



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION TO AMEND
AN APPLICATION FOR CONSTRUCTION PERMIT
FOR POST-TRANSITION DTV STATION
BPCDT-20080411ABZ
KRBK-DT - OSAGE BEACH, MISSOURI
CH. 49 - 575 kW - 311.3 m HAAT**

Prepared for: Koplars Communications International, Inc.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by Koplars Communications International, Inc., permittee of KRBK(TV), channel 49, Osage Beach, Missouri, to prepare this statement, and the associated exhibits in support of an application to amend a pending application for a post-transition DTV construction permit, BPCDT-20080411ABZ. Koplars Communications International, Inc. was the successful winning bidder and obtained construction permit BNPCT-20060421ACD, in Auction #64. That permit was granted on August 11, 2006, and expires August 11, 2009. The KRBK analog television facility authorized on channel 49 has no separate digital channel allotment, is considered a "singleton" and, as such, was allotted digital facilities in the new Post-Transition DTV Table of Allotments on its analog channel 49. The permittee herein seeks to amend its proposed post-transition DTV facilities in its pending application, BPCDT-20080411ABZ.

PROPOSED POST-TRANSITION DTV FACILITIES

The post-transition DTV facilities for KRBK-DT set forth in the new DTV Table of Allotments specify an Effective Radiated Power (ERP) of 204 kW and an Antenna Height Above Average Terrain (HAAT) of 463 meters at the analog construction permit site geographic coordinates. The Table also specifies a directional antenna, ID number 80245, which differs slightly from the directional antenna authorized in the construction permit, antenna ID number 72668. This difference appears to be a result of the Commission’s DTV replication process.

The permittee proposes post-transition digital facilities on channel 49 that differ from the new post-transition DTV Table facilities in that the ERP is increased from 204 kW to 575 kW, the directional antenna is replaced with a non-directional antenna, the geographic coordinates are changed from 37 49 10 N.L. - 92 44 52 W.L. to 37 42 26 N.L - 93 16 32 W.L. and the HAAT, 463 meters, is changed to 311.3 meters. See the table below which shows the proposed changes in **bold**.

166319	MO	OSAGE BEACH	49	49	204	463	80245	374910	924452	23362	524	0
166319	MO	OSAGE BEACH	49	49	575	463		374326	931632	27040	595	0

Interference studies using the Commission’s Longley-Rice methodology indicates that the proposed post-transition DTV facilities comply with the requirements of the rules and policies regarding interference protection to pre and post transition DTV facilities and existing analog facilities. The proposed DTV facilities cause no increase in interference exceeding 0.5% to the population of any relevant facility.

PROPOSED CHANGES IN PENDING APPLICATION

The pending application proposes a tower support structure which would extend to 479.2 meters above ground level (AGL). The permittee, according to a recommendation of the FAA, herein proposes a shorter tower structure that will only extend to 327.3 meters AGL. As a result the HAAT will decrease from 463 meters to 311.3 meters. The ERP will increase from 500 kW to 575 kW and the permittee proposes to install a non-directional antenna, a Dielectric model TFU-36 GTH O6, instead of the directional antenna proposed in the currently pending application.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 4 shows the predicted Noise Limited (41 dBu) contour, and the principal community (48 dBu) contour. The 48 dBu contour completely encompasses the principal community of license, Osage Beach, Missouri.

ALLOCATION CONSIDERATIONS

DTV Allocation Considerations

A study was performed to determine if the instant application for amendment to an application for construction permit for KRBK-DT is predicted to cause any level of new prohibited interference to domestic DTV stations, expansion construction permits or DTV allotments. Results of the study, utilizing the FCC's own application processing software, indicate that the instant application is predicted to cause no unacceptable level of new interference to the populations served by any domestic DTV station, expansion construction permit or allotment. .

Class A Television Allocation Considerations

As required in Section 73.616(f) of the FCC's Rules, a study was performed, using the FCC's application processing software. The study revealed that no class A stations will be affected by the instant proposal.

BLANKETING AND INTERMODULATION INTERFERENCE

There is one FM radio station, and several non-broadcast facilities, but there are no other television broadcast stations nor any AM radio broadcast stations located within 10 km of the proposed KRBK-DT antenna site. The permittee, however, does recognize its responsibility to investigate and remedy any complaints of interference that might result from the implementation of this proposal, in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, (frequency/1500). The MPE level for "controlled" environments is 1.0 milliwatts per

centimeter squared (mW/cm^2) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, (frequency/300). The predicted emissions of KRBK-DT channel 49 must be considered, along with the predicted emissions from any other proposed stations at the proposed site. For KRBK-DT, which operates on television Channel 49 (680-686 MHz), the MPE is 0.455 milliwatts per centimeter squared (mW/cm^2) in an "uncontrolled" environment and 2.275 mW/cm^2 in a "controlled" environment. The proposed KRBK-DT facility will operate with a maximum ERP of 575 kW from a horizontally polarized omni-directional transmitting antenna with a centerline height of 317.8 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the KRBK-DT facility is predicted to produce a power density at two meters above ground level of 0.01742 mW/cm^2 , which is 3.83% of the FCC's guideline value for an "uncontrolled" environment, and 0.766% of the FCC's guideline value for "controlled" environments (see Appendix A). The total percentage of the ANSI value at the proposed site, considering the cumulative radiation of all post-transition stations within relevant proximity is only 3.83% of the limit for "uncontrolled" environments, and 0.766% of the limit for "controlled" environments.

OCCUPATIONAL SAFETY

The licensee of KRBK-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the KRBK-DT antenna, and is committed to reducing power and/or ceasing operation during times of maintenance of the transmission systems, when necessary, to ensure protection to personnel.

SUMMARY

It is submitted that the instant application for construction permit for KRBK's post-transition DTV facilities on channel 49 is believed to be in substantial compliance with the Rules, Regulations and Policies of the Federal Communications Commission as set forth in the most recent Reports and Orders and Orders on Reconsideration. This statement was prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: June 16, 2008

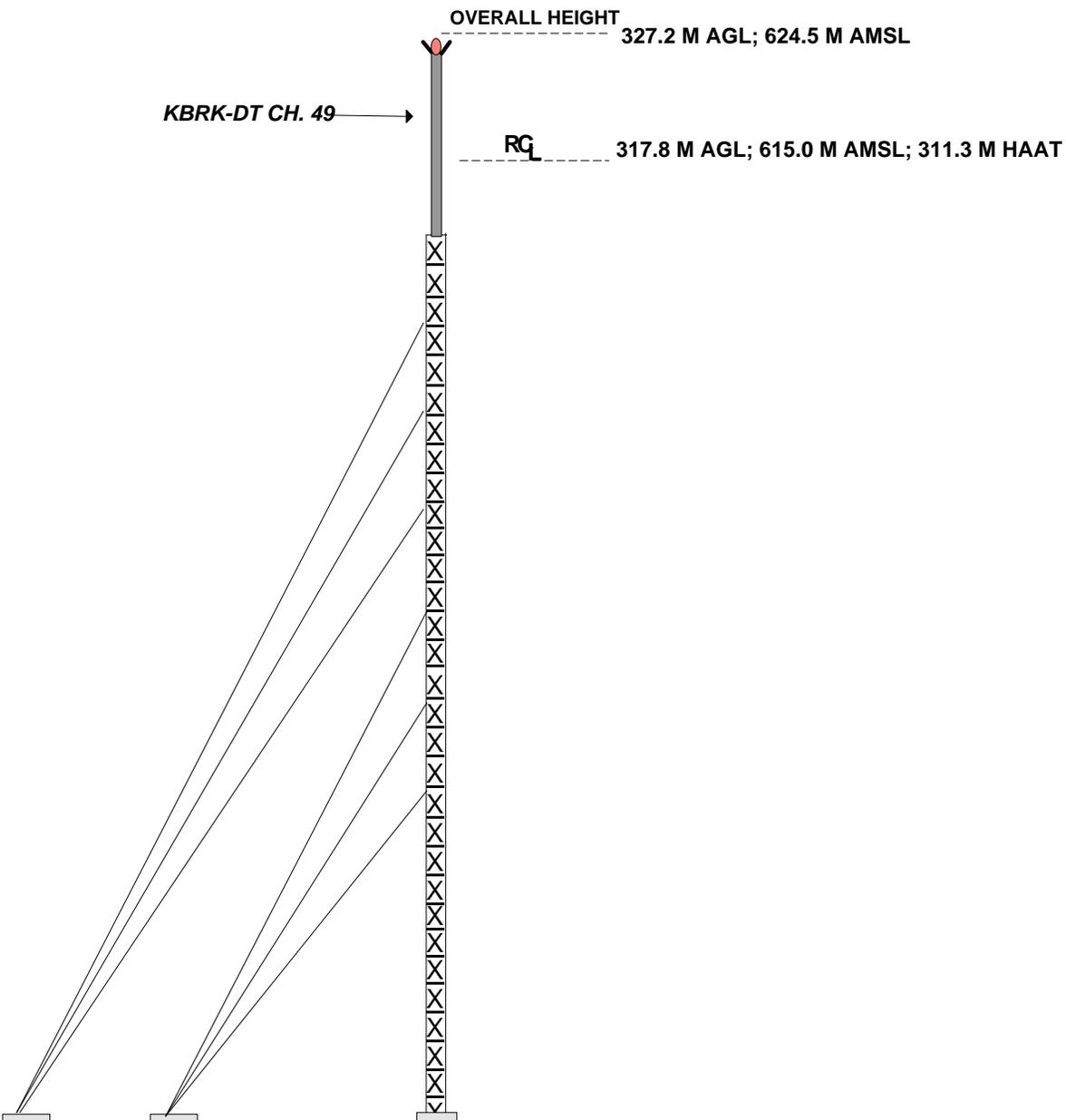

John E. Hidle, P.E.



OVERALL HEIGHT 327.2 M AGL; 624.5 M AMSL

KBRK-DT CH. 49 →

R_Q 317.8 M AGL; 615.0 M AMSL; 311.3 M HAAT



GROUND ELEVATION = 297.2 M AMSL / AVERAGE TERRAIN = 303.2 M

VERTICAL PLAN ANTENNA SKETCH

KBRK-DT, OSAGE BEACH, MISSOURI
CH. 49, 575 kW - 311.3 m HAAT

JUNE, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE

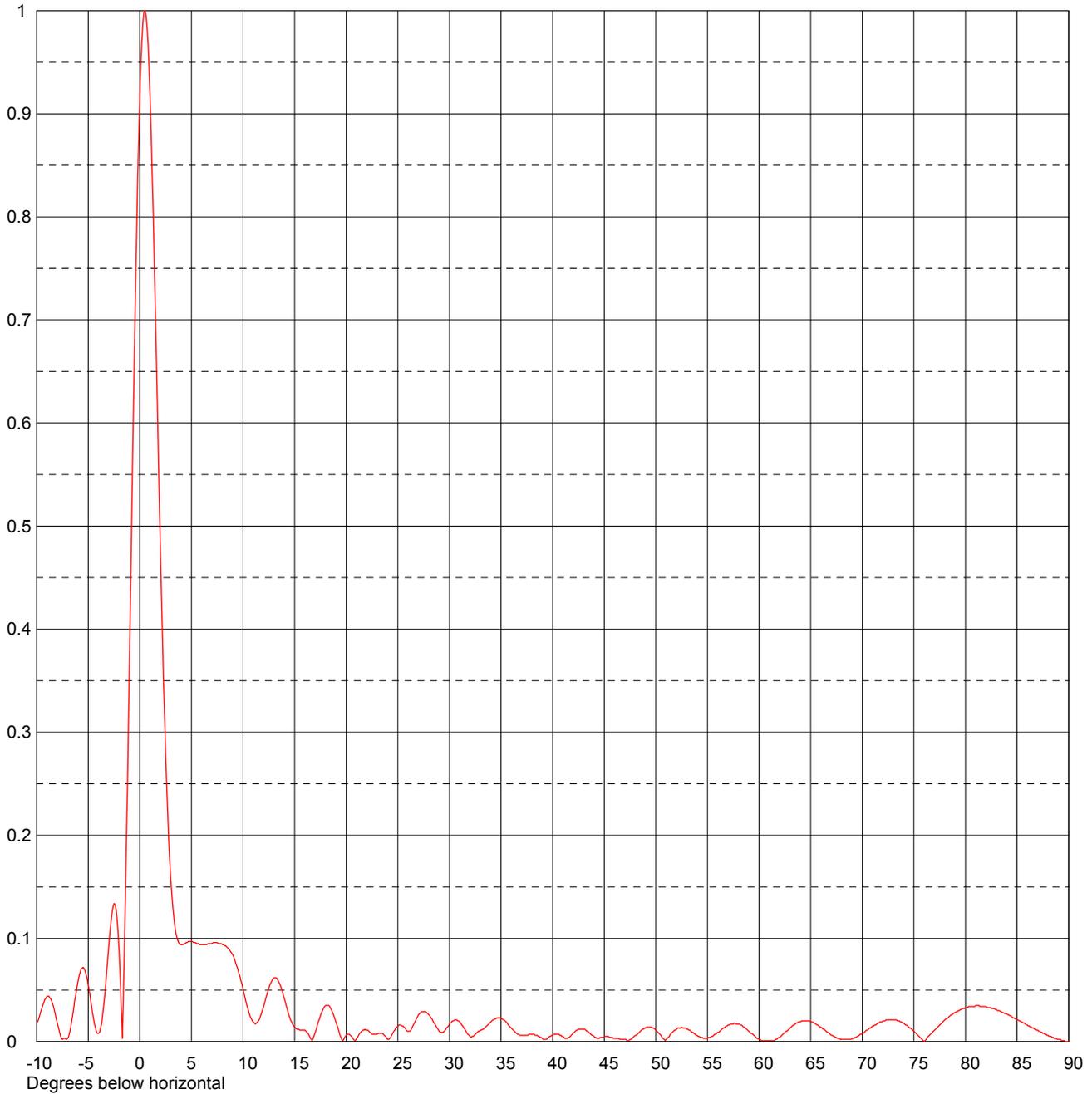


Exhibit No.
TWO-A

Date **16 Jun 2008**
Call Letters **KRBK-DT** Channel **49**
Location **Osage Beach, Missouri**
Customer **KOPLAR Communications, Inc.**
Antenna Type **TFU-36GTH O6**

ELEVATION PATTERN

RMS Gain at Main Lobe	30.0 (14.77 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	25.3 (14.03 dB)	Frequency	683.00 MHz
Calculated / Measured	Calculated	Drawing #	36G300050-90



Remarks:

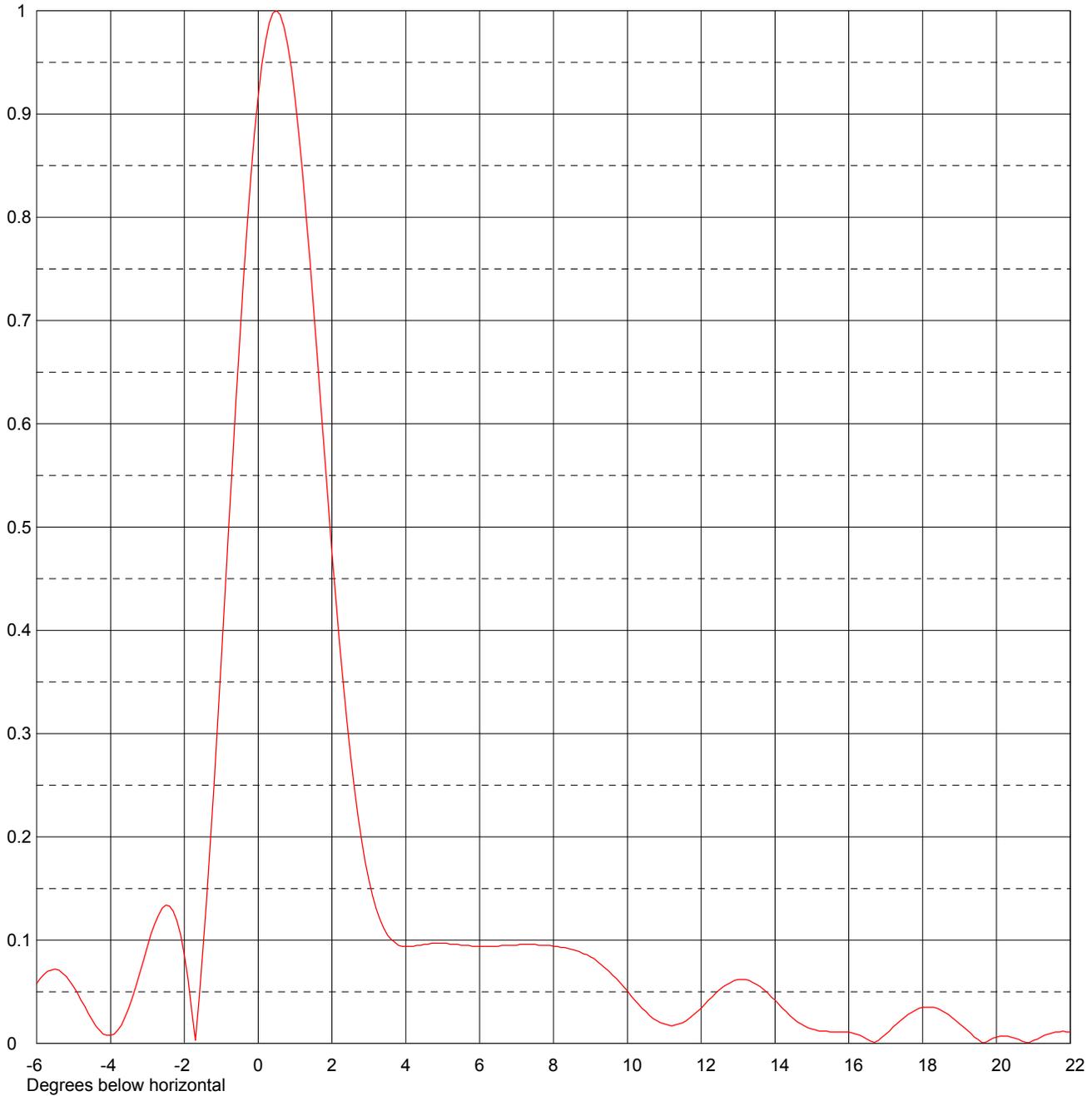


Exhibit No.
TWO-B

Date **16 Jun 2008**
Call Letters **KRBK-DT** Channel **49**
Location **Osage Beach, Missouri**
Customer **KOPLAR Communications, Inc.**
Antenna Type **TFU-36GTH O6**

ELEVATION PATTERN

RMS Gain at Main Lobe	30.0 (14.77 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	25.3 (14.03 dB)	Frequency	683.00 MHz
Calculated / Measured	Calculated	Drawing #	36G300050



Remarks:



Exhibit No.
THREE

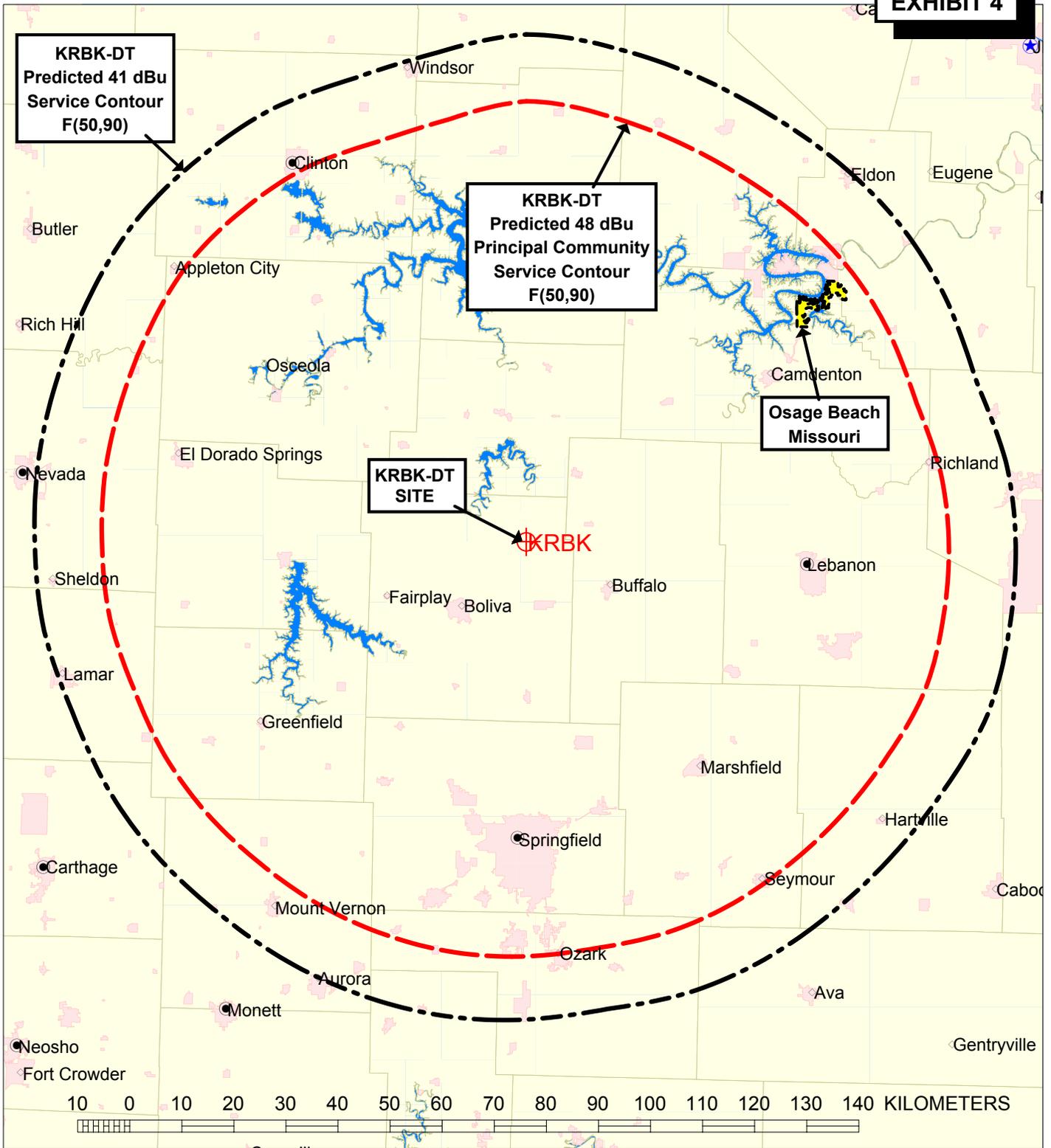
Date **16 Jun 2008**
 Call Letters **KRBK-DT** Channel **49**
 Location **Osage Beach, Missouri**
 Customer **KOPLAR Communications, Inc.**
 Antenna Type **TFU-36GTH O6**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **36G300050**

Angle	Field										
-10.0	0.015	2.4	0.314	10.6	0.027	30.5	0.021	51.0	0.002	71.5	0.018
-9.5	0.032	2.6	0.249	10.8	0.022	31.0	0.019	51.5	0.008	72.0	0.020
-9.0	0.044	2.8	0.197	11.0	0.019	31.5	0.012	52.0	0.012	72.5	0.021
-8.5	0.038	3.0	0.158	11.5	0.020	32.0	0.005	52.5	0.014	73.0	0.021
-8.0	0.018	3.2	0.130	12.0	0.034	32.5	0.007	53.0	0.012	73.5	0.020
-7.5	0.002	3.4	0.112	12.5	0.052	33.0	0.011	53.5	0.009	74.0	0.018
-7.0	0.003	3.6	0.101	13.0	0.062	33.5	0.014	54.0	0.006	74.5	0.014
-6.5	0.026	3.8	0.095	13.5	0.057	34.0	0.019	54.5	0.004	75.0	0.010
-6.0	0.058	4.0	0.094	14.0	0.042	34.5	0.022	55.0	0.003	75.5	0.005
-5.5	0.072	4.2	0.094	14.5	0.024	35.0	0.023	55.5	0.005	76.0	0.000
-5.0	0.055	4.4	0.095	15.0	0.014	35.5	0.019	56.0	0.009	76.5	0.006
-4.5	0.023	4.6	0.096	15.5	0.011	36.0	0.013	56.5	0.013	77.0	0.011
-4.0	0.008	4.8	0.097	16.0	0.011	36.5	0.008	57.0	0.016	77.5	0.016
-3.5	0.035	5.0	0.097	16.5	0.004	37.0	0.006	57.5	0.017	78.0	0.021
-3.0	0.094	5.2	0.096	17.0	0.009	37.5	0.006	58.0	0.017	78.5	0.025
-2.8	0.116	5.4	0.096	17.5	0.025	38.0	0.007	58.5	0.014	79.0	0.028
-2.6	0.131	5.6	0.095	18.0	0.035	38.5	0.006	59.0	0.010	79.5	0.031
-2.4	0.133	5.8	0.094	18.5	0.032	39.0	0.003	59.5	0.006	80.0	0.033
-2.2	0.119	6.0	0.094	19.0	0.019	39.5	0.003	60.0	0.002	80.5	0.034
-2.0	0.086	6.2	0.094	19.5	0.004	40.0	0.006	60.5	0.001	81.0	0.035
-1.8	0.032	6.4	0.094	20.0	0.006	40.5	0.007	61.0	0.001	81.5	0.034
-1.6	0.043	6.6	0.095	20.5	0.005	41.0	0.005	61.5	0.001	82.0	0.034
-1.4	0.138	6.8	0.095	21.0	0.003	41.5	0.004	62.0	0.004	82.5	0.032
-1.2	0.249	7.0	0.095	21.5	0.010	42.0	0.008	62.5	0.009	83.0	0.031
-1.0	0.371	7.2	0.096	22.0	0.011	42.5	0.012	63.0	0.013	83.5	0.029
-0.8	0.498	7.4	0.096	22.5	0.007	43.0	0.012	63.5	0.017	84.0	0.027
-0.6	0.623	7.6	0.095	23.0	0.007	43.5	0.009	64.0	0.019	84.5	0.024
-0.4	0.739	7.8	0.095	23.5	0.008	44.0	0.005	64.5	0.020	85.0	0.021
-0.2	0.839	8.0	0.094	24.0	0.002	44.5	0.003	65.0	0.019	85.5	0.019
0.0	0.918	8.2	0.093	24.5	0.008	45.0	0.005	65.5	0.017	86.0	0.016
0.2	0.971	8.4	0.092	25.0	0.015	45.5	0.004	66.0	0.014	86.5	0.013
0.4	0.998	8.6	0.090	25.5	0.015	46.0	0.003	66.5	0.010	87.0	0.011
0.6	0.996	8.8	0.087	26.0	0.010	46.5	0.002	67.0	0.006	87.5	0.008
0.8	0.967	9.0	0.084	26.5	0.016	47.0	0.002	67.5	0.004	88.0	0.006
1.0	0.915	9.2	0.079	27.0	0.026	47.5	0.002	68.0	0.002	88.5	0.004
1.2	0.844	9.4	0.073	27.5	0.029	48.0	0.006	68.5	0.002	89.0	0.002
1.4	0.759	9.6	0.066	28.0	0.026	48.5	0.010	69.0	0.003	89.5	0.001
1.6	0.665	9.8	0.059	28.5	0.018	49.0	0.013	69.5	0.005	90.0	0.000
1.8	0.570	10.0	0.051	29.0	0.010	49.5	0.014	70.0	0.008		
2.0	0.476	10.2	0.042	29.5	0.010	50.0	0.011	70.5	0.011		
2.2	0.390	10.4	0.034	30.0	0.017	50.5	0.006	71.0	0.015		

Remarks:



PREDICTED COVERAGE CONTOURS

KRBK-DT, OSAGE BEACH, MISSOURI

CH. 49, 575 kW - 311.3 m HAAT

Predicted Principal Community Contour

F(50,90) - 48 dBu

Population (2000 Census)

497,499 - 20,025 sq km

Predicted Noise Limited Contour

F(50,90) - 41 dBu

Population (2000 Census)

594,632 - 27,040 sq km

JUNE 2008



**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
KRBK-DT, OSAGE BEACH, MISSOURI
CHANNEL 49, 575 kW ERP, 311.3 meters HAAT
JUNE, 2008

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
KRBK-DT	DT	49	683	H	315	575.000	0.300	0.01742	0.455	3.83%
TOTAL PERCENTAGE OF ANSI VALUE=										3.83%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.