



**ENGINEERING STATEMENT**  
OF  
**JOHN F.X. BROWNE, P.E.**  
IN SUPPORT OF APPLICATION  
FOR  
MINOR CHANGE IN LICENSED FACILITY AND  
DIGITAL "FLASHCUT"  
**KUNU-LP**  
**VICTORIA, TX**

**Background**

SAGA Broadcasting, LLC (SAGA) is the licensee of television low power station KUNU-LP, CH21, (BLTTL-19990728JB, Facility ID. 31516) at Victoria, TX. SAGA is filing herewith a displacement application as provided for in the rules [(73.3572(a)(4)(i)]. SAGA proposes to change frequency to channel 19 because its present operation on CH21 is within the displacement distance of 265 km from co-channel KXAN-DT CH21, Austin, TX (190km distant) as specified in section 73.3572(a)(4)(iv)(1) of the Commission's rules. The proposal would move the facility to an existing tower 17.6 km from its present location, increase the antenna radiation center height, and "flashcut" it to digital operation.

**Site and Tower**

The tower is registered (ASRN 1238711). Since the antenna that will be used is the same antenna that is being used by the SURTSEY MEDIA LLC (SURTSEY) facility, KVCT-TV (CH19), and there would be no change to the overall height of the structure, the FAA would



not need to be notified nor would the ASR need to be changed. The center of radiation would be at 308m AGL (351m AMSL) which is 176m higher than the licensed antenna height.

### **Antenna and Power**

The proposed antenna is a Dielectric TUA-O4SP-14/55H-1-T-R omni-directional radiator. The antenna is placed at a height resulting in an HAAT of 312m (351m AMSL). The proposed ERP is 5 kW. The predicted F(50,90) 51 dBu contour would completely encompass the city of Victoria, TX.

### **Interference**

An interference study was conducted using the proposed parameters with software that emulates that used by the Commission. That study shows that there would be no predicted interference to any domestic DTV station; however, there would be prohibited contour overlaps and interference to SURTSEY's KVCT-TV (CH19 analog). A Longley-Rice evaluation of this interference scenario shows the interference to be 98.2%. Attached to this application is a letter of acceptance of the interference from KVCT-TV. SAGA requests a waiver of the interference rules based on the acceptance. It should be noted that SAGA will not begin construction of the proposed facility until after the DTV transition and, therefore, interference to analog KVCT-TV will not be an issue. These studies show that there will also be no interference to any Class A or other domestic low power facilities.

### **Environmental/RFR**

This construction does not involve any of the conditions that require preparation of an Environmental Assessment as specified in 47 CFR Section 1.1311.

The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000070 mW/cm<sup>2</sup>, which is less than 1% of the MPE for public exposure

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(0.335 mW/cm<sup>2</sup>) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

SAGA agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will also be encouraged to wear personal RFR monitors when on the structure. A locked security fence will enclose the tower base and appropriate signage warning of RFR hazards will be in place.

### **Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.

May 29, 2009