TECHNICAL EXHIBIT
AMENDMENT OF APPLICATION FOR
CONSTRUCTION PERMIT
LOW POWER TV STATION KDFX-LP
INDIO, CALIFORNIA

September 12, 2002

CHANNEL 33 9.7 KW (MAX-DA)

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Technical Statement

This Technical Exhibit was prepared in support of a complete FCC Form 346 application for KDFX-LP, Channel 33 at Indio, California (FCC File No. BMAPTTL-20000809AAX/Facility ID 51207), which is the displacement channel for Class A television station KDFX-CA, Indio, California. In addition to correcting the coordinates of the transmitter site, the instant application revises the proposed operation to specify a directional antenna with a maximum peak visual effective radiated power (ERP) of 9.7 kW toward the electrical horizon.* This "long-form" amendment provides all the necessary information to facilitate approval of the proposed facility. As detailed below, this application does not require coordination with Mexico.

Proposed Facilities

The proposed KDFX-LP facility will operate on Channel 33 (584-590 MHz) with a "minus" carrier frequency offset using an RFS model B16UA directional antenna. The maximum directional ERP will be 9.7 kW toward the electrical horizon. The antenna will be mounted on an existing tower located on Edom Hill near Palm Springs, California. The overall height of the antenna structure is 27 m AGL (501 m AMSL). The antenna radiation center height above ground will be 14 m, with a radiation center height above mean sea level of 488 m. The proposed antenna structure is

registered with an FCC antenna structure registration number of 1220472. There will be no change in the overall height of the existing antenna structure as a result of the instant proposal.

The proposed facility is located within the 320-km Mexican coordination zone. The transmitter site is located 141 km from the Mexico border with the United States. According to the Mexican/U.S. bilateral agreement concerning the UHF television service,[†] low power TV stations located in excess of 100 km from the Mexico border with the United States and with an ERP of less than 10 kW do not require coordination with Mexico. Therefore, the proposal does not require coordination with Mexico.

Response to Paragraph 13(a) – TV Broadcast Analog Protection

An allocation study has been conducted pursuant to the provisions of Section 74.705 of the FCC Rules. The proposed facility meets the contour overlap and spacing requirements with respect to all pertinent analog TV broadcast facilities

Response to Paragraph 13(b) – DTV Station Protection

Calculations based on OET-69 indicate that the proposed operation on Channel 33 complies with the FCC's 0.5% interference threshold criteria to all allotted, proposed or actual DTV operating facilities on channels 32, 33 and 34. Figure 1 provides the output of study based on OET-69, which demonstrates that the proposed operation complies with the FCC's DTV de minimis interference protection criteria.

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[*] The maximum ERP in the main beam of the vertical pattern is 48 kW.
[†] *Agreement on the Assignment of Television Channels along the United States and Mexican Border*, dated April 18, 1962, as modified and amended.

Response to Paragraph 13(c) – LPTV/TV Translator/Class A TV Protection

An allocation study has been conducted pursuant to the provisions of Section 74.707 of the FCC Rules. The proposed facility meets the contour overlap requirements with respect to all pertinent facilities pursuant to Section 74.707 of the FCC Rules requirements with respect to all pertinent facilities with the exception of the following:

- NEW, Morongo Valley-CA, Ch. 18 (BMPTTL-200011113AAB) (CP)
- K32EM, Morongo Valley-CA, Ch. 32 (BLTTL-19970721JS) (License)
- NEW, Banning-CA, Ch. 33 (BNPTTL-20000831AVX)(Application)
- KSMV-LP, Los Angeles-CA, Ch. 33 (BLTTL-20020725AAP) (License)
- KSMV-LP, Simi Valley-CA, Ch. 33 (BPTTL-20010529ABP) (CP)

Pursuant to Section 73.707(e) of the FCC Rules, a waiver of the interference protection rules is requested to permit the use of the Longley-Rice propagation methodology as provided in FCC OET Bulletin No. 69 (OET-69) with respect to the above facilities. As detailed in Figure 2 herein, the proposed facility meets the 0.5% de minimis criteria with respect to all of the above facilities.

Environmental Considerations

With respect to the potential for human exposure to radio frequency (RF) radiation, upon completion of the installation, the applicant shall conduct RF measurements at the transmitter site to demonstrate compliance with the FCC's guidelines for human exposure to RF radiation. Furthermore, the applicant, in

coordination with other users of the transmission facility, shall reduce power or cease operation as necessary to protect persons from RF radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr.

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Summary of OET-69 Analysis with Respect to DTV Stations

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	32	KMCC-DT	LAKE HAVASU CITY AZ	219.6	PLN	DTVPLN	DTVP0852
2	32	KDOC-DT	ANAHEIM CA	155.6	CP	BPCDT	19981028KE
3	32	KDOC-DT	ANAHEIM CA	122	PLN	DTVPLN	DTVP0854
4	32	KDOC-DT	ANAHEIM CA	155.6	APP	BMPCDT	20000427ABH
5	32	KMCC-DT	LAUGHLIN NV	222.8	CP	BPCDT	20000907AGF
6	33	KBAK-DT	BAKERSFIELD CA	264.5	CP	BPCDT	19990921AAS
7	33	KBAK-DT	BAKERSFIELD CA	264.5	PLN	DTVPLN	DTVP0892

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	--	--	--	*	0.00	--	pass
2	--	--	--	*	0.00	--	pass
3	--	--	--	*	0.00	--	pass
4	--	--	--	*	0.00	--	pass
5	--	--	--	*	0.00	--	pass
6	--	--	--	*	0.00	--	pass
7	--	--	--	*	0.00	--	pass

* Proposal causes no interference.

Figure 1
Sheet 2 of 2

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Summary of OET-69 Analysis with Respect to LPTV Stations

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	18	K05CU	MORONGO VALLEY CA	33.1	CP	BMPTTL	20011113AAB
2	32	K32EM	MORONGO VALLEY CA	13.9	LIC	BLTTL	19970721JS
3	33	NEW	BANNING CA	47.6	APP	BNPTTL	20000831AVX
4	33	KSMV-LP	LOS ANGELES CA	152.9	CP	BPTTL	20010529ABP
5	33	KSMV-LP	LOS ANGELES CA	153.0	LIC	BPTTL	20020752AAP

Figure 2
Sheet 1 of 2

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	3597	3597*	174498	0	0.00	0.5	pass
2	--	--	--	**	0.00	--	pass
3	--	--	--	**	0.00	--	pass
4	--	--	--	**	0.00	--	pass
5	--	--	--	**	0.00	--	pass

* Includes interference from proposed KDFX-LP pending application for 50 kW, which was pending prior to filing of K05CU application for Channel 18.

** Proposal causes no interference.

Figure 2
Sheet 2 of 2

Appendix 1

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Transmitting Antenna Manufacturer's Data Sheets

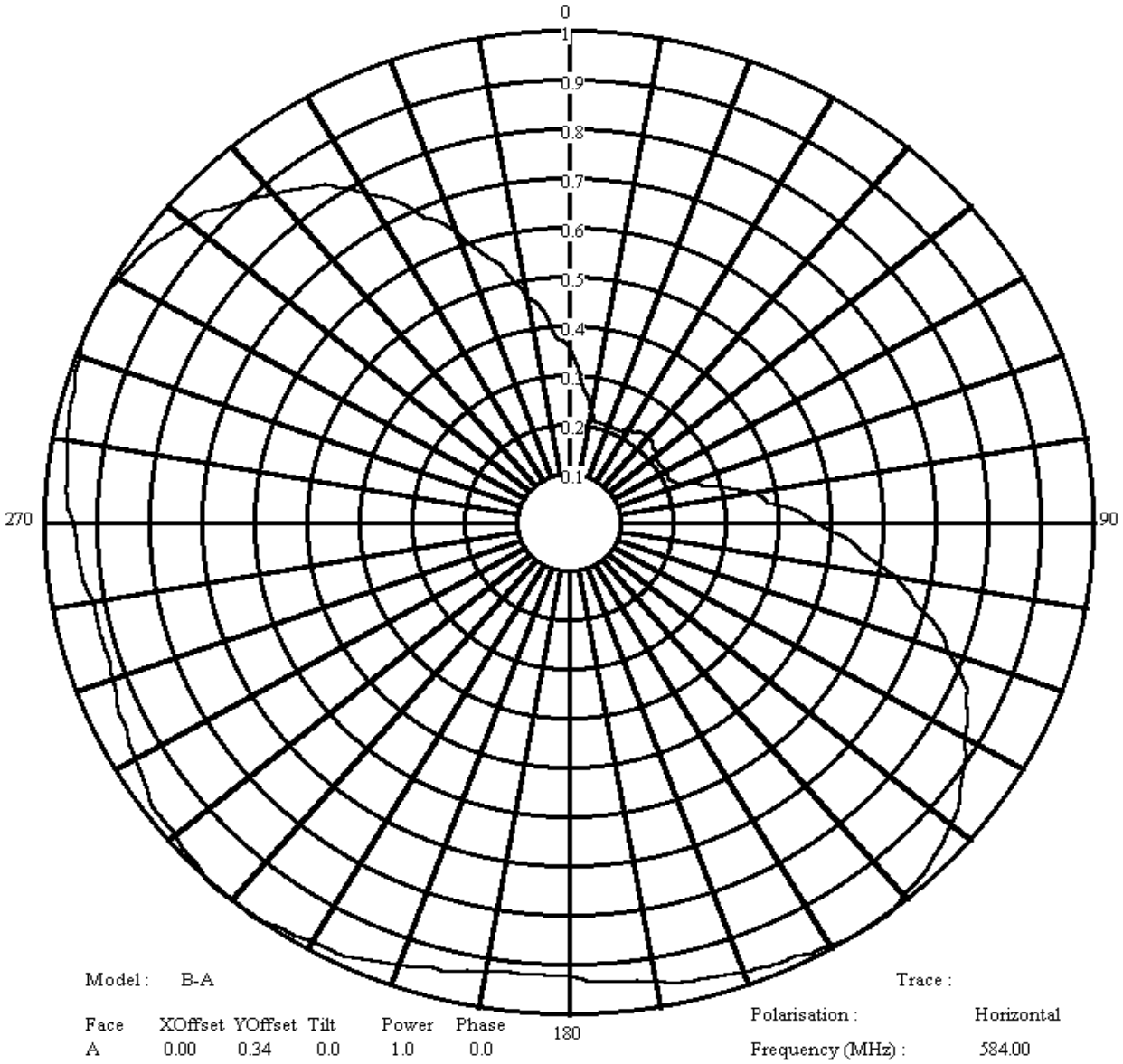
(three sheets follow)

Horizontal Radiation Pattern

E / Emax

Station : CHANNEL 33

Date : 8/27/02



Model : B-A

Face	XOffset	YOffset	Tilt	Power	Phase
A	0.00	0.34	0.0	1.0	0.0

Trace :

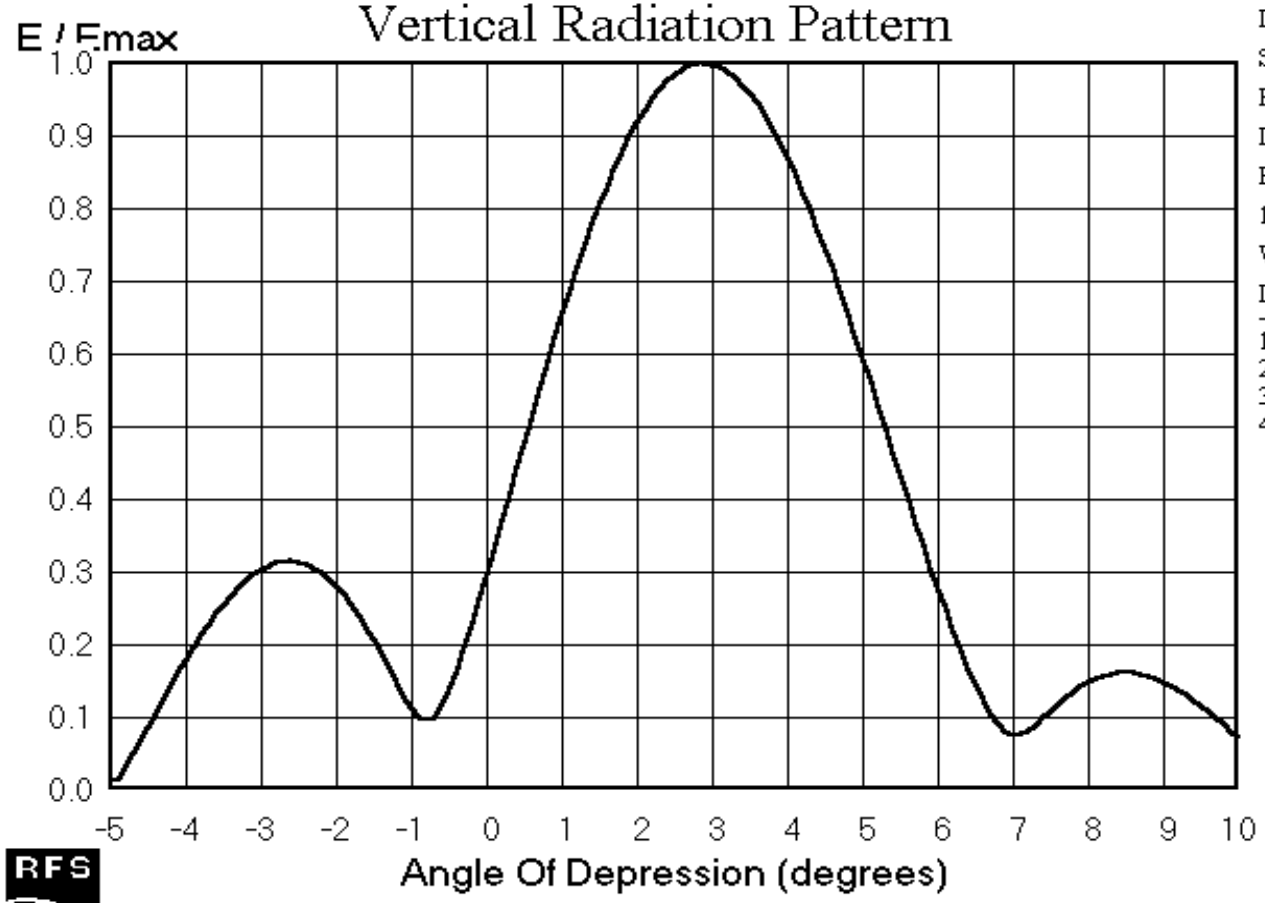
Polarisation :	Horizontal
Frequency (MHz) :	584.00
Directivity (dB) :	2.11

Loaded Measured Unit Pattern

File = rdua.pat

Pattern Tolerance +/- 5% of Emax

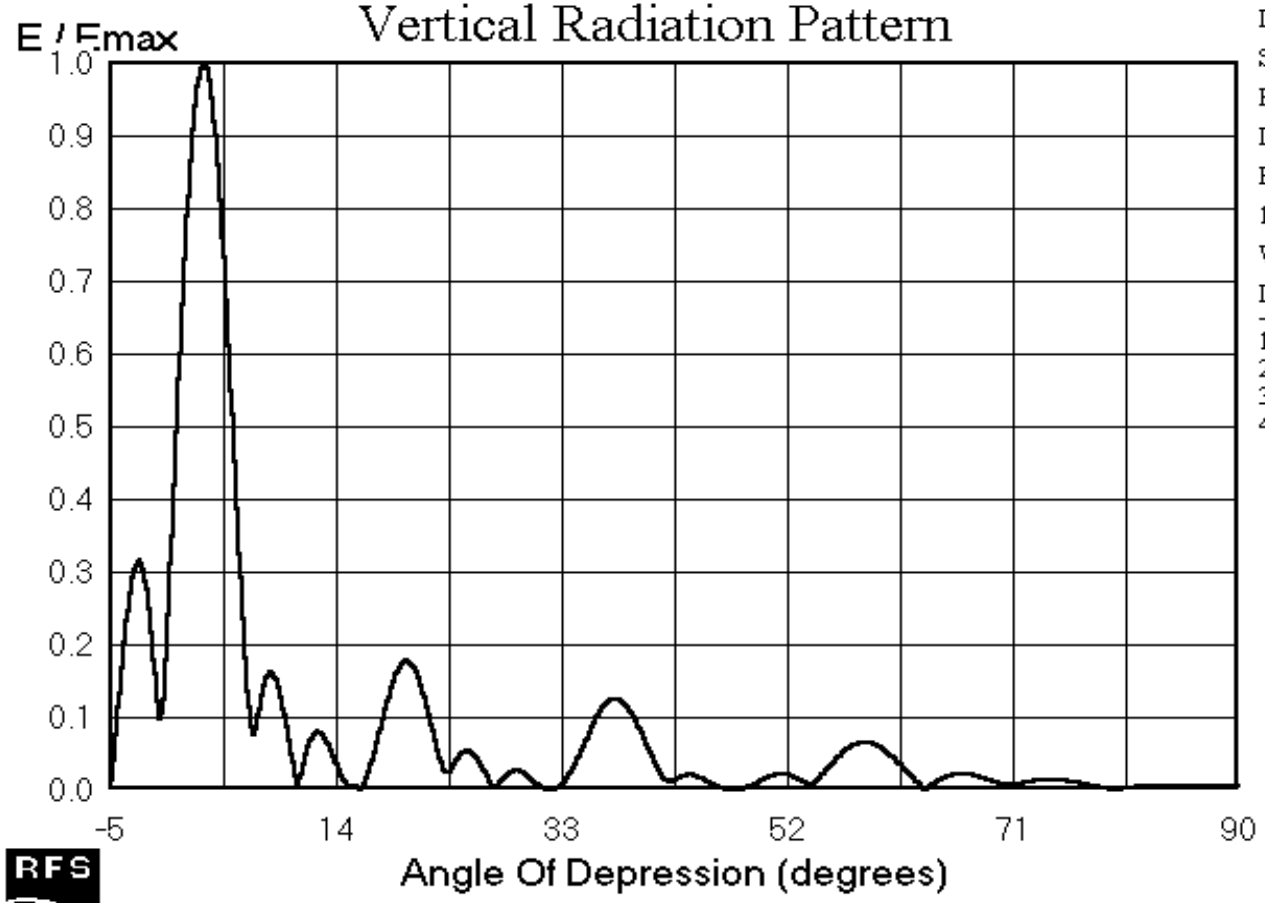
Vertical Radiation Pattern



Date :	8/27/02
Station :	CHANNEL 33
Frequency (MHz) :	584.00
Directivity (dB) :	12.02
Beam Tilt (deg) :	2.9
1/2 3dB Beamwidth :	7.1
Vertical Spacing (m)	1.876

Level	Power	Phase	Loc'n
1	1.0	208.1	0.00
2	1.0	126.9	1.88
3	1.0	50.2	3.75
4	1.0	0.0	5.63

Vertical Radiation Pattern



Date :	8/27/02
Station :	CHANNEL 33
Frequency (MHz) :	584.00
Directivity (dB) :	12.02
Beam Tilt (deg) :	2.9
1/2 3dB Beamwidth :	7.1
Vertical Spacing (m)	1.876

Level	Power	Phase	Loc'n
1	1.0	208.1	0.00
2	1.0	126.9	1.88
3	1.0	50.2	3.75
4	1.0	0.0	5.63