

ENGINEERING EXHIBIT

Application for Post-Transition Digital Television Station Construction Permit

prepared for

Wilderness Communications, LLC

KBCA-DT Alexandria, LA

Facility ID 16940

Ch. 41 210 kW 303 m

Wilderness Communications, LLC (“*Wilderness*”) is the licensee of television station KBCA(TV), analog Channel 41, Alexandria, LA. KBCA was originally authorized after April 3, 1997 and therefore does not have a companion digital channel. *Wilderness* herein proposes construction of the KBCA-DT post-transition digital facility on Channel 41 and intends to “flash cut” at the end of the transition. 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 210 kW at 303 meters antenna height above average terrain (“HAAT”), with a directional antenna. The proposed coverage extends beyond that of the Appendix B parameters of 191 kW ERP and 307 meters HAAT due to differences in the directional antenna pattern. The Appendix B facility incorporates a hypothetical directional pattern for KBCA which corresponds generally to the pattern associated with the authorized analog operation, but the pattern has become distorted with the FCC’s “carry over” procedure to digital operation due to the impact of non-uniform terrain and differences in the F(50,50) and F(50,90) propagation curves. Additionally, the proposal specifies slightly different geographic coordinates and antenna elevations from Appendix B (3 second Latitude, 11 seconds Longitude, and a 4 meter antenna height change), as the licensed KBCA parameters were corrected following the adoption of the KBCA certified parameters.

The proposed digital Channel 41 operation will employ the existing directional antenna system licensed for KBCA’s analog Channel 41. The antenna is top-mounted on the existing KBCA

antenna supporting structure, having FCC Antenna Structure Registration (“ASR”) number 1231316. No change to the overall structure height and no tower work are required to carry out this proposal.

The proposed KBCA-DT antenna system is an ERI model ATW30H3-HTC4-41H. The directional antenna’s azimuthal pattern is depicted in **Figure 1**. **Figures 2** and **2A** provide the theoretical vertical plane (elevation) pattern¹.

A map is supplied as **Figure 3**, which depicts the standard predicted coverage contours. This map includes the boundaries of Alexandria, KBCA-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 48 dB μ contour.

The proposed KBCA-DT facility’s predicted service population provides a 106.7 percent match of the Appendix B facility, as detailed in the table below.

Post-Transition Population Summary

| Population Summary (2000 Census) OET Bulletin 69 method | Appendix B | Proposed |
|--|----------------|----------------|
| Within Noise Limited Contour | 368,631 | 393,465 |
| Not affected by terrain losses | 368,631 | 393,446 |
| Lost to all interference | 2 | 21 |
| Net DTV Service | 368,629 | 393,425 |
| Match of Appendix B | --- | 106.73% |

¹ These patterns are supplied in terms of relative field. In recent years, FCC Staff have not required pattern data in dBk format however such patterns are available upon request.

Freeze Waiver Request

A waiver of the Commission's August 3, 2004 "freeze" concerning expansion in service area² is requested. The proposal complies with the criteria for a freeze waiver request outlined in the Report and Order in the Third Periodic Review.³ KBCA-DT will utilize its analog channel for post-transition operation and will employ its existing analog antenna.

The map attached as **Figure 4** supplies a comparison of the 41 dB μ digital service contours corresponding to the proposed KBCA-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 KBCA-DT directional ERP would have to be reduced to 64 kW to avoid a contour extension. At this power level, the resulting DTV service contour would not cover 21,359 persons within an area of 1,651 sq. km that are presently within the KBCA analog Grade B contour. The potential loss area is depicted in **Figure 4A**.

A detailed interference study per OET Bulletin 69⁴ shows that the proposal complies with the 0.5 percent limit of new interference caused to other stations' Appendix B facilities, as summarized in the table on the following page.

Protection requirements towards authorized Class A stations are also satisfied. The only potentially affected Class A station is KBTR-CA (Ch. 41, Baton Rouge, LA, 151.7 km distant) and an OET Bulletin 69 interference analysis with a 1 km cell size shows that there would be no interference caused to KBTR-CA.

²Public Notice "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.

³Third 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.

⁴FCC 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.

Post-Transition Interference Analysis Summary

| Ch | Call Sign | State/City Facility ID | Power (kW) HAAT (m) | Dist (km) Bear (°T) | Appendix B | |
|----|-----------|---------------------------|------------------------|------------------------|---|---|
| | | | | | Baseline Population (2000 Census) | New Interference From Proposal Population Percent |
| 40 | KBTB-DT | TX PORT ARTHUR 61214 | 1000 360 | 154.8 237.8 | --- no interference caused --- | |
| 41 | WUFX-DT | MS VICKSBURG 84253 | 209 253 | 247.2 49.7 | 445,934 (interference decreases) | -6 n/a |
| 41 | KAZH-DT | TX BAYTOWN 70492 | 1000 596 | 314.7 242.6 | --- no interference caused --- | |

Other Allocation Considerations

The nearest FCC monitoring station is 640 km distant at Kingsville, TX. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of 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 beyond the border areas requiring international coordination.

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 10 percent antenna relative field in downward elevations (pattern data shows less than 10 percent relative field at angles 15 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

0.8 $\mu\text{W}/\text{cm}^2$, which is 0.2 percent of the general population/uncontrolled maximum permitted exposure limit. This is 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 28, 2008

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

List of Attachments

- Figure 1 Antenna Horizontal Plane Pattern
- Figure 2, 2A Antenna Vertical Plane (Elevation) Pattern
- Figure 3 Proposed Coverage Contours
- Figure 4 Coverage Contour Comparison
- Figure 4A Potential Loss Area Without Waiver
- Form 301 Saved Version of Engineering Sections from FCC Form at Time of Upload

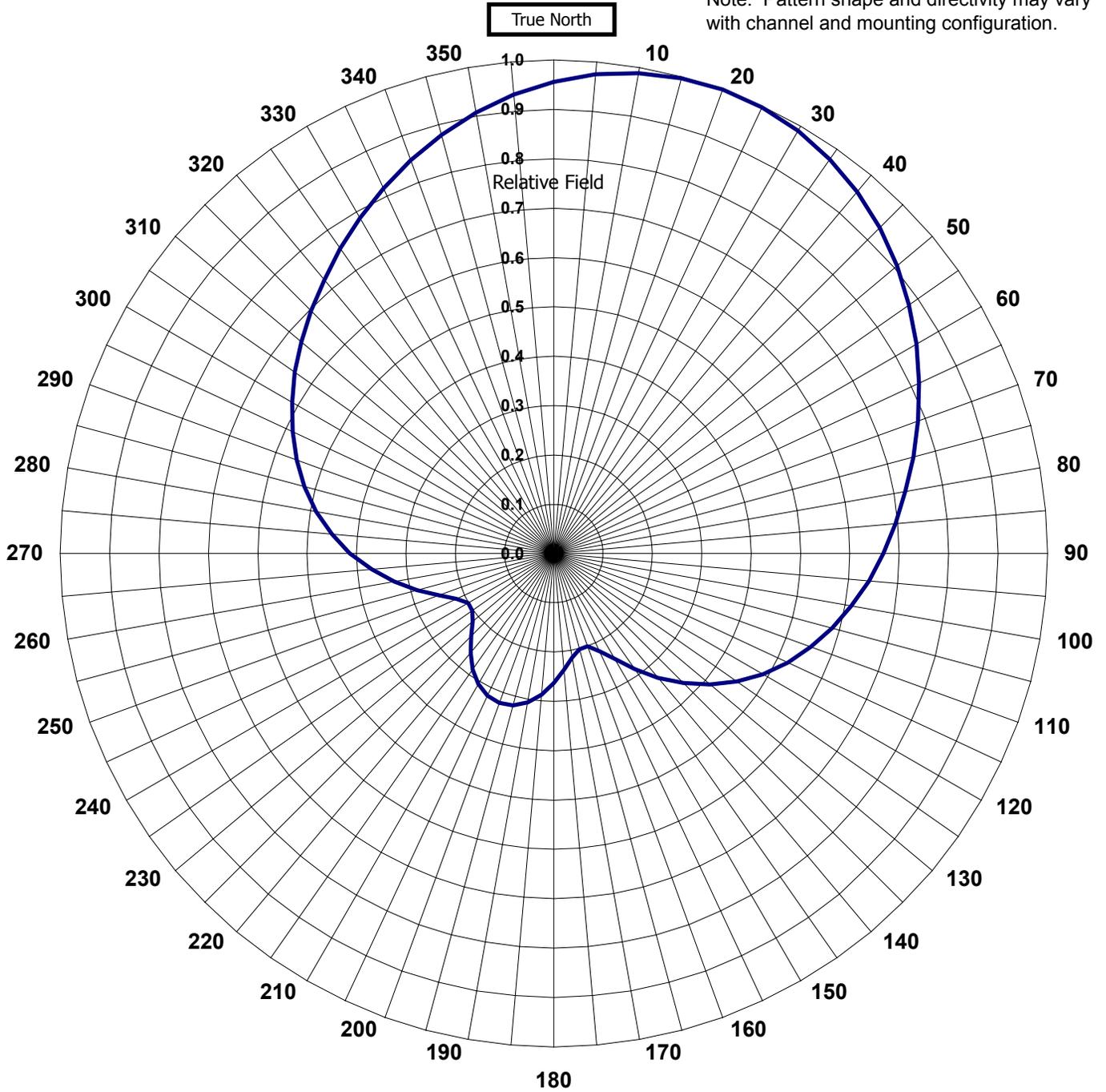
This material was entered March 28, 2008 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

AZIMUTH PATTERN

| | | |
|----------------------|-----------------------|-------------|
| TYPE: | CH41HAZ-C4 | |
| | Numeric | dB |
| Directivity: | 2.54 | 4.05 |
| Peak(s) at: | | |
| Polarization: | Horizontal | |
| Frequency: | 41(Analog) | |
| Location: | Alexandria, LA | |

**Figure 1
Antenna Horizontal
Plane Pattern**

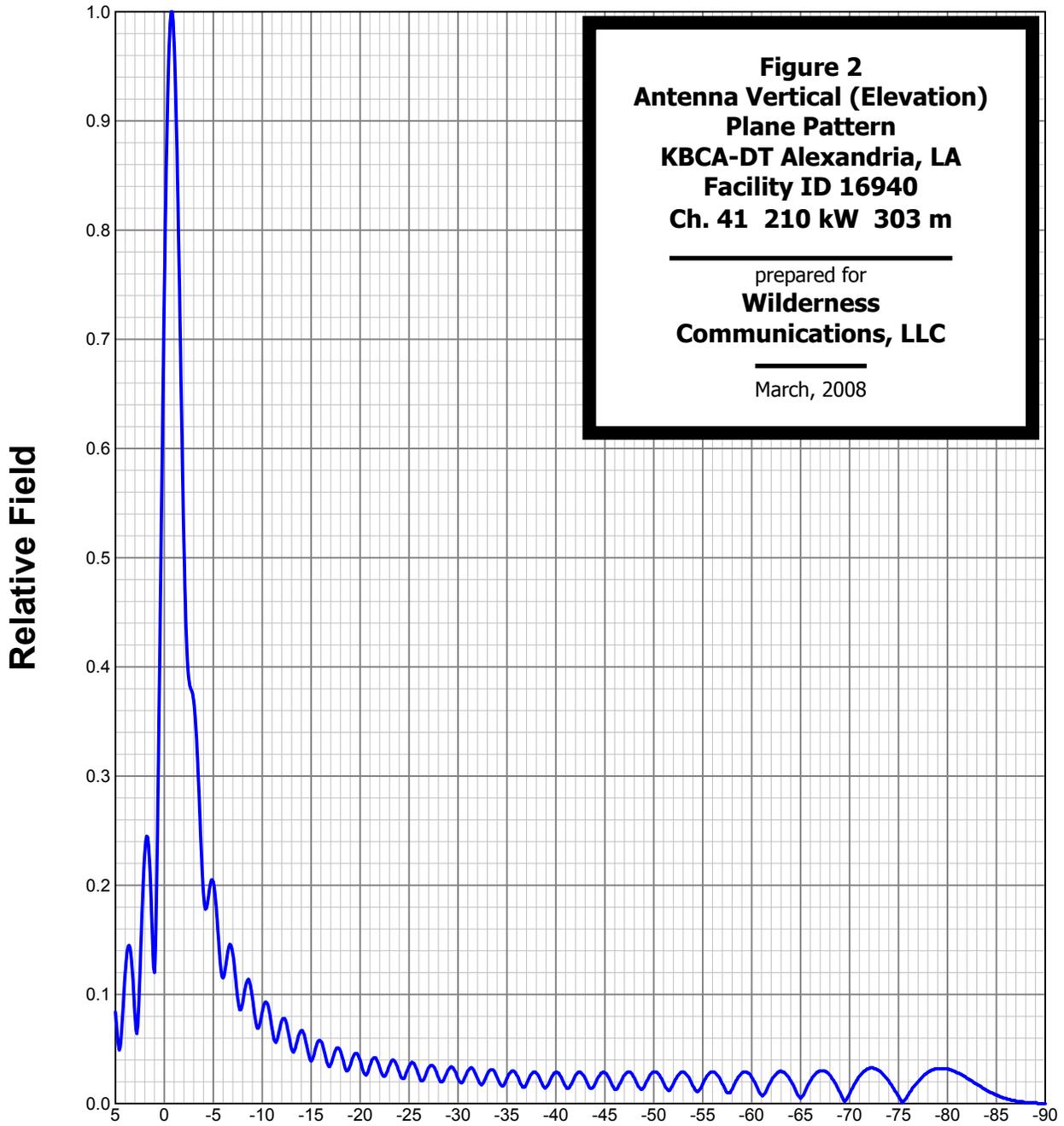
Note: Pattern shape and directivity may vary with channel and mounting configuration.



ELEVATION PATTERN

Type: ATW30H3H
Directivity: Numeric dBd
Main Lobe: 30.00 14.77
Horizontal: 16.52 12.18

Channel: 41
Location: Alexandria, LA
Beam Tilt: -0.75
Polarization: Horizontal

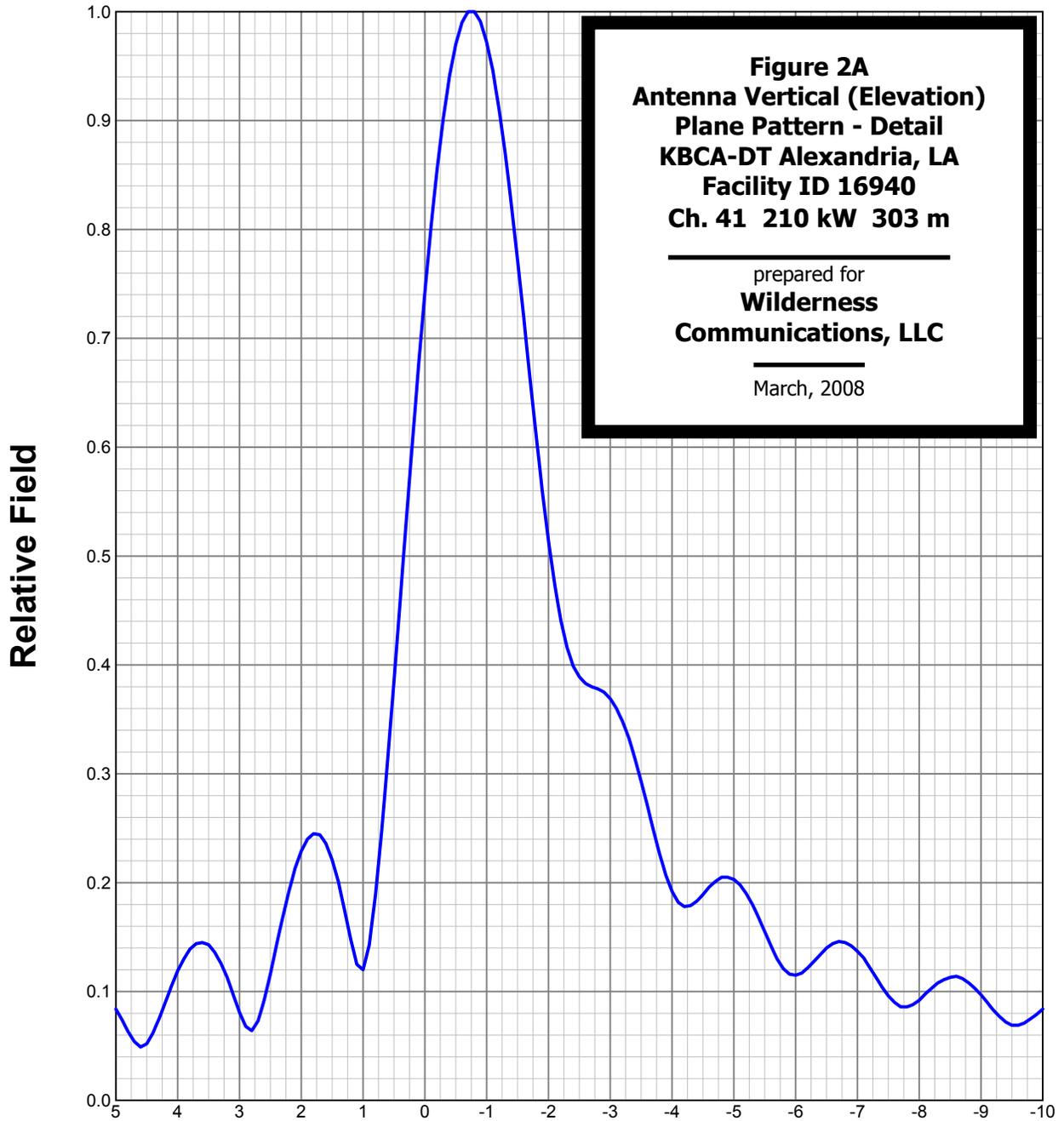


Preliminary, subject to final design and review.

ELEVATION PATTERN

Type: ATW30H3H
Directivity: Numeric dBd
Main Lobe: 30.00 14.77
Horizontal: 16.52 12.18

Channel: 41
Location: Alexandria, LA
Beam Tilt: -0.75
Polarization: Horizontal

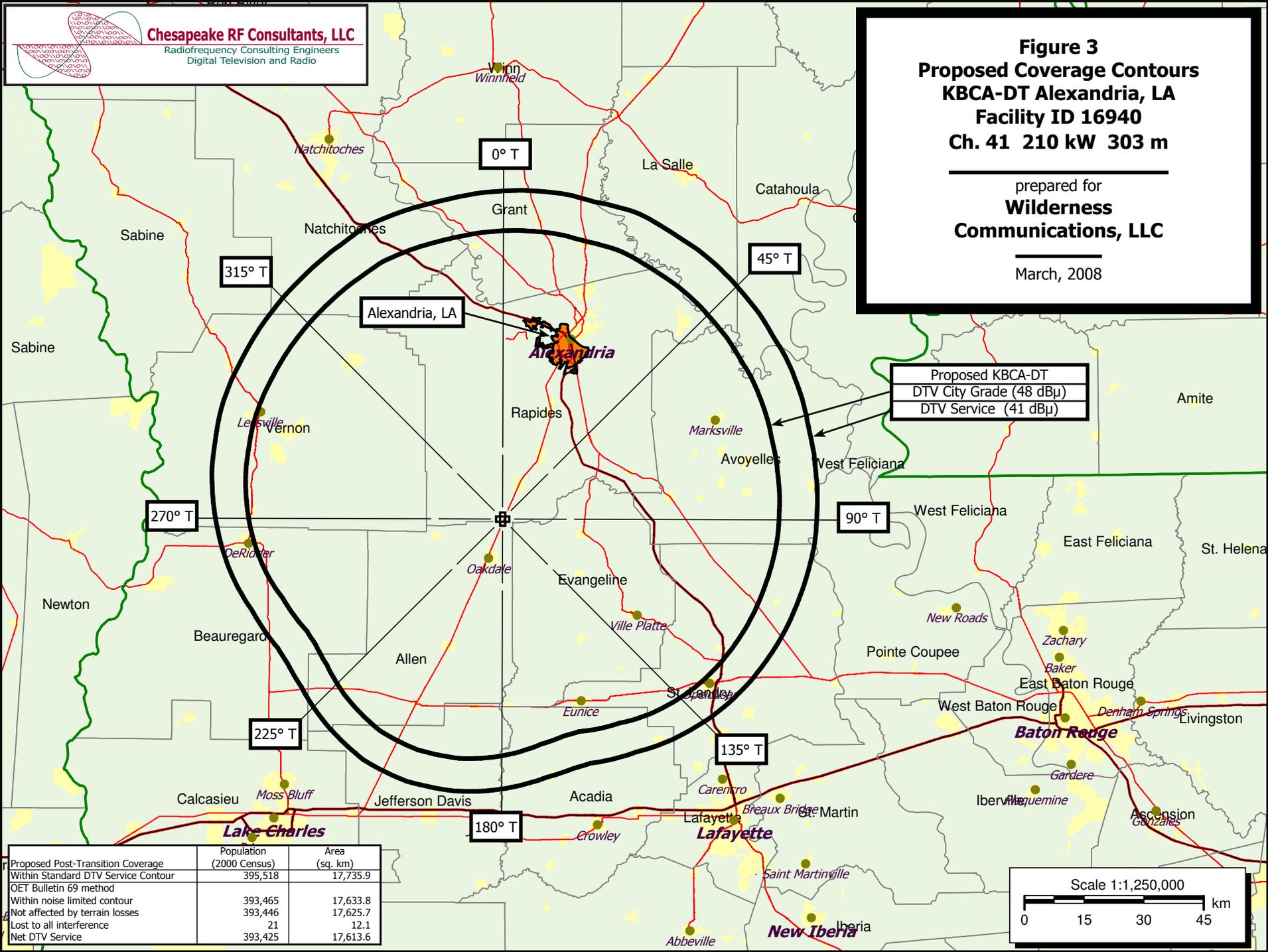


Preliminary, subject to final design and review.

Figure 3
Proposed Coverage Contours
KBCA-DT Alexandria, LA
Facility ID 16940
Ch. 41 210 kW 303 m

prepared for
Wilderness Communications, LLC

March, 2008



Proposed KBCA-DT
 DTV City Grade (48 dBμ)
 DTV Service (41 dBμ)

| Proposed Post-Transition Coverage | Population (2000 Census) | Area (sq. km) |
|-------------------------------------|--------------------------|---------------|
| Within Standard DTV Service Contour | 395,518 | 17,735.9 |
| OET Bulletin 69 method | | |
| Within noise limited contour | 393,465 | 17,633.8 |
| Not affected by terrain losses | 393,446 | 17,625.7 |
| Lost to all interference | 21 | 12.1 |
| Net DTV Service | 393,425 | 17,613.6 |

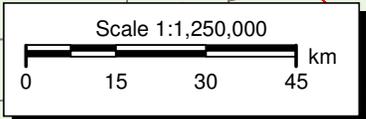
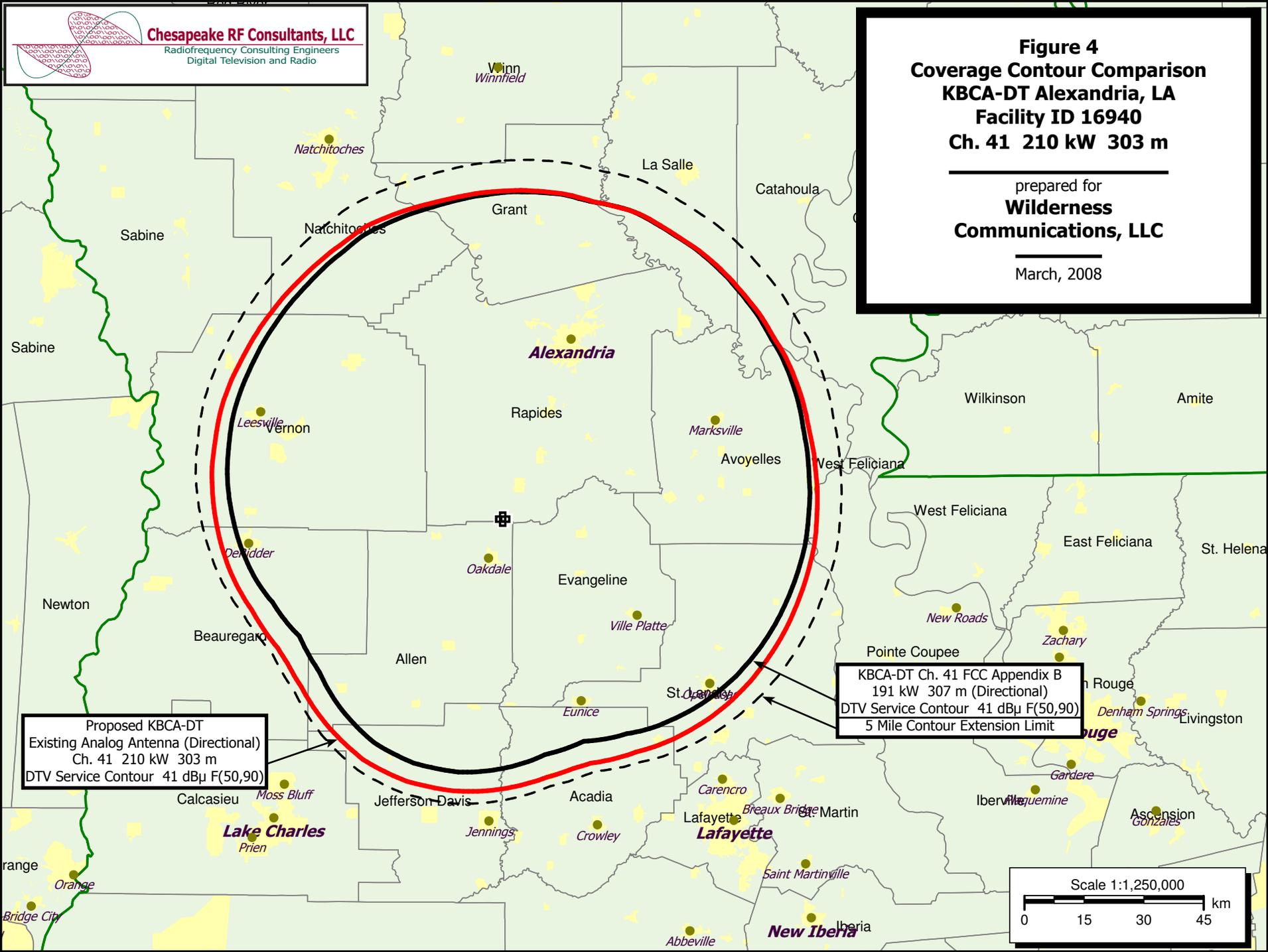


Figure 4
Coverage Contour Comparison
KBCA-DT Alexandria, LA
Facility ID 16940
Ch. 41 210 kW 303 m

prepared for
Wilderness
Communications, LLC

March, 2008



Proposed KBCA-DT
 Existing Analog Antenna (Directional)
 Ch. 41 210 kW 303 m
 DTV Service Contour 41 dBμ F(50,90)

KBCA-DT Ch. 41 FCC Appendix B
 191 kW 307 m (Directional)
 DTV Service Contour 41 dBμ F(50,90)
 5 Mile Contour Extension Limit

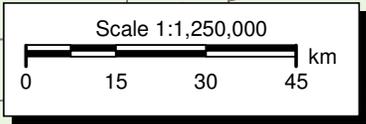


Figure 4A
Potential Loss Area Without Waiver
KBCA-DT Alexandria, LA
Facility ID 16940
Ch. 41 210 kW 303 m

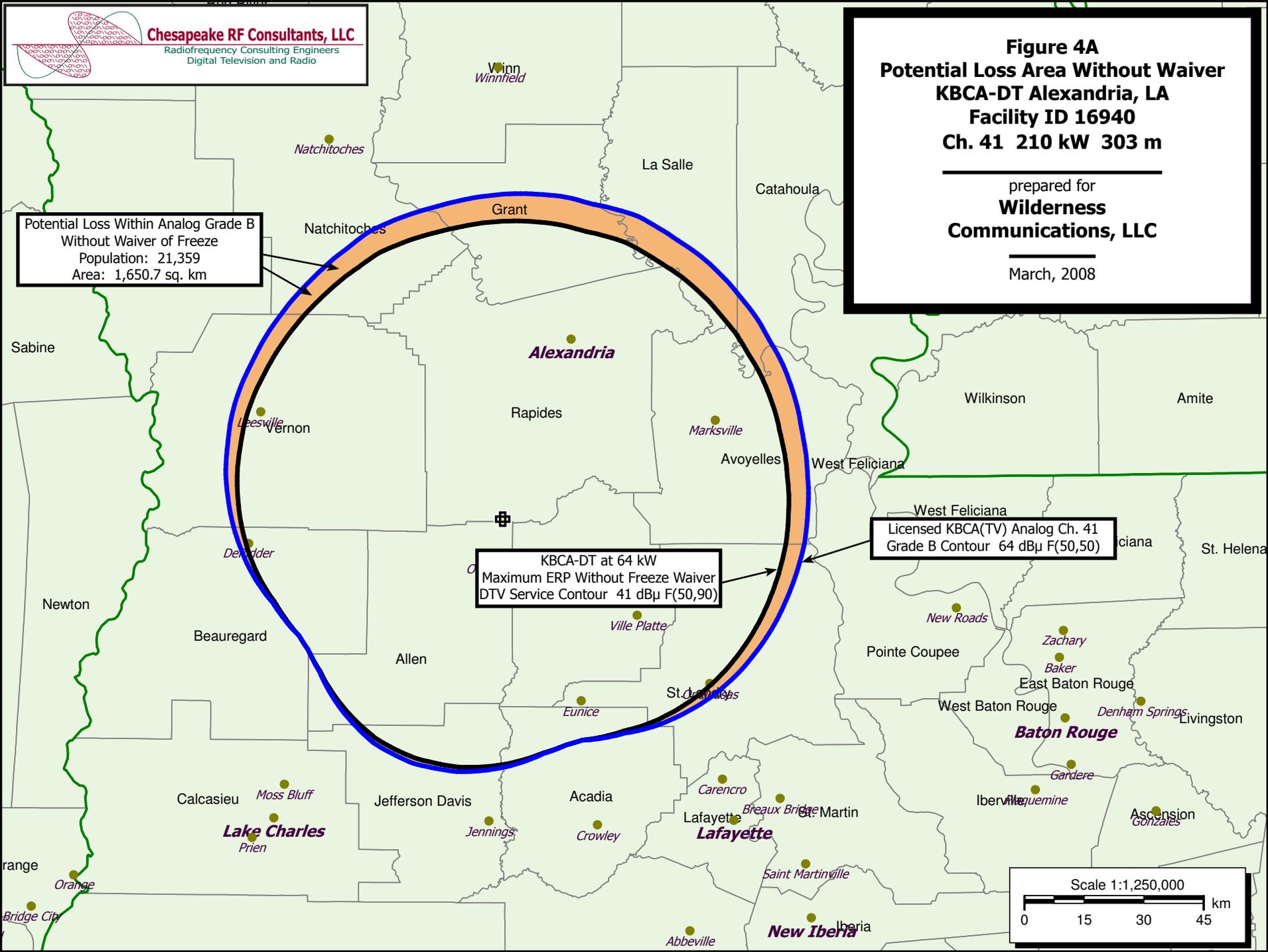
prepared for
Wilderness
Communications, LLC

March, 2008

Potential Loss Within Analog Grade B
 Without Waiver of Freeze
 Population: 21,359
 Area: 1,650.7 sq. km

KBCA-DT at 64 kW
 Maximum ERP Without Freeze Waiver
 DTV Service Contour 41 dBμ F(50,90)

Licensed KBCA(TV) Analog Ch. 41
 Grade B Contour 64 dBμ F(50,50)



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.

Pre-Transition Certification Checklist: 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.

Post-Transition Expedited Processing. 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.

| | |
|--|--|
| 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 submit the Exhibit 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 41 Analog TV, if any 41 |
| 2. Zone: <input type="radio"/> I <input type="radio"/> II <input checked="" type="radio"/> III |
| 3. Antenna Location Coordinates: (NAD 27) Latitude: Degrees 30 Minutes 54 Seconds 17 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 92 Minutes 37 Seconds 28 <input checked="" type="radio"/> West <input type="radio"/> East |
| 4. Antenna Structure Registration Number: 1231316 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA |
| 5. Antenna Location Site Elevation Above Mean Sea Level: 43.3 meters |
| 6. Overall Tower Height Above Ground Level: 304.8 meters |
| 7. Height of Radiation Center Above Ground Level: 297.2 meters |
| 8. Height of Radiation Center Above Average Terrain : 302.7 meters |

9. Maximum Effective Radiated Power (average power): 210 kW

10. Antenna Specifications:

a. Manufacturer ERI Model ATW30H3-HTC4-41H

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]

10e. Directional Antenna Relative Field Values

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees): No Rotation

| Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value |
|---------------------|-------|---------|-------|---------|-------|---------|-------|---------|-------|---------|-------|
| 0 | 0.956 | 10 | 0.989 | 20 | 1 | 30 | 0.989 | 40 | 0.956 | 50 | 0.907 |
| 60 | 0.848 | 70 | 0.785 | 80 | 0.723 | 90 | 0.667 | 100 | 0.612 | 110 | 0.554 |
| 120 | 0.489 | 130 | 0.413 | 140 | 0.328 | 150 | 0.247 | 160 | 0.2 | 170 | 0.214 |
| 180 | 0.262 | 190 | 0.306 | 200 | 0.322 | 210 | 0.306 | 220 | 0.262 | 230 | 0.214 |
| 240 | 0.2 | 250 | 0.247 | 260 | 0.328 | 270 | 0.413 | 280 | 0.489 | 290 | 0.554 |
| 300 | 0.612 | 310 | 0.667 | 320 | 0.723 | 330 | 0.785 | 340 | 0.848 | 350 | 0.907 |
| Additional Azimuths | | | | | | | | | | | |

[Relative Field Polar Plot](#)

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 3/28/2008 | |
| 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).

Any specified rotation has already been applied to the plotted pattern.
Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.

