

## **ENGINEERING EXHIBIT**

### **Displacement Application for Construction Permit**

prepared for

**Caballero Acquisition Inc.**  
KMMA-CA San Luis Obispo, CA  
Facility ID 58616  
Ch. 41 10.9 kW

*Caballero Acquisition Inc. (“CAI”)* is the licensee of Class A Television station KMMA-CA, Channel 18, San Luis Obispo, CA, Facility ID 58616 (BLTTA-20010625AAP). KMMA-CA is displaced pursuant to §73.3572(a)(4)(iii) by KSBY-DT, San Luis Obispo, CA. CAI proposes herein to change KMMA-CA’s channel, decrease maximum effective radiated power (“ERP”), and employ a different directional antenna. The instant application is intended to be filed on August 4, 2008 in response to the FCC’s lifting of the August 3, 2004 “freeze” concerning displacement channel relief and expansion in service area.<sup>1</sup>

The authorized KSBY-DT facility (BPCDT-19991012AAY) will operate on Channel 15 with 1000 kW ERP from a site 0.1 km distant from KMMA-CA. In its latest DTV Transition Status Report (BDTUCT-20080717AEG), KSBY-DT’s licensee reports that full power DTV operations are expected to commence on September 18, 2008 and will continue into the post-transition period. Interference analysis pursuant to OET Bulletin 69<sup>2</sup> shows that KSBY-DT will cause some interference to KMMA-CA within its protected service contour. Thus, KMMA-CA qualifies for displacement relief and a new channel is sought.

---

<sup>1</sup>Public Notice “*Commission Lifts the Freeze On the Filing of Certain Class A Television Applications Effective August 4, 2008*” DA 08-1644, released July 14, 2008.

<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission’s implementation of OET-69 show excellent correlation.

The proposed facility will operate on Channel 41 using “zero” offset, with a directional antenna. **Figure 1** depicts the 74 dBμ service contour of both the licensed and the proposed facility. No change in antenna site location or height is specified. Use of the licensed site and the service area overlap demonstrate compliance with §73.3572.

The proposed antenna system for KMMA-CA will be side-mounted on the existing antenna support structure as the licensed KMMA-CA facility. The tower structure is not presently registered with the FCC, as it is an existing structure of less than 61 meters overall height above ground and all known landing areas within 8 km satisfy the FCC’s “TOWAIR” slope test program. No marking or lighting specifications are presently required. Since no change to the structure’s overall height is proposed, FAA notification and commensurate FCC registration are not necessary.

The instant proposal complies with the Commission’s standard contour overlap protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations except those summarized in **Table 1**. The results of a detailed interference study per OET Bulletin 69 are summarized in **Table 1** which shows that any new interference created by the proposal does not exceed the Commission’s 0.5 percent rounding tolerance to any currently authorized facilities.

The instant proposal does create interference conflicts regarding two pending applications for Low Power Television digital companion facilities, both on Channel 41. The affected proposals are identified by file numbers BSFDTL-20060630CKJ (San Luis Obispo, CA) and BSFDTL-20060630AWX (Santa Maria, CA). The KMMA-CA displacement application would cause and receive interference in excess of the FCC’s 0.5 percent limit to both of these digital companion proposals, as summarized in the following table. Pursuant to §73.3572(a)(4)(iii), the KMMA-CA displacement application has priority over the two LPTV digital companion channel applications.

LPTV Digital Companion App File Number and Location	Interference Received from KMMA-CA Proposal	Interference Caused to KMMA-CA Proposal
BSFDTL-20060630CKJ San Luis Obispo, CA	79.3%	73.9%
BSFDTL-20060630AWX Santa Maria, CA	16.3%	34.7%

Accordingly, the instant proposal complies with §§73.6011 – 73.6019 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

The nearest FCC monitoring station is 280 km distant at Livermore, CA. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The site is not located within the areas requiring coordination with “quiet” zones specified in §73.1030(a) and (b). There are no AM stations within 3.2 kilometers of the site, based on information contained within the Commission’s database. The site location is beyond the border areas requiring international coordination.

### **Human Exposure to Radiofrequency Electromagnetic Field (Environmental)**

The proposed transmitting antenna will be installed on an existing antenna support structure. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission’s rules.

The transmitting location is on Cuesta Ridge overlooking San Luis Obispo. There are numerous other transmitting facilities at this site area situated on various antenna supporting structures. *CAI* will participate in a radiofrequency (“RF”) electromagnetic field exposure safety program, along with other broadcasters and FCC licensees that utilize the Cuesta Ridge antenna site area. Following construction of the proposed facility, *CAI* will conduct RF exposure measurements (and/or detailed calculations) to evaluate the level of RF exposure resulting from the KMMA-CA digital companion facility. As necessary, based on these results and considering all emitters, appropriate exposure abatement procedures will be established and followed, in order to comply

with the Commission's exposure limits. Such abatement procedures may involve the restriction of access to certain areas and/or facility modifications to reduce RF levels.

Considering the post-construction measurement and an appropriate abatement program, the general public and workers will not be exposed to RF levels in excess of the Commission's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, authorized personnel will be trained and/or supervised as necessary for access to any "controlled" areas. *CAI* will coordinate exposure procedures with all pertinent stations.

### **Certification**

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.

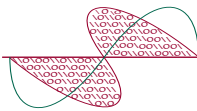
Joseph M. Davis, P.E.  
July 30, 2008

**Chesapeake RF Consultants, LLC**  
11993 Kahns Road  
Manassas, VA 20112  
703-650-9600

### List of Attachments

Figure 1      Coverage Contour Comparison  
Table 1      Interference Analysis Results Summary  
Form 301-CA   Saved Version of Engineering Sections from FCC Form at Time of Upload

*This material was entered July 30, 2008 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*



**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

**Figure 1**  
**Coverage Contour Comparison**  
**KMMA-CA San Luis Obispo, CA**  
**Facility ID 58616**  
**Ch. 41 10.9 kW**

prepared for  
**Caballero Acquisition Inc.**

July, 2008

Licensed Ch. 18  
74 dB $\mu$  Contour

Proposed Ch. 41  
74 dB $\mu$  Contour

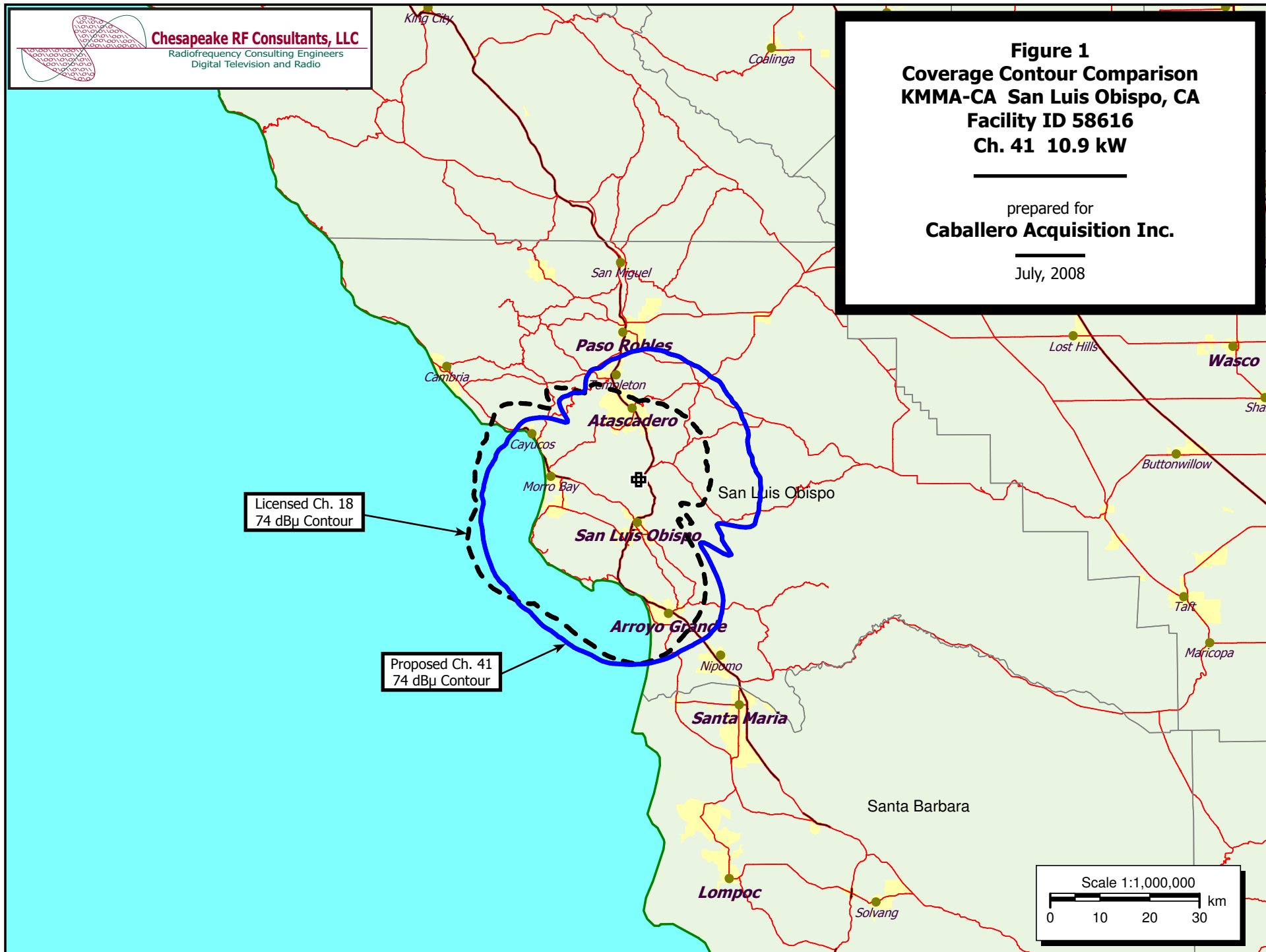
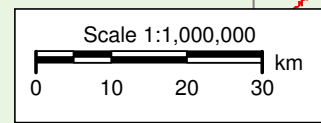


Table 1

# Interference Analysis Results Summary

prepared for

**Caballero Acquisition Inc.**

KMMA-CA San Luis Obispo, CA



<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist</u> <u>(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	---Population (1990 Census)---	
						<u>Baseline</u>	<u>New Interference</u>
41	KLCS	LOS ANGELES CA	268.3	LIC	BLEDT-20030507AAS	---	none
41	KLCS-DT	LOS ANGELES CA	268.3	PLN	DTVPLN-DTVP1151	---	none
41	KLCS	LOS ANGELES CA	268.3	CP	BPEDT-20080326AJE	---	none
41	KKPX	SAN JOSE CA	303.5	LIC	BLCDT-20021108ABD	---	none
41	KLXV-DT	SAN JOSE CA	221.7	PLN	DTVPLN-DTVP1152	---	none
41	NEW	SAN LUIS OBISPO CA	0.0	APP	BSFDTL-20060630CKJ	311,712	247,212 (79.3%) *
41	NEW	SANTA MARIA CA	51.7	APP	BSFDTL-20060630AWX	278,176	45,402 (16.3%) *
42	KSBO-CA	SAN LUIS OBISPO CA	0.0	LIC	BLTTL-19980902JA	148,855	281 (0.19%)

\* The KMMA-CA proposal is a displacement facility and has priority over these earlier-filed digital companion channel applications

<b>Section III - Engineering (Analog)</b>												
<b>TECHNICAL SPECIFICATIONS</b>												
Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.												
<b>NOTE:</b> 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.												
<b>TECH BOX</b>												
1.	Channel: 41											
2.	Frequency Offset: <input type="radio"/> No offset <input checked="" type="radio"/> Zero offset <input type="radio"/> Plus offset <input type="radio"/> Minus offset											
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 35 Minutes 21 Seconds 38 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 120 Minutes 39 Seconds 21 <input checked="" type="radio"/> West <input type="radio"/> East											
4.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable [Exhibit 5] <input type="checkbox"/> Notification filed with FAA											
5.	Antenna Location Site Elevation Above Mean Sea Level: 754 meters											
6.	Overall Tower Height Above Ground Level: 30 meters											
7.	Height of Radiation Center Above Ground Level: 16 meters											
8.	Maximum Effective Radiated Power (ERP) Towards Radio Horizon: 10.9 kW											
9.	Maximum ERP in any Horizontal and Vertical Angle: 10.9 kW											
10.	Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://fjallfoss.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm">CDBS Public Access</a> (http://fjallfoss.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. <input type="radio"/> Nondirectional <input checked="" type="radio"/> Directional "Off-the-shelf" <input type="radio"/> Directional composite  Manufacturer PSI Model PSILP16AOC											
	Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf") Rotation (Degrees): 180 <input type="checkbox"/> No Rotation											
	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
	0		10		20		30		40		50	
	60		70		80		90		100		110	
	120		130		140		150		160		170	
	180		190		200		210		220		230	
	240		250		260		270		280		290	
	300		310		320		330		340		350	
	Additional Azimuths											

[Relative Field Polar Plot](#)

#### CERTIFICATION

11.	<b>Interference</b> : The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 73.6011, 73.6012, 73.6013, 73.6014, 73.6020, 73.1030 and 74.709.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 6]
12.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an <b>Exhibit is required.</b>  By checking "Yes" above, 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.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 7]

#### 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 JOSEPH M. DAVIS, P.E.	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 7/30/2008	
Mailing Address CHESAPEAKE RF CONSULTANTS LLC 11993 KAHNS ROAD		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20112-
Telephone Number (include area code) 7036509600	E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.COM	

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).



Any specified rotation has already been applied to the plotted pattern.

Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.

