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**B. W. St. Clair**

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## COMPREHENSIVE TECHNICAL EXHIBIT

**Application for Construction Permit**  
**K38HA, FCC ID 130519**  
**FCC File Number BLTT-20020710AAO**  
**Prime Cities Broadcasting, Inc.**

**Application for Flash Cut, Licensed Facility.** The within proposal seeks a flash cut to digital operation. The transmitter location is unchanged; the service contour of the within application is encompasses that of the underlying station license and the proposal serves the same community.

**Digital Companion Channel.** This facility has a digital companion construction permit, BDCCDTT-20061024AFV, Facility ID 168280. In accordance with FCC policy, upon grant of the within application, it is appropriate that the companion CP be dismissed

**Unregistered Tower.** The facility uses the same tower as previously; it is unregistered, is 59 meters tall. It was reviewed pursuant to the FCC' TOWAIR program and found not to require registration as it is more than 88 km from any airport.

**Interference Analysis.** The proposal has been subjected to the Longley-Rice interference study used by the Commission, *tv\_process\_lp\_dtv\_d04\_12* as run on the *Sun Blade* computer and found to be in compliance with §74.793.

J. R. McDonald  
December 18, 2008