

TECHNICAL EXHIBIT
MINOR CHANGE APPLICATION
STATION KPXL (FACILITY ID 61173)
UVALDE, TEXAS

APRIL 6, 2007

CH 26 228 KW 521 M

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Technical Narrative

This Technical Exhibit supports a minor change application for construction permit for television station KPXL at Uvalde, Texas. Station KPXL is licensed on analog channel 26 with a non-directional antenna effective radiated power (ERP) of 5000 kilowatts (kW) and an antenna height above average terrain (HAAT) of 560 meters (BLCT-19990303KE).

Proposed Facilities

Station KPXL desires to “flash-cut” to digital mode on the current channel 26. Digital operation is proposed with the licensed (analog) non-directional antenna, along with an ERP of 228 kW from the current transmitter site. The licensed Dielectric TPU-33ETT-R O6 antenna is proposed for digital operation. The site coordinates are being corrected by 2 degrees in longitude to conform to the registration (ASR) for the existing structure (1058179). The corrected coordinates are (NAD27): 29-37-11 N, 99-02-55 W. There is also a correction (reduction) being made to the calculated HAAT, but no change in actual antenna height on the tower structure.

Figure 2 is a coverage map indicating compliance with the city coverage provisions of Section 73.625 (derived from 2000 U.S. Census information for Texas). Thirty six (36) evenly spaced radials along with the N.G.D.C. 30-second digitized terrain database were used in the calculation of the coverage contours.

In the FCC's 7th Further Notice of Proposed Rulemaking (7th FNPRM), the following DTV allotment is proposed for KPXL:

<u>Channel</u>	<u>ERP</u>	<u>HAAT</u>	<u>Site Coordinates</u>	<u>Antenna ID</u>	<u>Population</u>
26	235	560	29-37-11 N, 99-02-57 W	74761	1,771,000

This application proposes a digital operation using its licensed non-directional antenna from the licensed site. The proposed non-directional ERP has been reduced to 228 kW to avoid contour extension beyond the proposed 7th FNPRM contour (i.e., this can be considered a post-transition "checklist" application). Since there is a slight extension of the current analog contour, the applicant is requesting waiver of the FCC's Freeze, if necessary.

Allocation Considerations

The proposed KPXL-DT operation meets the FCC's current interference standards to pertinent analog (NTSC) and DTV assignments using the procedures outlined in the FCC's OET-69 Bulletin and a **1 kilometer grid cell size**. The proposed KPXL-DT operation complies with the FCC's "de minimis" interference policy with respect to pertinent Class A TV assignments. Below is the list of stations considered in the OET-69 analysis.

Stations Potentially Affected by Proposed KPXL-DT						
Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
23	KHCE-TV	SAN ANTONIO TX	85.1	LIC	BLET	-20030318AGJ
25	KEVI-LP	SAN ANTONIO TX	64.6	LIC	BLTTL	-19950103JA
25	KAVU-TV	VICTORIA TX	205.4	LIC	BLCT	-20050311AEC
26	KRIV	HOUSTON TX	343.6	LIC	BLCT	-19820429KK
26	KMID-DT	MIDLAND TX	413.1	PLN	DTVPLN	-DTVP0655
26	KMID	MIDLAND TX	413.0	CP	BPCDT	-19991029ADE
26	KXXV	WACO TX	253.4	LIC	BLCDT	-20050630AFE
26	KXXV-DT	WACO TX	253.3	PLN	DTVPLN	-DTVP0656
27	KXAM-DT	LLANO TX	126.3	PLN	DTVPLN	-DTVP0693
27	KXAM-TV	LLANO TX	126.3	CP	BPCDT	-19991018AAV
29	KABB	SAN ANTONIO TX	83.8	LIC	BLCT	-19880210KF
34	KNIC-CA	SAN ANTONIO TX	57.9	APP	BSTA	-20060925ADT

From the above list of stations considered, the table below shows the calculated interference caused to each station. Only stations that are predicted to receive interference from the proposed KPXL-DT operation are shown in the interference table.

Study Station	Baseline	Net Population Change/Interference
26 KXXV-DT WACO TX (LIC)	714,472	14,302 (2.0%) New Interference
26 KXXV-DT WACO TX (DTV ALT)	714,472	1,643 (0.2%) New Interference
27 KXAM-DT LLANO TX (DTV ALT)	249,609	135 (0.1%) New Interference
27 KXAM-DT LLANO TX (CP)	249,609	91 (0.04%) New Interference

Since the proposed 41 dBu contour is entirely within the 41 dBu contour for the proposed KPXL 7th FNPRM DTV allotment, this can be considered a “checklist” application (based on the checklist criteria in place today). Thus, no post-transition OET-69 interference analysis was conducted since the proposed facilities are less than the proposed 7th FNPRM DTV allotment facilities.

Radiofrequency Electromagnetic Field Exposure

The proposed KPXL-DT facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the proposed antenna is located 448 meters above ground level with an ERP of 228 kW. A conservative relative field value of 0.5 was assumed for the downward antenna radiation calculation. The calculated power density at a point 2 meters above ground level will be 0.01 mW/cm². This is less than 5% of the FCC's recommended limit of 0.36 mW/cm² for channel 26 for an “uncontrolled” environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner.



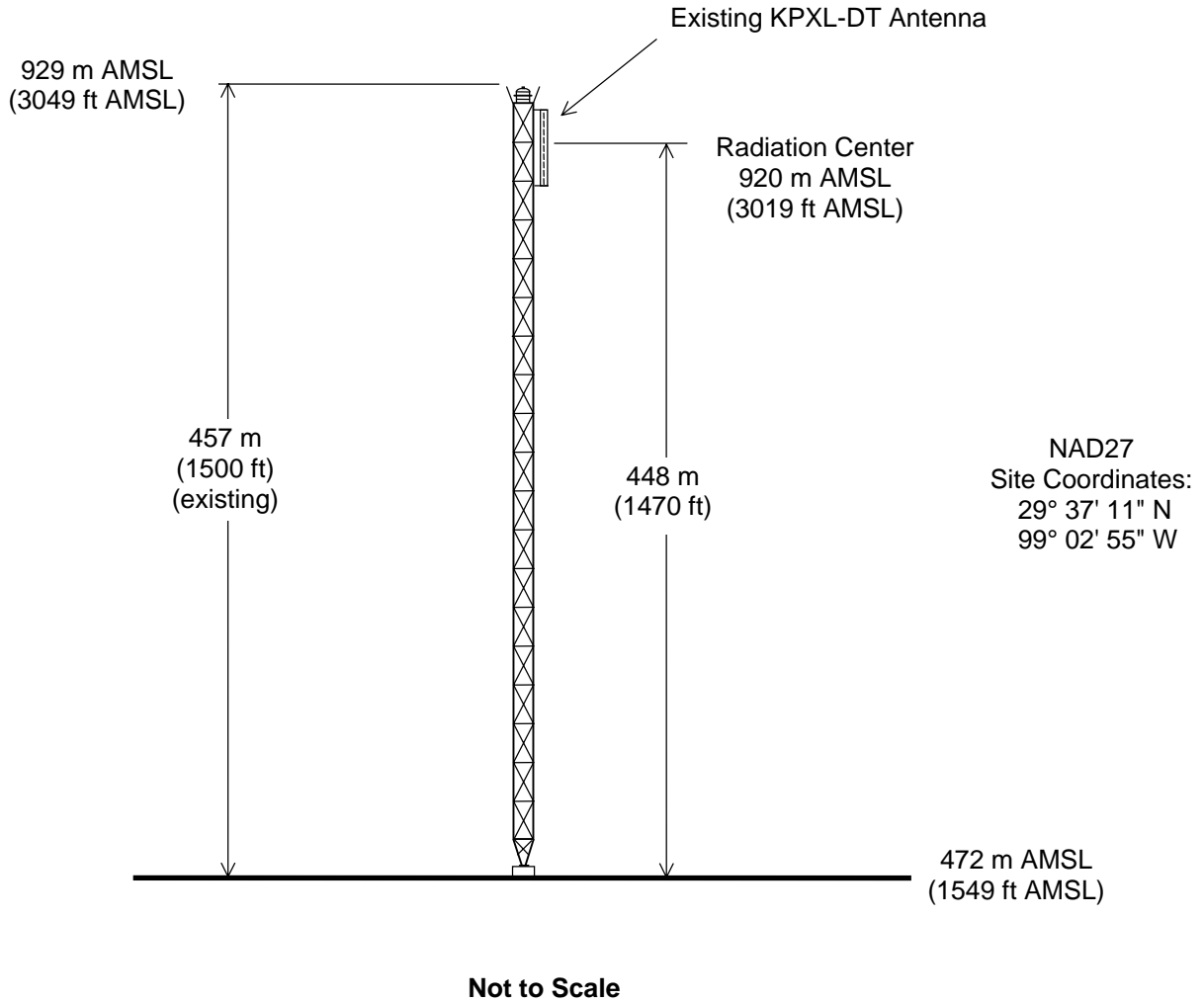
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ASRN: 1058179



ANTENNA AND SUPPORTING STRUCTURE

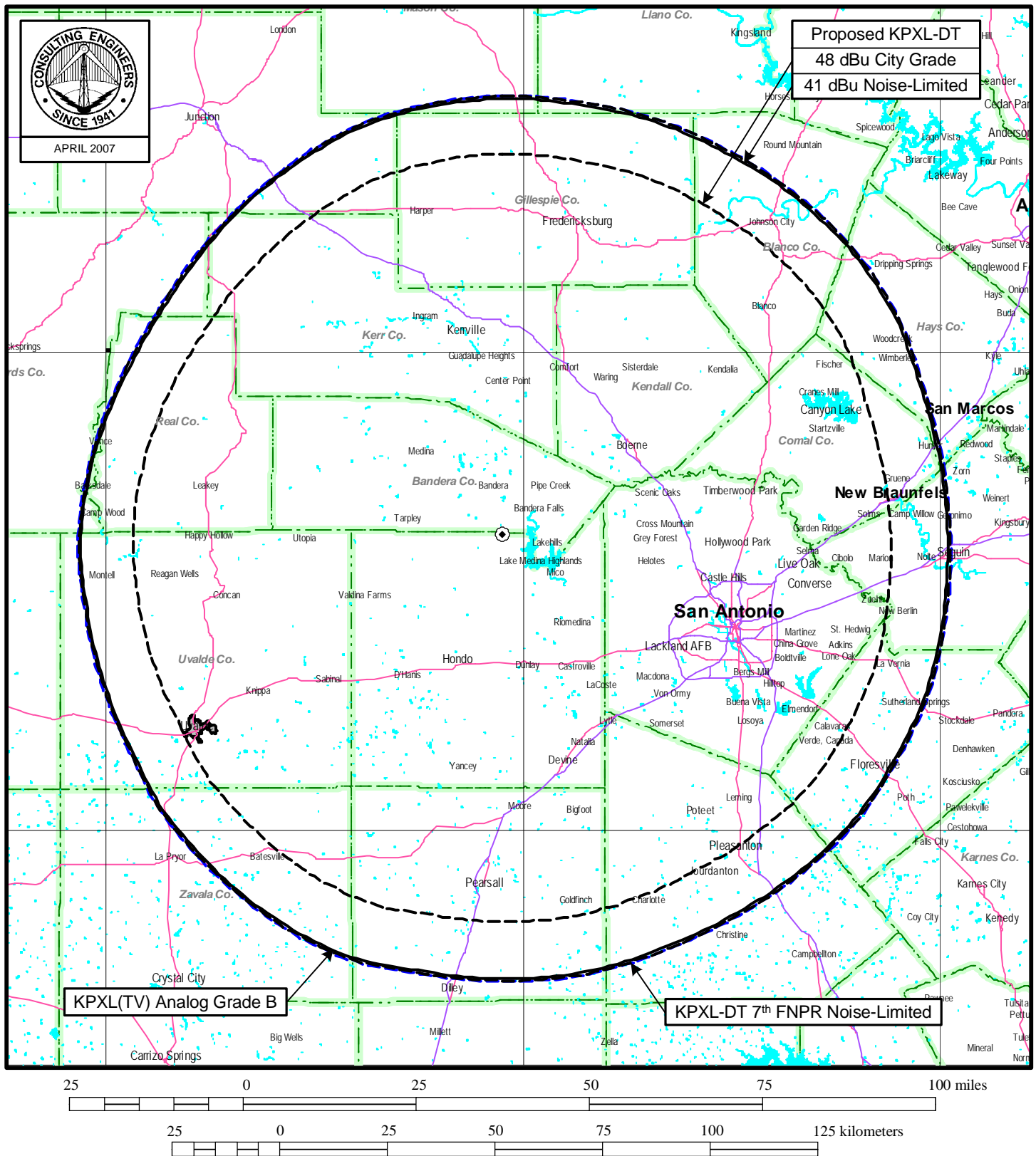
STATION KPXL-DT

UVALDE, TEXAS

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

Figure 2



PREDICTED COVERAGE CONTOURS

STATION KPXL-DT

UVALDE, TEXAS

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du Treil, Lundin & Rackley, Inc Sarasota, Florida