

Exhibit 43

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Technical Statement for

KJLA, LLC

**DTV Maximization Construction Permit
for Minor Change in a Licensed Facility:**

**KJLA-DT
Channel 49
Ventura, CA**

Licensed in File No. BLCDT-20041117AAB

Introduction

This Technical Statement provides the supplemental technical data and information required for the FCC Form 301 “Application for Construction Permit for Commercial Broadcast Station” of KJLA LLC, for Digital Television (DTV) facilities on Channel 49 in Ventura, CA. In particular, it addresses the additional information required by Section III-D – DTV Engineering – applicable to Station KJLA-DT. The Station is licensed in File No. BLCDT-20041117AAB. The instant application seeks a construction permit to enable alteration of the antenna pattern of KJLA-DT. Its location, effective radiated power, and antenna height will remain unchanged, but please see the discussion with respect to the antenna height in the section below on Facilities.

Transmitter Site

The transmitter site at which KJLA-DT operates is located on Mt Wilson – the location from which most stations in the Los Angeles market operate. The site is owned by American Tower Corporation and is shared with six other television stations: KDOC-TV,

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KDOC-DT, KOCE-TV, KOCE-DT, KXLA(TV), and KXLA-DT. There is a common antenna shared by the group of stations and split into two arrays to accommodate different patterns necessary for several stations in the group to provide protection to other stations. The site plan was shown in Figure 2 of the Technical Statement for the original KJLA-DT construction permit application (File No. BPCDT-19991101AFT) and is not repeated herein. The tower is covered by FCC Antenna Structure Registration (ASR) Number 1221073. The tower structure itself is 81 meters tall. Antennas mounted on the tower increase the overall height above ground level to 122 meters. The ground elevation at the site is 1739.8 meters above mean sea level. The overall tower height above mean sea level, as reflected in the ASR data, is 1861.8 meters. The tower layout is shown in Figure 2 below.

Facilities

The facilities requested in the application associated with this Technical Statement include continued operation by KJLA-DT at 1000 kW ERP at a height above average terrain of 937 meters. The change requested in the instant application comprises a modification of the antenna azimuth pattern to provide increased field strength in a generally northerly direction. Complete technical specifications for the proposed facilities are given in Figure 1.

The change in antenna pattern will be accomplished through modification of the existing antenna. The antenna currently used by KJLA-DT is a directional panel array having a sculpted pattern oriented to place its three major lobes extending from approximately 80 through 305 degrees true (at the half-power points). The resulting field places maximum signal in the direction of Ventura, CA, the KJLA-DT city of license, with 1 MW effective radiated power (ERP) at the peak of the beam. In order to protect Mexican station XHDTV (previously XHUPN), on Channel 49 in Tecate, BCN, as agreed to by the Mexican SCT (subsequently succeeded by the COFETEL organization), power is reduced to 200 kW in the direction of the border section encompassed by the Mexican station's 64 dBu contour. The relevant portion of the border extends from approximately 129 degrees to 155 degrees, as seen from Mt Wilson. The corresponding depression

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angles range from 1.1 to 1.3 degrees below horizontal. The considerations involved in providing protection toXHDTV were detailed in the sections on Protection to Mexican Station contained within the prior Technical Statements filed in support of the applications for the construction permit that underlies the current license. Those considerations and the solutions used to address them remain unchanged by the current proposal, and, thus, there should be no need to secure consent of the Mexican COFETEL for the processing of this application for a minor change to a licensed facility. For reference, the discussion of protection to the Mexican station is reproduced below, in the section again titled Protection to Mexican Station, now updated to take account of the changes in the antenna pattern proposed herein and the change in the Mexican government regulatory organization from the SCT to COFETEL.

Modification of the antenna to achieve the proposed change in pattern will require the addition of two columns of panels to the three columns already installed in the antenna array. The current columns extend from approximately 80.5 to 92 meters above ground level. Because of the presence of transmission lines on the two faces of the five-sided supporting structure in the aperture of the current antenna, the added columns of panels will be mounted higher on the supporting structure – in the region from 92 to 101 m above ground level. Because of the difference in heights, it could be argued that the radiation center of the antenna will shift higher. Since it is more conservative, in terms of the service area produced, to show the antenna at a lower elevation, that is the course that has been followed in the Form 301 Tech Box, with the elevation of the center of radiation unchanged from that of the current facility. Since, as described below, there is no new interference predicted to other stations from the change, it is deemed more appropriate to show a smaller service area by leaving the antenna elevation as it was before, but should the Commission consider it more appropriate to show a higher center of radiation, the application can be modified accordingly. In any event, the change in contour distances would be quite small from any adjustment to the antenna height value.

To achieve the designed power reduction toward the Mexican border, while minimizing service losses in the Los Angeles area, different beam tilt values were used on each of the antenna faces in the existing antenna design. Three major lobes were obtained, having

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peak values located at 96 degrees, 184 degrees, and 272 degrees True. The corresponding electrical beam tilt values are 2.4 degrees, 2.4 degrees, and 1.4 degrees, respectively. Other techniques also were applied to sculpt the pattern in the desired manner. The original lobe maxima will be unchanged by the proposed antenna modification. With the proposed addition of the two columns of panels, new major lobes will be produced at 40 degrees and 352 degrees True. The new lobes will have electrical beam tilt values of 1.4 and 1.0 degrees, respectively. With addition of the new columns of panels, peak power gain of the antenna will become 40.27 (16.05 dB) at the lobe maximum toward 272 degrees and a depression angle of 1.4 degrees.

A plot of the relative field azimuthal radiation pattern at the depression angles having maximum radiation in each direction is provided as Figure 3a.¹ Shown in Figure 3b is the relative field azimuthal radiation pattern at the depression angles to the radio horizon in each direction. Plotted in Figure 3c is the relative field, azimuthal radiation pattern in the horizontal plane. The azimuthal radiation pattern at the depression angles having maximum radiation in each azimuthal direction, expressed in decibels relative to 1 kW (dBk), is plotted in Figure 4a. Figure 4b shows the azimuthal radiation pattern at the depression angles to the radio horizon in each direction in dBk. Figure 4c is a plot of the horizontal plane radiation pattern in dBk. The tabulated azimuthal field and power values used in the derivation of Figures 3a, 3b, and 3c and Figures 4a, 4b, and 4c appear in Figure 5.

Because of the use of different electrical beam tilt values in the five main lobes, five elevation radiation patterns in relative field values are included as Figures 6a, 6b, 6c, 6d, and 6e, for the 96-, 184-, 272-, 352-, and 40-degree azimuths, respectively. (The two new elevation patterns were added to the end of the list so that presentation of the patterns for the original three faces of the antenna remained in like-numbered figures

¹ The azimuthal radiation pattern incorporating the maximum radiation in each direction at any depression angle provides the most conservative indication of the potential for interference to other stations. Consequently, it was used in all of the TV_Process studies cited in this statement, thereby offering the greatest possible protection to neighboring stations, and it is provided in the Tech Box of Form 301. This is the approach taken in prior filings for KJLA-DT and the other stations sharing the same common antenna system at Mt Wilson.

relative to their presentation in earlier Technical Statements.) The corresponding elevation power patterns expressed in dBk are plotted in Figures 7a, 7b, 7c, 7d, and 7e. The related tabulated elevation field and power values are given in Figure 8.

Figure 9 gives the tabulated values of average elevations and contour distances for the nine required radial directions, calculated as prescribed in §73.625(b)(1, 2, and 4). Figure 10 shows the Principal Community (48 dBu) and Noise Limited (41.9 dBu after correction for the dipole factor) contours on a map of the coverage area as prescribed by §73.625(b)(3).² The location of the Principal Community (48 dBu) (blue) contour is positioned beyond Ventura, as required by §73.625(a)(1). For comparison purposes, Figure 11 shows the contours of the currently proposed facilities and those of the licensed facilities.

Principal Community Coverage

As required by Section 73.625(a)(1), the DTV transmitter location must be chosen so as to put a minimum F(50,90) field strength of 48 dBu over the entire principal community to be served. Section 73.625(a)(2) further requires that “the location of the antenna must be so chosen that there is not a major obstruction in the path over the principal community to be served.” As demonstrated by the 48 dBu contour on the coverage map of Figure 10, taken alone, the transmitter location chosen, combined with the other characteristics of the transmission system, does deliver the minimum required field strength over the entire principal community to be served. Checklist question number 3, which asks whether “the DTV coverage contour of the proposed facility will encompass the allotted principal community,” therefore is correctly answered “yes.” It is noted, however, that, in an abundance of caution with respect to obstructions in the path that occur within the principal community, it was answered “no” on previous applications.

² It should be noted that, because of the complexity of the antenna patterns, the contours provided in the maps included herein were generated with three-dimensional models of the patterns. These models have 360 azimuth values and 72 elevation slices. Use of only the data provided with this Technical Statement or the Form 301 data will not accurately duplicate the contours. Should the Commission require the three-dimensional model, the complete data set can be supplied.

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As has been pointed out in all of the KJLA-DT applications heretofore filed, separate studies using shadowing techniques demonstrate that there is a certain amount of blockage of some portions of Ventura when served from Mt. Wilson. There will be no change in the service to Ventura as a result of the current proposal. Since this information has been provided to the Commission several times before, since the Commission has issued a construction permit and a modified construction permit to KJLA-DT with full knowledge of the situation, and moreover since the Commission has included the current KJLA-DT facility in the DTV Table of Allotments, it is deemed unnecessary to provide herein a further explanation of the circumstances with respect to the obstruction. Nevertheless, should the FCC desire more information on this aspect of the service from KJLA-DT, it will be provided upon request.

Interference to U.S. Stations

Because of the proposed change in antenna pattern, new interference studies were conducted to confirm that no additional interference, beyond that permitted by the FCC rules, is predicted to be caused by the current proposal. A version of the Commission's TV_Process program was used to perform those studies. A summary of the studies is shown in Table 1. In the table, the channel, call sign, city of license, and application record number of each station studied are given in the left four columns. These are followed by the DTV baseline or protected contour population in the fifth column, the total population predicted to be impacted by interference with KJLA-DT assumed to be using the antenna pattern in the Commission's DTV Plan (i.e., the licensed KJLA-DT pattern) in the sixth column, and the number of scenarios studied for each station in the seventh column. In the two columns on the right, the populations predicted to be impacted by additional interference with use of the planned modified antenna pattern are shown alongside the percent changes in total population from the DTV plan values. Dashes indicate instances in which the TV_Process program reported that the "proposal causes no interference," meaning that, without consideration of masking by other stations, there were no cells in its initial culling study that were predicted to receive interference. Thus, in these cases, no further examination was required, and the number of scenarios studied was zero.

Table 1 – KJLA-DT Interference Studies to Neighboring Stations Using FCC TV_Process Program

Chnl	Station	City	ARN	DTV Baseline / Protected Contour	Original Pttn Interference Population	Scen- arios	Pattern Mod Interference Population	% Change
45	KSKJ-CA	Van Nuys, CA	BPTTA-20050714ACI	—	—	—	—	—
45	KSKJ-CA	Van Nuys, CA	BSTA-20050714ACK	—	—	—	—	—
45	KSKJ-CA	Van Nuys, CA	BSTA-20050801CEA	—	—	—	—	—
48	KOCE-DT	Huntington Beach, CA	BLEDT-20041117ADG	—	—	—	—	—
48	KOCE-DT	Huntington Beach, CA	DTVPLN-DTVP1697	—	—	—	—	—
50	KVMD-DR	Twentynine Palms, CA	BPRM-20080620AOJ	8,664,980	1,348,498	2	1,348,498	0.000

Table 1 summarizes six cases for three stations implicated in the change of the KJLA-DT antenna pattern and therefore requiring analysis. In five of the cases studied, the result was that “the proposal causes no interference;” hence, there are dashes in all the cells on the right side of the table for those cases. In one case, there were two scenarios studied, but the level of interference remained unchanged, leading to zero percent change being indicated in the right-hand column. The result of the studies conducted is that no new interference is predicted to be caused to any station by the proposed antenna pattern modification.

Consideration of Class A Stations

The Commission’s Rules specify protection to be afforded by full service stations to LPTV stations that have achieved Class A status.³ For purposes of this application, the Commission’s TV_Process program was used to locate any Class A stations that might be impacted by the modification of the KJLA-DT antenna pattern. The TV_Process program reported contour overlap of the protected contours of all three cases studied with respect to Class A station KSKJ-CA. When the contour overlap of the proposal was compared with the contour overlap predicted for the currently licensed facility, however, there was no change in the amount of overlap at any point. Moreover, as shown in Table 1, the Longley-Rice analysis conducted by the TV_Process program reported that the “proposal causes no interference” in all three cases, indicating that there was no interference even when masking by other stations was not considered during the initial culling study. Thus, there is no new interference predicted to be caused to any configuration of KSKJ-CA when analyzed by the contour overlap method and no interference predicted to be caused to any configuration of that station when analyzed using the Longley-Rice terrain sensitive propagation model.

³ Section 73.613, Protection of Class A TV stations and Section 73.616(f), Post-transition DTV interference protection.

Protection to Mexican Station

As noted above, it is necessary for KJLA-DT to protect Mexican stationXHDTV, on Channel 49 in Tecate, BCN, and the current construction permit application proposes no changes with respect to the protection already provided. There is no change proposed in the antenna pattern in the direction of the Mexican border or in the power radiated in that direction. Because of this, it is believed that no further consent is required from the Mexican authorities. The application for the construction permit that was granted by the Commission for KJLA-DT (File No. BMPCDT-20040112ABL), based upon which the station now is licensed, contained an explanation of the resolution of the interference protection requirements with respect to XHDTV. Although it should have no bearing on this application, the relevant portion of that earlier explanation is repeated here for the convenience of the Commission staff so that the previous accommodation of the Mexican situation can be readily recalled. (Some verb tenses have been updated and other small edits made to avoid confusion of context and to take account of the change in the antenna pattern proposed herein.)

An amendment to the application for construction permit had been filed to conform the application to the parameters agreed upon between the Commission and the Secretaria de Comunicaciones y Transportes of the United Mexican States (“SCT”) regarding operation of KJLA-DT from the Mt Wilson antenna farm. The application by Costa de Oro Television, Inc. (hereinafter “Costa” — predecessor to KJLA, LLC) to move KJLA-DT to Mt Wilson using the parameters contained in that application had been considered by the FCC and forwarded to the Mexican SCT for coordination. It initially was rejected by the Mexican authorities because of their concerns about potential interference to station XHDTV, a co-channel NTSC facility just across the border from San Diego. Subsequently, a proposal was made by Costa to the International Bureau regarding possible changes in operating parameters to determine if they would be acceptable to the SCT. The SCT then informed the International Bureau that the

proposed parameters would indeed be acceptable.⁴ The final amended version of the construction permit application adopted the parameters accepted by the Mexican government.

To fully explain the situation with respect to the Mexican station and the resolution of the matter, the material supplied by Costa to the International Bureau and then forwarded to the SCT is reproduced in the next several subsections. The basic approach undertaken was to reduce to 200 kW or less the power radiated toward the section of the border within the 64 dBu contour of XHDTV.

Distance Separation from XHDTV

In the applicable Memorandum of Understanding (MOU) between the United States and Mexico,⁵ minimum required separation distances are specified for digital-to-analog, analog-to-digital, and digital-to-digital cases of co-channel and adjacent channel operation. Stations within 275 km of the border require coordination between the two governments as part of the authorization process. Mt. Wilson is slightly over 207 km from the nearest point on the U.S. / Mexico border, therefore requiring coordination.

The only separation distances over 207 km specified in the MOU are those for co-channel operation of DTV stations with respect to either NTSC or other DTV stations, for which separations of 244 km and 223 km, respectively, are required for operations on Channels 14 – 69. Information on the allotments in both countries is given in the MOU, including coordinates of the allotments. With respect to Channel 49 and Mt. Wilson, there is one NTSC allotment shown in Mexico, in Tecate, Baja California, that is sufficiently close so as to require detailed examination.

When the separation between the Mt. Wilson site (34-13-35N, 118-3-58W) and the location of the Tecate allotment as given in the MOU (32-34-3 N, 116-37-30 W) is

⁴ See letter, dated June 4, 2002, from Jorge Rodriguez Castañeda, Director General of the Direccion General de Sistemas de Radio y Television of the SCT to Kathryn O'Brien, of the International Bureau of the FCC.

⁵ Memorandum of Understanding Between the Federal Communications Commission of the United States of America and the Secretaria de Comunicaciones y Transportes of the United Mexican States Related to Footnotes continued on the next page.

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examined, the separation obtained is 227.9 km — less than the required 244 km separation between digital and analog stations. Further investigation shows, however, that the station holding the Tecate allotment, StationXHDTV, has built its transmission facility at a site different from the allotment location (32-18-49 N, 116-39-53 W). Calculation of the separation from the actual station transmission facility yields a value of 249.4 km — sufficient under the terms of the MOU.

Elevation Profile of U.S. / Mexico Border

Chart 1 contains an elevation profile of the U.S. / Mexico border looking south from Mt. Wilson and extending from east to west from left to right across the page. The profile begins at a point just beyond the XHDTV 64 dBu contour and extends to the Pacific coastline. It has been broken into sections having more or less similar elevations for determination of the depression angles from Mt. Wilson to the U.S. / Mexico border.

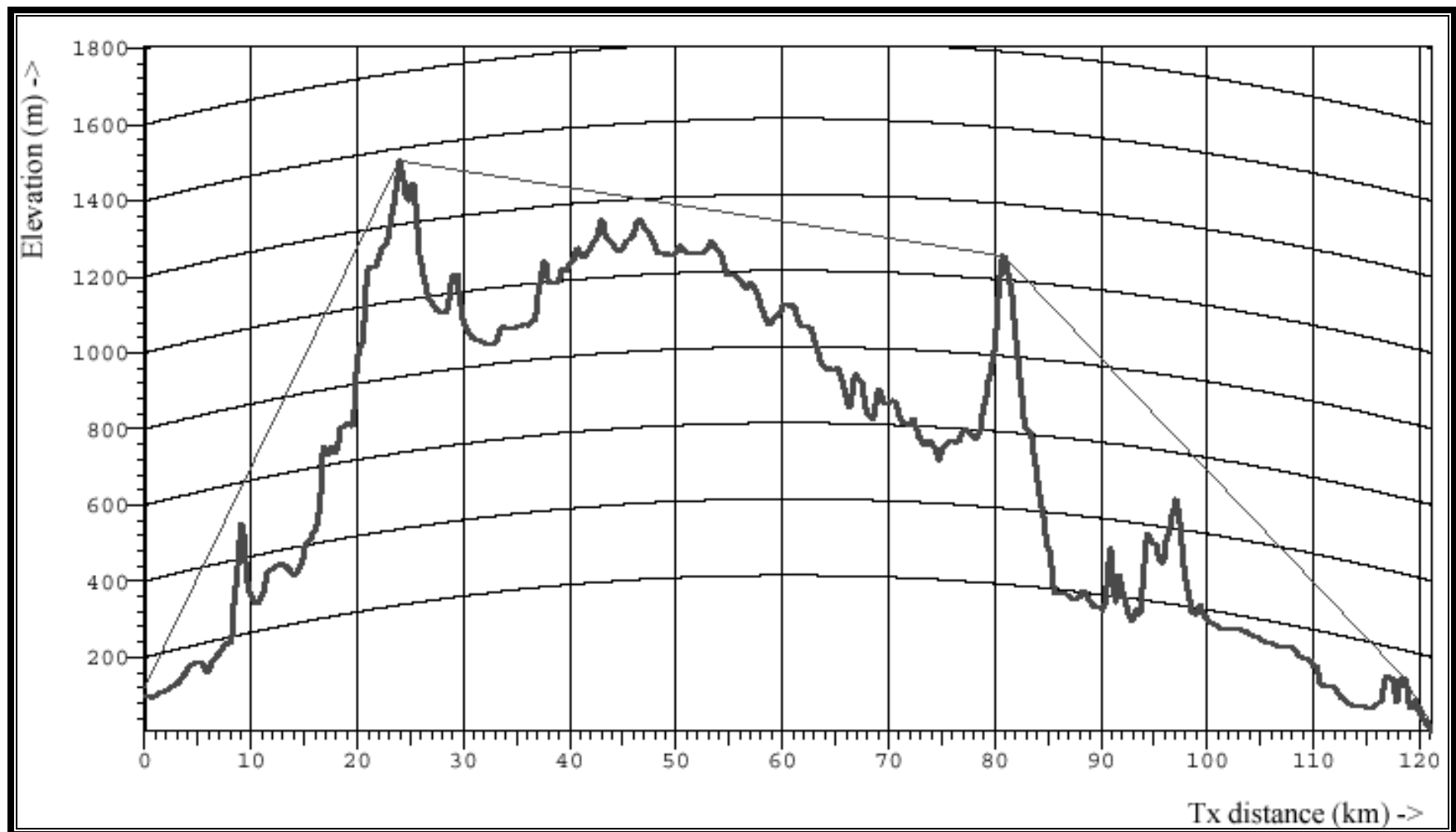
The first 20 km represents the angular range from 129 to 133.1 degrees as seen from Mt. Wilson. It is treated as having an elevation of 100 m and yields a depression angle from Mt. Wilson of just less than 1.3 degrees at the easternmost end (0 km). From 20 km to approximately 63 km represents the angular range from 133.1 to 140.7 degrees. It is treated as having an elevation of 800 m and yields a depression angle from Mt. Wilson of 1.1 degrees or less. From 63 km to about 84 km is from 140.7 to 145.9 degrees. It is treated as having an elevation of 350 m, resulting in a depression angle of 1.13 to 1.15 degrees. From 84 km to 110 km is the range from 145.9 to 151.65 degrees. It is treated as having an elevation of 100 m and results in a depression angle of 1.2 degrees or less. Finally, from 110 km to 120 km at the coastline ranges from 151.65 degrees to 154.7 degrees, is treated as having 0 m elevation, and results in a 1.2 degree depression angle.

Antenna Pattern Plots and Data

The critical depression angles along the U.S. / Mexico border range from 1.1 through 1.3 degrees as discussed above in the section on Elevation Profile of U.S. / Mexico Border. For the record, those depression angles were calculated using an equivalent earth radius

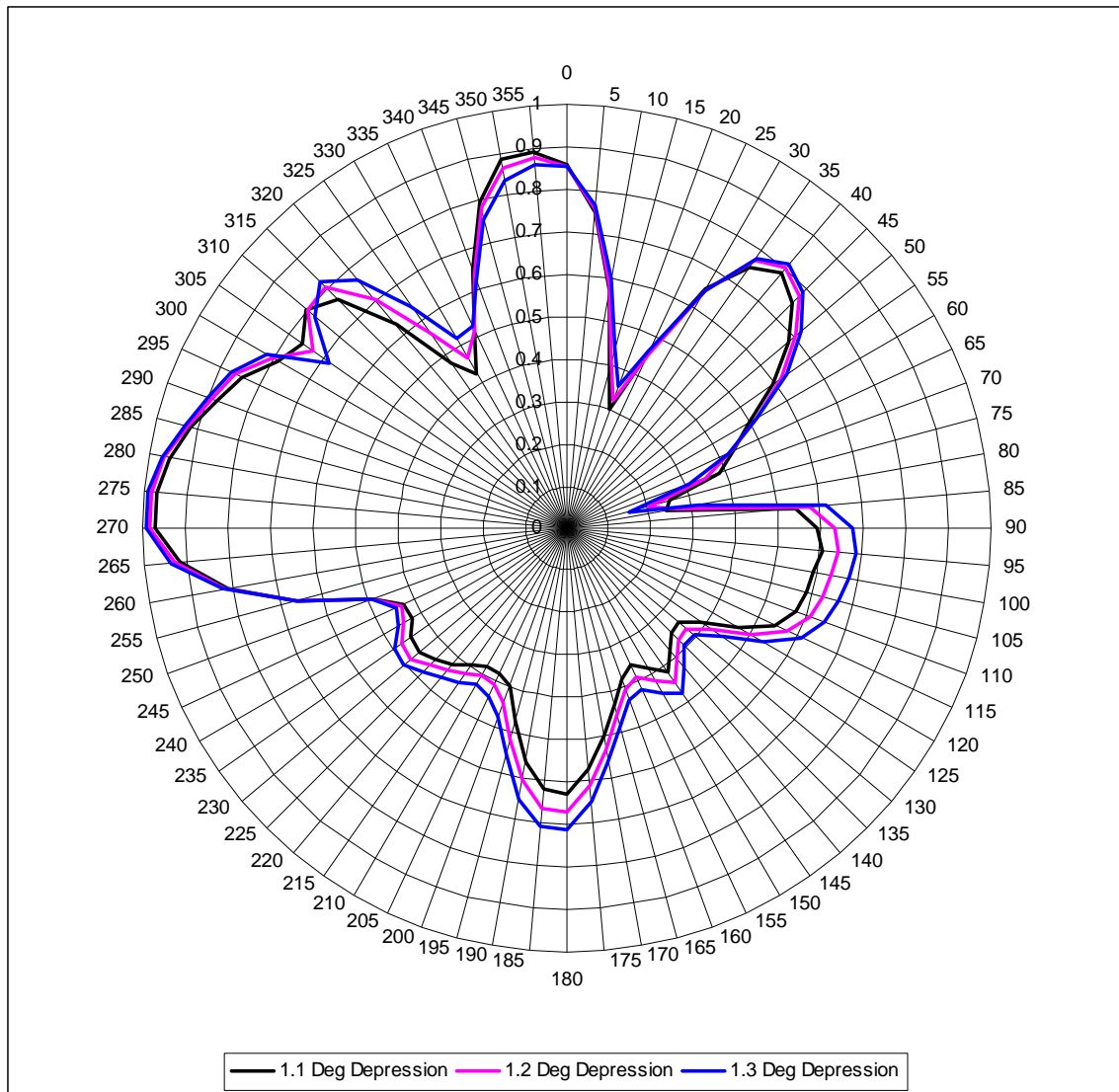
the Use of the 54-72 MHZ, 76-88 MHZ, 174-216 MHZ and 470-806 MHZ Bands for the Digital Television Broadcast Service Along the Common Border (July 22, 1998)

Chart 1 — Elevation Profile of Section of U.S. / Mexico Border



Note: Coordinates of end points derived from map – 0 km = 32-38-27.7 N, 115-50-10.7 W; 121 km = 32-32-19.7 N, 117-7-23.4 W

Chart 2 – KJLA-DT Azimuth Patterns at 1.1, 1.2, and 1.3 Degrees Depression



factor (K) of 4/3 and a true earth radius value (R) of 6371 km. In each case, the elevation used in determining the depression angle to use for an angular range along the border was below the lowest value for that region; thus the real depression angle is actually less than the cited values over each angular range, leading to additional protection to the border.

The antenna azimuth patterns at the 1.1, 1.2, and 1.3 degree depression angles are shown in Chart 2. Each of the patterns is identified in the plot, but for reference, the 1.1-degree pattern is innermost (in black), the 1.3-degree pattern is outermost (in blue), and the 1.2-degree pattern is in the middle (in violet). Since the maximum effective radiated power

Table 1 — Power Calculations to the U.S. / Mexico Border

Bearing	1.1 deg	1.2 deg	1.3 deg	Deprssn	Field	dB	Rel Pwr	ERP (kW)
129	0.3490	0.3747	0.4007	1.3	0.4007	-7.944	0.1606	160.56
130	0.3432	0.3680	0.3930	1.3	0.3930	-8.112	0.1544	154.45
131	0.3403	0.3644	0.3887	1.3	0.3887	-8.208	0.1511	151.09
132	0.3407	0.3642	0.3879	1.3	0.3879	-8.226	0.1505	150.47
133	0.3398	0.3627	0.3856	1.2	0.3627	-8.809	0.1316	131.55
134	0.3430	0.3657	0.3884	1.1	0.3430	-9.294	0.1176	117.65
135	0.3470	0.3698	0.3926	1.1	0.3470	-9.193	0.1204	120.41
136	0.3511	0.3739	0.3967	1.1	0.3511	-9.091	0.1233	123.27
137	0.3566	0.3798	0.4029	1.1	0.3566	-8.956	0.1272	127.16
138	0.3631	0.3869	0.4104	1.1	0.3631	-8.799	0.1318	131.84
139	0.3705	0.3947	0.4187	1.1	0.3705	-8.624	0.1373	137.27
140	0.3805	0.4054	0.4301	1.1	0.3805	-8.393	0.1448	144.78
141	0.3915	0.4175	0.4433	1.15	0.4045	-7.862	0.1636	163.62
142	0.4017	0.4287	0.4555	1.15	0.4152	-7.635	0.1724	172.39
143	0.4113	0.4395	0.4674	1.15	0.4254	-7.424	0.1810	180.97
144	0.4169	0.4461	0.4750	1.15	0.4315	-7.300	0.1862	186.19
145	0.4142	0.4440	0.4735	1.15	0.4291	-7.349	0.1841	184.13
146	0.4100	0.4405	0.4706	1.2	0.4405	-7.121	0.1940	194.04
147	0.4063	0.4374	0.4682	1.2	0.4374	-7.182	0.1913	191.32
148	0.3990	0.4306	0.4620	1.2	0.4306	-7.319	0.1854	185.42
149	0.3899	0.4216	0.4532	1.2	0.4216	-7.502	0.1777	177.75
150	0.3823	0.4142	0.4462	1.2	0.4142	-7.656	0.1716	171.56
151	0.3752	0.4072	0.4394	1.2	0.4072	-7.804	0.1658	165.81
152	0.3652	0.3970	0.4291	1.2	0.3970	-8.024	0.1576	157.61
153	0.3598	0.3913	0.4232	1.2	0.3913	-8.150	0.1531	153.12
154	0.3585	0.3896	0.4211	1.2	0.3896	-8.188	0.1518	151.79
155	0.3569	0.3875	0.4186	1.2	0.3875	-8.235	0.1502	150.16

(ERP) of KJLA-DT is 1000 kW and the intent was to reduce the power at the border with Mexico to 200 kW, the reduction needed was 7 dB. This translates to a field value of 0.44668 or less. The azimuth pattern tabular data is included in Table 1, described in the next subsection on Power Calculations to the U.S. / Mexico Border.

Power Calculations to the U.S. / Mexico Border

Table 1 indicates the power radiated toward the U.S. / Mexico border at each one-degree azimuth increment from 129 through 155 degrees. This covers the portion of the border within the XHDTV 64 dBu contour, ending at the Pacific coast. Reading from left-to-right, the columns in the table give the azimuth bearing for each row, the field values at the 1.1, 1.2, and 1.3 degree depression angles at each bearing, the depression angle used for calculations at each bearing, the field value that was used as a result of the depression angle selection, the field value converted to decibels, the field value converted to relative power, and finally the actual power radiated toward the border in kilowatts. For those bearings at which the depression angle fell between the regular values spaced every 0.1-degree, a linear interpolation was performed between the adjacent values to obtain the field value at the appropriate depression angle.

Results Summary

As shown in Table 1, the power radiated toward the U.S. / Mexico border by the antenna pattern described herein for the KJLA-DT facility is limited to a maximum of approximately 190 kW everywhere along the portion of the border within the XHDTV 64dBu contour. This value comports with the 200 kW maximum effective radiated power that the Commission had indicated it would routinely authorize at the time of the negotiation of the MOU with Mexico. This arrangement was in keeping with the FCC's suggestion that KJLA-DT should consider limiting the power to that which the FCC was authorizing to domestic DTV stations at the time the MOU was under consideration by both governments, which arrangement ultimately was accepted by the SCT (now COFETEL). The changes in the antenna pattern proposed in the current application would not affect the power radiated in the direction of the Mexican border over the range of azimuths included in Table 1; indeed, the values in Table 1 are unchanged from the last time this data was filed with the Commission. Thus, since no change in the radiation toward the Mexican border is proposed, it is believed that no further coordination with the Mexican government is required.

Environmental Impact / Radio Frequency Radiation

None of the conditions specified in Section 1.1307 that would require the preparation of an Environmental Assessment pertain with respect to the proposed facility at Mt. Wilson, in particular, owing to the fact that Mt. Wilson is an antenna farm and therefore exempted from environmental review under the provisions of Note 3 to Section 1.1306.

With respect to Radio Frequency Radiation exposure, OET Bulletin 65 provides methods for evaluating the level of exposure for both employees (occupational/controlled situations) and non-employees (general population/uncontrolled situations). The combination of the antenna radiation pattern, as provided in the manufacturer's technical specifications, with the antenna height above ground level and the operating power level indicate that the potential exposure would be less than 5 percent of the Maximum Permissible Exposure (MPE) limit for general population / uncontrolled situations. Specifically, application of the formulas provided in OET-65 yields a value of less than one percent of the MPE. Thus the proposed operation is categorically excluded from having to submit a detailed RF exposure analysis of the site.

Notwithstanding the foregoing, KJLA, LLC recognizes its responsibility for the safety and health of employees and contractors when exposed to RF radiation conditions. It will work cooperatively with the tower site owner, with other broadcasters, and with other licensees sharing the Mt. Wilson antenna farm to coordinate activities so as to maintain a safe environment under all conditions.

Notifications

The proposed site at Mt. Wilson is not in proximity to any of the government radio astronomy installations named in Section 73.1030, nor is it proximate to any of the named radio receiving locations. Furthermore, the nearest FCC monitoring station is over 500 km distant. Thus, none of the notifications mandated by Section 73.1030 is required in this instance.

**Figure 1 — Technical Specifications
Proposed KJLA-DT Facility — Channel 49 — Mt. Wilson, CA**

Frequency

Channel	49
Frequency Band	680-686 MHz
Center Frequency	683 MHz

Location

Site	Mt. Wilson Antenna Farm, CA
Geographic Coordinates (NAD27)	34° 13' 35.3" N 118° 03' 57.7" W
Antenna Structure Registration (ASR) Number	1221073

Elevation

Elevation of site above mean sea level	1739.8 m
Overall height of tower above site elevation	122 m
Overall height of tower above mean sea level	1862 m
Height of antenna radiation center above site elevation	86.2 m
Elevation of average terrain (45-degree spaced radials, 3.2-16.1 km)	889 m
Height of antenna above mean sea level	1826 m
Height of antenna above average terrain (HAAT)	937 m

Antenna

Manufacturer	Radio Frequency Systems
Model	PHP46EA-CH49
Description	Panel array, 46 panels, 10 high – 3 sides, 8 high – 2 sides 5 sides of pentagon, on 2 levels
Orientation (rotation around vertical axis)	186° True
Electrical beam tilt in principal lobes (40°, 96°, 184°, 272°, 352°)	1.4°, 2.4°, 2.4°, 1.4°, 1.0°
Mechanical beam tilt	None
Polarization	Horizontal
Gain (maximum in horizontal plane at 1.4° depression)	2.70 (4.31 dB)
Gain (maximum in vertical plane at 272° azimuth)	25.65 (14.09 dB)
Maximum gain (main beam ⁶)	40.27 (16.05 dB)

Power

Maximum effective radiated power (ERP) (main beam – 1.4° down)	1000 kW
Maximum effective radiated power (ERP) (horizontal plane)	526 kW

⁶ Main beam maximum gain does not equal the product of the horizontal & vertical plane gains (or the sum in dB) because of variations in the depression angle of the main beam with respect to the azimuth value.

KJLA-DT Channel 49 Ventura, CA

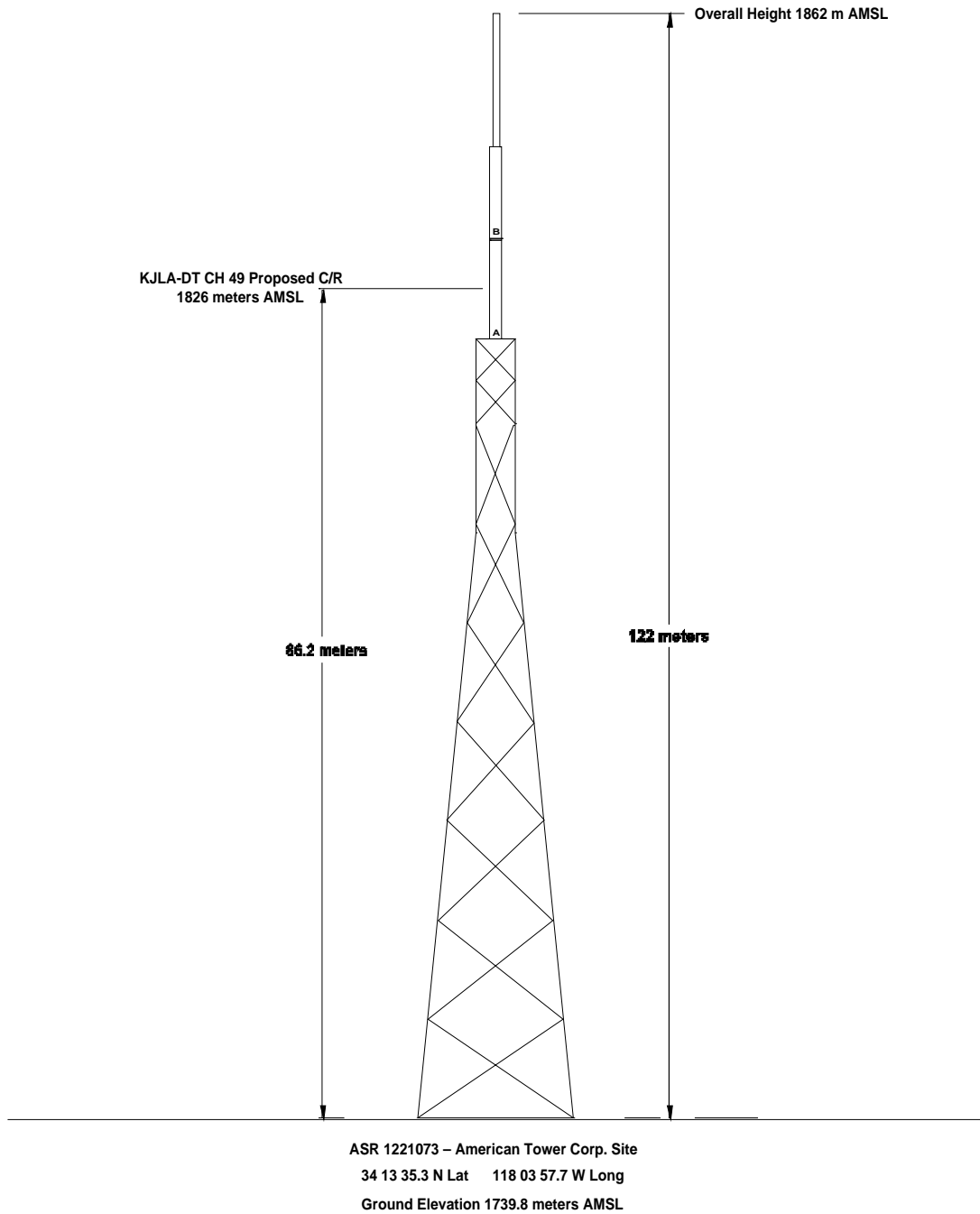
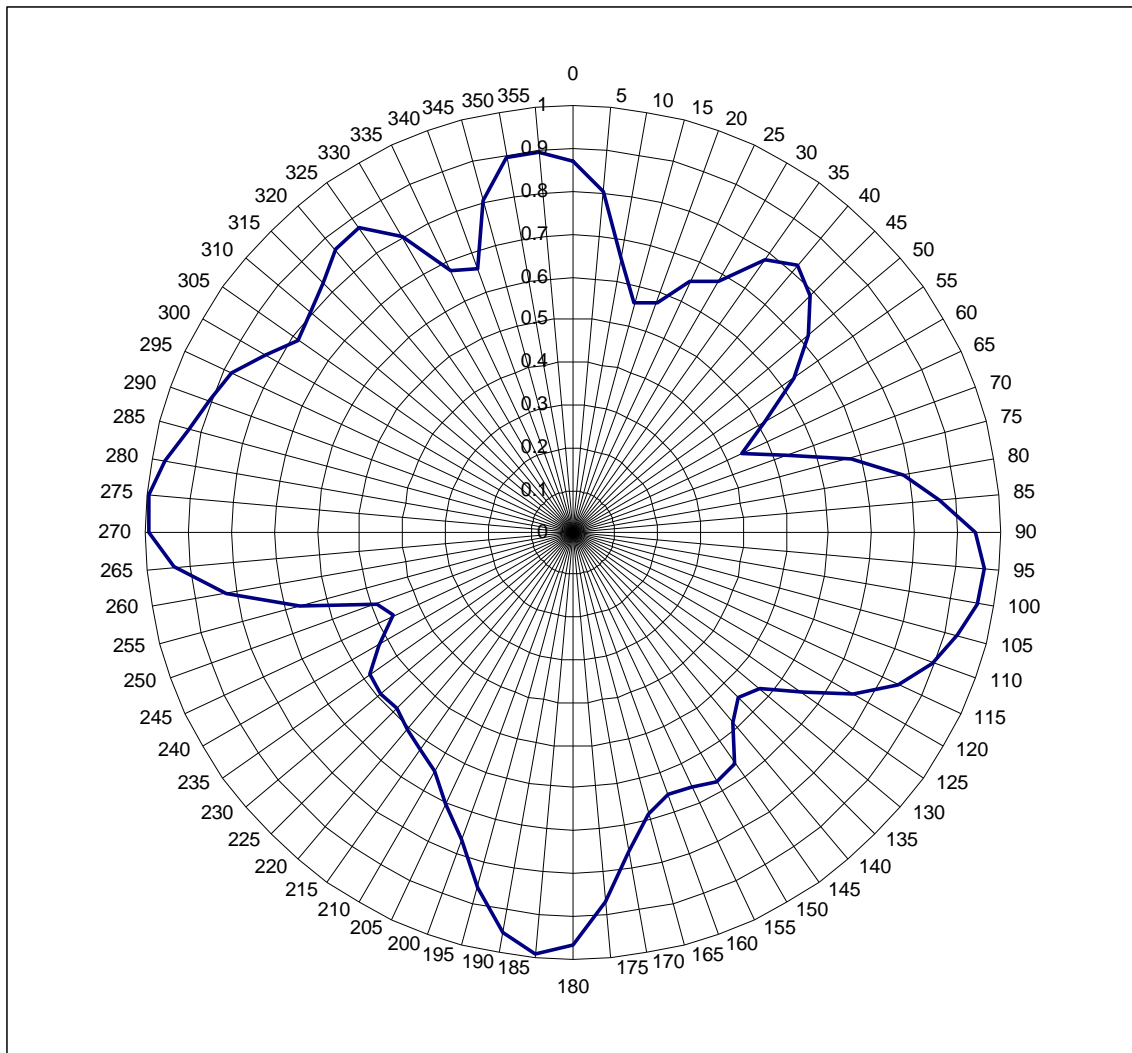


Figure 2
Not to Scale

Merrill Weiss Group, LLC Technical Consultants

KJLA-DT Channel 49 Ventura, CA

1000 kW ERP 937 m HAAT



Maximum Relative Field Pattern

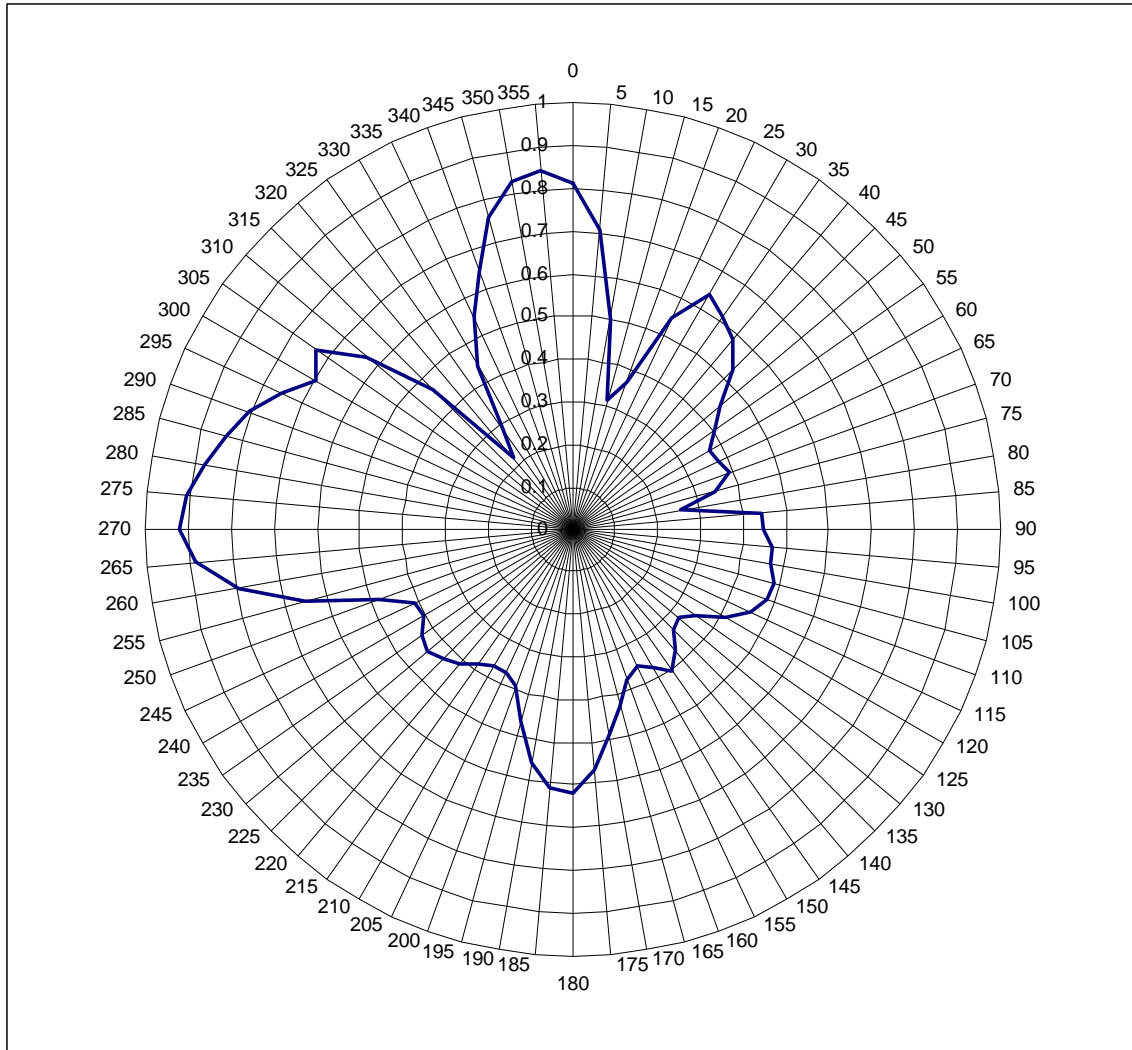
Based on data supplied by manufacturer

RFS PHP46EA

Figure 3a

KJLA-DT Channel 49 Ventura, CA

1000 kW ERP 937 m HAAT



Radio Horizon Relative Field Pattern

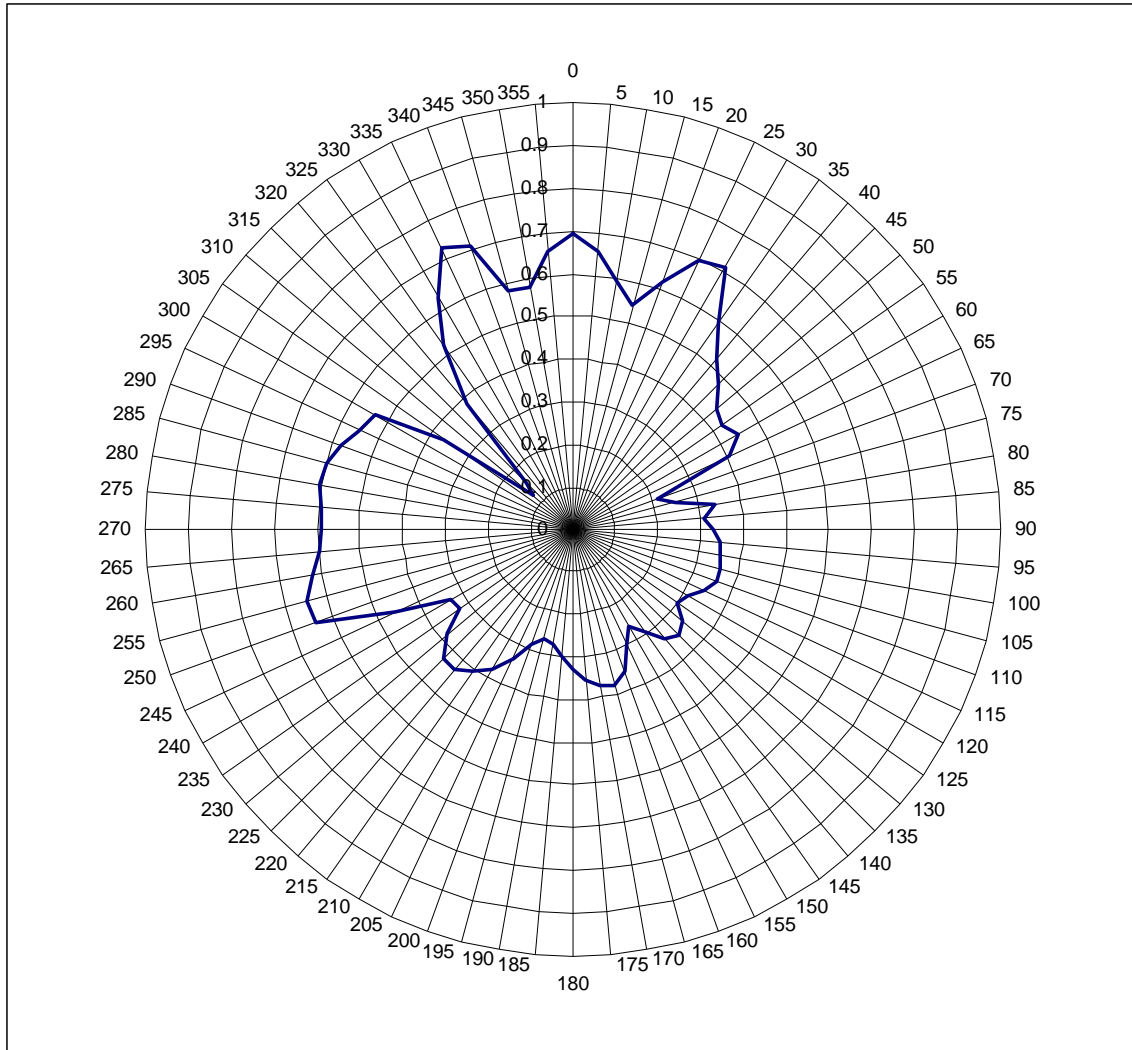
Based on data supplied by manufacturer

RFS PHP46EA

Figure 3b

KJLA-DT Channel 49 Ventura, CA

1000 kW ERP 937 m HAAT



Horizontal Plane Relative Field Pattern

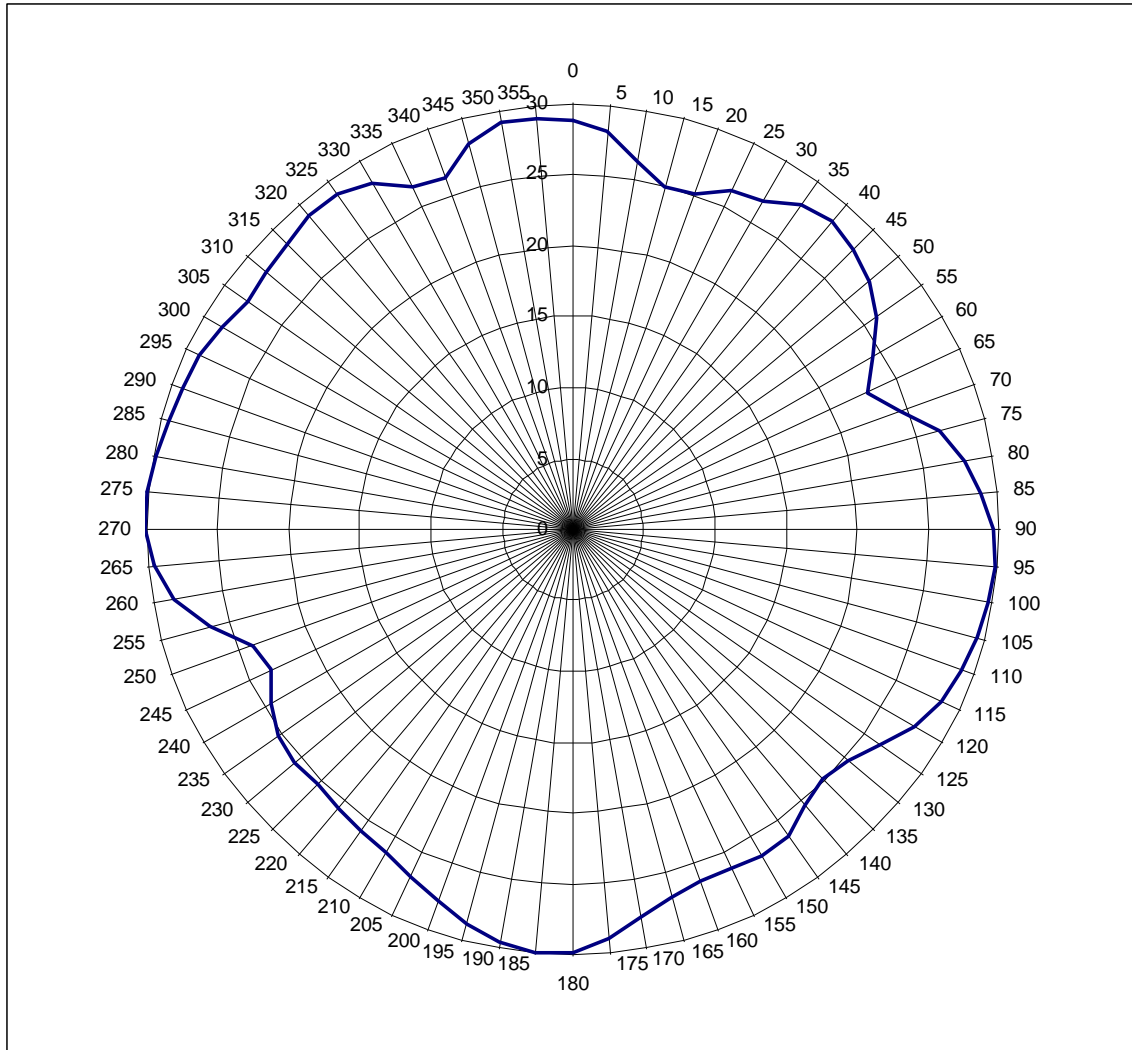
Based on data supplied by manufacturer

RFS PHP46EA

Figure 3c

KJLA-DT Channel 49 Ventura, CA

30.0 dBk at 272 Degrees



Maximum Effective Radiated Power (dBk)

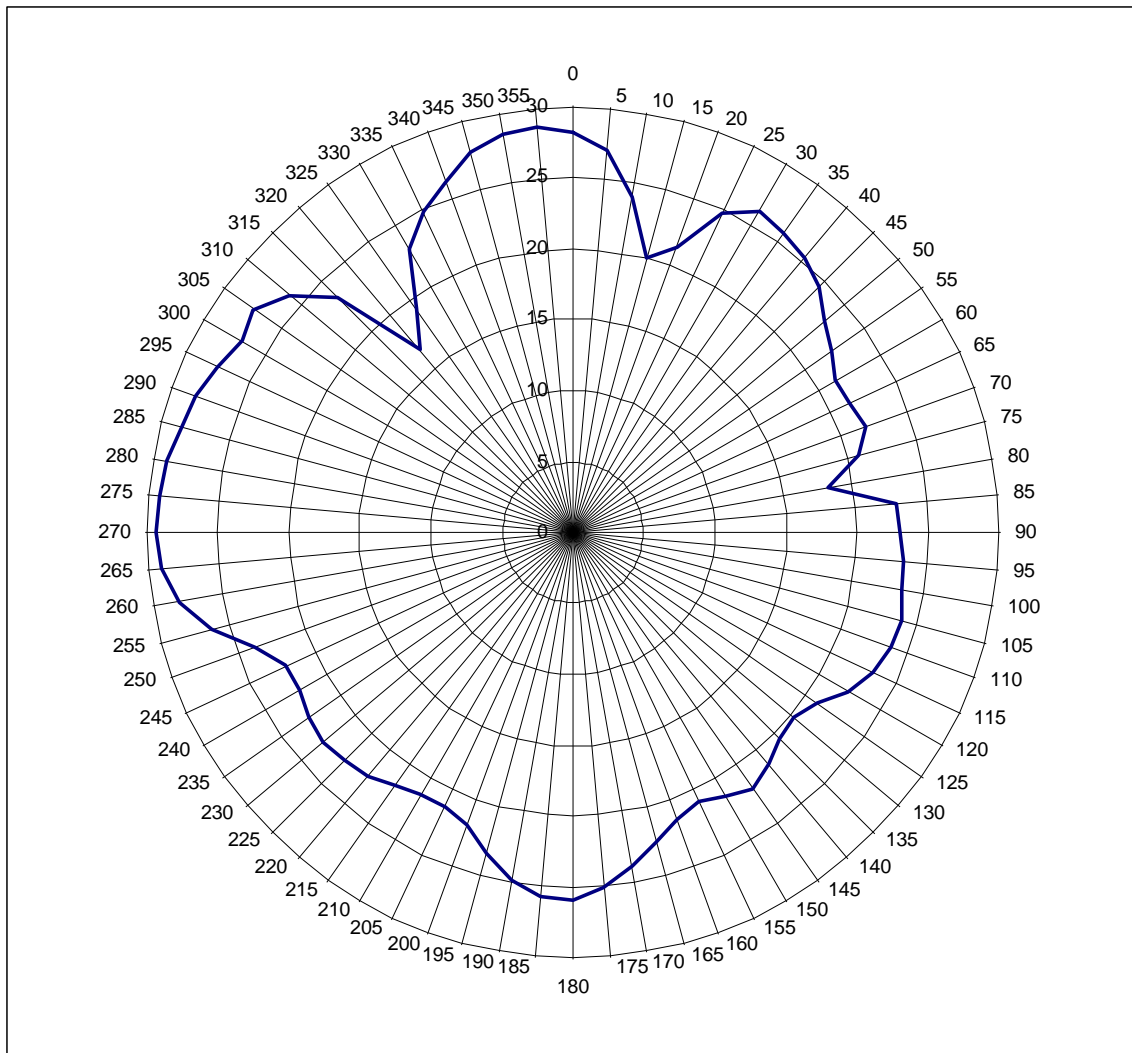
Based on data supplied by manufacturer

RFS PHP46EA

Figure 4a

KJLA-DT Channel 49 Ventura, CA

29.29 dBk at 270 Degrees



Radio Horizon Effective Radiated Power (dBk)

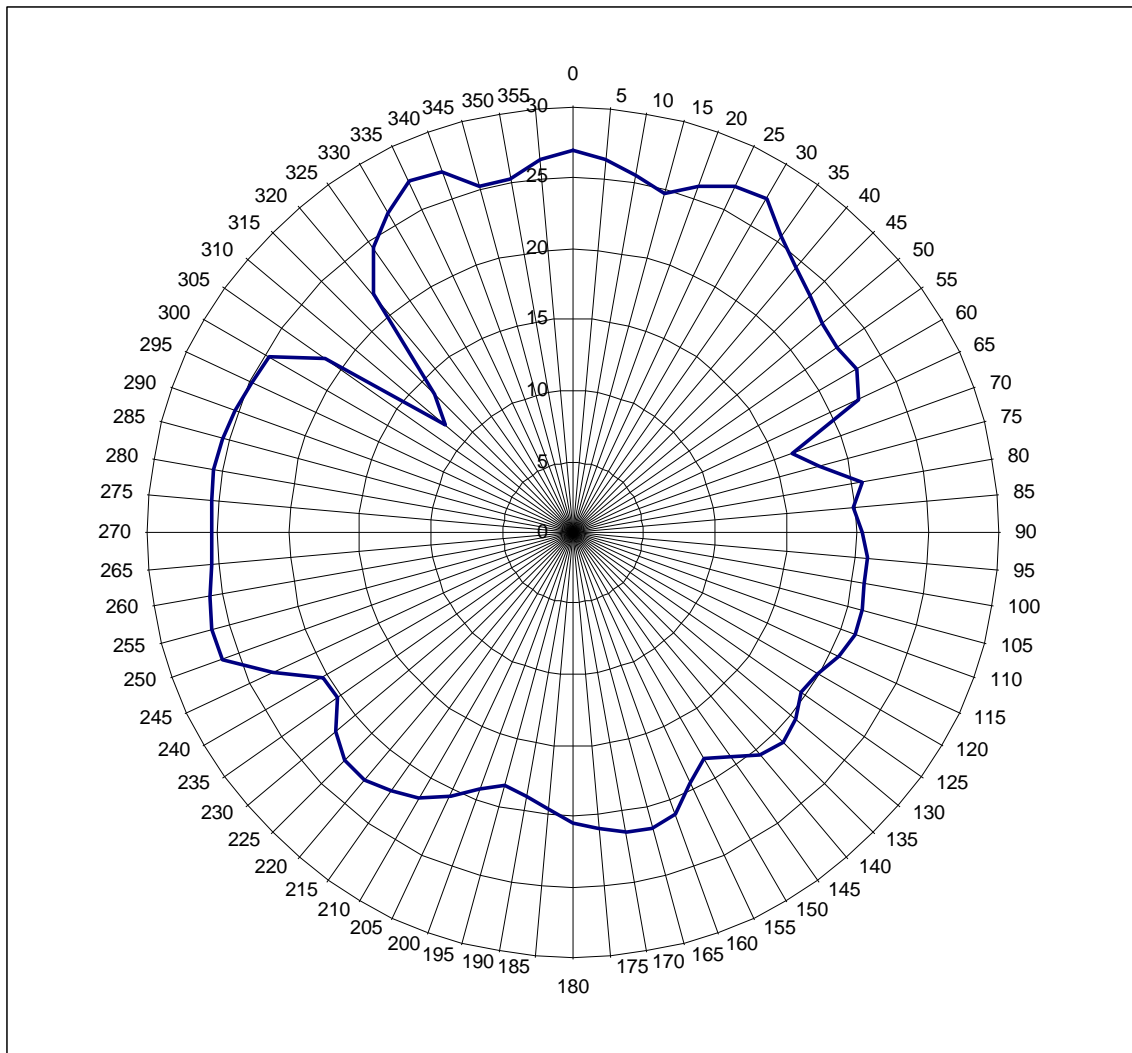
Based on data supplied by manufacturer

RFS PHP46EA

Figure 4b

KJLA-DT Channel 49 Ventura, CA

27.21 dBk at 335 Degrees



Horizontal Plane Effective Radiated Power (dBk)

Based on data supplied by manufacturer

RFS PHP46EA

Figure 4c

**Figure 5 — Tabulation of Azimuth Pattern Radiation Data
RFS Model PHP46EA Antenna — Channel 49**

Bearing	Radio Horizon— Depression	Radio Horizon — Field	Radio Horizon — dBk	Horizontal Plane — Field	Horizontal Plane — dBk	Maximum Pattern — Depression	Maximum Pattern — Field	Maximum Pattern — dBk
0	0.57	0.8102	28.17	0.6922	26.80	1.9	0.8702	28.79
5	0.64	0.7056	26.97	0.6575	26.36	1.8	0.8036	28.10
10	0.62	0.5015	24.01	0.5936	25.47	1.8	0.6491	26.25
15	0.55	0.3135	19.92	0.5440	24.71	1.8	0.5575	24.92
20	0.52	0.3666	21.28	0.6187	25.83	2.0	0.5705	25.13
25	0.49	0.5459	24.74	0.6954	26.84	2.1	0.6460	26.20
30	0.49	0.6354	26.06	0.7115	27.04	1.9	0.6792	26.64
35	0.49	0.6106	25.71	0.5905	25.42	1.4	0.7795	27.84
40	0.53	0.5801	25.27	0.5216	24.35	1.4	0.8188	28.26
45	0.56	0.5282	24.46	0.4772	23.57	1.4	0.7857	27.91
50	0.57	0.4505	23.07	0.4361	22.79	1.4	0.7186	27.13
55	0.65	0.4071	22.19	0.4226	22.52	1.4	0.6312	26.00
60	0.72	0.3693	21.35	0.4438	22.94	1.3	0.5205	24.33
65	0.77	0.3753	21.49	0.4018	22.08	1.1	0.4358	22.79
70	0.78	0.3917	21.86	0.2094	16.42	2.7	0.5319	24.52
75	0.84	0.3447	20.75	0.2485	17.91	2.5	0.6730	26.56
80	0.88	0.2553	18.14	0.3348	20.50	2.3	0.7850	27.90
85	0.83	0.4401	22.87	0.3072	19.75	2.4	0.8594	28.68
90	0.71	0.4461	22.99	0.3286	20.33	2.4	0.9422	29.48
95	0.72	0.4660	23.37	0.3443	20.74	2.4	0.9678	29.72
100	0.77	0.4698	23.44	0.3486	20.85	2.4	0.9568	29.62
105	0.83	0.4884	23.78	0.3569	21.05	2.4	0.9332	29.40
110	0.84	0.4817	23.66	0.3566	21.04	2.4	0.8949	29.04
115	0.87	0.4589	23.23	0.3357	20.52	2.4	0.8421	28.51
120	0.93	0.4114	22.28	0.3097	19.82	2.4	0.7575	27.59
125	0.98	0.3502	20.89	0.2986	19.50	2.5	0.6566	26.35
130	1.02	0.3234	20.20	0.3300	20.37	2.5	0.5729	25.16
135	1.04	0.3339	20.47	0.3476	20.82	2.4	0.5444	24.72
140	1.05	0.3692	21.34	0.3324	20.43	2.4	0.5845	25.34
145	1.06	0.4020	22.08	0.2914	19.29	2.4	0.6605	26.40
150	1.07	0.3727	21.43	0.2617	18.36	2.5	0.6706	26.53
155	1.08	0.3515	20.92	0.2964	19.44	2.5	0.6607	26.40
160	1.09	0.3739	21.46	0.3544	20.99	2.5	0.6519	26.28
165	1.08	0.4266	22.60	0.3782	21.55	2.4	0.6866	26.73
170	1.08	0.4935	23.87	0.3716	21.40	2.4	0.7615	27.63
175	1.08	0.5671	25.07	0.3531	20.96	2.4	0.8713	28.80
180	1.08	0.6189	25.83	0.3296	20.36	2.4	0.9646	29.69
185	1.08	0.6113	25.73	0.2991	19.52	2.4	0.9898	29.91
190	1.08	0.5528	24.85	0.2740	18.76	2.4	0.9478	29.53
195	1.08	0.4647	23.34	0.2648	18.46	2.5	0.8603	28.69
200	1.08	0.3918	21.86	0.2865	19.14	2.6	0.7662	27.69
205	1.08	0.3682	21.32	0.3331	20.45	2.6	0.7016	26.92
210	1.07	0.3685	21.33	0.3775	21.54	2.5	0.6489	26.24
215	1.07	0.3863	21.74	0.4091	22.24	2.4	0.6208	25.86
220	1.07	0.4099	22.25	0.4289	22.65	2.3	0.5991	25.55
225	1.06	0.4292	22.65	0.4276	22.62	2.2	0.5818	25.30
230	1.05	0.4452	22.97	0.3828	21.66	2.1	0.5895	25.41
235	1.03	0.4301	22.67	0.3219	20.15	2.1	0.5795	25.26
240	1.01	0.4051	22.15	0.3260	20.26	2.0	0.5245	24.39
245	1.00	0.4071	22.19	0.4566	23.19	1.7	0.4612	23.28
250	0.99	0.4814	23.65	0.6385	26.10	1.2	0.4894	23.79
255	0.98	0.6450	26.19	0.6432	26.17	1.2	0.6585	26.37

Technical Statement — KJLA-DT Construction Permit for Antenna Pattern Change

Bearing	Radio Horizon— Depression	Radio Horizon — Field	Radio Horizon — dBk	Horizontal Plane — Field	Horizontal Plane — dBk	Maximum Pattern — Depression	Maximum Pattern — Field	Maximum Pattern — dBk
260	0.95	0.7924	27.98	0.6196	25.84	1.3	0.8241	28.32
265	0.92	0.8845	28.93	0.5965	25.51	1.4	0.9378	29.44
270	0.88	0.9209	29.28	0.5884	25.39	1.4	0.9931	29.94
275	0.82	0.9089	29.17	0.5944	25.48	1.4	0.9937	29.95
280	0.75	0.8728	28.82	0.6005	25.57	1.4	0.9693	29.73
285	0.76	0.8407	28.49	0.5959	25.50	1.4	0.9347	29.41
290	0.78	0.8063	28.13	0.5774	25.23	1.4	0.9051	29.13
295	0.73	0.7534	27.54	0.5504	24.81	1.5	0.8830	28.92
300	0.73	0.6928	26.81	0.5346	24.56	1.5	0.8310	28.39
305	0.68	0.7355	27.33	0.3679	21.31	0.9	0.7857	27.91
310	0.66	0.6299	25.99	0.1223	11.75	1.1	0.8039	28.10
315	0.68	0.4648	23.35	0.1540	13.75	1.4	0.8253	28.33
320	0.62	0.2186	16.79	0.3885	21.79	1.6	0.8640	28.73
325	0.63	0.2863	19.14	0.5298	24.48	1.8	0.8702	28.79
330	0.68	0.4407	22.88	0.6267	25.94	2.0	0.8000	28.06
335	0.68	0.5487	24.79	0.7252	27.21	2.1	0.6755	26.59
340	0.70	0.6434	26.17	0.7044	26.96	0.9	0.6558	26.34
345	0.67	0.7555	27.56	0.5787	25.25	1.0	0.8073	28.14
350	0.66	0.8279	28.36	0.5737	25.17	1.0	0.8893	28.98
355	0.60	0.8463	28.55	0.6545	26.32	1.0	0.8967	29.05
360	0.57	0.8102	28.17	0.6922	26.80	1.9	0.8702	28.79

Derived from data supplied by manufacturer

KJLA-DT Channel 49 Ventura, CA

Relative Field Elevation Pattern

RFS PHP46EA at 96 Degrees Azimuth

Based on data supplied by manufacturer

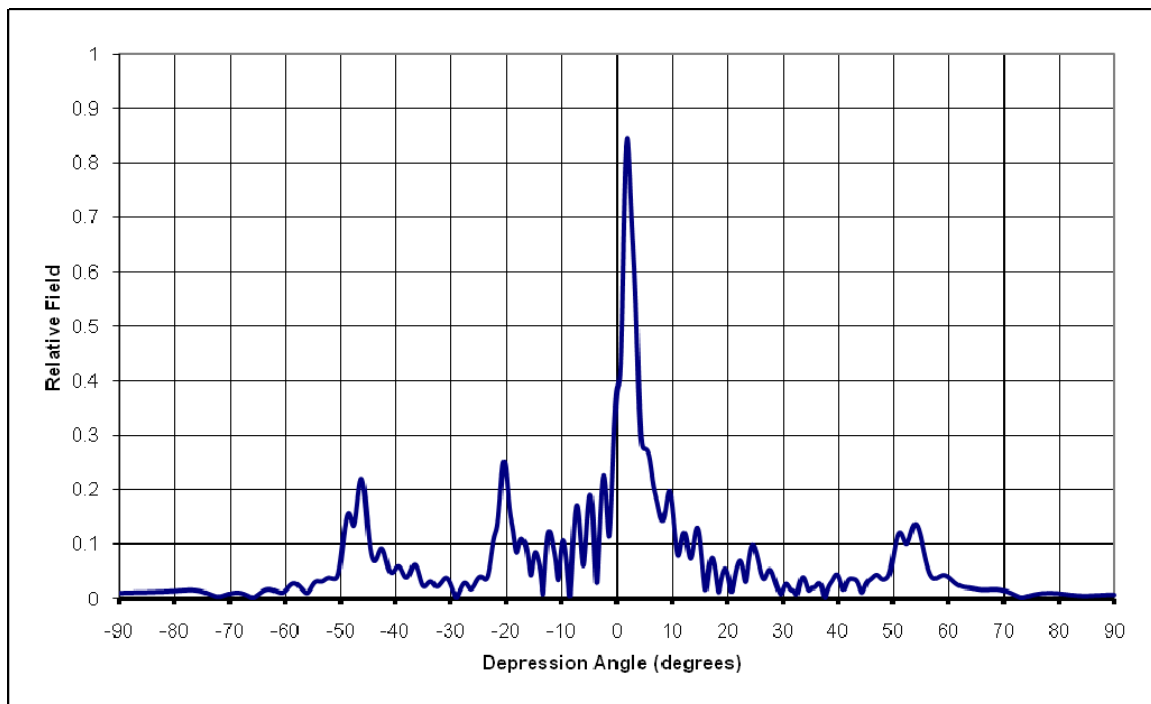
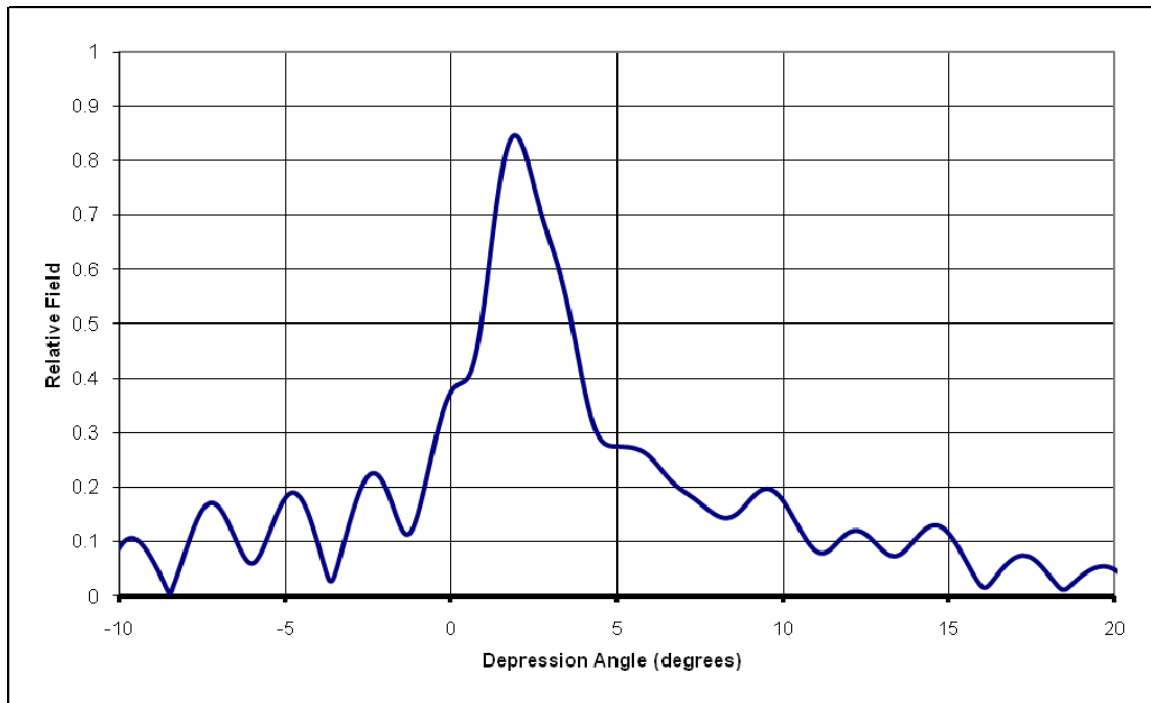


Figure 6a

KJLA-DT Channel 49 Ventura, CA

Relative Field Elevation Pattern

RFS PHP46EA at 184 Degrees Azimuth

Based on data supplied by manufacturer

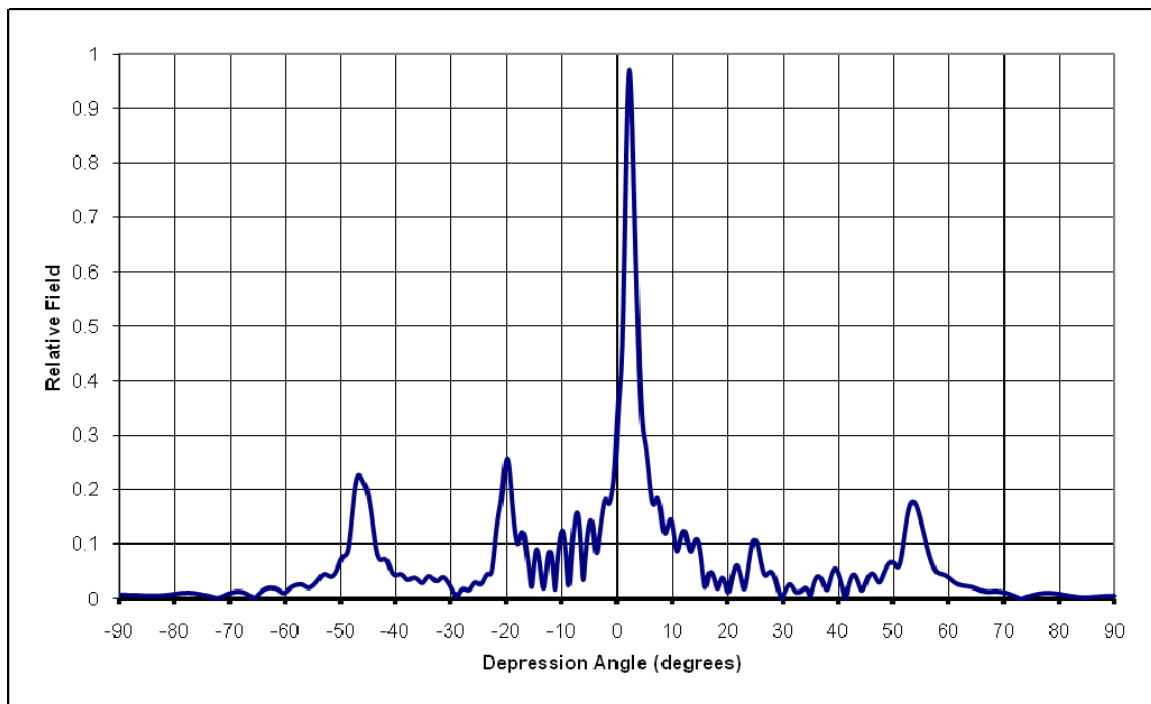
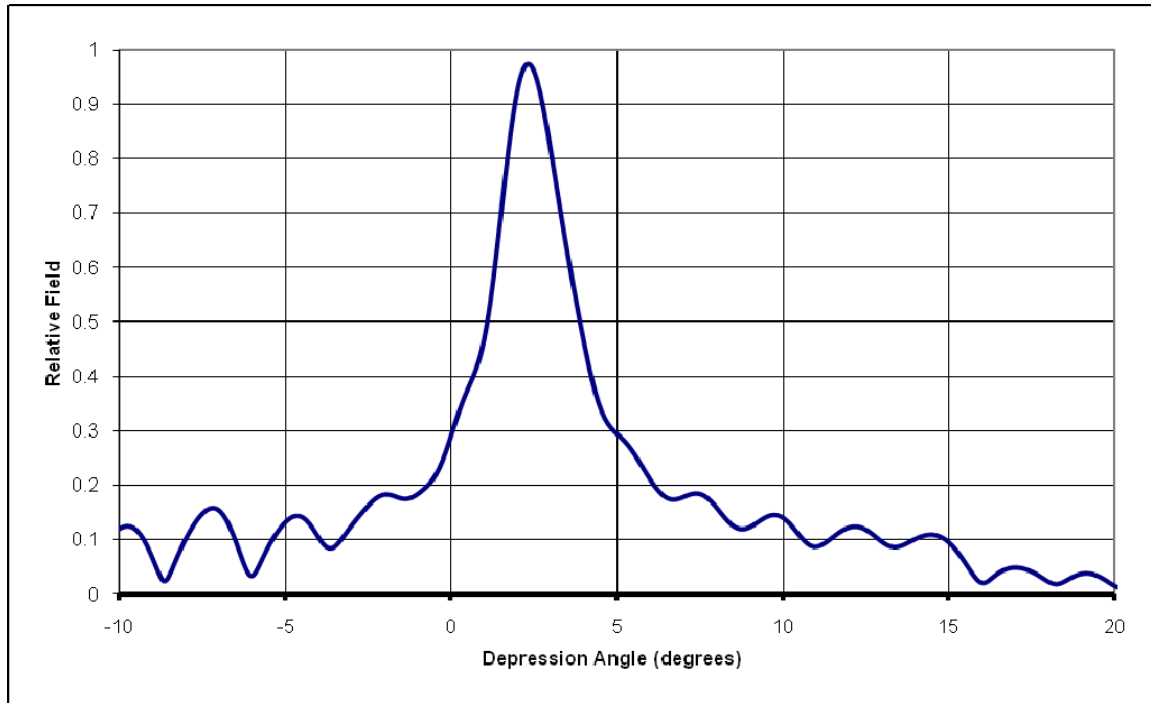


Figure 6b

KJLA-DT Channel 49 Ventura, CA

Relative Field Elevation Pattern

RFS PHP46EA at 272 Degrees Azimuth

Based on data supplied by manufacturer

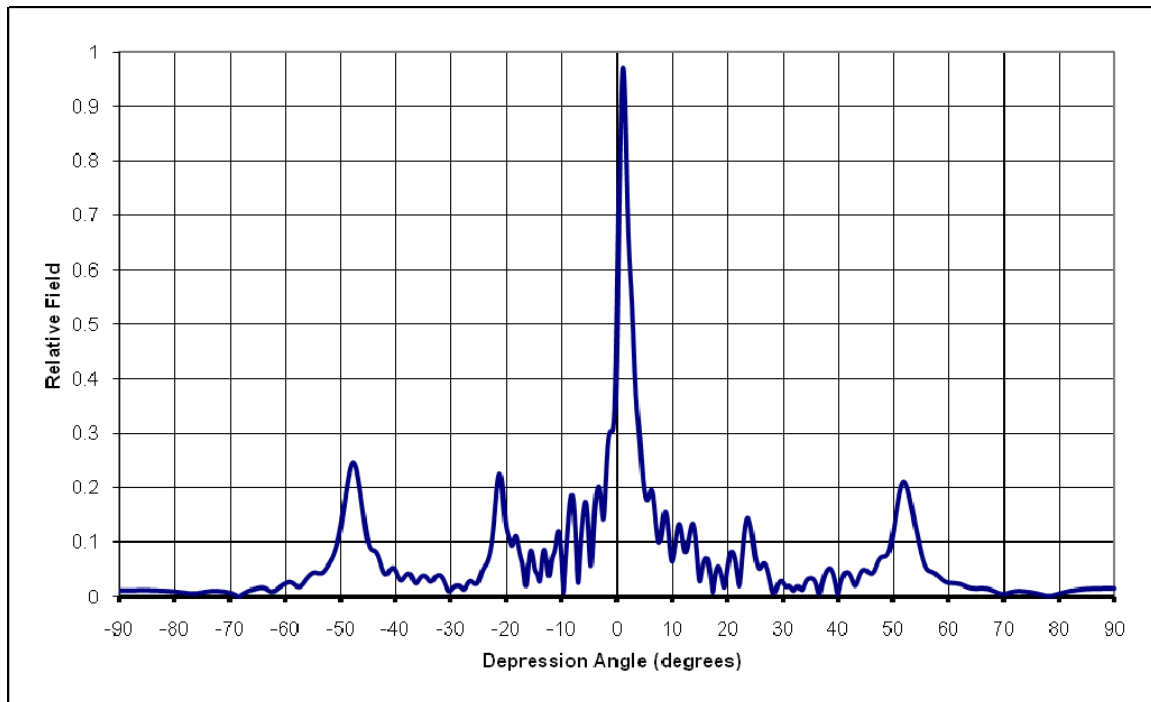
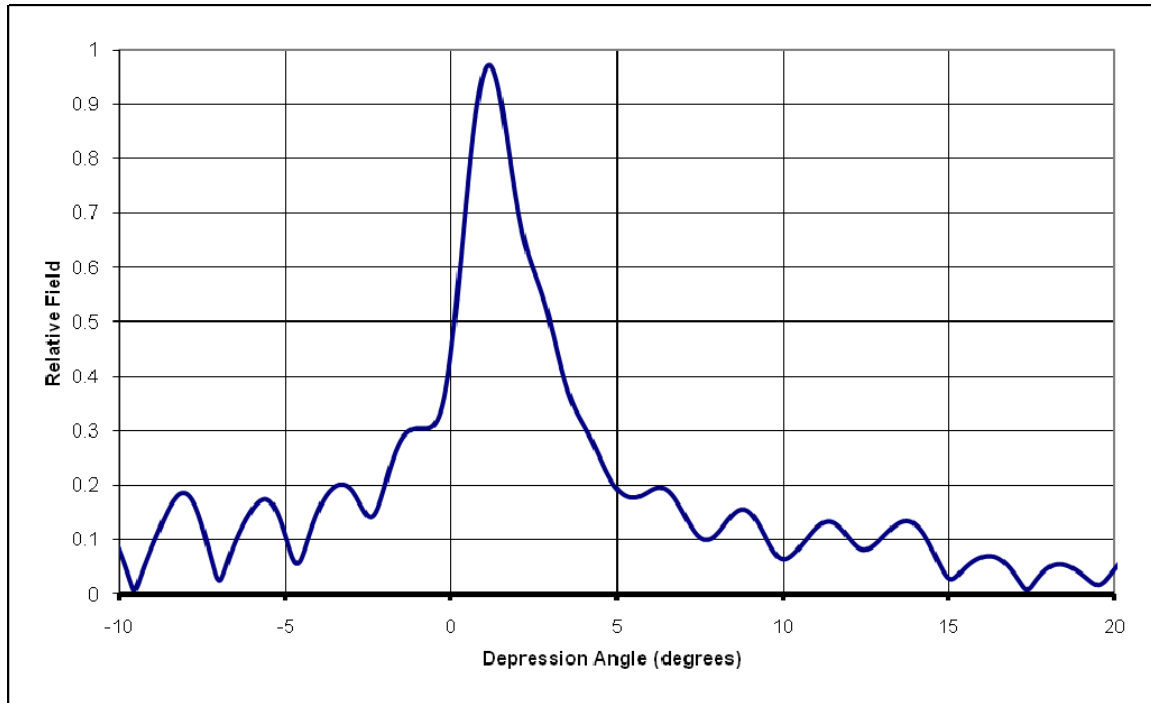


Figure 6c

KJLA-DT Channel 49 Ventura, CA

Relative Field Elevation Pattern

RFS PHP46EA at 352 Degrees Azimuth

Based on data supplied by manufacturer

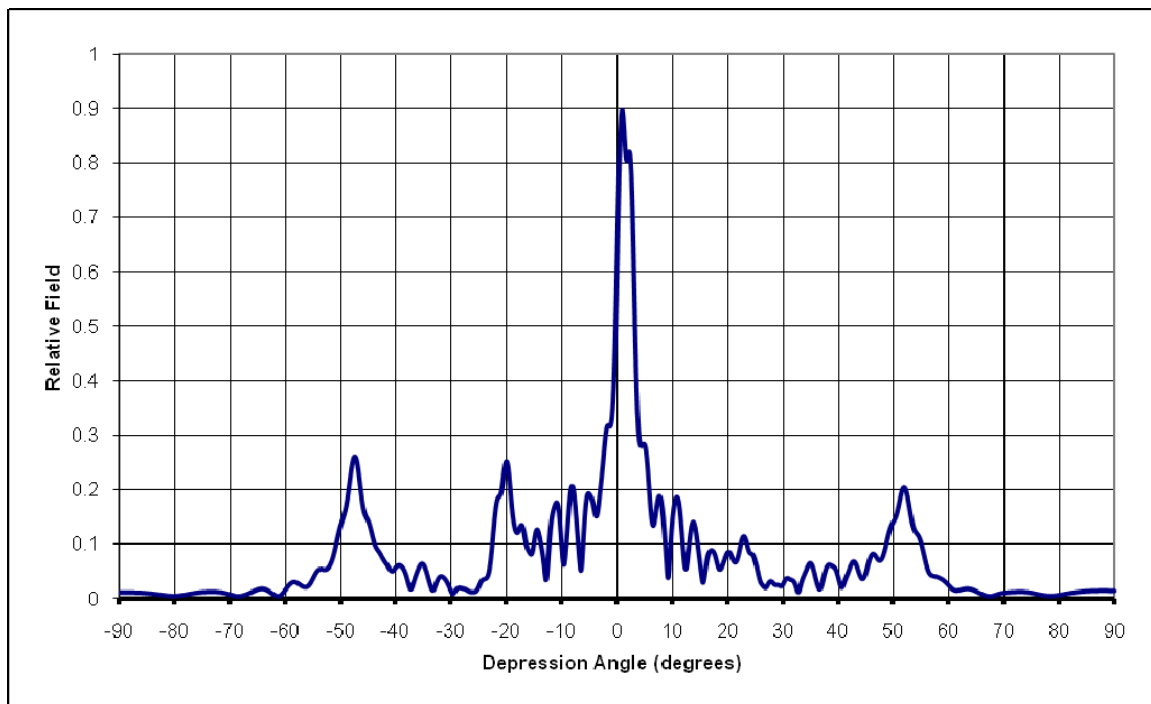
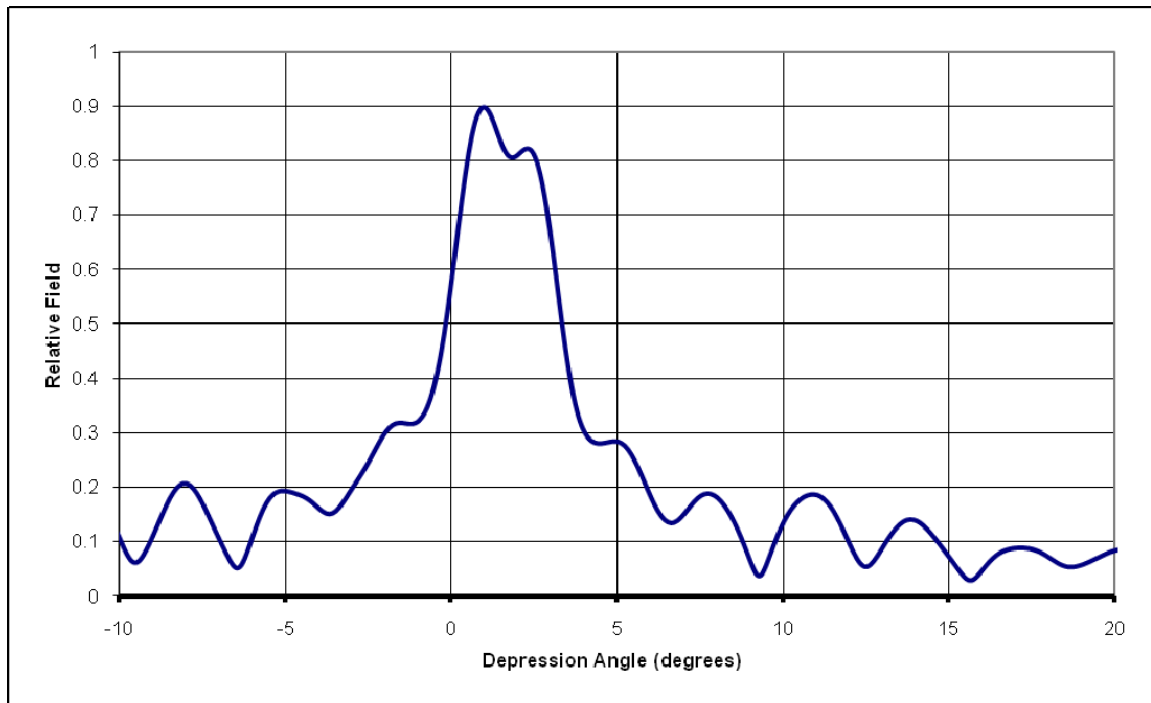


Figure 6d

KJLA-DT Channel 49 Ventura, CA

Relative Field Elevation Pattern

RFS PHP46EA at 40 Degrees Azimuth

Based on data supplied by manufacturer

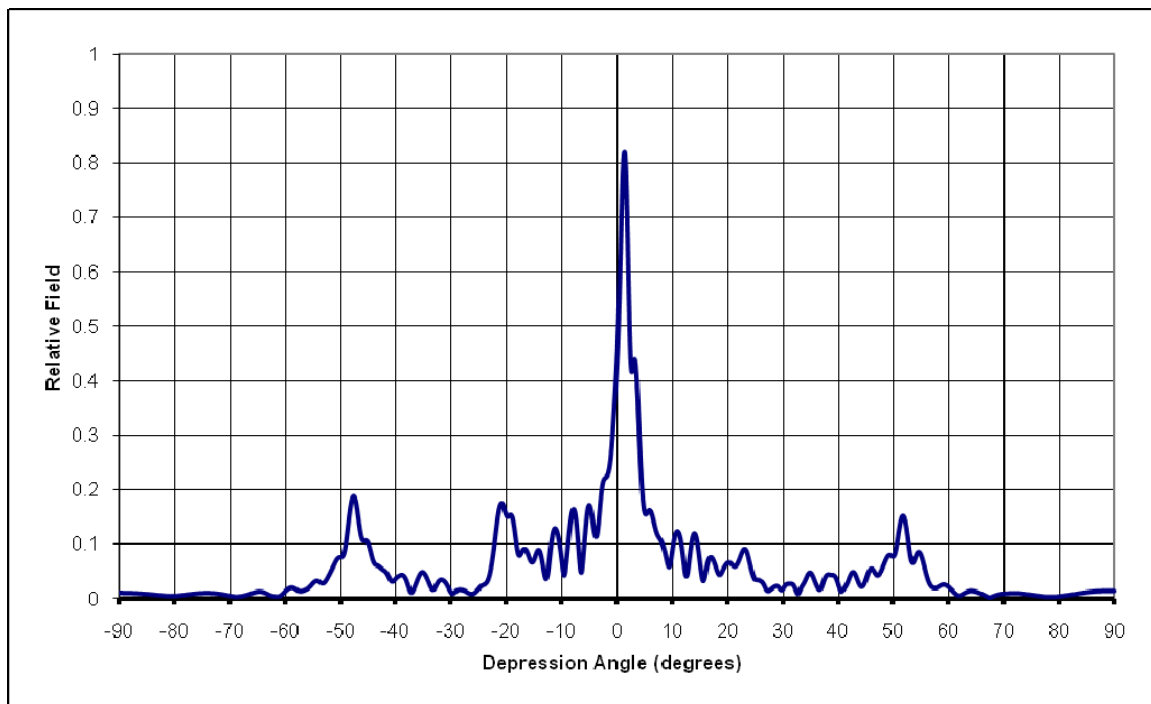
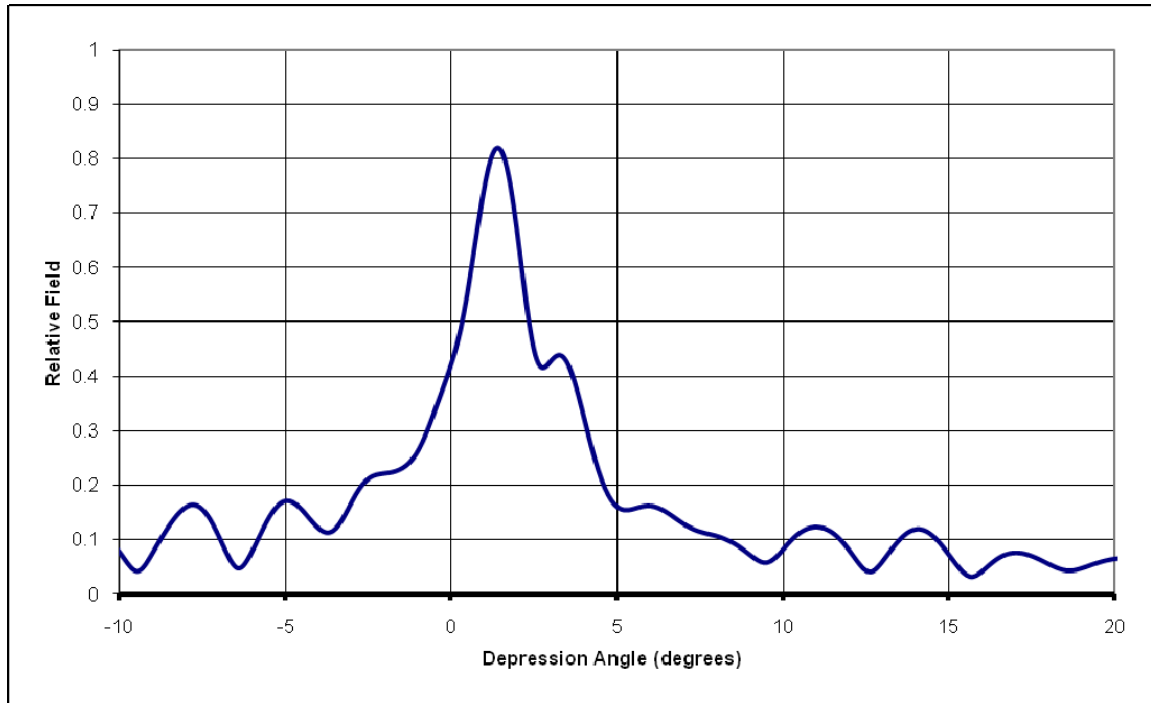


Figure 6e

KJLA-DT Channel 49 Ventura, CA
Effective Radiated Power Elevation Pattern (dBk)
RFS PHP46EA at 96 Degrees Azimuth
Based on data supplied by manufacturer

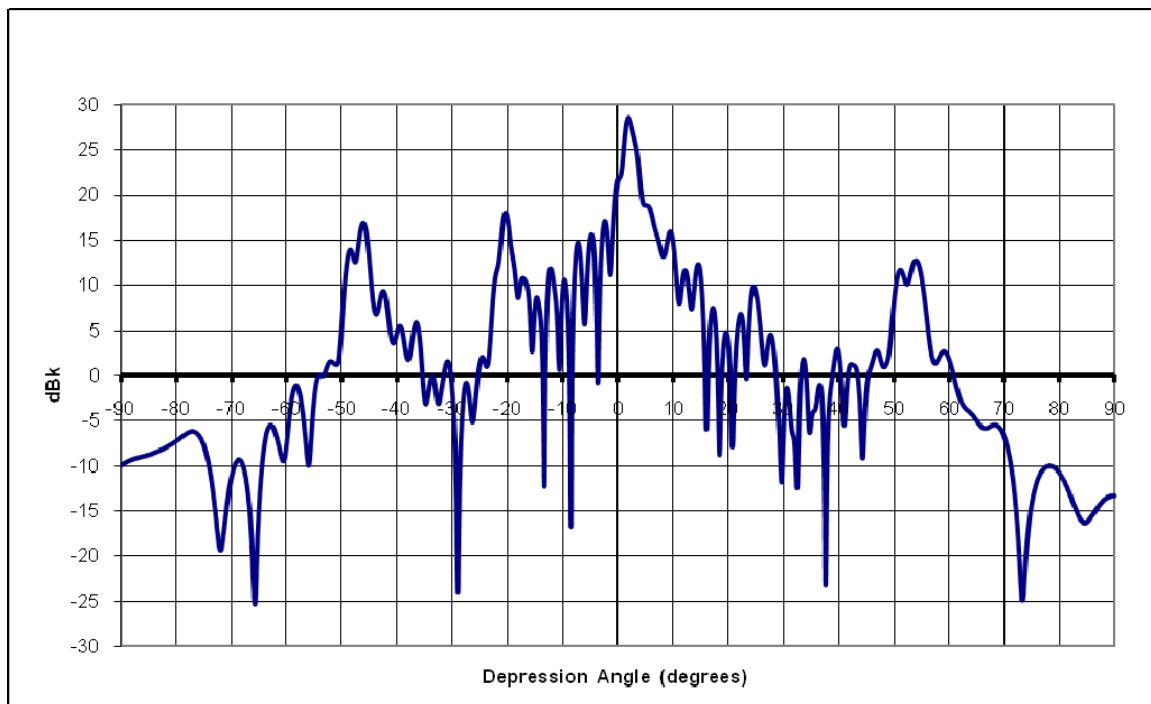
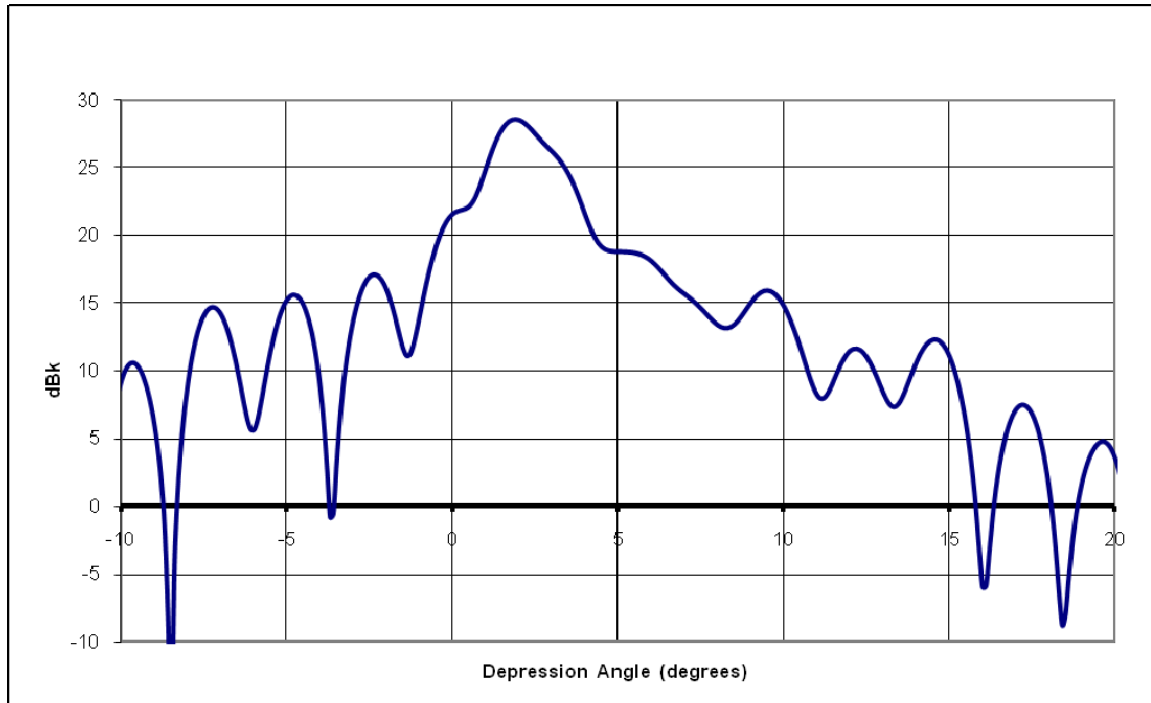


Figure 7a

KJLA-DT Channel 49 Ventura, CA
Effective Radiated Power Elevation Pattern (dBk)
RFS PHP46EA at 184 Degrees Azimuth
Based on data supplied by manufacturer

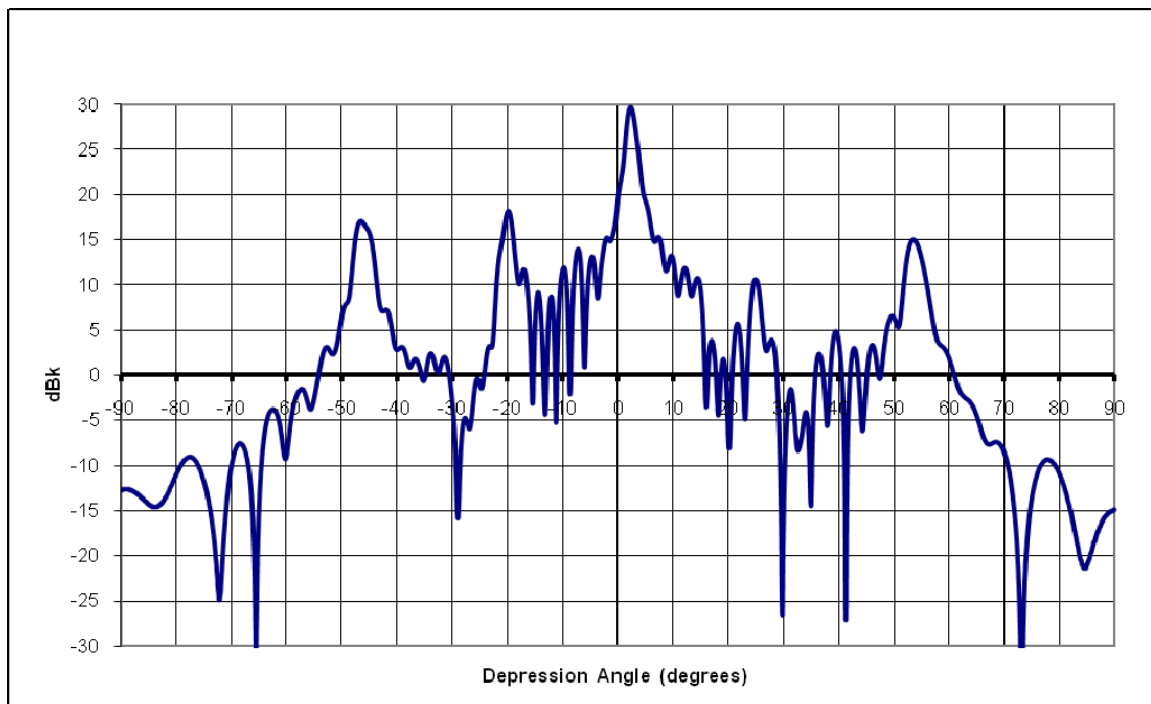
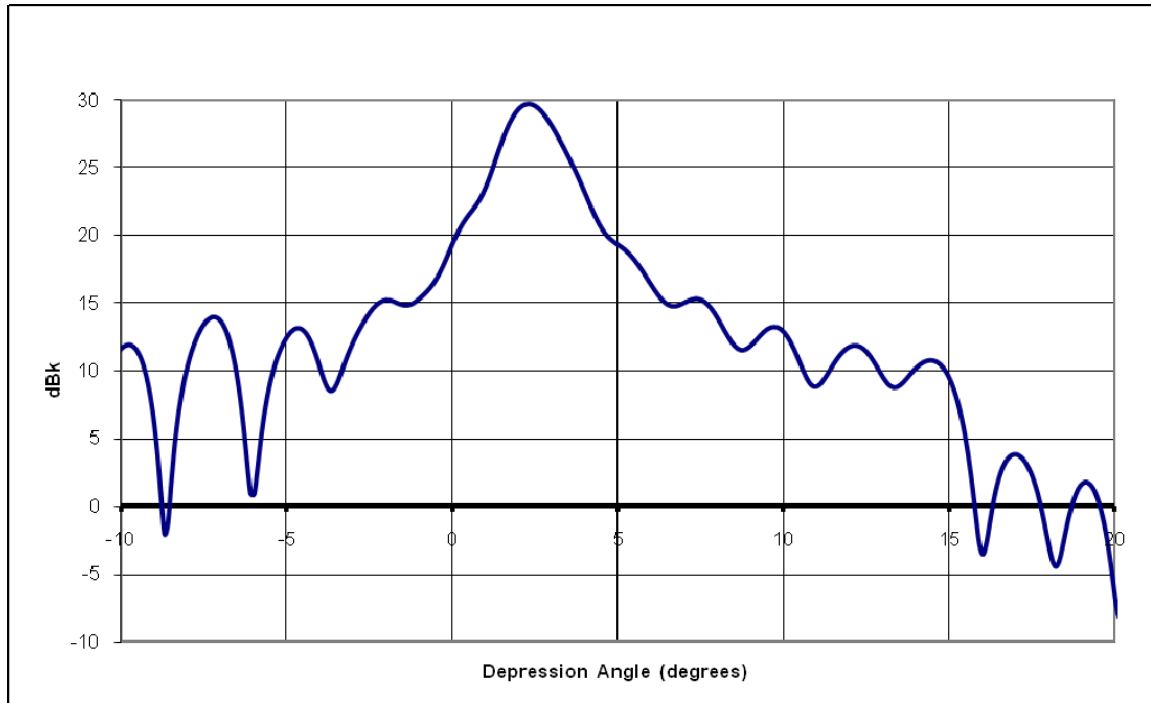


Figure 7b

KJLA-DT Channel 49 Ventura, CA
Effective Radiated Power Elevation Pattern (dBk)
RFS PHP46EA at 272 Degrees Azimuth
Based on data supplied by manufacturer

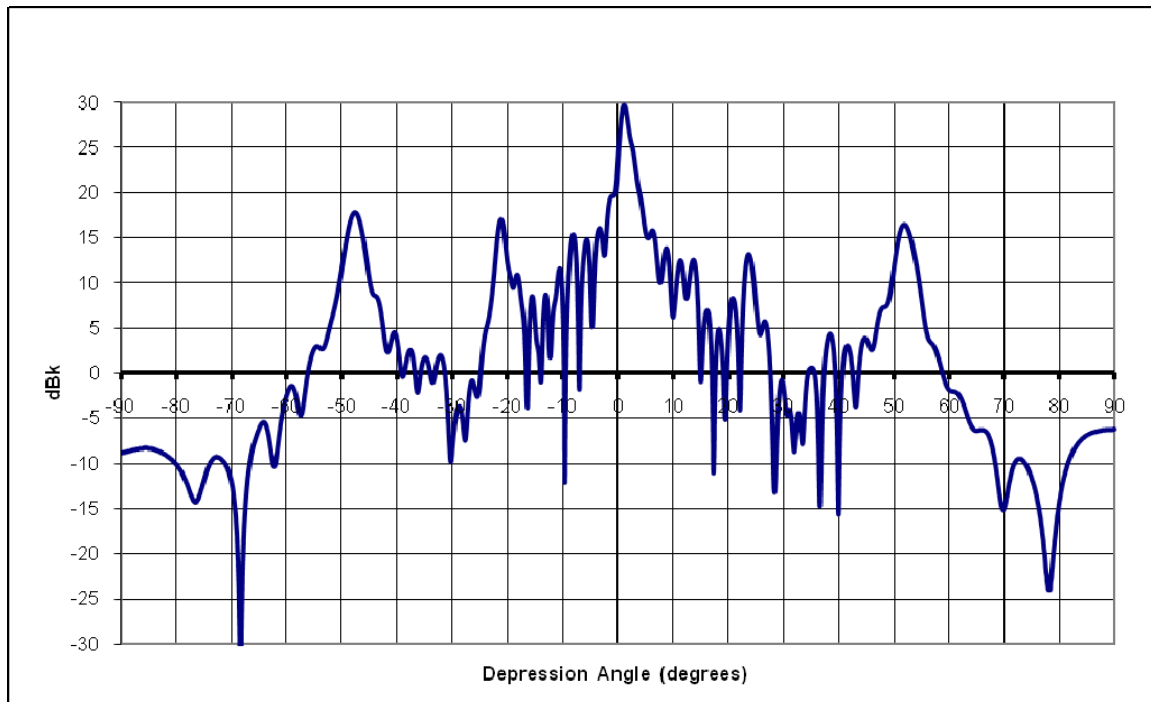
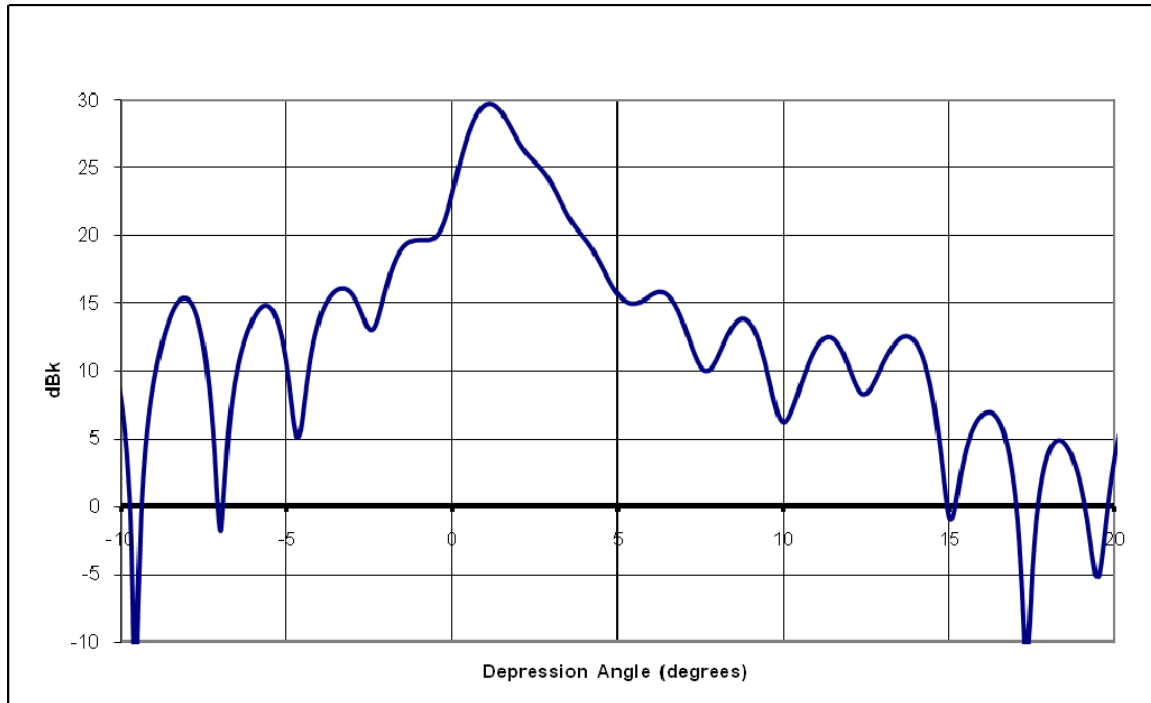


Figure 7c

KJLA-DT Channel 49 Ventura, CA
Effective Radiated Power Elevation Pattern (dBk)
RFS PHP46EA at 352 Degrees Azimuth
Based on data supplied by manufacturer

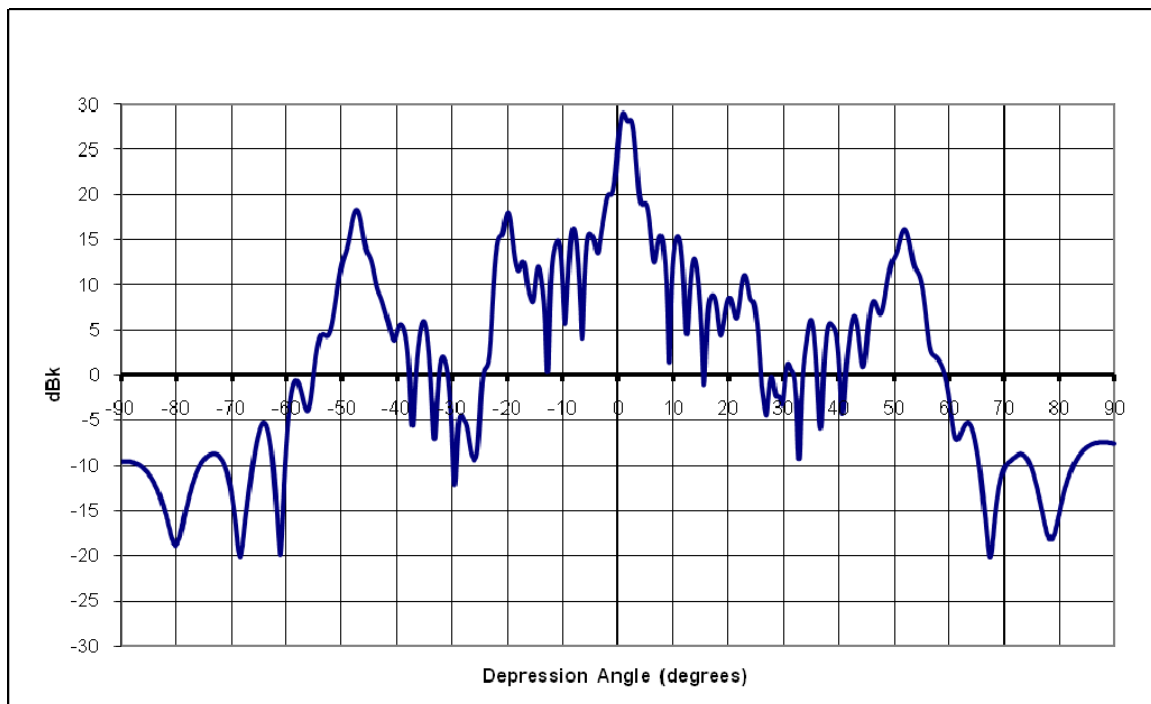
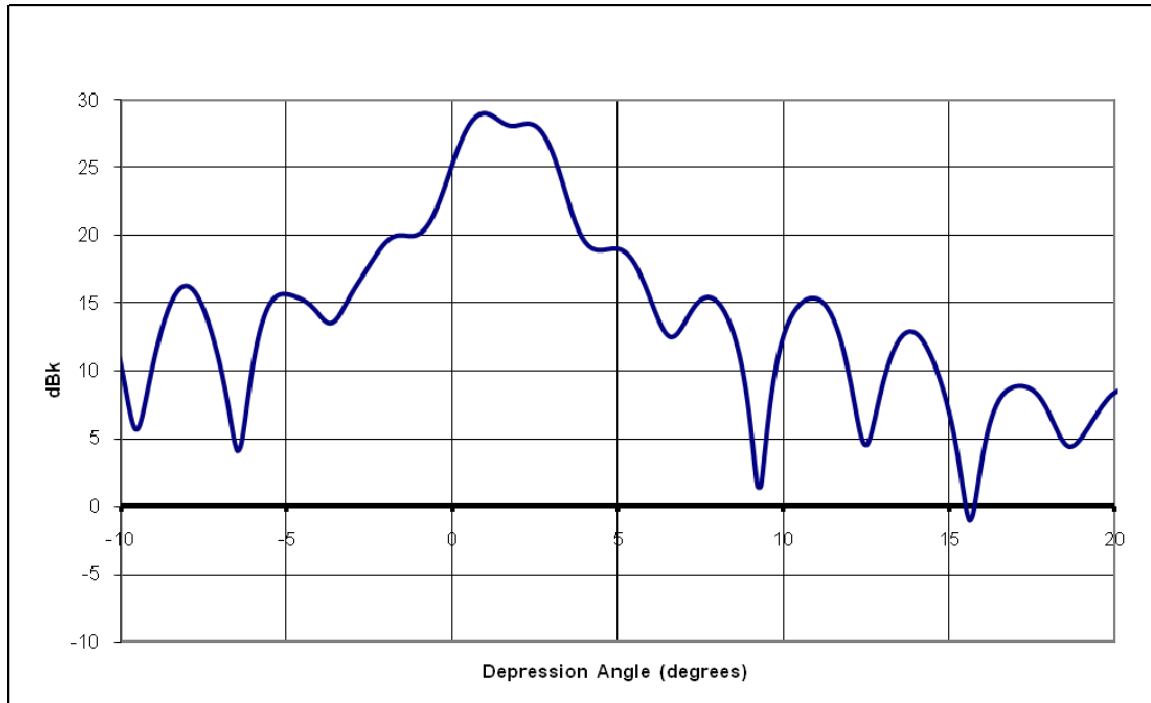


Figure 7d

KJLA-DT Channel 49 Ventura, CA
Effective Radiated Power Elevation Pattern (dBk)
RFS PHP46EA at 40 Degrees Azimuth
Based on data supplied by manufacturer

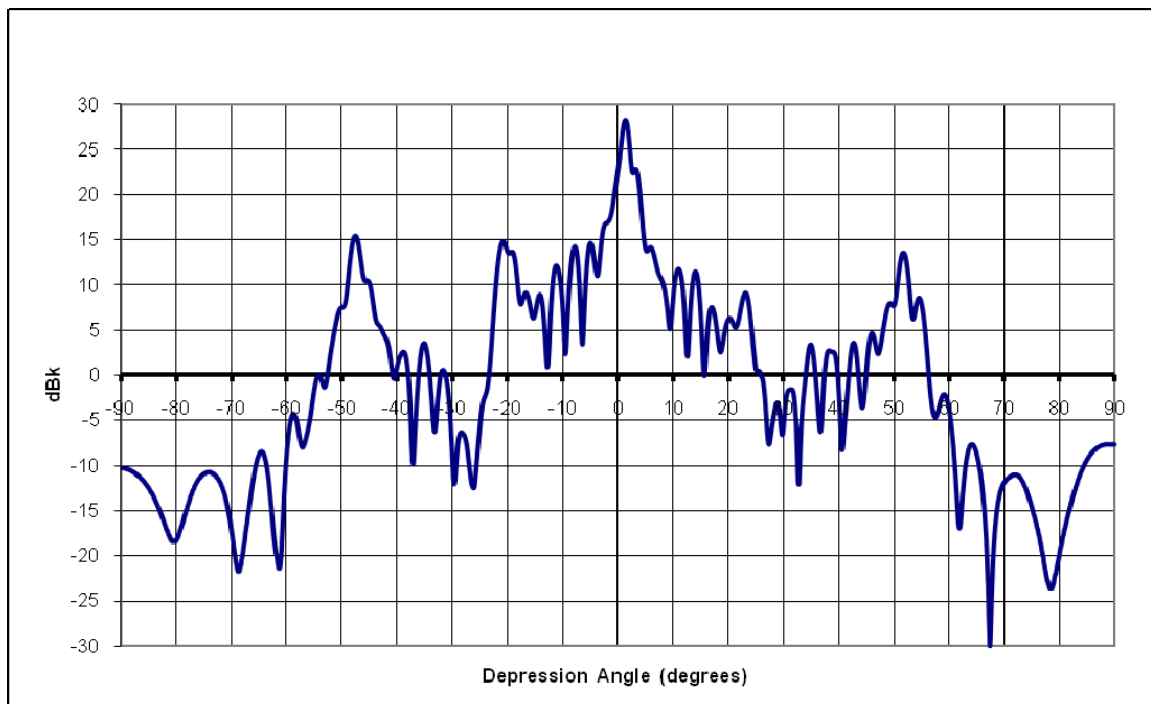
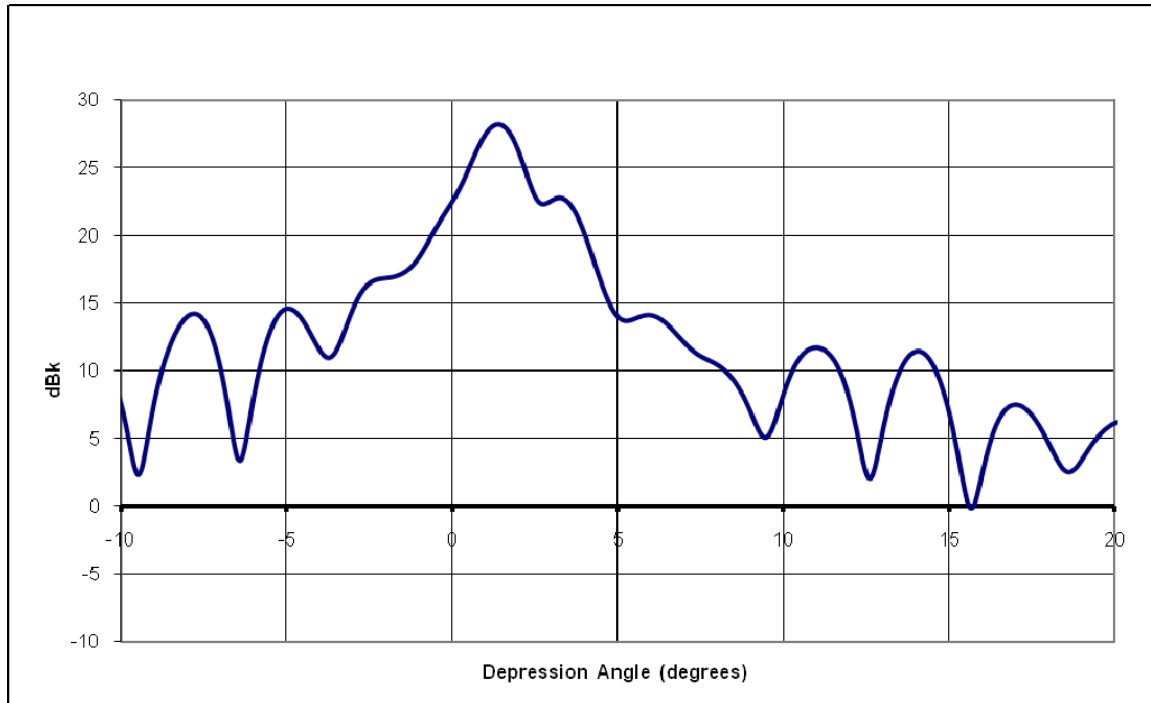


Figure 7e

**Figure 8 — Tabulation of Vertical Plane Radiation Data
RFS Model PHP46EA Antenna — Channel 49**

40 Degrees			96 Degrees			184 Degrees			272 Degrees			352 Degrees		
Elev. Angle	Rel. Field	ERP (dBk)	Elev. Angle	Rel. Field	ERP (dBk)	Elev. Angle	Rel. Field	ERP (dBk)	Elev. Angle	Rel. Field	ERP (dBk)	Elev. Angle	Rel. Field	ERP (dBk)
-5	0.1708	14.65	-5	0.1828	15.24	-5	0.1343	12.56	-5	0.1025	10.21	-5	0.1922	15.68
-4.5	0.1524	13.66	-4.5	0.1738	14.80	-4.5	0.1412	13.00	-4.5	0.0737	7.35	-4.5	0.1825	15.23
-4	0.1190	11.51	-4	0.0866	8.75	-4	0.1023	10.20	-4	0.1589	14.02	-4	0.1595	14.06
-3.5	0.1204	11.61	-3.5	0.0461	3.27	-3.5	0.0899	9.08	-3.5	0.1989	15.97	-3.5	0.1559	13.86
-3	0.1718	14.70	-3	0.1545	13.78	-3	0.1290	12.21	-3	0.1887	15.52	-3	0.1985	15.96
-2.5	0.2125	16.55	-2.5	0.2229	16.96	-2.5	0.1651	14.35	-2.5	0.1421	13.05	-2.5	0.2477	17.88
-2	0.2214	16.90	-2	0.1991	15.98	-2	0.1835	15.27	-2	0.2054	16.25	-2	0.3010	19.57
-1.5	0.2308	17.26	-1.5	0.1208	11.64	-1.5	0.1757	14.90	-1.5	0.2869	19.15	-1.5	0.3174	20.03
-1	0.2660	18.50	-1	0.1592	14.04	-1	0.1859	15.39	-1	0.3046	19.67	-1	0.3218	20.15
-0.5	0.3401	20.63	-0.5	0.2885	19.20	-0.5	0.2189	16.80	-0.5	0.3144	19.95	-0.5	0.3964	21.96
0	0.4271	22.61	0	0.3787	21.57	0	0.2973	19.46	0	0.4623	23.30	0	0.5869	25.37
0.5	0.5675	25.08	0.5	0.4044	22.14	0.5	0.3808	21.61	0.5	0.7674	27.70	0.5	0.8135	28.21
1	0.7570	27.58	1	0.5567	24.91	1	0.4806	23.64	1	0.9639	29.68	1	0.8967	29.05
1.5	0.8111	28.18	1.5	0.7815	27.86	1.5	0.7142	27.08	1.5	0.8929	29.02	1.5	0.8282	28.36
2	0.6440	26.18	2	0.8426	28.51	2	0.9343	29.41	2	0.6986	26.88	2	0.8110	28.18
2.5	0.4393	22.86	2.5	0.7453	27.45	2.5	0.9536	29.59	2.5	0.5866	25.37	2.5	0.8053	28.12
3	0.4293	22.66	3	0.6430	26.16	3	0.8026	28.09	3	0.4868	23.75	3	0.6463	26.21
3.5	0.4201	22.47	3.5	0.5301	24.49	3.5	0.6170	25.81	3.5	0.3707	21.38	3.5	0.4189	22.44
4	0.3170	20.02	4	0.3760	21.50	4	0.4533	23.13	4	0.3062	19.72	4	0.2992	19.52
4.5	0.2094	16.42	4.5	0.2858	19.12	4.5	0.3361	20.53	4.5	0.2432	17.72	4.5	0.2797	18.93
5	0.1584	14.00	5	0.2751	18.79	5	0.2926	19.33	5	0.1912	15.63	5	0.2829	19.03
5.5	0.1566	13.90	5.5	0.2719	18.69	5.5	0.2566	18.19	5.5	0.1775	14.98	5.5	0.2483	17.90
6	0.1613	14.15	6	0.2536	18.08	6	0.2078	16.35	6	0.1911	15.63	6	0.1797	15.09
6.5	0.1482	13.42	6.5	0.2181	16.77	6.5	0.1761	14.92	6.5	0.1900	15.58	6.5	0.1351	12.61
7	0.1274	12.10	7	0.1918	15.66	7	0.1795	15.08	7	0.1455	13.26	7	0.1509	13.57
7.5	0.1135	11.10	7.5	0.1694	14.58	7.5	0.1836	15.28	7.5	0.1032	10.27	7.5	0.1838	15.29
8	0.1055	10.47	8	0.1475	13.38	8	0.1569	13.91	8	0.1128	11.05	8	0.1797	15.09
8.5	0.0920	9.28	8.5	0.1481	13.41	8.5	0.1245	11.90	8.5	0.1489	13.46	8.5	0.1348	12.59
9	0.0704	6.95	9	0.1783	15.02	9	0.1245	11.90	9	0.1486	13.44	9	0.0613	5.75
9.5	0.0574	5.18	9.5	0.1976	15.92	9.5	0.1432	13.12	9.5	0.0984	9.86	9.5	0.0619	5.83
10	0.0835	8.43	10	0.1727	14.75	10	0.1395	12.89	10	0.0646	6.20	10	0.1368	12.72
10.5	0.1131	11.07	10.5	0.1206	11.63	10.5	0.1060	10.51	10.5	0.0884	8.93	10.5	0.1773	14.97
11	0.1225	11.76	11	0.0814	8.21	11	0.0880	8.89	11	0.1235	11.83	11	0.1850	15.34
11.5	0.1104	10.86	11.5	0.0919	9.27	11.5	0.1066	10.56	11.5	0.1313	12.37	11.5	0.1545	13.78
12	0.0768	7.71	12	0.1185	11.47	12	0.1236	11.84	12	0.1002	10.02	12	0.0918	9.26
12.5	0.0414	2.34	12.5	0.1121	10.99	12.5	0.1178	11.42	12.5	0.0828	8.36	12.5	0.0533	4.53
13	0.0618	5.82	13	0.0828	8.36	13	0.0946	9.52	13	0.1072	10.60	13	0.0913	9.21
13.5	0.1003	10.03	13.5	0.0767	7.70	13.5	0.0887	8.96	13.5	0.1319	12.40	13.5	0.1316	12.39
14	0.1187	11.49	14	0.1077	10.64	14	0.1033	10.28	14	0.1261	12.01	14	0.1374	12.76
14.5	0.1055	10.47	14.5	0.1301	12.29	14.5	0.1096	10.80	14.5	0.0780	7.84	14.5	0.1090	10.75
15	0.0693	6.81	15	0.1127	11.04	15	0.0939	9.45	15	0.0284	-0.93	15	0.0691	6.79
15.5	0.0343	0.71	15.5	0.0628	5.96	15.5	0.0544	4.71	15.5	0.0513	4.20	15.5	0.0308	-0.23
16	0.0427	2.61	16	0.0159	-5.97	16	0.0211	-3.51	16	0.0691	6.79	16	0.0486	3.73
16.5	0.0669	6.51	16.5	0.0444	2.95	16.5	0.0407	2.19	16.5	0.0650	6.26	16.5	0.0784	7.89
17	0.0754	7.55	17	0.0718	7.12	17	0.0494	3.87	17	0.0327	0.29	17	0.0877	8.86
17.5	0.0685	6.71	17.5	0.0688	6.75	17.5	0.0408	2.21	17.5	0.0187	-4.56	17.5	0.0851	8.60
18	0.0539	4.63	18	0.0370	1.36	18	0.0225	-2.96	18	0.0504	4.05	18	0.0698	6.88
18.5	0.0428	2.63	18.5	0.0126	-7.99	18.5	0.0254	-1.90	18.5	0.0535	4.57	18.5	0.0535	4.57

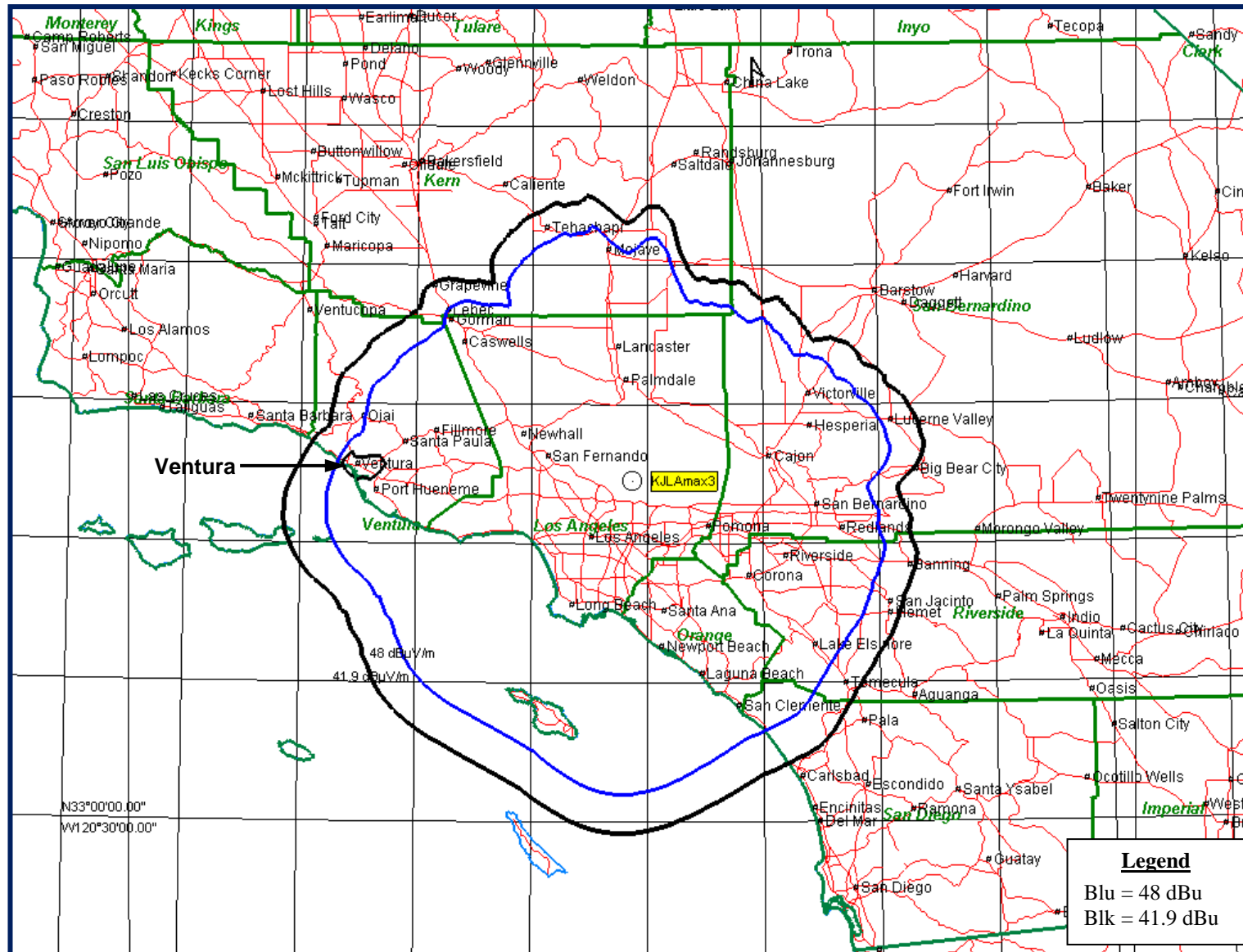
Derived from data supplied by manufacturer

**Figure 9 — Tabulation of City Grade & Noise Limited Contour Derivations
KJLA-DT Channel 49 at 1000 kW from Mt. Wilson
with RFS PHP46EA Antenna**

Azimuth	Average Terrain Elevation (meters)	Antenna Height Above Average Terrain (meters)	Effective Radiated Power (kW)	Distance to Contour F(50,90) (km)	
				City Grade 48 dBu	Noise Limited 41.9 dBu
0°	1405	421	806.4	91.7	103.8
45°	1424	402	264.8	83.0	92.7
90°	1166	660	200.3	94.6	106.6
135°	424	1402	111.4	108.6	123.7
180°	307	1519	383.6	125.3	140.9
225°	348	1478	184.2	115.9	131.7
270°	821	1005	986.0	120.1	136.0
* 273°	909	917	998.0	117.8	132.4
315°	1219	607	453.5	99.4	111.6

* Heading to Principal Community — Ventura, CA. Value not included in determination of average height above average terrain.

**Figure 10 — KJLA-DT Channel 49 — Contour Map
48 dBu (Principal Community) & 41.9 dBu (Noise Limited) Contours**



**Figure 11 — KJLA-DT Channel 49 — Comparison of Contours
Proposal vs. Currently Licensed Facility**

