

JULES COHEN, P.E.
CONSULTING ENGINEER

Exhibit Eng 12

**ENGINEERING STATEMENT ON BEHALF OF
NEW YORK TIMES MANAGEMENT SERVICES
TOWER AT ALVA, OKLAHOMA**

Environmental Considerations

This engineering statement was prepared on behalf of New York Times Management Services (“NY Times”). NY Times is applying for companion channel construction permits for KFOR-DT, Oklahoma City, Oklahoma, translators K64EA, K62EH, K60ER, K58EM and K56FK. The antennas for the five digital translators are all to be located on the existing 140.2-meter tower at Alva, Oklahoma (ASRN 1209900).

A study has been made of the RF exposure to be found in the vicinity of the tower with all systems operating. The study calculations were made as prescribed in OET Bulletin 65. Percentages of exposure, at two meters above ground, were determined for the individual systems relative to the maximum permitted for the general population. The sum of those percentages is 0.274.

Jules Cohen, P.E.

September 6, 2006