

SMITH AND FISHER

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of TRINITY BROADCASTING NETWORK, licensee of Television Translator K28EM, Channel 28 in Mariposa, California in support of this amendment to its Application for Construction Permit BPTT-20010223ABL, a displacement application seeking to specify operation on Channel 27 from its licensed transmitter site. The purpose of this amendment is to propose operation with a “zero” offset in order to avoid predicted interference to a previously-filed displacement application in Fresno. No other changes in operating parameters are proposed herein.

It is proposed to utilize the same standard Andrew directional antenna that is presently located on the side of the existing 67-meter K28EM communications tower. Exhibit B is a map upon which the predicted service contours are plotted. Exhibit C is a tabulation of operating parameters for the proposed facility.

We conducted a computer analysis of the interference situation for the proposed facility. The study is based on contour protection requirements of Section 74.705, 74.706, and 74.707 of the FCC’s Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility meets these requirements except in one instance: KTSF-DT, Channel 27 in San Francisco, California.

We then conducted a detailed interference study using the Longley-Rice

methodology contained in the Commission's *OET Bulletin No. 69* with respect to the authorized and proposed facilities of KTSF-DT. The software utilizes a 1-square kilometer cell size and does not count areas inside the DTV station's protected contour where interference from another source (other than proposed K28EM) already exists. It concludes that the facility proposed herein causes no significant new interference to either of these digital television facilities. Therefore waiver of Section 74.706 of the Commission's Rules is requested in this regard.

Therefore, we conclude that the proposed K28EM facility on Channel 27 meets the FCC's interference requirements with respect to full-power NTSC applications and authorizations (Section 74.705 of the Commission's Rules); full-power DTV authorizations, applications and allotment facilities (Section 74.706); and, authorized low-power television and television translator stations (Section 74.707).

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1018110 to this tower.

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Mariposa facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 39.9 kw, an effective antenna height of 46 meters above ground, and the vertical pattern of the Andrew antenna, maximum power density two meters above ground of 0.021 mw/cm^2 is calculated to occur 21 meters west of the base of the tower. Since this is only 5.7 percent of the 0.37 mw/cm^2 reference for uncontrolled

environments (areas with public access) for a facility operating on Channel 27 (548-554 MHz), this proposal may be considered a minor environmental action with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 4, 2001