

ENGINEERING STATEMENT
ANALOG DISPLACEMENT TRANSLATOR APPLICATION
ON BEHALF OF
MONTECITO PORTLAND LICENSE, LLC
K63AW, GRAYS RIVER, WASHINGTON
CHANNEL 29 1.39 KW MAX ERP 875 METERS RCAMSL

DECEMBER 2006

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

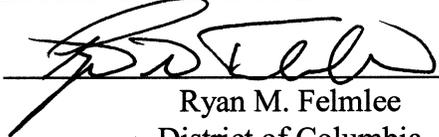
City of Washington)
) ss
District of Columbia)

Ryan M. Felmlee, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University and is a staff engineer at Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

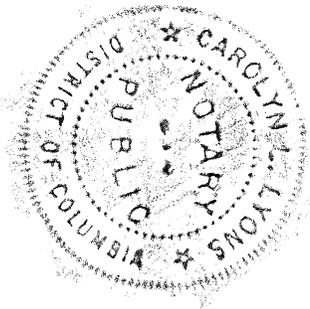
That the attached engineering report was prepared by him or under his supervision and direction and

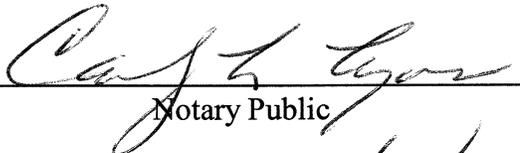
That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Ryan M. Felmlee
District of Columbia

Subscribed and sworn to before me this 6th day of December, 2006.





Notary Public

My Commission Expires: 2/28/2008

This engineering statement has been prepared on behalf of Montecito Portland License, LLC (“Montecito”) licensee of television translator station K63AW, Grays River, Washington, is licensed to operate on out-of-core channel 63 with a directional ERP of 1.39 kW. Accordingly, this statement supports the licensee’s request for analog operation on in-core channel 29 with a maximum effective radiated power (“ERP”) of 1.39kW at a radiation center above mean sea level (“RCAMSL”) of 875 meters.

There is no change in transmitter site. The NAD-27 geographic coordinates of the existing site are as follows:

North Latitude: 46° 27' 40"

West Longitude: 123° 32' 58"

The existing tower is less than 200 feet and TOWAIR indicates that the structure does not require registration. There are no airports within 8 kilometers (5 miles) of the existing site.

Elevation Data

Elevation of site above mean sea level	864 meters (2834.6 feet)
Center of radiation of antenna above ground level	11 meters (36.1 feet)
Center of radiation of antenna above mean sea level	875 meters (2870.7 feet)
Overall tower height above ground level	12 meters (39.4 feet)

Equipment Data

Transmitter:	Type Accepted
Antenna:	Kathrein Scala 4DR-16S or equivalent
Transmission Line:	Andrew, Type LDF5-50A, 7/8", 18.3 meters (60 feet) with 88.7% efficiency

Power Data

Transmitter:	0.097 kW	-10.14 dBk
Transmission Line Loss:	88.7%	0.52 dB
Input Into Antenna:	0.086 kW	-10.66 dBk
Antenna Gain:	16.18	12.09 dB
ERP:	1.39 kW	1.43 dBk

As indicated above, the transmitter with typical power output of 0.097 kW will deliver 0.087 kW to the input of the antenna. The antenna, having a maximum gain of 12.09 dB will produce a maximum ERP of 1.39kW. A coverage map providing the protected contour of the proposed channel 29 facility is included as Exhibit E-1 of this report.

The K63AW directional antenna system is side-mounted on the existing tower at 11 meters above ground. The overall tower height above ground level remains unchanged at 12 meters.

Allocation

An allocation study, performed in accordance with Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710 of the FCC Rules indicates that the proposed channel 29 operation will not cause

objectionable interference to any authorized or proposed full-service, analog, or digital operation or authorized LPTV / TV translator stations¹. However, per Section 74.703 of the FCC Rules, a Longley-Rice analysis demonstrates that the proposed channel 29 operation of K63AW will cause no interference to the KCKA(TV) facilities. The results of the Longley-Rice analysis are included as Exhibit E-2. Accordingly, K63AW requests a waiver of Section 74.705 of the FCC Rules by demonstrating interference compliance through use of Longley-Rice methodology as provided in OET Bulletin 69.

FCC Rule, Section 1.1307

The proposed channel 29, 1.39 kW directional operation will utilize a Kathrein Scala 4DR-16S directional antenna system (or equivalent) described above with a center of radiation above ground of 11 meters. The proposed channel 29 operation of K63AW will create a radiofrequency field level of $25.8 \mu\text{W}/\text{cm}^2$ at the base of the tower. This level is less than 6.9% of the Maximum Permissible Exposure (“MPE”) level for the general population and uncontrolled environment.

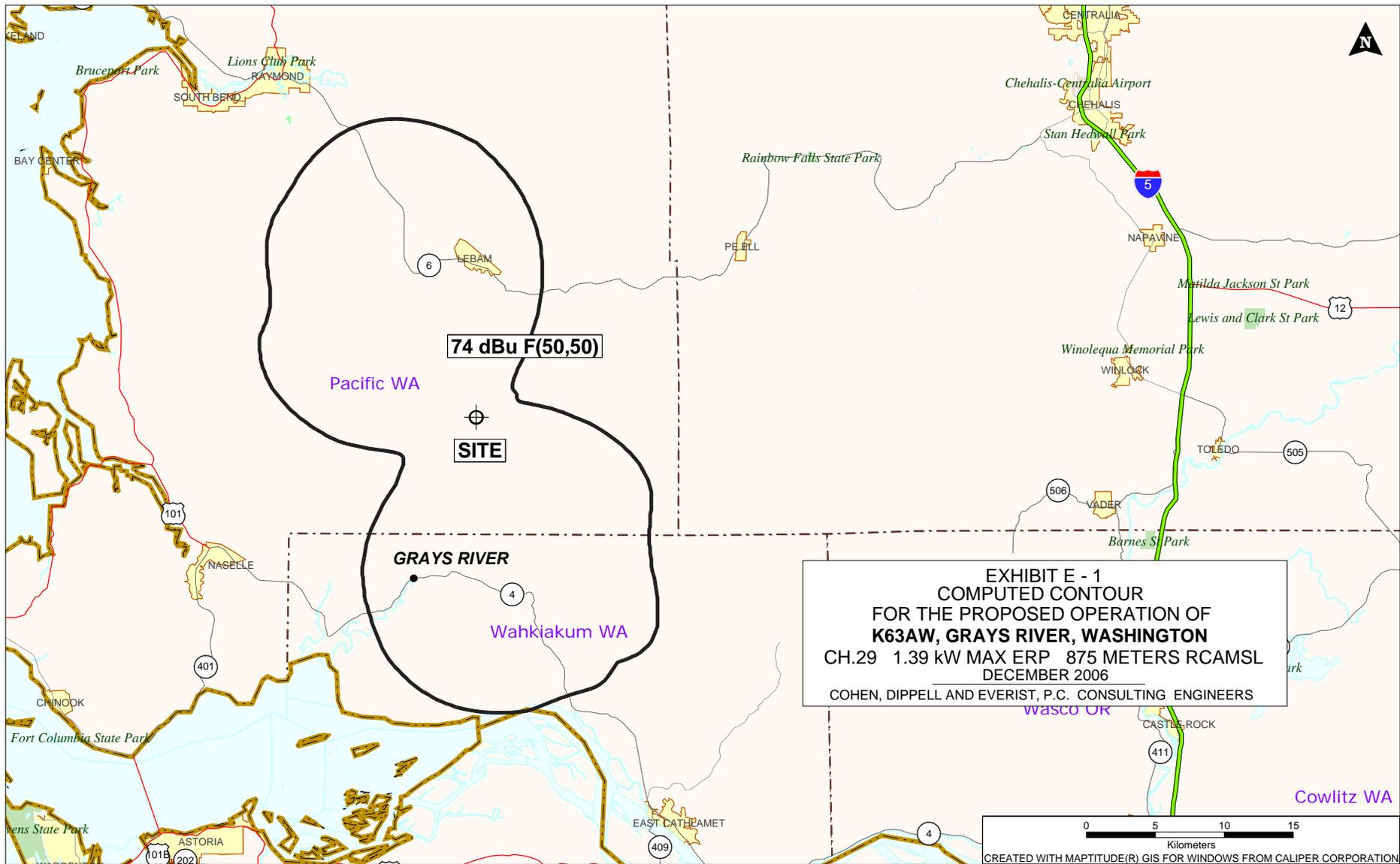
Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on or near the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

Environmental Assessment

¹The proposed channel 29 operation of K63AW is within the protected contour of the licensed channel 15 operation of KCKA(TV)

An environmental assessment (“EA”) is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the licensee indicates:

- (a)(1) The existing tower is not located in an officially designated wilderness area.
- (a)(2) The existing tower is not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The existing tower is not located near any known Indian religious sites.
- (a)(6) The existing tower is not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.



COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2
LONGLEY-RICE ANALYSIS
FOR THE PROPOSED DISPLACEMENT OPERATION OF
K63AW, GRAYS RIVER, WA
CH 29 1.39 KW MAX ERP 875 METERS RC/AMSL
DECEMBER 2006

<u>Station</u>	<u>City</u>	<u>State</u>	<u>Channel</u>	<u>Distance</u> km	<u>Status</u>	<u>FCC File No.</u>	<u>Interference</u>
KCKA	CENTRALIA	WA	15	39.1	LIC	BLET-19821004KG	No Interference
KBTC-TV	TACOMA	WA	28	120.3	CP	BPET-20061025AFJ	No Interference
KBTC-TV	TACOMA	WA	28	120.3	LIC	BLET-19870224KI	No Interference
K29AZ	NEWPORT	OR	29	193.4	LIC	BLTTL-19880803ID	No Interference
K53AZ	CENTRALIA, ETC.	WA	29	39.2	APP	BDISDTT-20061107ADK	0.47%
KPTV	PORTLAND	OR	30	121.4	LIC	BLCDT-20001102AAP	No Interference