

## ENGINEERING EXHIBIT

### Application for Post-Transition Digital Television Station Construction Permit

prepared for

#### Eagle Creek Broadcasting of Corpus Christi, LLC

KZTV-DT Corpus Christi, TX

Facility ID 33079

Ch. 10 13.5 kW 290 m

*Eagle Creek Broadcasting of Corpus Christi, LLC (“Eagle Creek”)* is the licensee of television station KZTV(TV), analog Channel 10 and digital Channel 18, Corpus Christi, TX. *Eagle Creek* herein proposes construction of the KZTV-DT post-transition digital facility on Channel 10. This channel was established in Appendix B of the Seventh Report and Order in MB Docket 87-278.

The instant proposal specifies an effective radiated power (“ERP”) of 13.5 kW at 290 meters antenna height above average terrain (“HAAT”), with a nondirectional antenna. The proposed coverage extends beyond that of the Appendix B parameters of 14.3 kW ERP and 287 meters HAAT. The Appendix B facility contour location falls short of portions of the KZTV analog Channel 10 Grade B contour. The Appendix B parameters were based on replication of KZTV’s former analog Channel 10 facility (BLCT-1770), which involved operation at a different site location 8.1 km distant from the current analog Channel 10 site (BLCT-20010201AEY).

The proposed digital Channel 10 operation will employ the existing non-directional antenna system licensed for KZTV’s analog Channel 10. The antenna is a horizontally polarized Andrew model ATW12V3HTC-10. The antenna is top-mounted on the existing KZTV antenna supporting structure, having FCC Antenna Structure Registration (“ASR”) number 1218044 and shared with KORO(TV) (Facility ID 64877, Corpus Christi, TX). No change to the overall structure height and no tower work are required to carry out this proposal.

A map is supplied as **Figure 1**, which depicts the standard predicted coverage contours. This map includes the location of Corpus Christi, KZTV-DT’s principal community. As demonstrated

thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 43 dB $\mu$  contour.

The proposed KZTV-DT facility's predicted service population provides a 99.3 percent match of the Appendix B facility, as detailed in the table below.

Population Summary (2000 Census) OET Bulletin 69 method	Appendix B	Proposed
Within Noise Limited Contour	539,827	536,096
Not affected by terrain losses	539,706	536,035
Lost to all interference	29	0
Net DTV Service	<b>539,677</b>	<b>536,035</b>
Match of Appendix B	---	<b>99.33%</b>

### **Freeze Waiver Request**

A waiver of the Commission's August 3, 2004 "freeze" concerning expansion in service area<sup>1</sup> is requested. The proposal complies with the criteria for a freeze waiver request outlined in the Report and Order in the Third Periodic Review.<sup>2</sup> KZTV-DT will change channel for post-transition operation and will employ its existing analog antenna.

The map attached as **Figure 2** supplies a comparison of the 36 dB $\mu$  digital service contour corresponding to the proposed KZTV-DT facility and the Appendix B parameters. As shown thereon, the amount of contour extension does not exceed five miles at any azimuth.

Absent the waiver, the KZTV-DT non-directional ERP would have to be reduced to 4.75 kW to avoid a contour extension. At this power level, the resulting DTV service contour would not cover 2,945 persons within a land area of 3,230 sq. km that are presently within the KZTV analog Grade B contour. The potential loss area is depicted in **Figure 2A**.

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<sup>1</sup>Public Notice "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.

<sup>2</sup>Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, MB Docket No. 07-91, FCC 07-228, released December 31, 2007.

A detailed interference study per OET Bulletin 69<sup>3</sup> shows that the proposal complies with the 0.5 percent limit of new interference caused to other stations' Appendix B facilities, as summarized below. Protection requirements towards authorized Class A stations are also satisfied.

**Post-Transition Interference Analysis Summary**

Ch	Call Sign	State/City Facility ID	Power (kW) HAAT (m)	Dist (km) Bear (°T)	Appendix B	New Interference	
					Baseline Population (2000 Census)	From Proposal Population	Percent
9	KLRN-DT	TX SAN ANTONIO 749	8.3 259	192.9 338.8	--- no interference caused ---		
10	KWTX-DT	TX WACO 35903	13.8 552	401.8 4.3	1,164,962	0	0.00%
11	KVCT-DT	TX VICTORIA 35846	18 290	135.5 21.3	256,245 (interference decreases)	-592	n/a

**Other Allocation Considerations**

The nearest FCC monitoring station is 38.5 km distant at Kingsville, TX. Using the FCC propagation curves, the proposed F(50,90) signal level at the monitoring station is 2.69 mV/m, which is below the 10 mV/m threshold of §73.1030(c) for further analysis. Further, the proposal represents a decrease in signal level from the current KZTV analog Channel 10 facility, which operates at 316 kW ERP and results in a F(50,50) signal of 15.5 mV/m at the monitoring station. The site is not located within the areas requiring coordination with “quiet” zones specified in §73.1030(a) and (b). There are no AM stations within 3.2 kilometers of the site, based on information contained within the Commission’s database. The site location is within the Mexican coordination zone (183 km to the Mexico border), thus further international coordination may be necessary.

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<sup>3</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission’s implementation of OET-69 show excellent correlation.

### **Human Exposure to Radiofrequency Electromagnetic Field (Environmental)**

The proposal will involve use of an existing transmitting antenna. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No tower construction or change in structure height is proposed. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. Based on OET-65 equation (10), and considering 20 percent antenna relative field in downward elevations (pattern data shows less than 20 percent relative field at angles 20 to 90 degrees below the antenna), the calculated signal density near the tower at two meters above ground level attributable to the proposed facility is  $0.2 \mu\text{W}/\text{cm}^2$ , which is 0.1 percent of the general population/uncontrolled maximum permitted exposure limit. This is well below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic field exposure in excess of FCC guidelines.

### **Certification**

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.

Joseph M. Davis, P.E.  
March 19, 2008

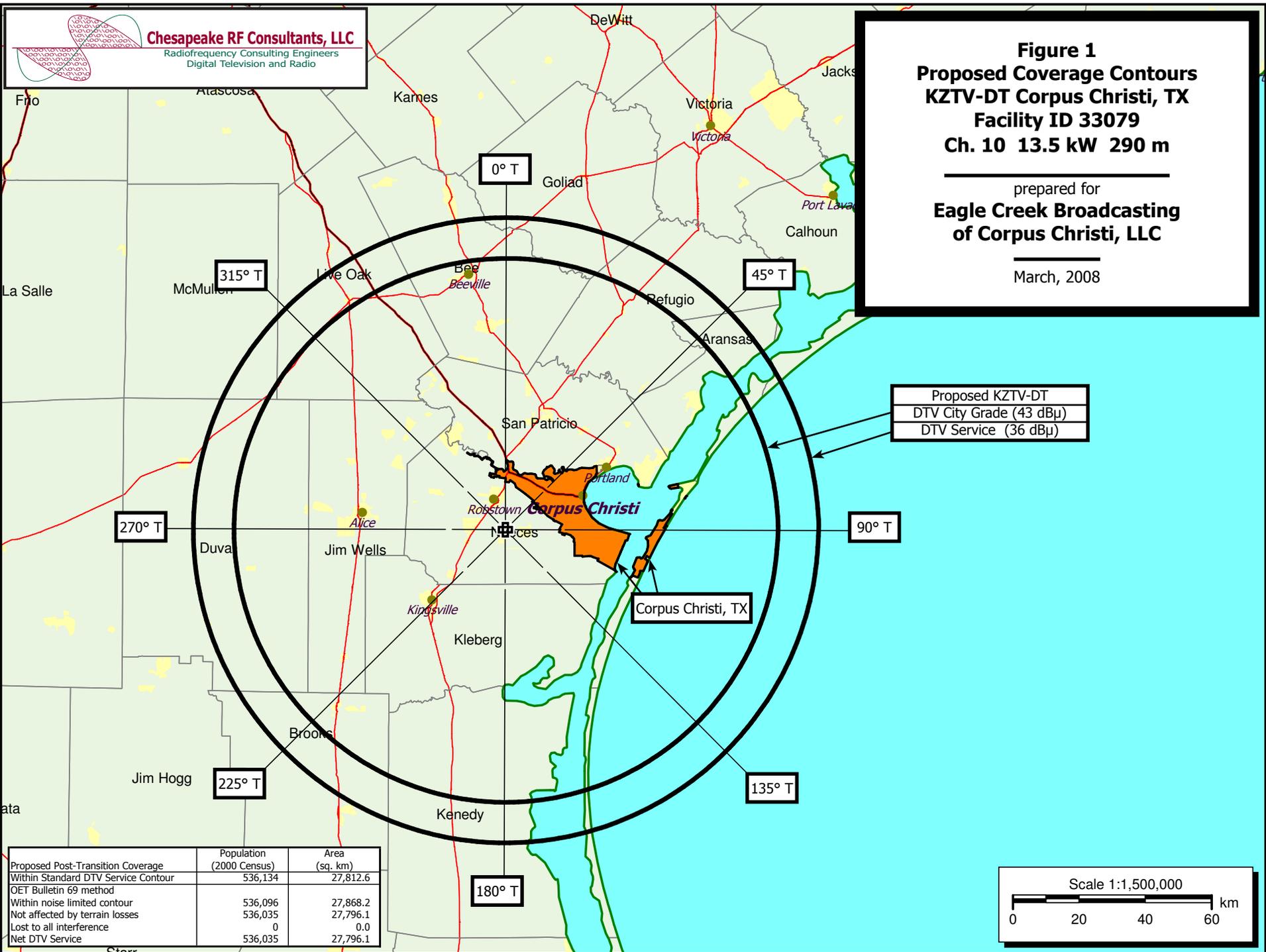
**Chesapeake RF Consultants, LLC**  
11993 Kahns Road  
Manassas, VA 20112  
703-650-9600

### List of Attachments

Figure 1	Proposed Coverage Contours
Figure 2	Coverage Contour Comparison
Figure 2A	Potential Loss Area Without Waiver
Form 301	Saved Version of Engineering Sections from FCC Form at Time of Upload

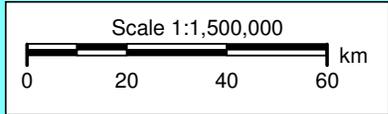
*This material was entered March 19, 2008 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*

**Figure 1**  
**Proposed Coverage Contours**  
**KZTV-DT Corpus Christi, TX**  
**Facility ID 33079**  
**Ch. 10 13.5 kW 290 m**  
 prepared for  
**Eagle Creek Broadcasting**  
**of Corpus Christi, LLC**  
 March, 2008



Proposed KZTV-DT  
 DTV City Grade (43 dBμ)  
 DTV Service (36 dBμ)

	Population (2000 Census)	Area (sq. km)
Proposed Post-Transition Coverage		
Within Standard DTV Service Contour	536,134	27,812.6
OET Bulletin 69 method		
Within noise limited contour	536,096	27,868.2
Not affected by terrain losses	536,035	27,796.1
Lost to all interference	0	0.0
Net DTV Service	536,035	27,796.1





**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

**Figure 2**  
**Coverage Contour Comparison**  
**KZTV-DT Corpus Christi, TX**  
**Facility ID 33079**  
**Ch. 10 13.5 kW 290 m**

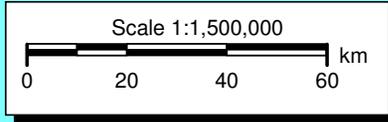
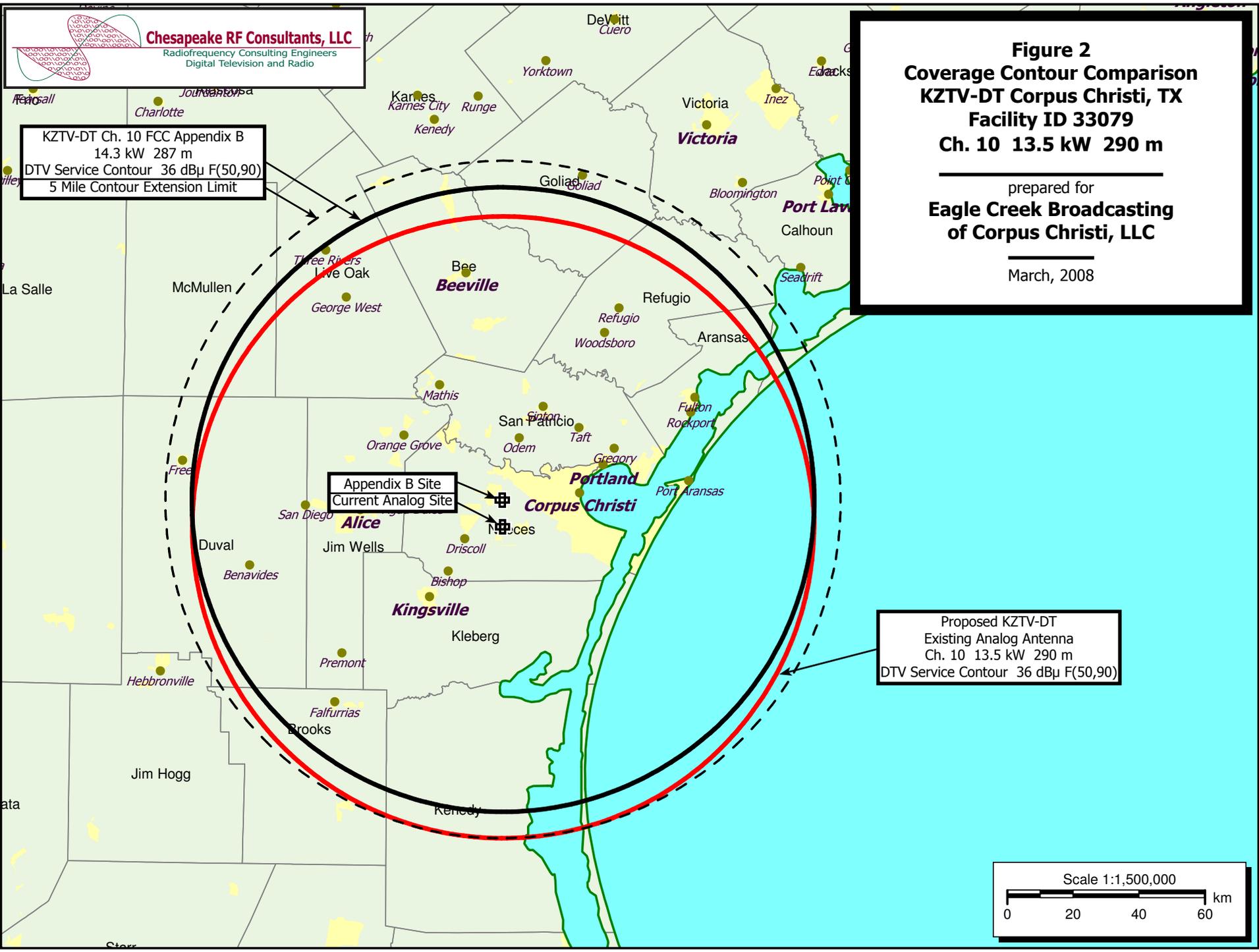
prepared for  
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March, 2008

KZTV-DT Ch. 10 FCC Appendix B  
14.3 kW 287 m  
DTV Service Contour 36 dBμ F(50,90)  
5 Mile Contour Extension Limit

Appendix B Site  
Current Analog Site

Proposed KZTV-DT  
Existing Analog Antenna  
Ch. 10 13.5 kW 290 m  
DTV Service Contour 36 dBμ F(50,90)





**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

**Figure 2A**  
**Potential Loss Area Without Waiver**  
**KZTV-DT Corpus Christi, TX**  
**Facility ID 33079**  
**Ch. 10 13.5 kW 290 m**  

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prepared for  
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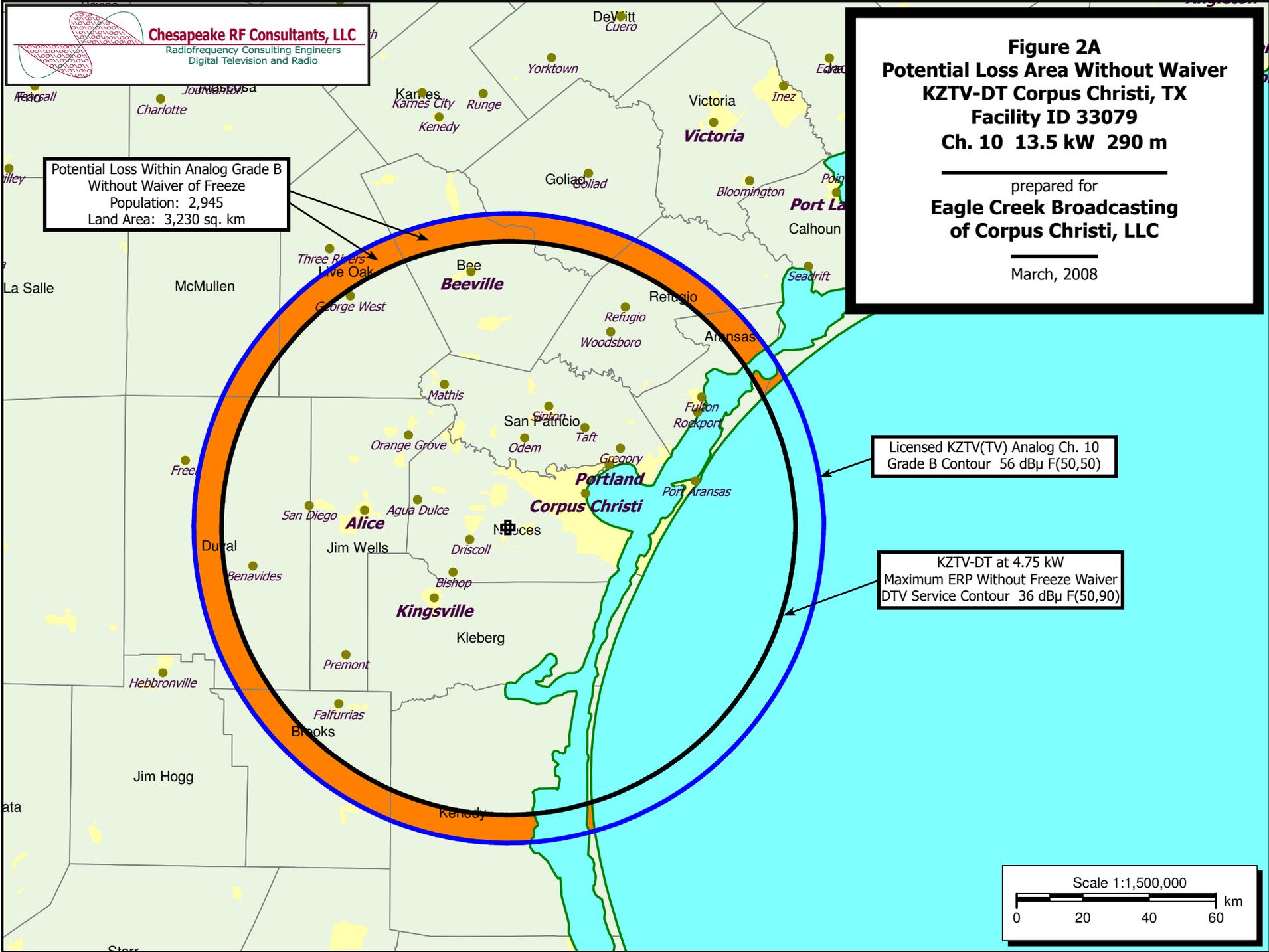
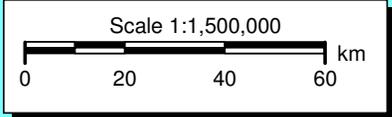
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March, 2008

Potential Loss Within Analog Grade B  
Without Waiver of Freeze  
Population: 2,945  
Land Area: 3,230 sq. km

Licensed KZTV(TV) Analog Ch. 10  
Grade B Contour 56 dBμ F(50,50)

KZTV-DT at 4.75 kW  
Maximum ERP Without Freeze Waiver  
DTV Service Contour 36 dBμ F(50,90)



SECTION III-D - DTV Engineering	
Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p><b>Pre-Transition Certification Checklist:</b> An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p><b>Post-Transition Expedited Processing.</b> An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must <b>submit the Exhibit</b> called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION III-D - DTV Engineering	
TECHNICAL SPECIFICATIONS	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
TECH BOX	
1. Channel Number:	DTV 10 Analog TV, if any 10
2. Zone:	<input type="radio"/> I <input type="radio"/> II <input checked="" type="radio"/> III
3. Antenna Location Coordinates: (NAD 27)	Latitude: Degrees 27 Minutes 42 Seconds 28 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 97 Minutes 37 Seconds 59 <input checked="" type="radio"/> West <input type="radio"/> East
4. Antenna Structure Registration Number: 1218044	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level:	18.3 meters
6. Overall Tower Height Above Ground Level:	301.4 meters
7. Height of Radiation Center Above Ground Level:	287.1 meters
8. Height of Radiation Center Above Average Terrain :	289.8 meters
9. Maximum Effective Radiated Power (average power):	13.5 kW
10. Antenna Specifications:	
a. Manufacturer AND Model	ATW12V3HTC-10

b. Electrical Beam Tilt:  
0.75 degrees  Not Applicable

c. Mechanical Beam Tilt:  
degrees toward azimuth  
degrees True  Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). [Exhibit 42]

d. Polarization:  
 Horizontal  Circular  Elliptical

e. Directional Antenna Relative Field Values:  Not applicable (Nondirectional)

[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.]  
[Relative Field Values]

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If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 43]

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616?  Yes  No

[Exhibit 44]

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered "No.") [Exhibit 45]

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 46]

If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

**PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.**

**SECTION III - PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOSEPH M. DAVIS, P.E.	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 3/19/2008	
Mailing Address CHESAPEAKE RF CONSULTANTS, LLC 11993 KAHNS ROAD		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20112 -
Telephone Number (include area code) 7036509600	E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).