

DIGITAL FLASH-CUT APPLICATION
TRI-STATE BROADCASTING, L.L.C.
KKAX-LP LPTV STATION
CH 36 - 602 - 608 MHZ - 0.022 KW (DA)
HILLTOP, ARIZONA
August 2011

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Tri-State Broadcasting, L.L.C. ("Tri-State"), licensee of LPTV station KKAX-LP, Channel 36N, Hilltop, Arizona. Tri-State herein requests permission to flash-cut KKAX-LP to digital operation on Channel 36 with a maximum effective radiated power of 0.022 kilowatt at the station's licensed transmitter site, with a slight adjustment to the center of radiation above ground.

The antenna system for the proposed KKAX-LP digital facility is to be located on an existing structure. Therefore, the Federal Aviation Administration was not apprised of this proposal. The antenna supporting structure is only 12.2 meters above the ground and does not require tower registration.¹ The proposed KKAX-LP operation on Channel 36 complies with the Commission's interference rules, based on the use of the Longley-Rice OET-69 Bulletin. It is noted that the terrain was sampled at 1.0 kilometer, and a signal cell size of 1.0 kilometer was used with 2000 Census population reviews. Exhibit A is a tabulation of the results of the Longley-Rice review showing that the proposed facility causes no interference to any other existing, applied for, or proposed facility, based on the database used on the indicated study date. A stringent emission mask was used for the calculations.

1) Based on a review using the Commission's TOW-AIR program.

No full service station receives predicted interference above 0.5% of its population as a result of this instant proposal. No secondary LPTV station receives predicted interference above 2.0% of its population as a result of this instant proposal. Exhibit B is a review which shows the proposed KKAX-LP facility is in compliance with the Commission's RF exposure limits.

All other data used to certify compliance with the Commission's rules has been forwarded to Tri-State and is available for submission to the Commission on request.²

2) The undersigned is certifying only the radio frequency exposure portion of the environmental analysis. All data regarding TV facilities was extracted from the CDBS database on the date of the interference study included herein. We assume no liability for errors or omissions in that database which may be adverse to the request made herein.