

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR LPTV K63AY

K63AY
FCC File No. BLTT-2166
Facility ID. No. 52930

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for displacement relief and the grant of a construction permit for K63AY (File No. BLTT-2166, Facility ID. 52930). Applicant's facility is presently operating on out of core NTSC Channel 63. Applicant proposes to operate on in core NTSC Channel 17.

The proposed operational parameters for K63AY are as follows:

Frequency Offset:	PLUS OFFSET
Antenna radiation center height above ground level:	196 meters
Maximum effective radiated power:	150 kW
Antenna type and model #:	SBP UP-12-SL
Antenna Orientation	90 Degrees
Antenna Mechanical Downtilt	0.0 Degrees
Transmitter Site	30-19-23.6 N 97-47-58.3W
FCC Tower ID#:	1013180

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than the following:

NTSC Full-Power stations:

KVUE-TV, 24Z, Austin TX, Fac. ID. 35867, Licensed.
KLRU, 18+, Austin TX, Fac. ID. 8564, Application.
KLRU, 18+, Austin TX, Fac. ID. 8564, Licensed.

However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Section 74.705 based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power stations.**

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KVUE-TV, CH 24Z AUSTIN, TX FILE NO. BLCT-2113 LICENSE	967,208	0 (0.0%)
KLRU, CH 18+ AUSTIN, TX FILE NO. BPET-20020429ABA APPLICATION	974,874	0 (0.0%)
KLRU, CH 18+ AUSTIN, TX FILE NO. BLET-19790424KG LICENSE	892,358	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause zero interference to existing NTSC facilities, applications, or construction permits.

The proposed facility complies with all LPTV, DTV, and Class A protections as contained in sections 74.706, 74.707, and 74.708 without reliance upon OET 69 standards.

Land Mobile

There are no co-channel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 17 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 150 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0027 milliwatt per square centimeter (MW/CM²), or .8% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.326 MW/CM² for TV channel 17). However, as this

is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.