



## **ENGINEERING STATEMENT**

OF

**JOHN F.X. BROWNE, P.E.**

**IN SUPPORT OF APPLICATION**

FOR

**DIGITAL "FLASHCUT"**

**KVTX-LP**

**VICTORIA, TX**

### **Background**

SAGA Broadcasting, LLC (SAGA) is the licensee of analog television low power station KVTX-LP, CH45, (BLTT-20010523ABB, Facility ID. 5842) at Victoria, TX. SAGA also holds a construction permit (BPTTL-20041122AIL) to increase KVTX's ERP from 1 kW to 25 kW and change to a different omni-directional antenna that would also accommodate co-owned low power TV facilities KXTS-LP and KUNU-LP. SAGA now proposes to move KVTX-LP to a different location and "flashcut" it to digital.

### **Site and Tower**

The proposed tower is registered (ASRN 1238711). The antenna would be side-mounted on the tower in such a manner so as not to increase the overall height of the structure and, therefore, the FAA would not need to be notified nor would the ASR need to be modified. The proposed center of radiation is 132.6m AGL (175.9m AMSL).



### **Antenna and Power**

The proposed antenna is a Technalogix 8UHP-360 omni-directional radiator having an RMS gain of 14.5 dB. The antenna would be placed at a height resulting in an HAAT of 136.6m. The predicted F(50,90) 51dBu contour using the proposed 15 kW ERP would completely encompass the city of Victoria, TX.

### **Interference**

An interference study was conducted using the proposed parameters with software that emulates that used by the Commission. The study shows that there would be prohibited contour overlap with a new translator application in Beeville, TX on CH45 (BNPTTL-20000831ANK). A Longley-Rice evaluation of this interference scenario predicts the interference to be 0.0%; therefore, SAGA requests a waiver of the overlap rules [74.706(d) and 74.707(d)] based on interference studies using Longley-Rice methodology.

The Longley-Rice evaluation also shows that the proposed facility would not create more than 0.5% new interference to any full service TV, DTV, or Class A facility or more than 2% to any other translator station.

### **Environmental/RFR**

This construction does not involve any of the conditions that require preparation of an Environmental Assessment as specified in 47 CFR Section 1.1311.

The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be  $0.001131 \text{ mW/cm}^2$ , which is less than 5% of the MPE for public exposure ( $0.439 \text{ mW/cm}^2$ ) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

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SAGA agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will also be encouraged to wear personal RFR monitors when on the structure. A locked security fence will enclose the tower base and appropriate signage warning of RFR hazards will be in place.

**Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.

July 24, 2008