TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF
CONSTRUCTION PERMIT
LPTV STATION KWBP-LP
PORTLAND, OREGON

December 17, 2004

CHANNEL 5 2.7 KW

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Technical Statement

This Technical Exhibit was prepared in support of an application for modification of construction permit for LPTV station KWBP-LP, Portland, Oregon. KWBP-LP is authorized for operation on Channel 5 with a maximum effective radiated power (ERP) of 3.0 kW, using a directional antenna, and an antenna height of 506 m above mean sea level (See FCC File No. BPTVL-20020221AAM). The purpose of the instant application is to authorize a non-directional transmitting antenna with an ERP of 2.7 kW. This application is classified as a minor change. See 62 dBu coverage comparison at Figure 1 herein.

Proposed Facilities

It is proposed to operate on Channel 5 (76-82 MHz) with a "minus" carrier frequency offset using a Dielectric, DCBR-O3-2M/6L-1 non-directional antenna. The nominal non-directional ERP will be 2.7 kW. The antenna radiation center height above ground will be 183 m, with a radiation center height above mean sea level of 506 m. These elevations are identical to what is now authorized for KWBP-LP.

The proposed facility is located 307 km from the border with Canada. An allocation analysis was conducted concerning Canada. It was determined that the proposed 2 dBu, f(50,10) contour does not touch Canadian land area. Figure 3 herein is map showing the predicted 2 dBu, f(50,10) contour for the proposed facility. As shown,

the predicted 2 dBu, f(50,10) contour of the proposed facility does cross the Canadian border over water in British Columbia in the Strait of Juan de Fuca near Victoria. However, the contour does not touch Canadian land area. The U.S./Canadian Working Arrangement concerning television broadcast matters at Section 3.1.3 limits the boundaries of protection to the land area of the respective country. Therefore, the KWBP-LP proposal does not require referral to Canada.

TV Broadcast Analog Protection

An allocation study has been conducted pursuant to the provisions of Section 74.705 of the FCC Rules. The proposed facility meets the contour overlap and spacing requirements with respect to all pertinent facilities with the exception of the following:

- KOBI(TV), Channel 5, Medford, OR, BLCT-19880629KF
- KING-TV, Channel 5, Seattle, WA, BMLCT-19970714KE
- KOIN(TV), Channel 6, Portland, OR, BLCT-2115

Pursuant to Section 73.705(e) of the FCC Rules, a waiver of the interference protection rules is requested to permit the use of the Longley-Rice propagation methodology as provided in FCC OET Bulletin No. 69 ("OET-69"). Processing is requested based on a 1-km grid resolution.

An interference analysis using the procedures of OET-69 reveals that the proposed facility will meet the FCC 0.5% rounding tolerance for interference protection to each of the above listed facilities. Figure 2 herein summarizes the OET-69 based interference analysis with respect to the above facilities.

DTV Station Protection

Calculations based on OET-69 indicate that the proposed KWBP-LP operation on Channel 5 complies with the FCC's 0.5% interference threshold criteria to all authorized DTV operating facilities on Channels 5 and 6. Figure 2 provides the output of study based on OET-69, which demonstrates that the proposed KWBP-LP operation complies with the FCC's DTV interference protection criteria. Processing is requested based on a 1-km grid resolution.

LPTV/TV Translator/Class A TV Protection

An allocation study was conducted pursuant to the provisions of Section 74.707 of the FCC Rules. The proposed facility meets the contour overlap requirements with respect to all pertinent facilities pursuant to Section 74.707 of the FCC Rules, with the exception of the following:

- K05LE, Channel 5, Astoria, OR, BNPTVL-20000831BPG
- K05GZ, 5, Black Butte Ranch, OR, BLTTV-19801215II
- K05JV, 5, La Pine, OR, BLTTV-19930830IH
- K05KY, 5, Lincoln City, OR, BNPTVL-20000831BPU
- K05DF, 5, Mapleton, OR, BLTTV-1865
- NEW, 5, Prineville, OR, BNPTVL-20000831BPH
- NEW, 5, Sweet Home, OR, BNPTVL-20000831BPF
- K05KX, 5, Tillamook, OR, BNPTVL-20000831BPW
- K05AP, 5, Trout Lake, WA, BLTTV-3284

Pursuant to Section 73.707(e) of the FCC Rules, a waiver of the interference protection rules is requested to permit the use of the Longley-Rice propagation methodology as provided in OET-69. Processing is requested based on a 1-km grid resolution.

An interference analysis using the procedures of OET-69 reveals that the proposed facility will meet the 0.5% interference protection requirements with respect to all of the above stations. The OET-69 analysis is summarized in Figure 2 herein.

Environmental Considerations

With respect to the potential for human exposure to radio frequency (RF) radiation, calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground* based on the following conservative assumptions, with the following results:

Call Sign	Channel	Peak Visual ERP (kW)	Aural ERP (kW)	Relative Field Factor†	FCC Limit‡ (mW/cm^2)	Percentage of Limit
KWBP-LP	5	2.7	0.27	1.00	0.200	0.7%

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 0.7% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing.

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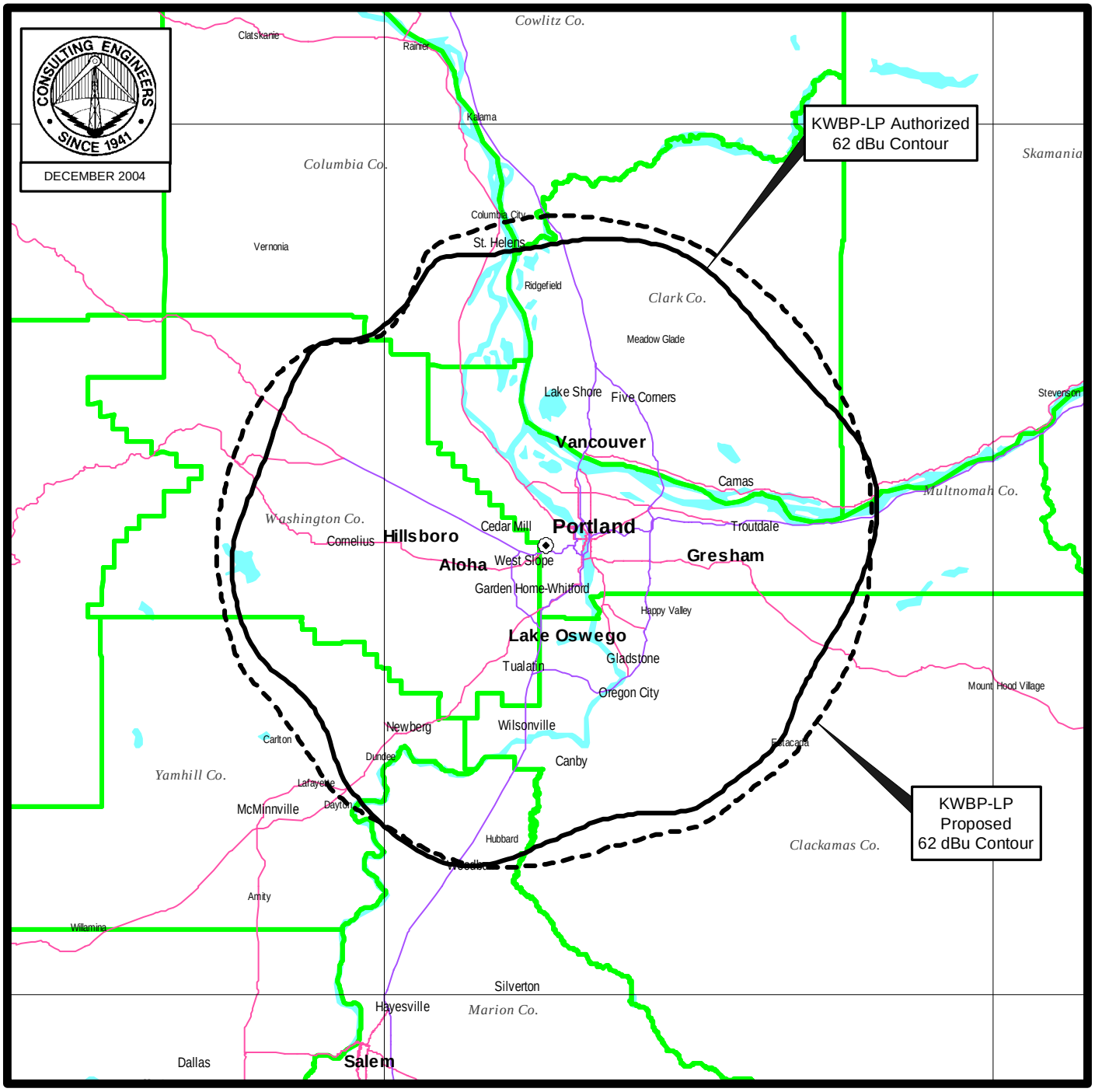
December 17, 2004

* The radiation center is located 183 m above ground level.
† This is a very conservative estimate of the relative field factor in the downward direction.
‡ for general population/uncontrolled environments



PREDICTED 62 dBu COVERAGE COMPARISON

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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Summary of OET-69 Interference Analysis

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	5	K05LE	ASTORIA OR	124.2	CP	BNPTVL	20000831BPG
2	5	K05GZ	BLACK BUTTE RANCH OR	153.2	LIC	BLTTV	19801215II
3	5	KTVR	LA GRANDE OR	390.9	CP MOD	BMPEDT	20031203AGV
4	5	K05JV	LA PINE OR	231.2	LIC	BLTTV	19930830IH
5	5	K05KY	LINCOLN CITY OR	133.2	CP	BNPTVL	20000831BPU
6	5	K05DF	MAPLETON OR	185.1	LIC	BLTTV	1865
7	5	KOBI	MEDFORD OR	315.8	LIC	BLCT	19880629KF
8	5	NEW	PRINEVILLE OR	184.2	APP	BNPTVL	20000831BPH
9	5	NEW	SWEET HOME OR	124.3	APP	BNPTVL	20000831BPF
10	5	K05KX	TILLAMOOK OR	86.7	CP	BNPTVL	20000831BPW

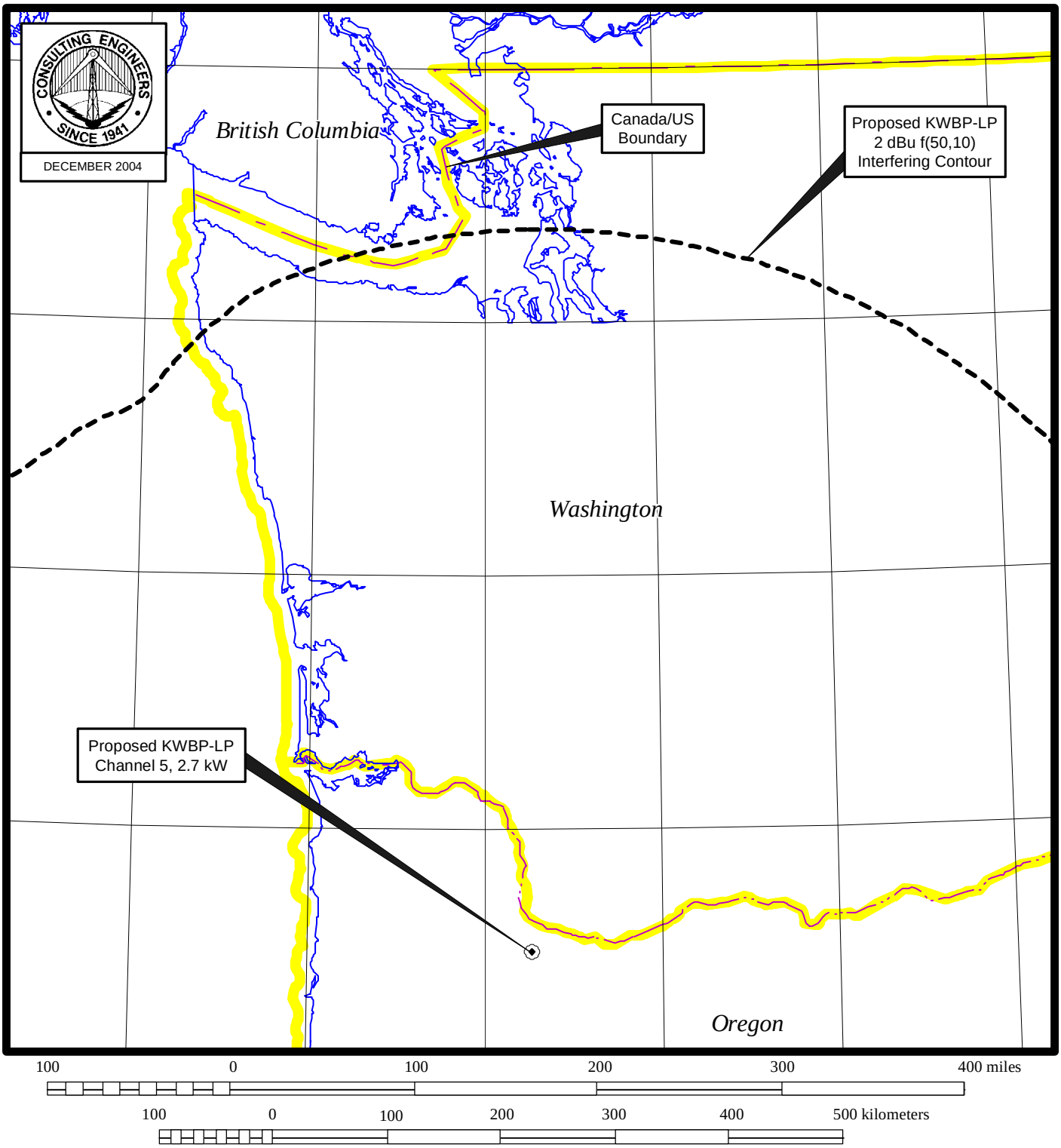
Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
11	5	KING-TV	SEATTLE WA	237.0	LIC	BMLCT	19970714KE
12	5	K05AP	TROUT LAKE WA	110.9	LIC	BLTTV	3284
13	6	KOIN	PORTLAND OR	0.0	LIC	BLCT	2115
14	6	KOIN	PORTLAND OR	0.0	CP	BPCT	20031024AAY

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	14	14	35173	0	0.000	0.5	pass
2	--	--	--	*	0.000	0.5	pass
3	--	--	--	*	0.000	0.5	pass
4	--	--	--	*	0.000	0.5	pass
5	4	4	28386	0	0.000	0.5	pass
6	--	--	--	*	0.000	0.5	pass
7	0	1759	458681	1759	0.383	0.5	pass
8	--	--	--	*	0.000	0.5	pass
9	249	255	10372	6	0.058	0.5	pass
10	3174	3174	4723	0	0.000	0.5	pass

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
11	0	646	3109273	646	0.021	0.5	pass
12	--	--	--	*	0.000	0.5	pass
13	--	--	--	*	0.000	0.5	pass
14	--	--	--	*	0.000	0.5	pass

* Proposal causes no interference.

Figure 2
Sheet 3 of 3



ALLOCATION ANALYSIS WITH RESPECT TO CANADA

LPTV STATION KWBP-LP
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida