



**ENGINEERING STATEMENT**  
**OF**  
**JOHN F.X. BROWNE, P.E.**  
**IN SUPPORT OF "FLASHCUT" APPLICATION**  
**FOR**  
**K16CH**  
**RATON, NM**

**Background**

KOAT Hearst-Argyle Television, Inc. (KOAT) is the licensee of television translator station K16CH, CH16, (BLTT-19921109IP, Facility ID 53880) at Raton, NM. KOAT now proposes to "flashcut" K16CH to digital operation.

**Site and Tower**

The site will remain the same as that of the licensed facility as will the height of the antenna radiation center. The overall height of the tower (18.0m AGL) is less than that required for notification to the FAA and, further, the tower passes the TOWAIR program.

**Antenna and Power**

The proposed antenna is a Scala SL-8 omni-directional radiator. The proposed ERP is 1 kW.



### **Interference**

An interference study was conducted using the proposed parameters with software that emulates that used by the Commission. A Longley-Rice analysis with that software shows that there would be no new interference exceeding 0.5% to any full-service DTV or Class A station as defined in the Commission's Rules and, also, there would be no predicted interference of more than 2 % to any LPTV, or translator station.

### **Environmental/RFR**

This construction does not involve any of the non-RFR conditions that require an Environmental Assessment as specified in 47CFR1.1311; therefore, further consideration of these issues is not required.

The location of the proposed construction is a multi-user site and the worst case total fractional contribution, expressed as a percentage, of the other users at the proposed site is calculated to be 56.3% of the MPE limit for public exposure. The site is, therefore, assumed to be currently "in compliance" with FCC guidelines for uncontrolled exposure to RFR (as defined in OET-65). The worst case ground level RFR created by this proposal in public areas is calculated to be 0.0117mW/cm<sup>2</sup> making its fractional contribution of the MPE limit for public exposure 3.6% at CH16 (485MHz). This level of RFR, in addition to the calculated fractional contribution of the existing facilities (for a total of 59.9%), does not exceed the MPE limit and, therefore, the site will remain "in compliance" with FCC guidelines.

KOAT 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 be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower base is enclosed by a locked security fence and appropriate signage warning of potential RFR hazards is posted.

**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.

February 25, 2010