

ENGINEERING STATEMENT
RE DTV BROADCAST APPLICATION
PURSUANT TO THE REPORT AND ORDER
MM DOCKET NO. 00-198
ON BEHALF OF
KRIS-DT, CORPUS CHRISTI, TEXAS
CHANNEL 13 160 KW ERP 290.6 METERS

MARCH 2004

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

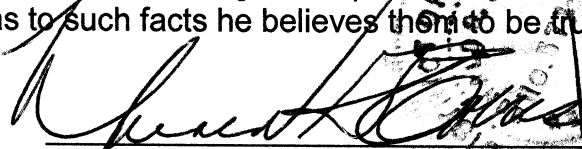
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

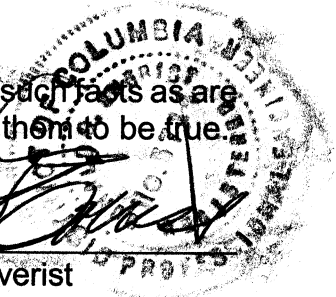
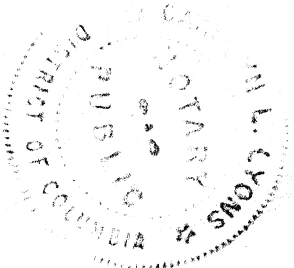
That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 4th day of March, 2004.


Notary Public

My Commission Expires: 2/28/2008



COHEN, DIPPELL AND EVERIST, P. C.


City of Washington)
) ss
District of Columbia)

Daryl Mastracci, being duly sworn upon his oath, deposes and states that:


He is a graduate electrical engineer of the Pennsylvania State University, and is a staff engineer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

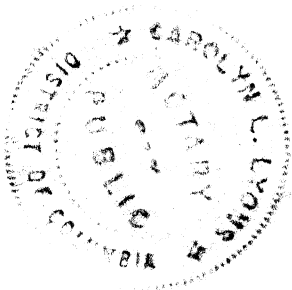
That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Daryl Mastracci
District of Columbia

Subscribed and sworn to before me this 4th day of March, 2004.


Notary Public

My Commission Expires: 2/28/2008



This engineering statement has been prepared on behalf of KVOA Communications, Inc., licensee of KRIS-TV, Corpus Christi, Texas. The purpose of this engineering statement is to accompany its request for digital television ("DTV") facilities, specifically that data required in FCC Form 301, Section III-D.

KVOA Communications, Inc. ("KVOA") operates on NTSC television station KRIS-TV on Channel 6 with a maximum visual effective radiated power (ERP) of 100 kW and an antenna height above average terrain (HAAT) of 291 meters. KRIS-TV has been allocated DTV Channel 50 with facilities of 1000 kW and HAAT of 291 meters in the revised DTV Table of Allotments.¹ KVOA has been granted a petition for rule making in MM Docket No. 00-198 to change to DTV Channel 13 in lieu of Channel 50. The Report and Order was adopted December 2, 2003.

In the application, KVOA proposes DTV facilities on Channel 13 with an ERP of 160 kW with HAAT of 290.6 meters.

The existing KRIS-TV tower will be utilized to support the KRIS-DT antenna. The overall height of the structure will remain unchanged. The tower registration number is 1045871.

The geographic coordinates of the site remain unchanged and are as follows.

North Latitude: 27° 44' 28"

West Longitude: 97° 36' 08"

NAD-27

¹"In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-286, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98, DTV Table of Allotments.

Equipment Data

Antenna: Dielectric, Type TW-12B13-R antenna with 0.75° electrical beam tilt. The vertical plane pattern and other exhibits required by Section 73.625(c) are herein included as Exhibits E-2a through E-2e.

Transmission Line: 330.0 meters (1082 ft) of Dielectric, Type EIA Rigid, 3" 50 ohm or equivalent.

Power Data

Transmitter output (post filter)	19.13 kW	12.82 dBk
Transmission line efficiency/loss	69.7%	(1.57) dB
Input power to antenna	13.33 kW	11.25 dBk
Antenna power gain, main lobe	12.0	10.79 dB
Effective Radiated Power, maximum	160 kW	22.04 dBk

Elevation Data

Elevation of site above mean sea level	18.7 meters (61.4 feet)
Overall height above ground of the existing antenna structure (including beacon)	301.0 meters (988 feet)
Overall height above mean sea level of existing tower (including beacon)	319.7 meters (1049 feet)
Center of radiation of Channel 13 antenna above ground	288.0 meters (945 feet)
Center of radiation of Channel 13 antenna above mean sea level	306.8 meters (1007 feet)
Antenna height above average terrain	290.6 meters (953.4 feet)

NOTE: Slight height differences result due to conversion to metric.

Allocation

An allocation study from the proposed site has not been performed since the proposed DTV facilities will operate as authorized in the Report and Order, MM Docket No. 00-198.

Other Licensed and Broadcast Facilities

There are no AM stations within 3.2 km of the proposed KRIS-TV tower site. There are six FM Stations operating within 100 meters of the proposed site.

No adverse technical effect is anticipated by the proposed DTV operation to any other FCC licensed facility. If required, the licensee of KRIS-DT will install filters or take other measures as necessary to resolve the problem.

Radio Frequency Radiation Level

The permittee proposes to mount the new DTV antenna for Station KRIS-DT on the existing KRIS-TV tower.

According to the FCC data base, there are five FM stations authorized to operate from the KRIS-TV tower.² The FM stations are as follows:

KFTX(FM)	Channel 248C1
KLUX(FM)	Channel 208C1
KLTG(FM)	Channel 243C1
KKLM(FM)	Channel 204C2

Assuming a relative field factor of 0.3 for these FM antennas, the total RFF contribution of all these stations, 2 meters above the ground at the base of the tower, will be approximately

²K201CR, Channel 201D has although shown in the CDBS been physically removed from the tower as advised by the KRIS technical staff, and therefore, has not been included in this analysis.

16.68 $\mu\text{W}/\text{cm}^2$ or 8.34% of the 200 $\mu\text{W}/\text{cm}^2$ limit for the general public based upon OET Bulletin No. 65, Edition No 97-01.

For the proposed DTV operation, the antenna manufacturer representative indicates that the elevation pattern for this antenna shows a maximum relative field of less than 0.2 towards the ground in the vicinity of the tower. Using this relative field factor and the procedures prescribed in OST Bulletin No. 65, the maximum RFF resulting from the present operation at two meters above the base of the tower will be approximately 2.6 $\mu\text{W}/\text{cm}^2$. This is approximately 1.3% of the 200 $\mu\text{W}/\text{cm}^2$ maximum uncontrolled exposure to RFF recommended by the current FCC guidelines for the general population.

For NTSC Station KRIS-TV a relative field factor of 0.2 will be assumed. Using this relative field factor and the procedures prescribed in OET Bulletin 65, the maximum RFF resulting from the proposed operation will be approximately 1.4 $\mu\text{W}/\text{cm}^2$. This is 0.7 percent of the 200 $\mu\text{W}/\text{cm}^2$ maximum human exposure to RFF recommended by the current FCC guidelines for the general population.

The total contribution of all stations, 2 meters above the ground at the base of the tower, will be less than 11 percent of the current FCC guidelines for general population exposure.

Authorized personnel and rigging contractors will be alerted to the potential zone of high radiation on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

An environmental assessment ("EA") is categorically excluded under Section 1.1307 of the FCC Rules and Regulations since the permittee indicates:

- (a)(1) The existing tower is not located in an officially designated wilderness area.
- (a)(2) The existing tower is not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The existing tower is not located near any known Indian religious sites.
- (a)(6) The existing tower is not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) The tower was equipped with high intensity white lights when it was erected and it has not been a source of controversy. According to the KRIS technical staff, this tower has used strobe lighting since its construction in the late 1980's. The tower is not in a residential area.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin 65, Edition 97-01 and Supplement A. Authorized personnel will be alerted to areas of the antennas where potential radiation levels are in excess of the FCC guidelines. A security fence with a locked gate precludes access to the tower site.

TABLE I
DTV COVERAGE DATA
FOR THE PROPOSED OPERATION
KRIS-DT, CORPUS CHRISTI, TEXAS
CHANNEL 13 160 KW 290.6 METERS HAAT
MARCH 2004

<u>Azimuth</u> N ° E, T	<u>HAAT</u> meters	<u>ERP</u> kW	<u>Distance to Contour</u>	
			<u>43 dBu</u> km	<u>36 dBu</u> km
0	291	160	100.9	115.3
10	293	160	101.0	115.4
20	294	160	101.0	115.5
30	295	160	101.1	115.6
40	295	160	101.1	115.6
50	296	160	101.2	115.7
60	294	160	101.1	115.5
70	294	160	101.1	115.5
80	295	160	101.1	115.6
90	296	160	101.2	115.7
100	297	160	101.2	115.8
110	299	160	101.3	116.0
120	297	160	101.3	115.8
130	296	160	101.2	115.7
140	294	160	101.1	115.5
150	293	160	101.0	115.4
160	292	160	101.0	115.3
170	293	160	101.0	115.4
180	293	160	101.0	115.4
190	293	160	101.0	115.5
200	293	160	101.0	115.4
210	292	160	101.0	115.4
220	292	160	101.0	115.3
230	291	160	100.9	115.2
240	290	160	100.9	115.2
250	289	160	100.8	115.1
260	289	160	100.8	115.0
270	287	160	100.7	114.9
280	286	160	100.7	114.8
290	285	160	100.6	114.7
300	285	160	100.6	114.7
310	285	160	100.6	114.7
320	285	160	100.6	114.7
330	285	160	100.6	114.7
340	288	160	100.8	115.0
350	289	160	100.8	115.0

ABOVE GROUND

ABOVE MEAN SEA LEVEL

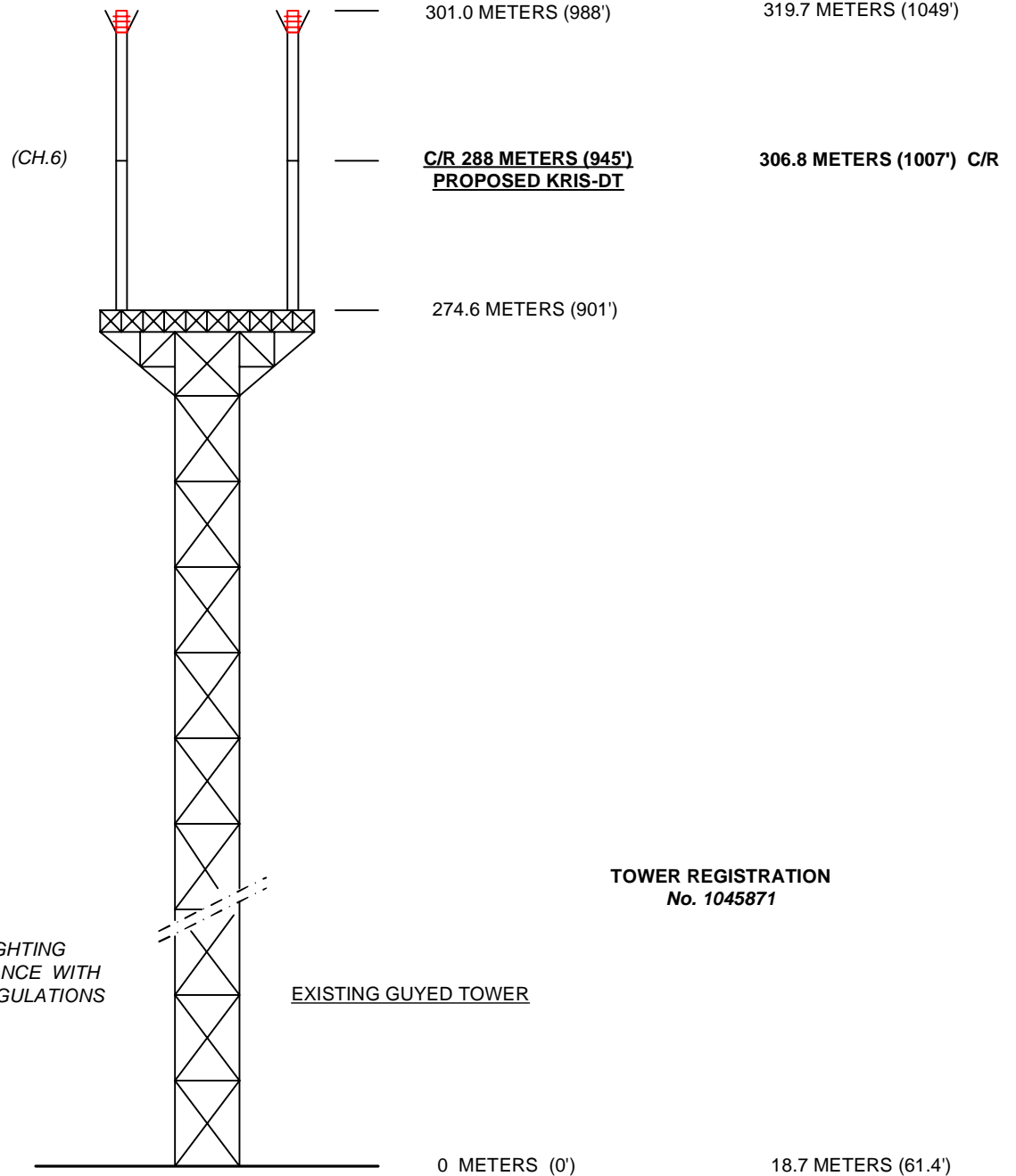


EXHIBIT E - 1
VERTICAL SKETCH
FOR THE PROPOSED DTV OPERATION OF
KRIS-DT, CORPUS CHRISTI, TEXAS
CHANNEL 13 160 kW ERP 290.6 METERS HAAT
MARCH 2004

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.



SYSTEM SUMMARY

Antenna:

Type:	TW-12B13-R	ERP:	160 kW	(22.04 dBk)
Channel:	13	RMS Gain*:	12.0	(10.79 dB)
Location:		Input Power:	13.33 kW	(11.25 dBk)

H Pol

Transmission Line:

Type:	EIA Style Rigid TL	Attenuation:	1.57 dB
Size:	3" 50 ohm	Efficiency:	69.7%
Length	1082 ft	330 m	

Transmitter:

Average Power Required: **19.13 kW** (12.82 dBk)

* Gain is with respect to half wave dipole.



MECHANICAL SPECIFICATIONS

Antenna:

Type: **TW-12B13-R**
Channel: **13**
Location:

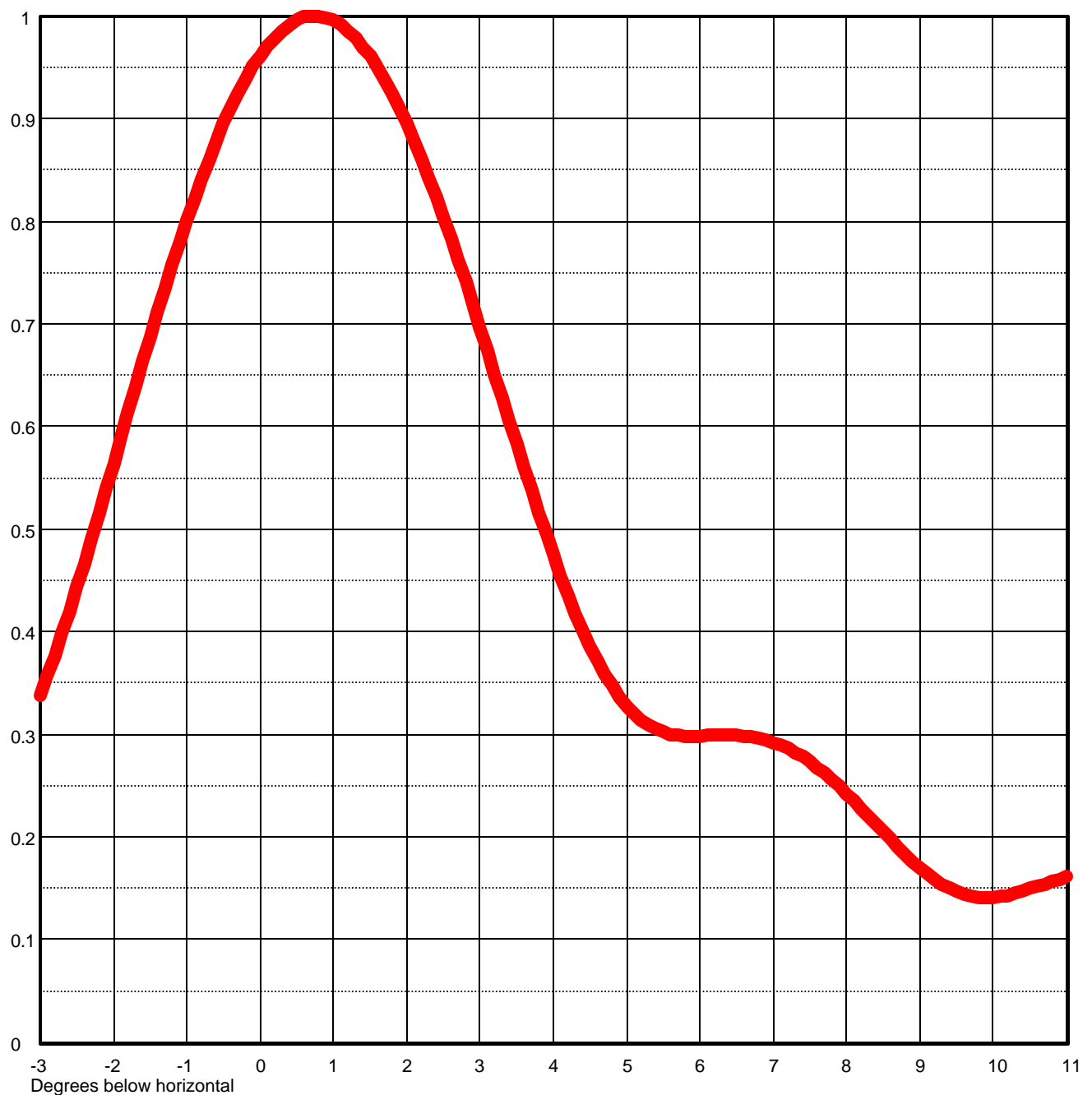
Antenna Length (H2): **64.4 ft**
With Lightning Protector (H4): **68.4 ft**
Center of Radiation (H3): **33.4 ft**



Proposal Number		Revision
Date	02 Mar 2004	
Call Letters		Channel 13
Location		
Customer		
Antenna Type	TW-12B13-R	

ELEVATION PATTERN

RMS Gain at Main Lobe	12.0 (10.79 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	11.1 (10.45 dB)	Frequency	213.00 MHz
Calculated / Measured	Calculated	Drawing #	25W120075



Remarks:



Proposal Number

Revision

Date

02 Mar 2004

Call Letters

Channel

13

Location

Customer

Antenna Type

TW-12B13-R

ELEVATION PATTERN

RMS Gain at Main Lobe

12.0 (10.79 dB)

Beam Tilt

0.75 Degrees

RMS Gain at Horizontal

11.1 (10.45 dB)

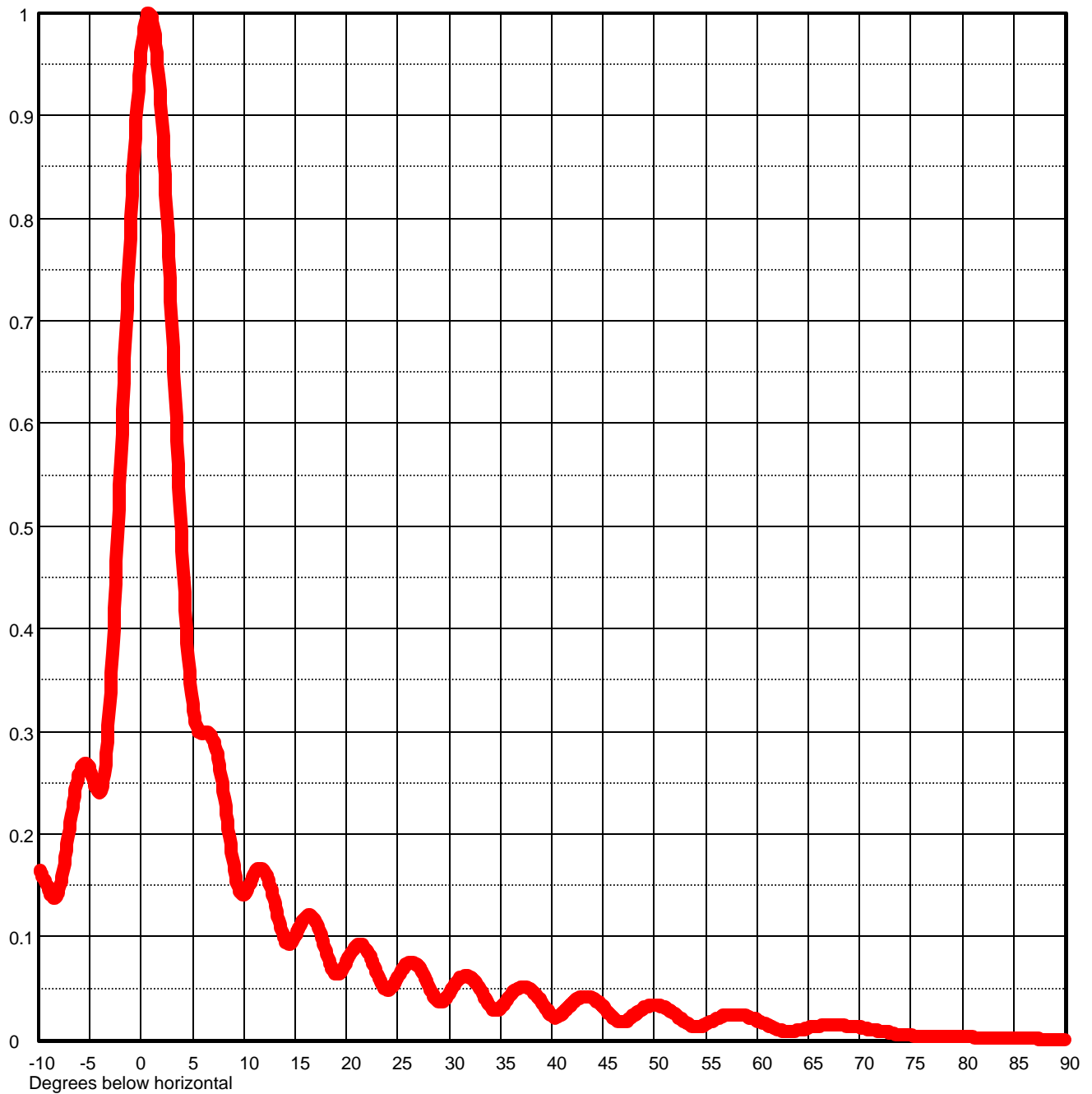
Frequency

213.00 MHz

Calculated / Measured

Calculated

Drawing #

25W120075-90

Remarks:



Proposal Number

Revision

Date

02 Mar 2004

Call Letters

Channel

13

Location

Customer

Antenna Type

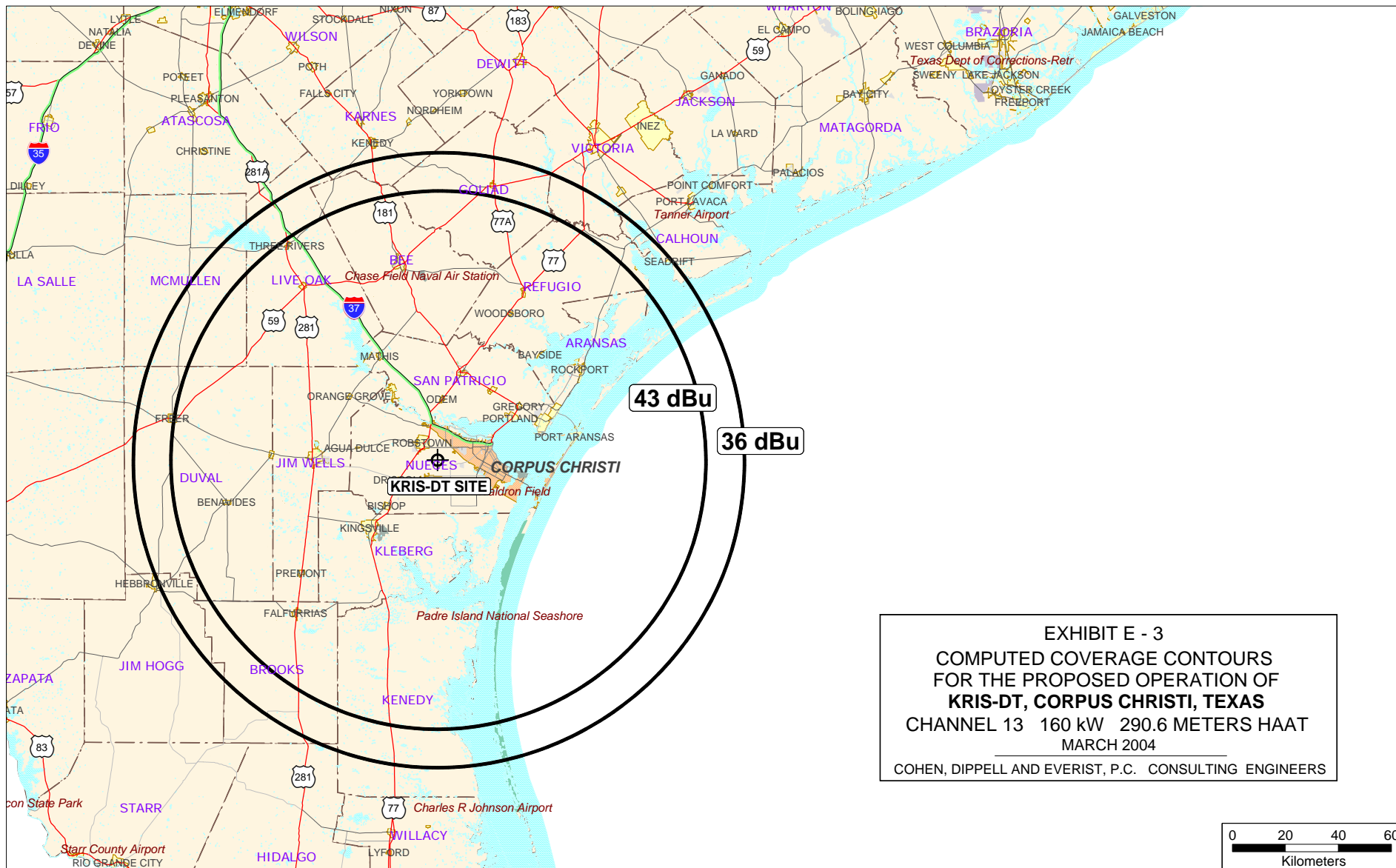
TW-12B13-R**TABULATION OF ELEVATION PATTERN**

Elevation Pattern Drawing #

25W120075-90

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.165	2.4	0.824	10.6	0.152	30.5	0.053	51.0	0.031	71.5	0.009
-9.5	0.157	2.6	0.784	10.8	0.157	31.0	0.059	51.5	0.028	72.0	0.008
-9.0	0.145	2.8	0.741	11.0	0.161	31.5	0.062	52.0	0.025	72.5	0.007
-8.5	0.138	3.0	0.697	11.5	0.167	32.0	0.061	52.5	0.021	73.0	0.006
-8.0	0.146	3.2	0.651	12.0	0.164	32.5	0.056	53.0	0.017	73.5	0.005
-7.5	0.171	3.4	0.606	12.5	0.152	33.0	0.049	53.5	0.014	74.0	0.005
-7.0	0.205	3.6	0.560	13.0	0.133	33.5	0.040	54.0	0.012	74.5	0.004
-6.5	0.237	3.8	0.516	13.5	0.112	34.0	0.032	54.5	0.013	75.0	0.004
-6.0	0.260	4.0	0.475	14.0	0.097	34.5	0.028	55.0	0.015	75.5	0.003
-5.5	0.269	4.2	0.436	14.5	0.093	35.0	0.030	55.5	0.017	76.0	0.003
-5.0	0.262	4.4	0.401	15.0	0.100	35.5	0.036	56.0	0.020	76.5	0.003
-4.5	0.247	4.6	0.371	15.5	0.111	36.0	0.043	56.5	0.022	77.0	0.003
-4.0	0.241	4.8	0.347	16.0	0.119	36.5	0.048	57.0	0.023	77.5	0.003
-3.5	0.267	5.0	0.327	16.5	0.120	37.0	0.051	57.5	0.024	78.0	0.003
-3.0	0.338	5.2	0.314	17.0	0.115	37.5	0.051	58.0	0.024	78.5	0.003
-2.8	0.377	5.4	0.305	17.5	0.102	38.0	0.048	58.5	0.024	79.0	0.003
-2.6	0.420	5.6	0.300	18.0	0.087	38.5	0.043	59.0	0.022	79.5	0.003
-2.4	0.466	5.8	0.298	18.5	0.072	39.0	0.036	59.5	0.021	80.0	0.003
-2.2	0.515	6.0	0.298	19.0	0.064	39.5	0.029	60.0	0.019	80.5	0.003
-2.0	0.564	6.2	0.299	19.5	0.066	40.0	0.023	60.5	0.016	81.0	0.003
-1.8	0.614	6.4	0.299	20.0	0.076	40.5	0.022	61.0	0.014	81.5	0.002
-1.6	0.663	6.6	0.298	20.5	0.085	41.0	0.025	61.5	0.012	82.0	0.002
-1.4	0.711	6.8	0.296	21.0	0.091	41.5	0.030	62.0	0.010	82.5	0.002
-1.2	0.757	7.0	0.292	21.5	0.092	42.0	0.035	62.5	0.008	83.0	0.002
-1.0	0.801	7.2	0.286	22.0	0.087	42.5	0.039	63.0	0.008	83.5	0.002
-0.8	0.841	7.4	0.278	22.5	0.076	43.0	0.042	63.5	0.008	84.0	0.002
-0.6	0.878	7.6	0.267	23.0	0.064	43.5	0.042	64.0	0.009	84.5	0.002
-0.4	0.911	7.8	0.256	23.5	0.053	44.0	0.040	64.5	0.010	85.0	0.001
-0.2	0.938	8.0	0.242	24.0	0.048	44.5	0.037	65.0	0.011	85.5	0.001
0.0	0.962	8.2	0.228	24.5	0.052	45.0	0.032	65.5	0.012	86.0	0.001
0.2	0.979	8.4	0.213	25.0	0.061	45.5	0.026	66.0	0.013	86.5	0.001
0.4	0.992	8.6	0.198	25.5	0.069	46.0	0.021	66.5	0.014	87.0	0.001
0.6	0.999	8.8	0.183	26.0	0.074	46.5	0.017	67.0	0.014	87.5	0.000
0.8	1.000	9.0	0.170	26.5	0.075	47.0	0.017	67.5	0.014	88.0	0.000
1.0	0.996	9.2	0.159	27.0	0.071	47.5	0.020	68.0	0.014	88.5	0.000
1.2	0.986	9.4	0.150	27.5	0.063	48.0	0.024	68.5	0.014	89.0	0.000
1.4	0.970	9.6	0.144	28.0	0.053	48.5	0.027	69.0	0.013	89.5	0.000
1.6	0.950	9.8	0.141	28.5	0.042	49.0	0.031	69.5	0.013	90.0	0.000
1.8	0.925	10.0	0.141	29.0	0.036	49.5	0.033	70.0	0.012		
2.0	0.895	10.2	0.143	29.5	0.038	50.0	0.033	70.5	0.011		
2.2	0.861	10.4	0.147	30.0	0.045	50.5	0.033	71.0	0.010		

Remarks:



SECTION III-D - DTV Engineering

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:
 - (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No
 - (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No
 - (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☐ Yes ☐ No

Applicant must **submit the Exhibit** called for in Item 13.
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☐ Yes ☐ No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☐ Yes ☐ No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☐ Yes ☐ No

SECTION III-D DTV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV _____ Analog TV, if any _____
2. Zone: ☐ I ☐ II ☐ III
3. Antenna Location Coordinates: (NAD 27)
- _____° _____' _____" ☐ N ☐ S Latitude
_____° _____' _____" ☐ E ☐ W Longitude
4. Antenna Structure Registration Number: _____
- ☐ Not applicable ☐ FAA Notification Filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level: _____ meters
6. Overall Tower Height Above Ground Level: _____ meters
7. Height of Radiation Center Above Ground Level: _____ meters
8. Height of Radiation Center Above Average Terrain: _____ meters
9. Maximum Effective Radiated Power (average power): _____ kW
10. Antenna Specifications:
- a.

Manufacturer	Model
--------------	-------
- b. Electrical Beam Tilt: _____ degrees ☐ Not Applicable
- c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True ☐ Not Applicable
- Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No.
- d. Polarization: ☐ Horizontal ☐ Circular ☐ Elliptical

TECHBOX

- e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)
 Rotation: _____° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☐ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No.

- a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

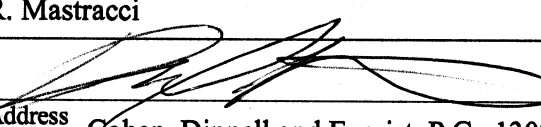
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Daryl R. Mastracci	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date 3/5/04	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

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