TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
DIGITAL COMPANION CHANNEL APPLICATION
LPTV STATION KZSW-LP
FACILITY ID 168217
RIVERSIDE, CALIFORNIA
CH 10 0.015 KW (DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in response to the FCC Public Notice (Public Notice) dated March 22, 2007 and entitled "LPTV and TV Translator Digital Companion Channel Applications Non-Mutually Exclusive Proposals (Auction No. 85)" (DA 07-1342). Specifically, this technical exhibit was prepared in support of a complete FCC Form 346 as required by the Public Notice for KZSW-LP's proposed digital companion channel operation on channel 10 at Riverside, California (FCC File No. BSFDTL-20060630CDW, Facility ID 168217). It is proposed to operate on digital channel 10 using a Scala 3XCA2/HV directional antenna. The maximum directional ERP will be 0.015 kW and the antenna radiation center height above mean sea level will be 961 meters. The transmitter will employ a "stringent" out-of-channel emission mask to control adjacent channel interference.

Figure 1 depicts the 74 dBu contours for the licensed and authorized analog operations and the 48 dBu contour for the proposed KZSW-LD digital operation. As indicated, the proposed 48 dBu overlaps a portion of both 74 dBu contours.

Response to Paragraph 5 – Antenna Registration

The antenna will be mounted at the 26 meter level on an existing tower having an overall height above ground level of 36.6 meters. The FCC Tower Registration Number for the existing tower is 1012220.

Response to Paragraph 13 – Interference

A study has been conducted using the provisions of

Section 74.793 and the OET Bulletin 69 interference model.[1] A nominal grid size resolution of 1 km was employed. The results indicate that the proposed operation will not create prohibited interference to stations in the Land Mobile Radio Service (LMRS) or other existing, authorized or proposed NTSC or DTV full-power, LPTV, TV translator or Class A stations.

Mexican Coordination

The proposed site is located 159 km north of the US/Mexican border area. Therefore, coordination of the proposal with Mexico is respectfully requested. It is understood that the existing bilateral agreement with Mexico does not contain provisions for digital LPTV stations and that the FCC will work to update the current bilateral agreement to include such provisions. Therefore, at this time it is believed appropriate to use the interference provisions of the Memorandum of Understanding (MOU) between the United States and Mexico regarding use of DTV Broadcasting Service along the common border to gauge the potential for interference to Mexican NTSC and DTV stations.

Based on the minimum distance separation requirements contained in the MOU, which are applicable to full-service US and Mexican DTV stations, it appears that the proposed KZSW-LP DTV operation on channel 10 would be fully spaced to all pertinent stations and allotments. It appears the closest first adjacent Mexican allotment is on channel 9 at Puerto Lobos, Sonora located over 589 kilometers away. Thus it is believed the proposal will not adversely affect any pertinent Mexican allotments or stations.

Response to Paragraph 14 - Environmental Protection Act

The proposed LPTV facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to

[1]The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. A Sun based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

Radiofrequency Radiation."[2] The calculated power density at the base of the tower was calculated using the appropriate equation of the Bulletin.

The power density at the base of the tower was calculated using the appropriate equation in the Bulletin. Based on a worst case relative field factor of 1, a maximum directional effective radiated power of 0.015 kilowatt, the calculated power density at 2 meters above ground at the tower base will be 0.0009 mW/cm^2. This is less than 5% of the recommended limit of 0.2 mW/cm^2 for channel 10, applicable to general population/uncontrolled exposure areas. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the FCC's 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.

Finally, it is noted that this technical exhibit only addresses the potential for radio frequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner as part of the tower registration process.

If there are any questions concerning the technical portion of this application, please contact the office of the undersigned. In addition, it appears that the proposal is

[2] See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.

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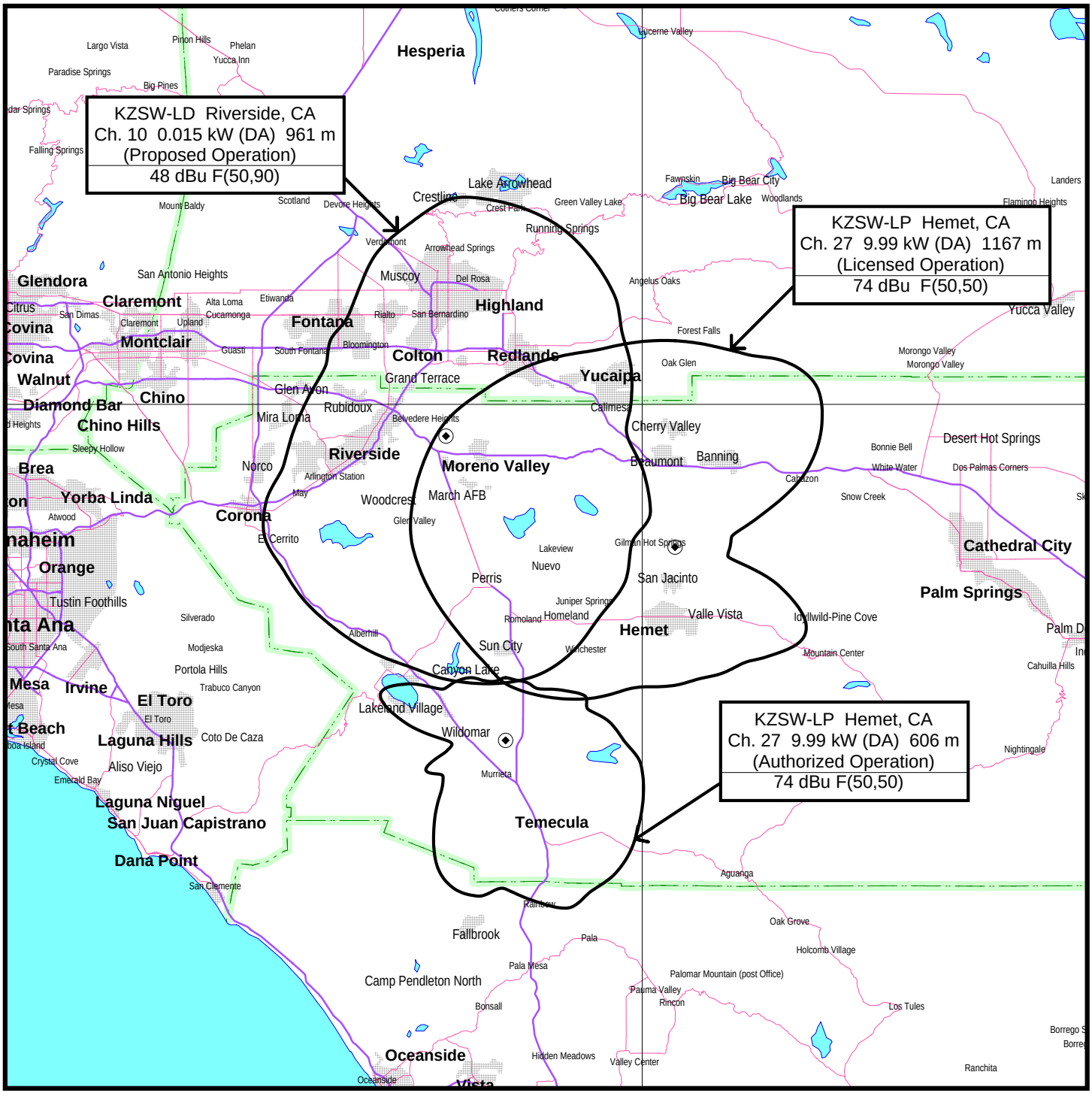

15 0 15 30 45 60 75 90 105

Kilometers

FCC PREDICTED COVERAGE CONTOURS

LOW POWER DIGITAL STATION KZSW-LD
RIVERSIDE, CALIFORNIA
CH 10 0.015 KW (DA)

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