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# ENGINEERING STATEMENT

## IN SUPPORT OF

## AN ENGINEERING AMENDMENT TO AN APPLICATION TO MODIFY THE CONSTRUCTION PERMIT OF

## KBSV-DT FILE No: BMPET 20060622ABE

## IN ORDER TO CORRECT ENGINEERING ERRORS

## KBSV-DT CHANNEL 15-DT LICENSED AT CERES, CA

**FCC FACILITY ID: 4939**

**BET-NAHRAIN, INC**

**SEPTEMBER 12, 2006**

# Purpose and Discussion

This engineering statement is in support of an engineering amendment to an application on file (BMPEDT-20060622ABE) to modify the construction permit (BPEDT-200000728AEC) It is being filed in response to a FCC deficiency letter Ref: 1800E3-TN regarding lack of protection to KMUM-LPTV.

## C. P. PERMITTED FACILITY

The permitted DTV transmitter facility parameters are:

N. 37-29-34.0
W. 121-13-29.0

Horizontal Polarization
ERP: 18.7 kw
RCAMSL: 347.0 m
RCAGL: 15.0 m
Overall Tower Ht: 151.0 M
Ant ID: Make: JAM Model: JA/LS-AK-12 Pattern: peanut shape

## PROPOSED CORRECTED FACILITY

The proposed DTV transmitter parameters are:

N. 37-29-32.3
W. 121-13-27.8

Horizontal Polarization
ERP: 18.5 kw
RCAMSL: 342.0 m
RCAGL: 19.0 m
Overall Tower Ht: 24.0 m AGL 366 m AMSL
Ant ID: Make: JAM Model: JA/LS-AK-12 Pattern: “peanut shape”

## COMPARATIVE SERVICE CONTOURS

Exhibit 35 is a map showing the predicted F(50/90) 41-dBu contours of both the permitted and the proposed transmitter facilities. The coverage of the proposed facility's f(50/90) 41-dBu contour is completely contained within the permitted 41-dBu contour, consequently, the modified pattern will maintain the interference protections to all other stations.

Exhibit E-33 is a polar plot of the Jampro antenna azimuth pattern with a tabulation of the relative field ratios at ten degree azimuth increments. The antenna pattern center will be oriented at 66 degrees "T" as indicated in the FCC-340 technical information section..

## ENVIRONMENTAL CONCERNS

As indicated above, the antenna is proposed to be a Jampro Antenna Co. model JA/LS-AK-12 which is a twelve element, 1.0 wavelength spaced system with a peanut shaped azimuth pattern. The elevation pattern and the underlying relative field reference table is shown in exhibit E-4

Engineering Exhibit 36 is the result of a radiation density study at the proposed transmitter facility. The exhibit shows that the proposed antenna and transmission system is predicted to produce less than 50% of the ANSI recommended radiation density at two meters AGL (MPE) at and around the base of the antenna support structure for non-controlled transmitter sites. Furthermore, the tower site is at a remote location on private land and access is only through a locked gate.

The site is not likely to be visited by the general public. The tower has a perimeter fence with a locked gate which will further restrict access. The site also has posted "NO TRESPASSING" and "DANGER HIGH RADIATION LEVEL" signs which are visible from all directions.

Since site access is limited to only service and maintenance personnel, the site should be considered as a controlled site and the MPE is calculated to be below 10% of ANSI.

The applicant will coordinate with all other users at the site to insure that operations will cease, power reduced to a required level or maintenance time limited in accordance with the applicable standard should any maintenance in the area of high radiation on the antenna support structure be required.

Additionally, after construction has been completed and the station is technically operational, should the Commission request it, the licensee will conduct a radiation measurement program both with and without the proposed transmitter facility at full authorized power. The measurement report shall be made available to all concerned persons and/or organizations and be made a part of the Station's Public File.

## CONCLUSION

After a thorough analysis of the proposed DTV transmitter facility, allocation/interference issues pertaining to this application and the lack of potential interference to all other licensed facilities, permitted facilities, applications and all other considerations, it is the opinion of this engineer that the transmitter facility, proposed herein, will meet the FCC rules as well as the intent of the rules.

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**- END OF ENGINEERING STATEMENT -**

If anyone concerned with this engineering statement or the proposed transmitter facility or may require additional information or would like to discuss the enclosed request for modification of the outstanding Construction Permit of the new transmitter facilities, please contact the following:

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Respectfully Submitted

*WILLIAM RICHARD GREEN* / 9-12-2006

William Richard Green Date