

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of UHF TV, INC., licensee of Television Translator Station K36FL, Channel 36 in Willmar, Minnesota, in support of this Application for Construction Permit to specify operation on Channel 14. This change is necessitated by the recent authorization of the KSAX-DT allotment channel from Channel 14 to Channel 36. Since KSAX-DT will operate on Channel 36 and is located only 60 kilometers from the site of K36FL, this LPTV station is clearly in a displacement situation.

Exhibit B is a map upon which the predicted service contours of proposed K36FL are plotted. Operating parameters for the proposal are provided in Exhibit C. We conducted an interference analysis of the proposed facility, the results of which are tabulated in Exhibit D. The study is based on the contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the instant proposal meets these requirements, except toward the authorized KSAX-DT facility on Channel 14. However, as noted above, KSAX-DT is now authorized to operate on Channel 36, not Channel 14, as provided in MM Docket No. 01-207, RM-10206 (released May 9, 2002). A copy of that Report and Order appears as Exhibit E. Therefore, no waiver of Commission interference rules is required for grant of the facility proposed herein.

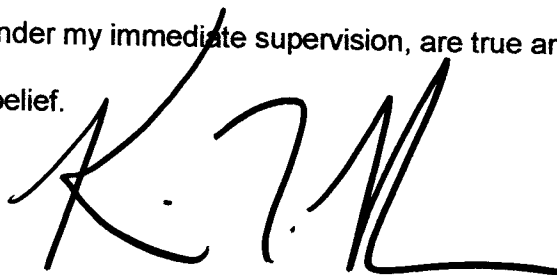
EXHIBIT A

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1040404 to this tower.

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Willmar facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 1.0 kw, an effective antenna height of 144 meters above ground, and assuming a vertical relative field value of 10 percent at the steeper elevation angles for the proposed antenna, maximum power density two meters above ground of 0.0000082 mw/cm² is calculated to occur near the base of the tower. Since this is less than 0.1 percent of the 0.31 mw/cm² reference for uncontrolled environments (areas with public access) for a facility operating on Channel 14 (470-476 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a stylized flourish at the end.

KEVIN T. FISHER

July 11, 2002

Belgrade

Smith and Fisher

POPULATION (2000 CENSUS)

GRADE A (74 DBU) : 23,256

GRADE B (64 DBU) : 32,712

Regal

Sunburg

GRADE B

New London

GRADE A

Spicer

Kerkhoven

K36FL
⊕

Penrock

Kandiyohi

Kandiyohi

Atwater

Willmar

Raymond

Blomkest

Prinsburg

Scale 1:250,000

0 3 6 9 km

EXHIBIT B

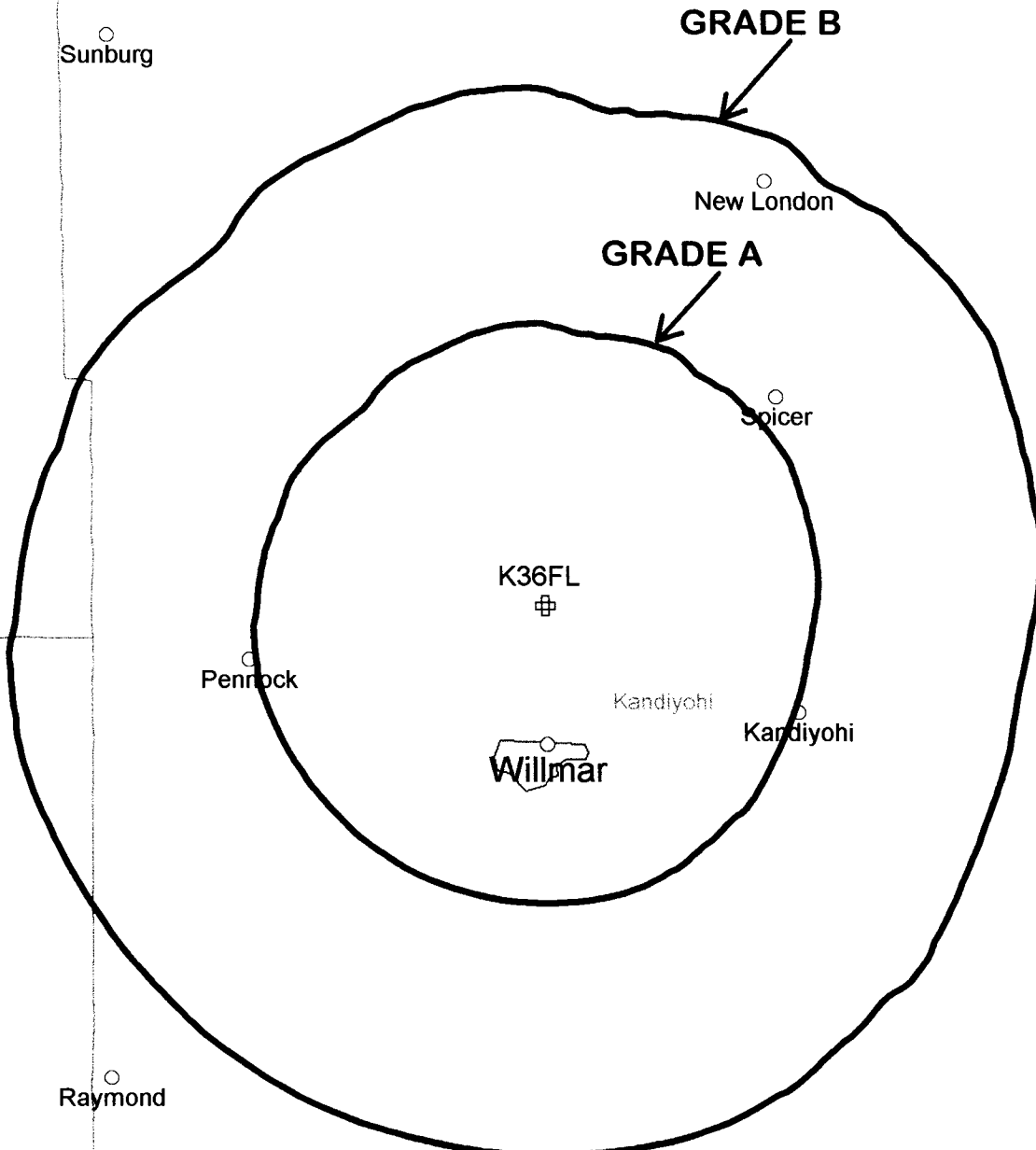


EXHIBIT C

PROPOSED OPERATING PARAMETERS

TELEVISION TRANSLATOR STATION K36FL
CHANNEL 14 – WILLMAR, MINNESOTA

Transmitter Power Output:	0.10 kw (-10 dBk)
Transmission Line Efficiency:	60.3% *
Antenna Input Power	0.06 (-12.2 dBk)
Antenna Power Gain – Toward Horizon:	16.2 (12.1 dB)
Antenna Power Gain – Main Lobe:	16.2
Effective Radiated Power – Toward Horizon:	0.97 kw
Effective Radiated Power – Main Lobe:	0.97 kw (-0.1 dBk)
Transmitter Make and Model:	Type accepted
Rated Output:	0.1 kw
Transmission Line Make and Model:	Andrew HJ8-50B
Size and Type:	3" air heliax
Length:	480 feet
Antenna Make and Model:	MCI 955126
Orientation:	Omnidirectional
Beam Tilt:	0 degrees
Effective Height Above Ground:	144 meters
Effective Height Above Mean Sea Level:	510 meters

*0.5 dB combiner loss; 1.7 dB transmission line loss

EXHIBIT D

Smith and Fisher

PROPOSED K36FL
CH. 14 - WILLMAR MN

REFERENCE

45 09 58 N
95 02 37 W

LPTV Pwr = 1.3 kW, HAMS L COR= 509 M

DISPLAY DATES

DATA 07-06-02
SEARCH 07-10-02

..... Channel 14-, 470 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin	
KSAX-D CP	14	Alexandria	MN	60.21	350.1	> 247.65	-187.44
K15DC LI	15Z	Appleton	MN	74.92	271.5	> 016.00	58.92
K14KE CP	14+	St. James	MN	122.79	163.2	> 061.00	61.79
WXOW-D CP	14	Lacrosse	WI	329.18	116.1	> 266.68	62.50
KSMN-D CP	15	Worthington	MN	158.19	207.2	> 091.00	67.19
K14KH CP	14Z	Minneapolis	MN	141.18	98.1	> 072.15	69.03
KSMN	ALD 15	WORTHINGTON	MN	158.19	207.2	> 088.23	69.96

Federal Communications Commission

DA 02-1039

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.622(b),
Table of Allotments,
Digital Television Broadcast Stations.
(Alexandria, Minnesota)

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)
)
)
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MM Docket No. 01-207
RM-10206

REPORT AND ORDER
(Proceeding Terminated)

Adopted: May 3, 2002

Released: May 9, 2002

By the Chief, Video Division:

1. At the request of KSAX-TV, Inc. ("KSAX"), licensee of station KSAX(TV), NTSC channel 42, Alexandria, Minnesota, the Commission has before it the Notice of Proposed Rule Making, 16 FCC Rcd 16173 (2001), proposing the substitution of DTV channel 36 for station KSAX(TV)'s assigned DTV channel 14. KSAX filed comments stating its intention to promptly construct facilities to operate on DTV channel 36, if allotted to Alexandria, Minnesota. No other comments were received.

2. We believe the public interest would be served by adopting KSAX's channel substitution proposal since it will help station KSAX-DT to alleviate the short-spacing problems to the adjacent frequencies used by the land mobile radio service. DTV channel 36 can be allotted to Alexandria, Minnesota, as proposed, in compliance with the principle community coverage requirement of Section 73.625(a) at coordinates 45-41-59 N. and 95-10-35 W. Since the community of Alexandria is located within 400 kilometers of the U.S.-Canadian border, concurrence from the Canadian government has been obtained for this allotment. In addition, we find that this channel is acceptable under the 2 percent criterion for *de minimis* impact that is applied in evaluating requests for modification of initial DTV allotments under Section 73.623(c)(2) for Station KSAX-DT with the following specifications:

<u>State & City</u>	<u>DTV Channel</u>	<u>DTV power (kW)</u>	<u>Antenna HAAT (m)</u>	<u>DTV Service Pop. (thous.)</u>
MN Alexandria	36	1000	340	414

3. Accordingly, pursuant to the authority contained in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED, That effective June 24, 2002, the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, IS AMENDED, with respect to the community listed below, to read as follows:

Federal Communications Commission

DA 02-1039

City

Channel No.

Alexandria, Minnesota 24, 36

4. IT IS FURTHER ORDERED, That within 45 days of the effective date of this Order, KSAX-TV, Inc. submit to the Commission a minor change application for a construction permit (FCC Form 301) specifying DTV Channel 36 in lieu of DTV Channel 14 for station.

5. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

6. For further information concerning this proceeding, contact Pam Blumenthal, Media Bureau, (202) 418-1600.

FEDERAL COMMUNICATIONS COMMISSION

Barbara A. Kreisman
Chief, Video Division
Media Bureau