

Exhibit 8 - Statement A  
**COMPLIANCE WITH SPECIAL OPERATING CONDITION**  
prepared for

**Lincoln Broadcasting Company,**  
**A California Limited Partnership**  
KTSF-DT San Francisco, California  
Facility ID: 37511  
Ch. 27 500 kW 403.4 m

*Lincoln Broadcasting Company, A California Limited Partnership* (“*Lincoln*”) is the permittee of digital television station KTSF-DT, San Francisco, California. *Lincoln* has completed construction of the DTV facility authorized in the construction permit (“CP”), FCC File No. BMPCDT-20040727AEK, and has commenced program tests in accordance with Section 73.1620(a)(1) of the FCC Rules.

The KTSF-DT CP contains one Special Operating Condition which requires notification of health care facilities prior to the commencement of operation. Based on information provided by Mr. Mike Fusaro, Director of Engineering for *Lincoln*, such notification was performed on September 13, 2004.

The underlying application for construction permit indicated that the calculated RF density at a small, confined, publicly accessible area, near the transmitter site was predicted to reach 5.6% of the general population / uncontrolled limit. The application stated that RF density measurements would be performed and, depending on the measurement results, appropriate action would be taken to ensure compliance with the Commission’s exposure limits.

Station technical personnel employing a Narda 8716 meter with an 8721<sup>1</sup> ELF probe (both with current calibration and with measurement capabilities within the frequency range of concern), measured all publicly accessible areas near the transmitter site including the location identified in the application for CP. According to KTSF staff, with the KTSF-DT facility turned off, the maximum RF density measured at all locations was 35  $\mu\text{W}/\text{cm}^2$ . With the KTSF-DT facility in operation, the maximum RF density measured at the same locations was 40  $\mu\text{W}/\text{cm}^2$ . The difference measured is the contribution to the RF density from the KTSF-DT facility. Thus, KTSF-DT contributes a maximum of 5  $\mu\text{W}/\text{cm}^2$  to the RF environment at the publicly accessible areas measured. The

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<sup>1</sup> According to the manufacturer’s published specifications, the Narda 8721 probe measures electric fields in the range of 300 MHz to 50 GHz. The probe’s frequency response is flat.

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measured increase in RF density is 1.36% of the general population /uncontrolled limit of 367.3  $\mu\text{W}/\text{cm}^2$  at the Channel 27 center frequency of 551 MHz.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all measured publicly accessible ground level areas, the impact of the any other facilities using this site may be considered independently from this proposal. Thus, the KTSF-DT operation is in compliance the Commission's environmental rules and no corrective measures are required.