	119.4	-0.3
308	118.9	119.1	-0.2
309	118.6	118.8	-0.2
310	118.4	118.6	-0.2
311	118.1	118.3	-0.2
312	118	118.1	-0.1
313	117.8	117.9	-0.1
314	117.6	117.6	0
315	117.3	117.2	0.1
316	116.9	116.8	0.1
317	116.6	116.4	0.2
318	116.2	116	0.2
319	115.9	115.6	0.3
320	115.5	115.2	0.3
321	115.1	114.7	0.4
322	114.7	114.3	0.4
323	114.4	113.9	0.5
324	114	113.4	0.6
325	113.7	113	0.7
326	113.3	112.4	0.9
327	112.9	111.9	1
328	112.4	111.1	1.3
329	111.8	110.2	1.6
330	111.1	109.3	1.8
331	110.2	108.3	1.9
332	109.1	107.1	2
333	108	106.1	1.9
334	107	105	2
335	106.1	104	2.1
336	104.9	102.8	2.1
337	103.9	101.8	2.1
338	103.1	101	2.1
339	102.2	100	2.2
340	101.5	99.3	2.2

341	100.7	98.4	2.3
342	99.7	97.3	2.4
343	98.4	96	2.4
344	97	95	2
345	96.4	94.2	2.2
346	95.6	93	2.6
347	93.5	90.6	2.9
348	90.9	88	2.9
349	87.8	84.4	3.4
350	83.7	79.4	4.3
351	78.3	73.4	4.9
352	69	62.9	6.1
353	56.8	54.7	2.1
354	59.5	54.7	4.8
355	78.3	74.8	3.5
356	87.7	84.5	3.2
357	90.9	87.7	3.2
358	93.6	90.2	3.4
359	95.8	92.4	3.4
Note: A Difference > 8 km would exceed the 5 mile			
	Limitation.		

Matthew A. Sanderford, Jr., P.E.

Census data selected 2000

Post Transition Data Base Selected
/space/software/cdbs/tvdb.sff_B

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-14-2008 Time: 15:18:09

Record Selected for Analysis

KTSM USERRECORD-01 EL PASO TX US
 Channel 09 ERP 20. kW HAAT 577. m RCAMSL 01818 m
 Latitude 031-48-18 Longitude 0106-28-57
 Status APP Zone 2 Border
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	36.0 dBu F(50,90) (km)
0.0	20.000	282.8	96.9
45.0	20.000	619.8	119.6
90.0	20.000	620.9	119.6
135.0	20.000	692.3	122.6
180.0	20.000	643.1	120.6
225.0	20.000	550.1	115.5
270.0	20.000	630.8	120.1
315.0	20.000	577.9	117.2

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KTSM 09 EL PASO TX USERRECORD01

Matthew A. Sanderford, Jr., P.E.

and station

SHORT TO: KTSM-TV 09 EL PASO TX BDTV 1534
31 -48-18 106 -28-57
Req. separation 273.6 Actual separation 0.0 Short 273.6 km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance
Distance to border = 4.5km

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel Call Proposed Station City/State ARN
09 KTSM EL PASO TX USERRECORD01

Stations Potentially Affected by Proposed Station

Table with 7 columns: Chan, Call, City/State, Dist(km), Status, Application, Ref. No. Rows include KGUN TUCSON AZ, KNMD-TV SANTA FE NM, KWES-TV ODESSA TX, KOVT SILVER CITY NM.

Analysis of Interference to Affected Station 1

Analysis of current record

Channel Call City/State Application Ref. No.
09 KGUN TUCSON AZ BDTV -0113

Stations Potentially Affecting This Station

Table with 7 columns: Chan, Call, City/State, Dist(km), Status, Application, Ref. No. Rows include KAET PHOENIX AZ, KEY-TV EL CENTRO CA, KSAZ-TV PHOENIX AZ, KTSM EL PASO TX.

Proposal causes no interference

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
09	KNMD-TV	SANTA FE NM	BDTV	-1092

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
08	KOFT	FARMINGTON NM	228.0	LIC	BDTV	-1082
10	KCHF	SANTA FE NM	63.5	LIC	BDTV	-1093
09	KTSM	EL PASO TX	378.8	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
09	KWES-TV	ODESSA TX	BDTV	-1587

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
08	KOBR	ROSWELL NM	175.3	LIC	BDTV	-1088
10	KBIM-TV	ROSWELL NM	147.9	LIC	BDTV	-1089
09	KTSM	EL PASO TX	340.7	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 3
Before Analysis

Results for: 9A TX ODESSA BDTV 1587 LIC
HAAT 391.0 m, ATV ERP 25.7 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	341734	35789.4
not affected by terrain losses	341712	35126.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	57	567.3
lost to ATV IX only	57	567.3
lost to all IX	57	567.3

Potential Interfering Stations Included in above Scenario 1

10A NM ROSWELL	BDTV	1089	LIC
----------------	------	------	-----

After Analysis

Matthew A. Sanderford, Jr., P.E.

Results for: 9A TX ODESSA BDTV 1587 LIC
 HAAT 391.0 m, ATV ERP 25.7 kW
 POPULATION AREA (sq km)
 within Noise Limited Contour 341734 35789.4
 not affected by terrain losses 341712 35126.3
 lost to NTSC IX 0 0.0
 lost to additional IX by ATV 57 595.2
 lost to ATV IX only 57 595.2
 lost to all IX 57 595.2

Potential Interfering Stations Included in above Scenario 1

10A NM ROSWELL BDTV 1089 LIC
 9A TX EL PASO USERRECORD01 APP

Percent new IX = 0.0000%

Worst case new IX 0.0000% Scenario 1

#####

Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
10	KOVT	SILVER CITY NM	BDTV	-1096

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
10	KSAZ-TV	PHOENIX AZ	359.6	LIC	BDTV	-0101
10	KBIM-TV	ROSWELL NM	412.8	LIC	BDTV	-1089
10	KCHF	SANTA FE NM	360.4	LIC	BDTV	-1093
09	KTSM	EL PASO TX	202.7	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
09	KTSM	EL PASO TX	USERRECORD-01	

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
09	KGUN	TUCSON AZ	404.3	LIC	BDTV	-0113
09	KNMD-TV	SANTA FE NM	378.8	LIC	BDTV	-1092
09	KWES-TV	ODESSA TX	340.7	LIC	BDTV	-1587
10	KOVT	SILVER CITY NM	202.7	LIC	BDTV	-1096

Matthew A. Sanderford, Jr., P.E.

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 5
Before Analysis

Results for: 9A TX EL PASO USERRECORD01 APP
HAAT 577.0 m, ATV ERP 20.0 kW
within Noise Limited Contour POPULATION AREA (sq km)
not affected by terrain losses 859205 42917.8
lost to NTSC IX 856135 39829.4
lost to additional IX by ATV 0 0.0
lost to ATX IX only 6 384.6
lost to all IX 6 384.6

Potential Interfering Stations Included in above Scenario 1

9A TX ODESSA BDTV 1587 LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0027 (January 2008)	FOR FCC USE ONLY
FCC 301		
APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION		FOR COMMISSION USE ONLY FILE NO. -
Read INSTRUCTIONS Before Filling Out Form		

Section I - General Information

1.	Legal Name of the Applicant COMCORP OF EL PASO LICENSE CORP.									
	Mailing Address P.O. BOX 53708									
	<table border="1" style="width: 100%;"> <tr> <td style="width: 40%;">City LAFAYETTE</td> <td style="width: 30%;">State or Country (if foreign address) LA</td> <td style="width: 30%;">ZIP Code 70505 - 3708</td> </tr> <tr> <td>Telephone Number (include area code) 3372371142</td> <td colspan="2">E-Mail Address (if available)</td> </tr> <tr> <td>FCC Registration Number:</td> <td>Call Sign KTSM-TV</td> <td>Facility ID Number 67760</td> </tr> </table>	City LAFAYETTE	State or Country (if foreign address) LA	ZIP Code 70505 - 3708	Telephone Number (include area code) 3372371142	E-Mail Address (if available)		FCC Registration Number:	Call Sign KTSM-TV	Facility ID Number 67760
City LAFAYETTE	State or Country (if foreign address) LA	ZIP Code 70505 - 3708								
Telephone Number (include area code) 3372371142	E-Mail Address (if available)									
FCC Registration Number:	Call Sign KTSM-TV	Facility ID Number 67760								
2.	Contact Representative (if other than Applicant) SCOTT S. PATRICK									
	Firm or Company Name DOW LOHNES, PLLC									
	Mailing Address 1200 NEW HAMPSHIRE AVE. NW SUITE 800									
	<table border="1" style="width: 100%;"> <tr> <td style="width: 40%;">City WASHINGTON</td> <td style="width: 30%;">State or Country (if foreign address) DC</td> <td style="width: 30%;">ZIP Code 20036 -</td> </tr> <tr> <td>Telephone Number (include area code) 2027762000</td> <td colspan="2">E-Mail Address (if available) SPATRICK@DOWLOHNES.COM</td> </tr> </table>	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -	Telephone Number (include area code) 2027762000	E-Mail Address (if available) SPATRICK@DOWLOHNES.COM				
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -								
Telephone Number (include area code) 2027762000	E-Mail Address (if available) SPATRICK@DOWLOHNES.COM									
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)									
4.	Application Purpose <input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application <input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments <input type="radio"/> Major Change in licensed facility <input checked="" type="radio"/> Minor Change in licensed facility <input type="radio"/> Minor Amendment to pending application (a) File number of original construction permit: - <input type="checkbox"/> NA (b) Service Type: <input type="radio"/> AM <input type="radio"/> FM <input type="radio"/> TV <input checked="" type="radio"/> DTV (c) DTV Type: <input type="radio"/> Pre-Transition <input checked="" type="radio"/> Post-Transition <input type="radio"/> Both (d) Community of License: City: EL PASO State: TX (e) Facility Type: <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary									
	If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending [Exhibit 1]									

application that are being revised.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1.	<p>Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No		
2.	<p>Parties to the Application.</p> <p>a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> (1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners. </td> <td style="width: 50%; border: none;"> (2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt). </td> </tr> </table> <p>[Enter Parties/Owners Information]</p> <hr/> <p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p>	(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.	(2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt).	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 2]
(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.	(2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt).			
3.	<p>Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p>	<input type="checkbox"/> N/A [Exhibit 3]		
4.	<p>Multiple Ownership.</p> <p>a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?</p> <p>If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p> <p>b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.</p> <p>Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p>	<input type="radio"/> Yes <input type="radio"/> No [Exhibit 4] <input type="radio"/> Yes <input type="radio"/> No [Exhibit 5]		

	<p>All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p> <p>c. Applicant certifies that the proposed facility:</p> <ol style="list-style-type: none"> 1. does not present an issue under the Commission's policies relating to media interests of immediate family members; 2. complies with the Commission's policies relating to future ownership interests; and 3. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors. 	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 6]</p>
5.	<p>Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <ol style="list-style-type: none"> a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised. 	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 7]</p>
6.	<p>Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 8]</p>
7.	<p>Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 9]</p>
8.	<p>Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
9.	<p>Local Public Notice. Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
10.	<p>Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p> <p>An exhibit is required unless this question is inapplicable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p> <p>[Exhibit 10]</p>
11.	<p>Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
12.	<p>Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p>
13.	<p>Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments. If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p>

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

<p>Typed or Printed Name of Person Signing GREG BOULANGER</p>	<p>Typed or Printed Title of Person Signing SECRETARY</p>
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Signature	Date
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WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III-D - DTV Engineering	
Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p>Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p>Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622 (i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION III-D - DTV Engineering	
TECHNICAL SPECIFICATIONS	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
TECH BOX	
1.	Channel Number: DTV 9 Analog TV, if any 9
2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 31 Minutes 48 Seconds 18 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 106 Minutes 28 Seconds 57.6 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1051409 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 1716 meters
6.	Overall Tower Height Above Ground Level: 113.1 meters
7.	Height of Radiation Center Above Ground Level: 102 meters
8.	Height of Radiation Center Above Average Terrain : 577 meters
9.	Maximum Effective Radiated Power (average power): 20 kW
10.	Antenna Specifications: a. Manufacturer DIE Model TF-12BH(S) b. Electrical Beam Tilt: 0.75 degrees <input type="checkbox"/> Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). [Exhibit 42] d. Polorization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]

	If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. Exhibit required.	[Exhibit 43]
11.	Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if Certification Checklist Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 44]
12.	If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if Certification Checklist item 3 is answered "No.")	[Exhibit 45]
13.	Environmental Protection Act. Submit in an Exhibit the following: If Certification Checklist Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site. By checking "Yes" to Certification Checklist Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines. If Certification Checklist Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.	[Exhibit 46]
PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.		

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MATTHEW A. SANDERFORD, JR., P.E.		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 6/16/2008	
Mailing Address P.O. BOX 485 6100 I-35W			
City ALVARADO	State or Country (if foreign address) TX		Zip Code 76009 -0485
Telephone Number (include area code) 8177835566	E-Mail Address (if available) TVCOWBOY@MARSAND.COM		

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Exhibits

Exhibit 43

Description: ENGINEERING STATEMENT

Attachment 43

Exhibit 46

Description: SEE ENGINEERING STATEMENT

Attachment 46
