



**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 - 615 kW - 299.8 m HAAT**

Prepared for: Koplar 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 Koplar 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. Koplar 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 299.8 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	615	299		374326	931632	25035	566	0

Interference studies using the Commission's Longley-Rice methodology, **utilizing a 0.5 km cell**, 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 312.4 meters AGL. As a result the HAAT will decrease from 463 meters to 299.8 meters. The ERP will increase from 500 kW to 615 kW and the permittee proposes to install a non-directional antenna, a Dielectric model TFU-20GTH O4, instead of the directional antenna proposed in the currently pending application. See exhibits 2A, 2B and 3 for elevation patterns.

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 a 0.5 km cell size with 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, $(\text{frequency}/1500)$. 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 615 kW from a horizontally polarized omni-directional transmitting antenna with a centerline height of 306.3 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 0.01987 mW/cm^2 , which is 4.36% of the FCC's guideline value for an "uncontrolled" environment, and 0.872% 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 4.36% of the limit for "uncontrolled" environments, and 0.872% of the limit for "controlled" environments.

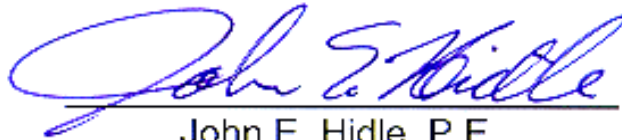
OCCUPATIONAL SAFETY

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 27, 2008


John E. Hidle, P.E.



OVERALL HEIGHT 312.4 M AGL; 609.6 M AMSL

KBRK-DT CH. 49 →

R_Q 306.3 M AGL; 603.5 M AMSL; 299.8 M HAAT

GROUND ELEVATION = 297.2 M AMSL / AVERAGE TERRAIN = 303.7 M

VERTICAL PLAN ANTENNA SKETCH

KBRK-DT, OSAGE BEACH, MISSOURI
CH. 49, 615 kW - 299.8 m HAAT

JUNE, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE

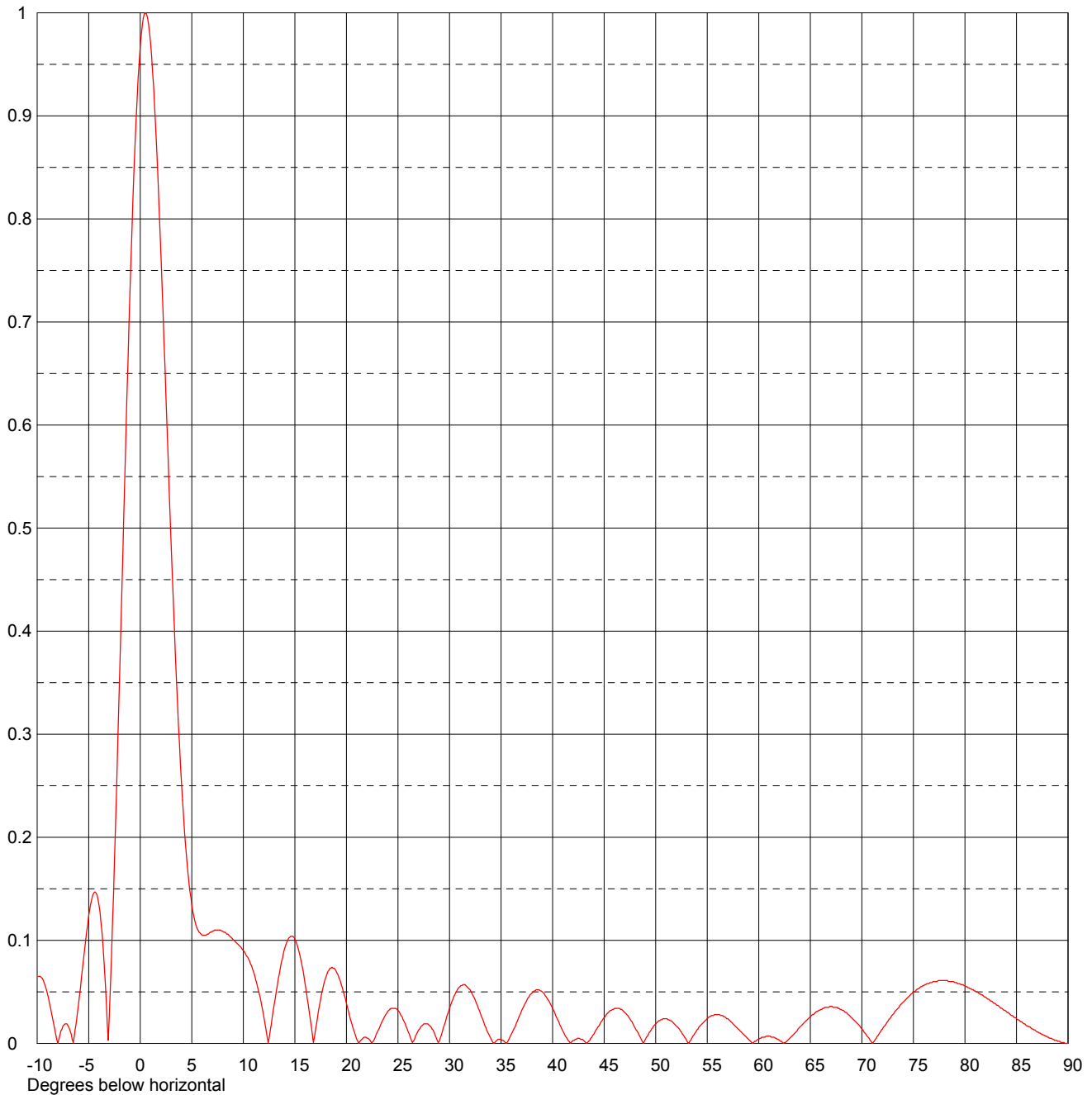


Exhibit No.
2A

Date	23 Jun 2008	Channel	49
Call Letters	KRBK-DT		
Location	Osage Beach, MO		
Customer	KOPLAR Comm.		
Antenna Type	TFU-20GTH O4		

ELEVATION PATTERN

RMS Gain at Main Lobe	18.0 (12.55 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	16.9 (12.28 dB)	Frequency	683.00 MHz
Calculated / Measured	Calculated	Drawing #	20G180050-90



Remarks:

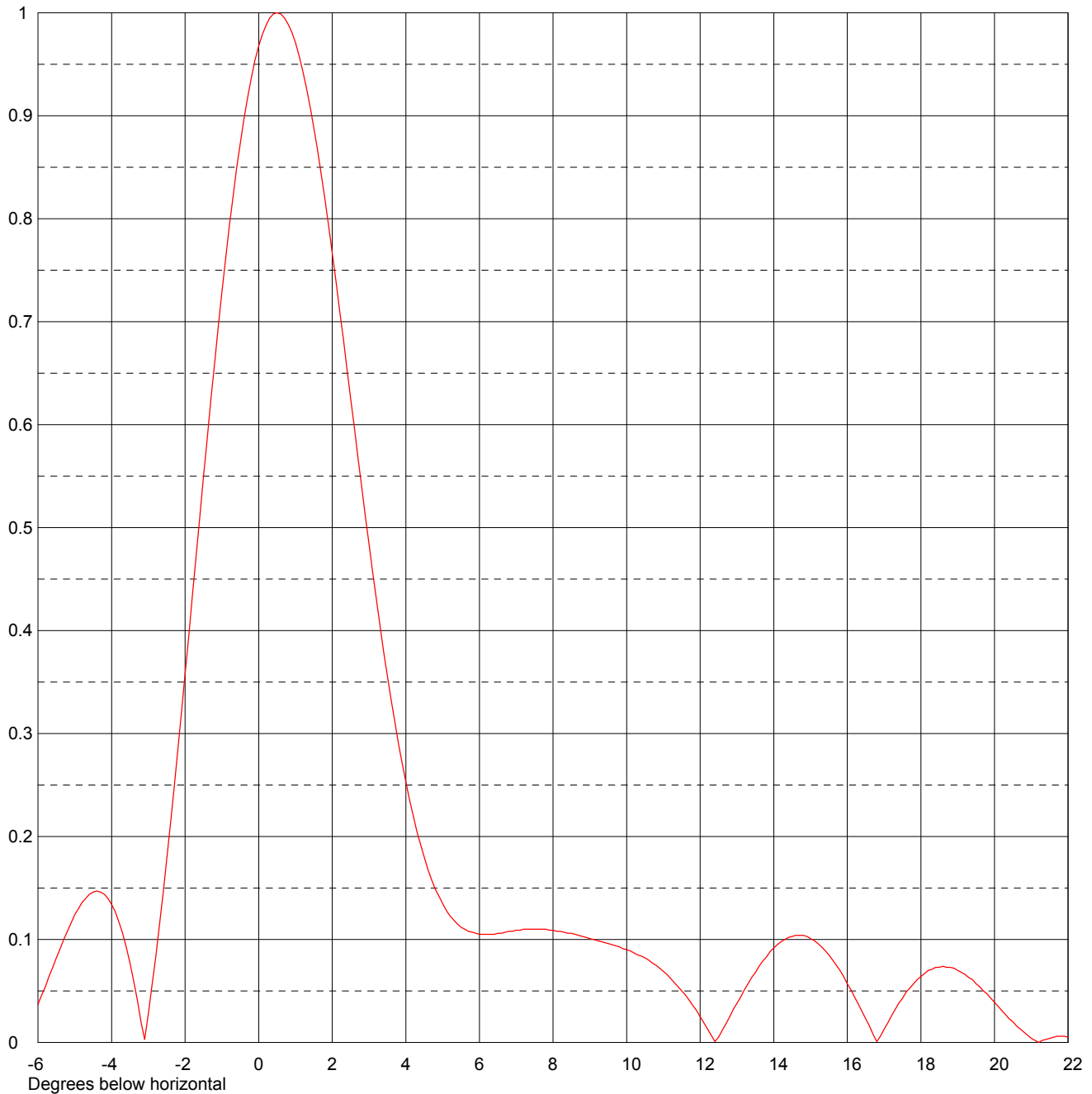


Exhibit No.
2B

Date	23 Jun 2008	Channel	49
Call Letters	KRBK-DT		
Location	Osage Beach, MO		
Customer	KOPLAR Comm.		
Antenna Type	TFU-20GTH O4		

ELEVATION PATTERN

RMS Gain at Main Lobe	18.0 (12.55 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	16.9 (12.28 dB)	Frequency	683.00 MHz
Calculated / Measured	Calculated	Drawing #	20G180050



Remarks:



Exhibit No.

3

Date

23 Jun 2008

Call Letters

KRBK-DT

Channel

49

Location

Osage Beach, MO

Customer

KOPLAR Comm.

Antenna Type

TFU-20GTH O4

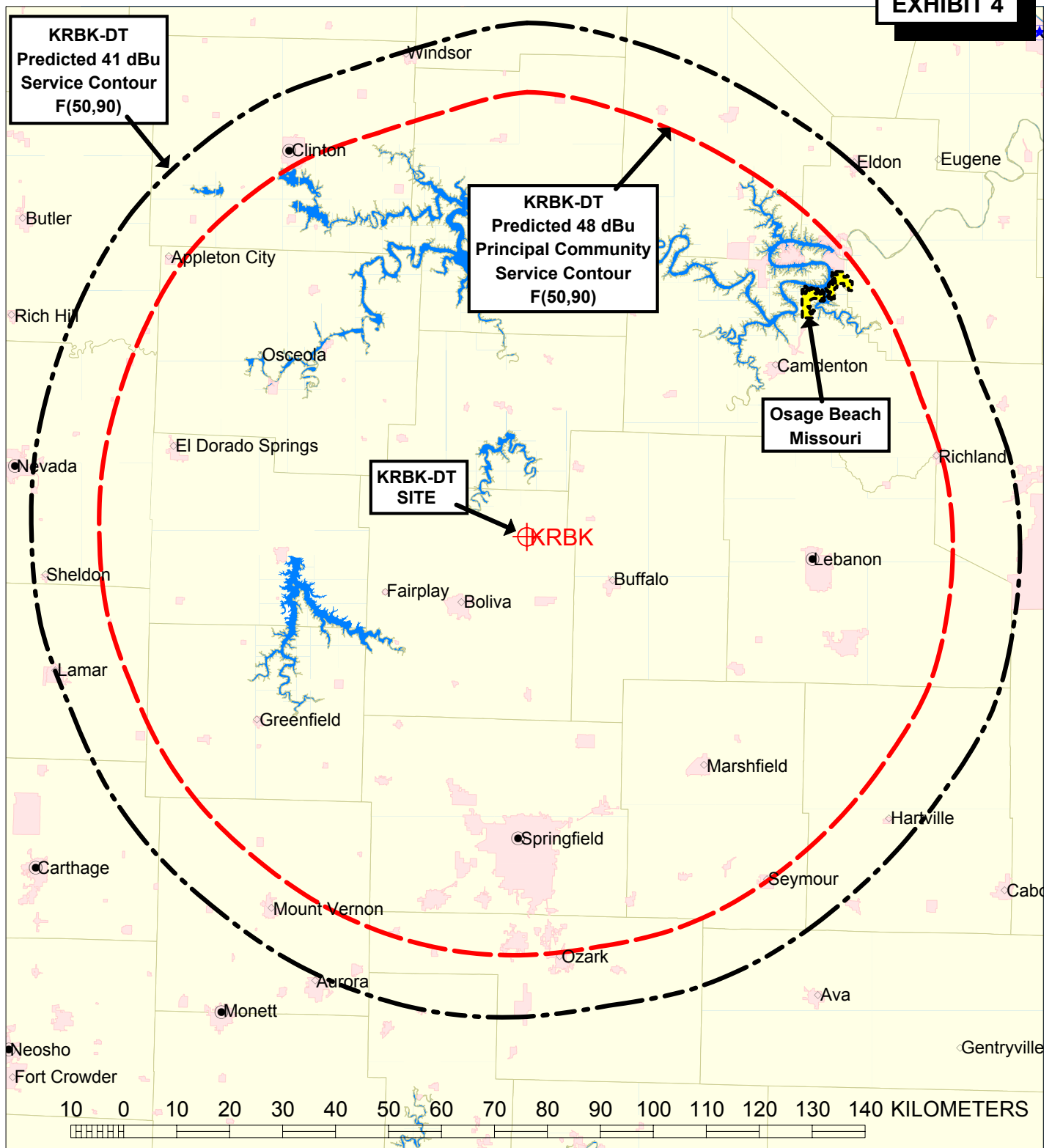
TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #

20G180050

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.064	2.4	0.654	10.6	0.080	30.5	0.047	51.0	0.024	71.5	0.007
-9.5	0.063	2.6	0.597	10.8	0.075	31.0	0.055	51.5	0.022	72.0	0.014
-9.0	0.048	2.8	0.539	11.0	0.069	31.5	0.057	52.0	0.017	72.5	0.021
-8.5	0.024	3.0	0.483	11.5	0.050	32.0	0.052	52.5	0.011	73.0	0.028
-8.0	0.000	3.2	0.430	12.0	0.025	32.5	0.042	53.0	0.003	73.5	0.034
-7.5	0.017	3.4	0.379	12.5	0.005	33.0	0.029	53.5	0.005	74.0	0.040
-7.0	0.017	3.6	0.333	13.0	0.038	33.5	0.016	54.0	0.013	74.5	0.045
-6.5	0.001	3.8	0.290	13.5	0.068	34.0	0.005	54.5	0.019	75.0	0.050
-6.0	0.037	4.0	0.253	14.0	0.092	34.5	0.002	55.0	0.024	75.5	0.053
-5.5	0.082	4.2	0.220	14.5	0.103	35.0	0.004	55.5	0.027	76.0	0.056
-5.0	0.124	4.4	0.192	15.0	0.101	35.5	0.000	56.0	0.028	76.5	0.058
-4.5	0.146	4.6	0.168	15.5	0.085	36.0	0.009	56.5	0.027	77.0	0.060
-4.0	0.134	4.8	0.149	16.0	0.057	36.5	0.020	57.0	0.024	77.5	0.061
-3.5	0.077	5.0	0.135	16.5	0.023	37.0	0.032	57.5	0.019	78.0	0.061
-3.0	0.028	5.2	0.123	17.0	0.013	37.5	0.042	58.0	0.014	78.5	0.060
-2.8	0.083	5.4	0.115	17.5	0.043	38.0	0.049	58.5	0.009	79.0	0.059
-2.6	0.145	5.6	0.110	18.0	0.064	38.5	0.052	59.0	0.004	79.5	0.058
-2.4	0.212	5.8	0.107	18.5	0.073	39.0	0.050	59.5	0.001	80.0	0.056
-2.2	0.283	6.0	0.105	19.0	0.070	39.5	0.043	60.0	0.004	80.5	0.053
-2.0	0.358	6.2	0.105	19.5	0.057	40.0	0.034	60.5	0.006	81.0	0.051
-1.8	0.435	6.4	0.105	20.0	0.039	40.5	0.023	61.0	0.007	81.5	0.048
-1.6	0.511	6.6	0.106	20.5	0.020	41.0	0.012	61.5	0.006	82.0	0.045
-1.4	0.587	6.8	0.108	21.0	0.004	41.5	0.003	62.0	0.003	82.5	0.041
-1.2	0.660	7.0	0.109	21.5	0.004	42.0	0.003	62.5	0.001	83.0	0.038
-1.0	0.729	7.2	0.110	22.0	0.005	42.5	0.005	63.0	0.005	83.5	0.034
-0.8	0.792	7.4	0.110	22.5	0.001	43.0	0.003	63.5	0.010	84.0	0.031
-0.6	0.849	7.6	0.110	23.0	0.011	43.5	0.002	64.0	0.016	84.5	0.027
-0.4	0.897	7.8	0.110	23.5	0.022	44.0	0.009	64.5	0.021	85.0	0.024
-0.2	0.937	8.0	0.109	24.0	0.031	44.5	0.017	65.0	0.026	85.5	0.021
0.0	0.968	8.2	0.108	24.5	0.034	45.0	0.025	65.5	0.030	86.0	0.017
0.2	0.988	8.4	0.106	25.0	0.032	45.5	0.031	66.0	0.033	86.5	0.014
0.4	0.999	8.6	0.105	25.5	0.023	46.0	0.034	66.5	0.035	87.0	0.011
0.6	0.999	8.8	0.103	26.0	0.011	46.5	0.034	67.0	0.036	87.5	0.009
0.8	0.989	9.0	0.101	26.5	0.002	47.0	0.030	67.5	0.035	88.0	0.006
1.0	0.971	9.2	0.099	27.0	0.013	47.5	0.024	68.0	0.033	88.5	0.004
1.2	0.943	9.4	0.097	27.5	0.019	48.0	0.015	68.5	0.030	89.0	0.002
1.4	0.908	9.6	0.095	28.0	0.018	48.5	0.006	69.0	0.025	89.5	0.001
1.6	0.866	9.8	0.093	28.5	0.011	49.0	0.004	69.5	0.020	90.0	0.000
1.8	0.819	10.0	0.090	29.0	0.002	49.5	0.012	70.0	0.014		
2.0	0.767	10.2	0.087	29.5	0.018	50.0	0.019	70.5	0.007		
2.2	0.711	10.4	0.084	30.0	0.034	50.5	0.023	71.0	0.000		

Remarks:



PREDICTED COVERAGE CONTOURS

KRBK-DT, OSAGE BEACH, MISSOURI

CH. 49, 615 kW - 299.8 m HAAT

Predicted Principal Community Contour

F(50,90) - 48 dBu

Population (2000 Census)

489,370 - 19,860 sq km

Predicted Noise Limited Contour

F(50,90) - 41 dBu

Population (2000 Census)

584,486 - 26,520 sq km

JUNE 2008

**CARL T. JONES
CORPORATION**

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
KRBK-DT, OSAGE BEACH, MISSOURI
CHANNEL 49, 615 kW ERP, 299.8 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	305	615.000	0.300	0.01987	0.455	4.36%
TOTAL PERCENTAGE OF ANSI VALUE=										4.36%

*** 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.

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