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**Technical Statement for
Burlington Television Acquisition Licensing LLC
DTV Maximization Construction Permit:
KGCW-DT
Channel 41
Burlington, IA
Construction Permit in File No. BPCDT-19991028AFB**

Introduction

This Technical Statement provides the supplemental technical data and information required for an application on FCC Form 301 “Application for Construction Permit for Commercial Broadcast Station” by Burlington Television Acquisition Licensing LLC (“Burlington”) for its digital television facilities at Burlington, IA. Burlington seeks a construction permit to maximize the facility of its digital television station, Station KGCW-DT, on Channel 41. KGCW-DT holds an authorized construction permit in File Number BPCDT-19991028AFB. The current application seeks only to increase the post-transition power of the KGCW-DT facility currently under construction. The antenna radiation center will remain at the same height, and the azimuth and elevation patterns will be unchanged. This Technical Statement addresses the additional information required by Section III-D – DTV Engineering of the Form 301 application.

Facility

The only change proposed by the current application is an increase in power from 500 kW to 615 kW ERP. The facility will continue to include the currently authorized side-mounted antenna on the tower currently being built. The proposed height above ground level to the center of radiation of the antenna will remain 387 meters. This level

corresponds to a height above average terrain of 388 meters. Full specifications for the proposed facility are provided below in Figure 1. Since the location of the antenna on the tower and the location of the tower itself at the Aledo, IL site are unchanged, no tower layout drawing or map of the site is included in this document. Similarly, since the antenna is unchanged, the pattern plots and tabulated data also are not included herewith. Complete specifications of the antenna system and its mounting were provided within the exhibits that accompanied the application for the current facilities in File Number BPCDT-19991028AFB, and they remain unchanged. The contour map required by §73.625(b) is provided in Figure 2.

The combination of height above average terrain (HAAT) and effective radiated power (ERP) proposed for KGCW-DT does not exceed the maximum facilities permitted for UHF DTV operations under §73.622(f)(8)(i) of the Commission's rules and, thus, is permissible under the rules.

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 2, 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. Furthermore, a shadow study demonstrates that there is not a major obstruction in the path over Burlington – the principal community.

Interference to Other Stations

Since the proposal is to increase the power of the station, new interference studies were conducted to determine that adequate protection would be provided to all stations within the distances prescribed by the FCC rules. A version of the Commission's TV_Process program designed to evaluate post-transition interference 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 Class A service contour population in the fifth column, the total population predicted to be impacted by interference with KGCW-DT assumed to be operating with the parameters included in the Table of Allotments (Appendix B) 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 proposed facilities are shown alongside the percent changes in population impacted from the Table of Allotment values. The dashes shown on most rows indicate instances in which the TV_Process program reported that the “proposal causes no interference,” meaning that there were no cells in its initial culling study that indicated interference. Thus, in these cases, no further examination was required, and the number of scenarios studied was zero. When multiple scenarios existed and TV_Process studied them, the worst-case population impact was selected for presentation in the table.

Table 1 summarizes fourteen cases involving seven stations implicated in the power increase of KGCW-DT and therefore requiring analysis. All but two cases show that analysis beyond the initial culling study was unnecessary. The two cases requiring full study both report zero new predicted interference. Thus, there is no impermissible interference predicted for the proposed KGCW-DT facility with its effective radiated power increased to 615 kW.

Consideration of Class A Station

The Commission’s Rules specify protection to be afforded by full service DTV stations to analog and digital LPTV stations that have achieved Class A status.¹ 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 power increase of KGCW-DT. The TV_Process program discovered in the CDBS database contour overlaps to no facilities of any

¹ Section 73.623(c)(5), *Minimum technical criteria for modification of DTV allotments included in the initial DTV Table of Allotments and for applications filed pursuant to this section.*

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

Chnl	Station	City	ARN	DTV Baseline / Service Pop	Appendix B Interference Population	Scen- arios	CP Mod Interference Population	% Change
41	WICD-DT	Champaign, IL	BMPCDT-20041215AAN	991,005	69,631	2	69,631	0.0000
41	WICD-DT	Champaign, IL	DTVPLN-DTVP1470	991,005	69,631	2	69,631	0.0000
41	WOCH-CA	Chicago, IL	BSTA-20060109ACO	—	—	—	—	—
41	WOCH-CA	Chicago, IL	BLTTA-20060103ACT	—	—	—	—	—
41	WOCH-CA	Chicago, IL	BPTTA-20050127ALO	—	—	—	—	—
41	KMCI-DT	Lawrence, KS	BPCDT-20080306AAQ	—	—	—	—	—
41	KMCI-DT	Lawrence, KS	DTVPLN-DTVP1471	—	—	—	—	—
41	WGBA-DT	Green Bay, WI	BMPCDT-20080207AAN	—	—	—	—	—
41	WGBA-DT	Green Bay, WI	DTVPLN-DTVP1488	—	—	—	—	—
41	WMLW-CA	Milwaukee, WI	BLTTA-20021002AAA	—	—	—	—	—
42	WQRF-DT	Rockford, IL	BMPCDT-20070207ABW	—	—	—	—	—
42	WQRF-DT	Rockford, IL	DTVPLN-DTVP1499	—	—	—	—	—
42	WICS-DT	Springfield, IL	BLCDT-20050627AAI	—	—	—	—	—
42	WICS-DT	Springfield, IL	DTVPLN-DTVP1500	—	—	—	—	—

Class A stations. Nevertheless, as shown in Table 1, the TV_Process program conducted further analysis of these facilities, which resulted in reports that the “proposal causes no interference” in all cases. Thus, there is no impermissible interference to Class A stations predicted for the proposed KGCW-DT facility with its effective radiated power increased to 615 kW.

International Coordination

The KGCW-DT transmitter site is within neither the Canadian nor the Mexican coordination zone. Thus, no coordination with either country is required for this application.

Environmental Impact / Radio Frequency Radiation

By the time the power increase requested herein is implemented, the antenna will have been installed on an already-approved tower now under construction at an already-approved transmitter site. Therefore, none of the conditions of significant environmental effect specified in §1.1307(a) that would trigger the requirement for an Environmental Assessment (EA) exist for this application.

With respect to Radio Frequency Radiation (RFR), the Maximum Permissible Exposure (MPE) limits in §1.1310 for both General Population/Uncontrolled Exposure and Occupational/Controlled Exposure are computed not to be exceeded in the area surrounding the tower, as determined using methods of OET Bulletin Number 65 and Supplement A thereto (Edition 97-01). In fact, the maximum exposure in the area surrounding the tower is calculated to be less than 0.19 percent of the General Population/ Uncontrolled MPE and less than 0.04 percent of the Occupational/Controlled MPE.

Given that the predicted levels of RFR are below 5 percent of the MPE for the General Population/Uncontrolled Exposure situation, the proposed facility is categorically excluded from requirements for the making of measurements to confirm the radiation levels in the region around the tower and for the submission of a detailed RF exposure analysis of the site. Nevertheless, Burlington recognizes its responsibility for the safety

and health of employees and contractors when exposed to RF radiation conditions. It undertakes to assure protection to workers when they must enter into areas with high radiation levels, such as when necessary to work on antennas and towers. Steps to be taken will include measurements and monitoring as well as power reductions or turning off the transmitter if necessary to ensure a safe working environment.

Notifications

The site at Aledo 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. The nearest FCC monitoring station, furthermore, is over 430 km distant. Thus, none of the notifications mandated or recommended by Section 73.1030 is required in this instance.

Summary

The increase in effective radiated power of the KGCW-DT facility to 615 kW has been shown to fall within the maximum value permitted by the Commission's rules and also has been shown not to produce impermissible interference to any other station.

Furthermore, the station is not in an international coordination zone. As a result, the KGCW-DT application for a construction permit to increase its power to 615 kW ERP post transition should be immediately grantable.

**Figure 1 — Technical Specifications — Proposed KGCW-DT Facility
Channel 41 — Burlington, IA**

Frequency

Channel	41
Frequency Band	632 – 638 MHz
Center Frequency	635 MHz

Location

Site	Aledo, IL
Geographic Coordinates (NAD27)	41° 08' 08.0" N 90° 48' 30.0" W
Tower Registration (FAA Study Number)	1222627 (1999-AGL-4863-OE)

Elevation

Elevation of site above mean sea level	192.6 m
Overall height of tower above site elevation	431.9 m
Overall height of tower above mean sea level	612.0 m
Height of antenna radiation center above site elevation	387.0 m
Elevation of average terrain (45-degree spaced radials, 3.2-16.1 km)	191.6 m
Height of antenna radiation center above mean sea level	579.6 m
Height of antenna radiation center above average terrain (HAAT)	388.0 m

Antenna

Manufacturer	Dielectric
Model	TFU-22JSC-R C152
Description	Side-Mounted, Center Fed, Slotted Coaxial
Orientation (direction of primary axis of azimuth pattern)	255 degrees true
Electrical beamtilt	1.0°
Mechanical beamtilt	None
Polarization	Horizontal
Gain (in horizontal plane – 0° depression)	17.10 (12.33 dB)
Gain (peak of beam – 1.0° depression)	30.00 (14.77 dB)

Power

Effective radiated power (ERP) (main beam – 1.0° depression)	615 kW
Effective radiated power (ERP) (toward avg. radio horizon – 0.546° dn.)	552.1 kW
Effective radiated power (ERP) (horizontal plane)	350.6 kW

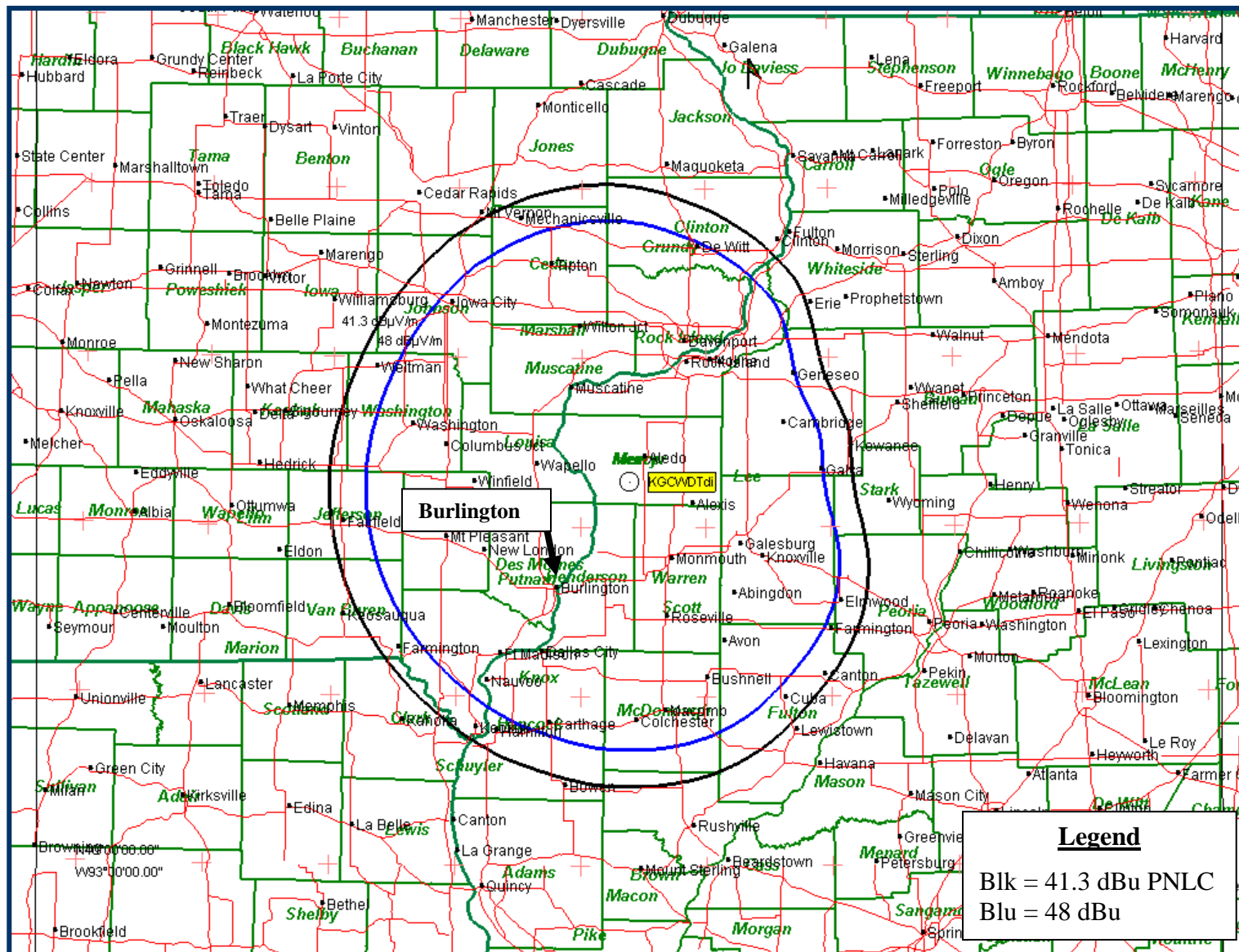


Figure 2 — 41.3 dBu Noise Limited and 48 dBu Principal Community Contours of Proposed KGCW-DT Facility