

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

301 921-0115 Voice
301 590-9757 Fax
mullengr@aol.com E-mail

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-1:

**KM LPTV OF ATLANTA, L.L.C.
CLASS-A TELEVISION STATION WSKC-CA**

**DIGITAL CHANNEL
"FLASH-CUT" APPLICATION**

NOVEMBER 2006

**FCC FACILITY NUMBER
35090**

**ENGINEERING EXHIBIT
IN SUPPORT OF
AN APPLICATION FOR AUTHORITY TO CONSTRUCT
OR MAKE CHANGES IN A
CLASS A TELEVISION BROADCAST STATION**

ENGINEERING EXHIBIT EE-1:

**KM LPTV OF ATLANTA, L.L.C.
CLASS-A TELEVISION STATION WSKC-CA**

**DIGITAL CHANNEL
"FLASH-CUT" APPLICATION**

NOVEMBER 2006

TABLE OF CONTENTS:

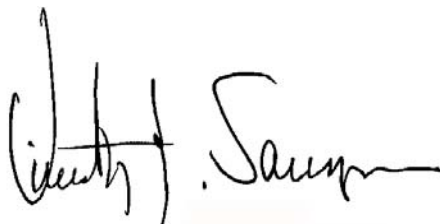
1. F.C.C. Form 301-CA, Section III
2. F.C.C. Form 301-CA, Section III (certification)
3. Declaration of Engineer
4. Narrative Statement
5. Figure 1, Predicted Coverage Contours
6. Figure 2, Directional Antenna Details
7. Figure 3, Allocation Study

DECLARATION

I, Timothy Z. Sawyer, declare and that I have provided engineering services in the area of telecommunications since 1969. My qualifications are a matter of record with the Federal Communications Commission. I am a senior engineer with the firm of Mullaney Engineering, Inc., consulting radio telecommunications engineers with offices in Gaithersburg, Maryland.

The firm of Mullaney Engineering, Inc., has been retained by KM LPTV OF ATLANTA, L.L.C., to prepare the instant engineering exhibit in support of *an application for Authority to Construct or Make Changes in a Class A Television Broadcast Station* (FCC FACILITY ID NUMBER: 35090).

All facts contained herein are true of my own knowledge except those stated to be on information and belief, and as to those facts, I believe them to be true. I declare under the penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Timothy Z. Sawyer", is written over a light blue horizontal line.

Digitized Signature - Original ON FILE - Timothy Z. Sawyer

Timothy Z. Sawyer

Executed on the 30th day of November 2006

ENGINEERING EXHIBIT EE-1:

**KM LPTV OF ATLANTA, L.L.C.
CLASS-A TELEVISION STATION WSKC-CA**

**DIGITAL CHANNEL
"FLASH-CUT" APPLICATION**

NOVEMBER 2006

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement and the instant engineering exhibit of which it is part has been prepared on behalf of KM LPTV OF ATLANTA, L.L.C., (hereinafter KM”).

This engineering exhibit supports a "flash-cut" application for Class A station WSKC-CA.

Station WSKC-CA is licensed (BLTTA-20051013AAE) to operate on analog channel 22 with a directional antenna maximum (visual) effective radiated power (ERP) of 150 kW and an antenna height above mean sea level (RCAMSL) of 546 meters.

The proposed digital "flash-cut" facilities will operate on channel 22 with a maximum effective radiated power of 0.8 kilowatts (800 watts) and an antenna height above mean sea level of 546 meters.

The proposed facilities will be built to comply with the *FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* and the instant proposal is categorically excluded from environmental processing pursuant to the provisions of Section 1.1306 of the Commission’s Rules. A more detailed discussion of environmental factors is included under the heading Environmental Considerations below.

Information requested by exhibits in response to questions on Section III of FCC Form 301-CA is incorporated in the following paragraphs, figures and/or tables.

Processing of this application is requested under the rules currently in effect at the time of filing.

ENGINEERING DISCUSSION:

FREEZE COMPLIANCE:

This application can be accepted for filing as it does not request a change which is consider “frozen” by FCC’s Public Notice (DA 04-2446) released August 3, 2004, Freeze on the filing of Certain TV and DTV Requests for Allotment or Service Area Changes.

Specifically, the proposed 51 dBu contour will not result in an extension of the currently licensed 74 dBu contour.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, the 51 dBu contour does not result in an extension of the 74 dBu contour.

PROPOSED FACILITIES:

This application proposes digital operation on the current analog channel assignment (TV channel 22), at the current transmitter site and with the same antenna.

The transmitter site coordinates remain (NAD27): 34-04-01 N, 84-27-23 W.

A Dielectric Corporation "DIE" directional antenna, model "TLP-12-C380" orientated at 90 degrees true, with a maximum ERP of 0.800 kW and antenna RCAMSL of 546 meters is proposed.

This antenna employs an electrical beam tilt of 1.0 degrees.

Figure 2 contains a horizontal radiation (relative field) pattern of the directional horizontal radiation pattern.

ALLOCATION CONSIDERATIONS:

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations.

Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments).

Each station of concern has been analyzed using the methods described in OET Bulletin No. 69, and the results indicate that no interference (unmasked) or interference below 0.5% of the service population of the station studied will occur.

The results of the OET Bulletin No. 69 styled study are contained with Figure 3.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations.

ENVIRONMENTAL CONSIDERATIONS:

The applicant believes its proposal will not significantly affect the environment for the following reasons.

The proposal does not meet any of the criteria specified in Section 1.1307 of the FCC Rules. More specifically, the proposed facilities are not known to fall within any of the categories enumerated in Sections 1.1307(a)(1)-(7) and will not involve the use of high intensity white lights.

Furthermore, operation of the proposed facility will not involve the exposure of workers or the general public to levels of radio frequency electromagnetic fields exceeding guidelines adopted by the Federal Communications Commission. (The current FCC guidelines are based upon criteria contained in the National Council of Radiation Protection and Measurements (NCRP) Report No.86 (1986) and ANSI/IEEE C95.1-1992.)

Based upon a worst case downward field value of 0.5 for all angles 40 degrees and greater below the horizon, and a digital power of 0.8- kilowatt, and an antenna height of 34 meters above ground. The power density level 2-meters above ground is predicted to be 0.0026 mW/cm² or less. The computed power density is 0.15% of the Commission's guidelines for a controlled area and 0.75% for an uncontrolled area. This level is well below the Commission's guidelines for maximum exposure levels to electromagnetic fields and no further study is required.

The applicant will fully-cooperate and coordinate with all site users as required by the Commission's rules.

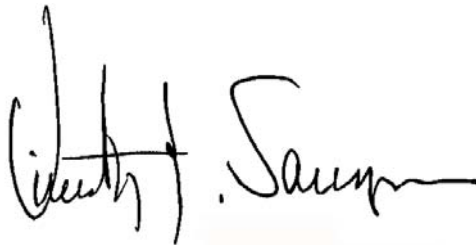
II SUMMARY:

The proposed station will operate on Digital Television Channel 22 with a maximum ERP of 08- kilowatts (800 Watts), utilizing a DIRECTIONAL antenna system.

Operation as proposed herein would not cause/increase any normally prohibited contour overlap using a terrain dependant - OET Bulletin No. 69 review, and would not have any significant impact on the environment. The proposed operation will not create any new prohibited interference.

The proposed operation is fully in compliance with all other areas of the Commission's rules and applicable international agreements.

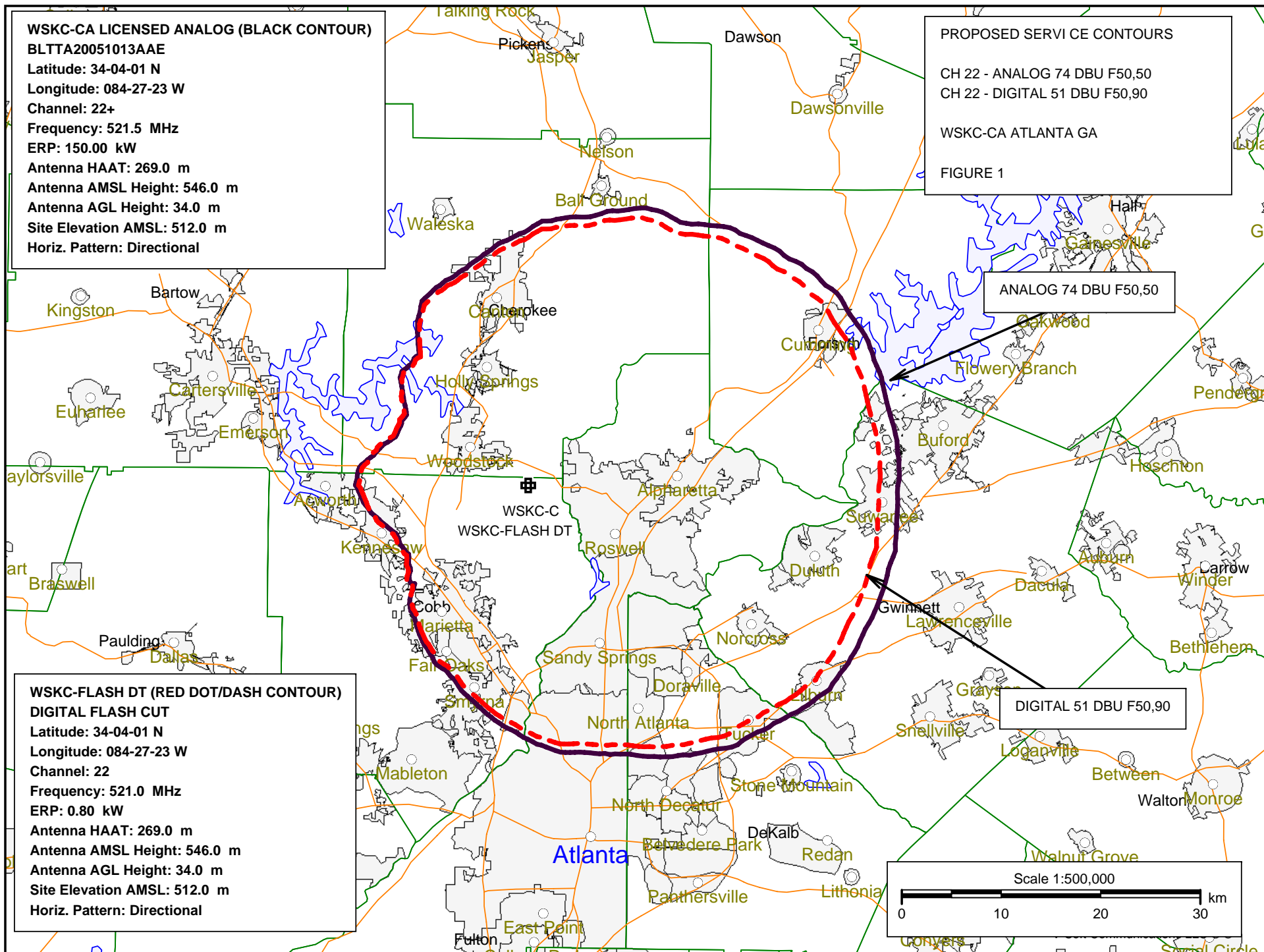
30 November 2006

A handwritten signature in black ink, appearing to read "Timothy Z. Sawyer". The signature is fluid and cursive, with a large initial "T" and "S".

Digitized Signature - Original ON FILE - Timothy Z. Sawyer

Timothy Z. Sawyer

TIMOTHY Z. SAWYER
MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MARYLAND USA
TEL.: (301) 921-0115



DIGITAL FLASHCUT WSKC FIGURE 2

Azimuth (deg)	Effective Field
0.0	0.323
10.0	0.375
20.0	0.438
30.0	0.520
40.0	0.617
50.0	0.721
60.0	0.822
70.0	0.912
80.0	0.976
90.0	1.000
100.0	0.976
110.0	0.912
120.0	0.822
130.0	0.721
140.0	0.617
150.0	0.520
160.0	0.438
170.0	0.375
180.0	0.323
190.0	0.276
200.0	0.237
210.0	0.205
220.0	0.172
230.0	0.130
240.0	0.099
250.0	0.103
260.0	0.133
270.0	0.151
280.0	0.133
290.0	0.103
300.0	0.099
310.0	0.130
320.0	0.130
330.0	0.205
340.0	0.237
350.0	0.276

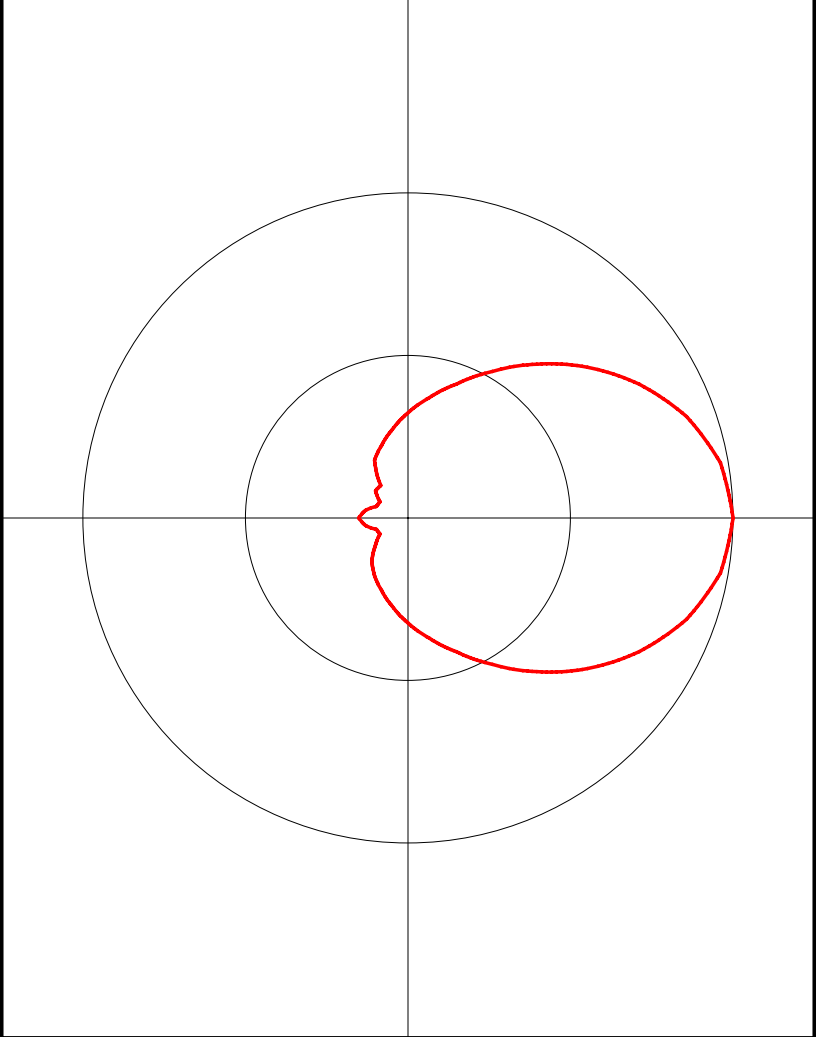


FIGURE 3 - INTERFERENCE STUDY - OET BULLETIN NO. 69 STUDY RESULTS

Outgoing Interference Population Report

WSKC-FLASH DT (22) Atlanta, GA
 Broadcast Type: Digital Service: G [Stringent Emission Mask]
 Lat: 34-04-01 N Lng: 084-27-23 W ERP: 0.8 kW AMSL: 546.0 m
 TV Outgoing Interference Study
 Signal Resolution: 1.0 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 # of radials computed for contours: 72
 Contours calculated using 8 radial HAAT.
 LR Profile Spacing Increment: 1.0 km
 Masked interference points are being counted
 as interference free.
 Using LPTV/translator D/U rules.
 Pop Centroid DB: 1990 US Census

Primary Terrain: NED 3 Second US Terrain
 Secondary Terrain: V-Soft 30 Second World Terrain

Population Database: 1990 US Census

 Stations Considered:

Call Letters	City	State	Dist	Bear
NEW.C (23-)	Blairsville	GA	99.9	27.3
NEW-D.A (22)	Demopolis	AL	321.8	246.7
W22AC (22N)	Hartwell & Royston	GA	142.6	78.6
W24AL (24-)	Atlanta	GA	29.6	163.2
W24AL.A (26+)	Atlanta	GA	30.8	159.4
W24AL.A (23+)	Atlanta	GA	30.8	159.4
W24AL.A (23+)	Atlanta	GA	30.8	159.4
WANX-L (26-)	Atlanta	GA	34.7	169.6
WANX-L.C (26-)	Atlanta	GA	34.7	169.6
WBMM (22-)	Tuskegee	AL	261.6	212.5
WCLPTV (18-)	Chatsworth	GA	79.6	342.7
WCLPTV.A (18-)	Chatsworth	GA	79.6	342.7
WCNC-D (22)	Charlotte	NC	332.8	63.8
WCTD-L.C (22-)	Ducktown	TN	107.8	0.1
WCTE (22Z)	Cookeville	TN	247.3	341.2
WELFTV (23Z)	Dalton	GA	129.9	319.4
WFIQ-D.C (22)	Florence	AL	311.4	281.4
WHNS (21+)	Greenville	SC	204.4	52.2
WJCL (22Z)	Savannah	GA	366.5	126.6
WJSP-D.C (23)	Columbus	GA	136.6	189.7
WJZC-L (22+)	Sevierville	TN	217.4	22.0
WPBA (30Z)	Atlanta	GA	35.9	161.8

WPBA-D (21)	Atlanta	GA	36.0	161.8
WPXA (14+)	Rome	GA	32.6	327.1
WSUT-L (21+)	Summerville/trion	GA	93.5	303.1

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
NEW.C (23-)	0.0	0	3,772	0	0	0.0
NEW-D.A (22)	0.0	0	180,706	0	0	0.0
W22AC (22N)	0.0	0	12,037	0	0	0.0
W24AL (24-)	0.0	0	445,081	0	0	0.0
W24AL.A (26+)	0.0	0	778,954	0	0	0.0
W24AL.A (23+)	0.0	0	778,954	0	0	0.0
W24AL.A (23+)	0.0	0	778,954	0	0	0.0
WANX-L (26-)	0.0	0	1,623,520	0	0	0.0
WANX-L.C (26-)	0.0	0	2,138,009	0	0	0.0
WBMM (22-)	0.0	0	484,563	0	0	0.0
WCLPTV (18-)	0.0	0	1,710,590	0	0	0.0
WCLPTV.A (18-)	0.0	0	124,018	0	0	0.0
WCNC-D (22)	0.0	0	2,627,712	0	0	0.0
WCTD-L.C (22-)	0.0	0	57,401	0	0	0.0
WCTE (22Z)	0.0	0	381,481	0	0	0.0
WELFTV (23Z)	0.0	0	730,340	0	0	0.0
WFIQ-D.C (22)	0.0	0	480,287	0	0	0.0
WHNS (21+)	0.0	0	1,754,471	0	0	0.0
WJCL (22Z)	0.0	0	592,607	0	0	0.0
WJSP-D.C (23)	0.0	0	1,065,094	0	0	0.0
WJZC-L (22+)	0.0	0	28,163	0	0	0.0
WPBA (30Z)	0.0	0	3,022,916	0	0	0.0
WPBA-D (21)	27.3	1,857	2,991,251	1,820	4,885	0.2
WPXA (14+)	0.0	0	3,580,585	0	0	0.0
WSUT-L (21+)	0.0	0	6,945	0	0	0.0