

ENGINEERING EXHIBIT

Application for Construction Permit

prepared for

Caballero Acquisition Inc.

KMMW-LP Stockton, CA

Facility ID 18744

Ch. 28 (digital) 15 kW

Caballero Acquisition Inc. (“CAI”) is the licensee of Low Power Television station KMMW-LP, Channel 47, Stockton, CA, Facility ID 18744 (BLTTL-20000517AFI). A Construction Permit (“CP,” BDISTTL-20060403AOS) authorizes KMMW-LP to change to analog Channel 28 due to displacement on its current Channel 47 by full-power digital television operations. CAI herein proposes a CP¹ to flash-cut to digital operation on Channel 28.

The proposed antenna is a PSI model PSILP8ANR-28-CP and will employ circular polarization. The proposed facility will operate on Channel 28 using a “stringent” out of channel emission mask. **Figure 1** depicts the 51 dB μ coverage contours of the proposed facility, as well as that of the KMMW-LP licensed analog Channel 47 and authorized analog Channel 28. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system will be side-mounted on an existing antenna support structure, having FCC Antenna Structure Registration number 1050375, in place of the KMMW-LP Channel 47 antenna. No change in overall structure height is proposed

A detailed interference study per OET Bulletin 69² shows that the proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator,

¹A separate CP has previously authorized KMMW-LD, a digital companion facility on Channel 24 (Facility ID 167836, BDCCDTL-20061030AME). CAI obtained cancellation of the digital companion CP on July 28, 2008.

²FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this

LPTV, and Class A stations. The results, summarized in **Table 1**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations).

The nearest FCC monitoring station is 100.5 km distant at Livermore, CA. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The site is not located within the areas requiring coordination with "quiet" zones specified in §73.1030(a) and (b). There are no AM stations within 3.2 kilometers of the site, based on information contained within the Commission's database. The site location is beyond the border areas requiring international coordination.

Human Exposure to Radiofrequency Electromagnetic Field (Environmental)

The proposed transmitting antenna will be installed on an existing antenna support structure. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. Based on OET-65 equation (10), and considering 20 percent antenna relative field in downward elevations, the calculated signal density near the tower at two meters above ground level attributable to the proposed facility is $7.4 \mu\text{W}/\text{cm}^2$, which is 2.0 percent of the general population/uncontrolled maximum permitted exposure limit. This is well below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic field exposure in excess of FCC guidelines.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.

Joseph M. Davis, P.E.
July 28, 2008

Chesapeake RF Consultants, LLC
11993 Kahns Road
Manassas, VA 20112
703-650-9600

List of Attachments

Figure 1	Coverage Contour Comparison
Table 1	Interference Analysis Results Summary
Form 346	Saved Version of Engineering Sections from FCC Form at Time of Upload

This material was entered July 28, 2008 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

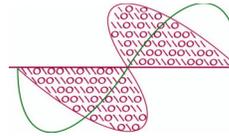
Table 1

Interference Analysis Results Summary

prepared for

Caballero Acquisition Inc.

KMMW-LP Stockton, CA

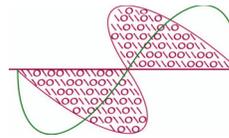


Chesapeake RF Consultants, LLC

Radiofrequency Consulting Engineers
Digital Television and Radio

Ch.	Call	City/State	Dist	Status	Application Ref. No.	---Population (1990 Census)---	
			(km)			Baseline	New Interference
14	KDTV	SAN FRANCISCO CA	122.1	LIC	BLCT-19990625KG	---	none
26	K27FX	SACRAMENTO CA	94.6	APP	BPTTL-20020816AAS	---	none
27	K27DV	CROWLEY LAKE-LONG VA CA	186.8	LIC	BLTTL-19940429JZ	---	none
27	KJKZ-LP	FRESNO CA	198.7	LIC	BLTTL-20070130AAY	---	none
27	K27GZ	MARIPOSA CA	89.5	LIC	BLTT-20020221AAJ	---	none
27	KEXT-CA	MODESTO CA	89.9	LIC	BLTTA-20030123ACJ	510,315	0 (0.00%)
27	KYMB-LP	MONTEREY CA	197.9	CP	BDFCDTT-20060315AFF	---	none
27	KYMB-LP	MONTEREY CA	197.9	LIC	BLTT-20051118AGH	---	none
27	K27EU	SACRAMENTO CA	94.6	LIC	BLTTL-19970213JG	---	none
27	KTSF	SAN FRANCISCO CA	157.5	LIC	BLCDT-20050131AOD	5,223,784	734 (0.01%)
27	KREN-TV	RENO NV	151.4	LIC	BLCT-19861016KF	---	none
27	KREN-TV	RENO NV	151.4	CP	BPCT-20040507AAV	---	none
27	KREN-TV	RENO NV	151.4	APP	BSTA-20051117AAC	---	none
27	KREN-TV	RENO NV	151.4	APP	BSTA-20060221AEH	---	none
28	KKPM-CA	CHICO CA	153.6	LIC	BLTTA-20040805ABM	177,616	878 (0.49%)
28	KBVU	EUREKA CA	402.1	CP MOD	BMPCDT-20051220AIY	---	none
28	K28DB	FALL RIVER MILLS CA	327.1	CP	BDFCDTT-20080423ADM	---	none
28	K28DB	FALL RIVER MILLS-MCA CA	327.1	LIC	BLTT-19910821IE	---	none
28	K28CY	LEWISTON CA	338.3	CP	BDFCDTT-20080423ADN	---	none
28	K28CY	LEWISTON CA	338.3	LIC	BLTT-19910715IF	---	none
28	KFTL-CA	SAN FRANCISCO, ETC. CA	157.4	LIC	BLTTA-20050105ACB	2,967,966	0 (0.00%)
28	K28FK	SAN LUIS OBISPO CA	306.7	LIC	BLTTL-19980902JB	---	none
28	K28GY	SANTA BARBARA, ETC. CA	405.3	CP	BDFCDTT-20080221AAU	---	none
28	K28GY	SANTA BARBARA, ETC. CA	405.3	LIC	BLTT-20040412AAU	---	none
28	KDTV-CA	SANTA ROSA CA	175.2	LIC	BLTTA-20030212AAT	513,611	-576 (decreases)
28	KMPH-TV	VISALIA CA	229.4	LIC	BLCDT-20030204AGN	---	none
28	K28EI	AUSTIN NV	351.9	LIC	BLTT-19960815IB	---	none
28	K28GX	WALKER LAKE, ETC NV	195.0	LIC	BLTT-20010727ABU	---	none
29	KMSX-LD	CHICO CA	181.8	LIC	BLDTL-20080616ADQ	---	none
29	K29AB	MONTEREY, ETC. CA	166.3	CP	BDFCDTT-20060829BHB	---	none
29	K29AB	MONTEREY, ETC. CA	166.3	LIC	BLTT-19811124IC	---	none
29	KSPX	SACRAMENTO CA	68.8	APP	BPCT-20031002AEJ	3,501,577	3,325 (0.09%)
29	KSPX	SACRAMENTO CA	57.9	LIC	BLCT-19900904KE	1,589,292	1,419 (0.09%)
29	KPIX-TV	SAN FRANCISCO CA	156.7	LIC	BLCDT-19990301KF	5,785,650	6 (0.00%)
29	K29ES	CARSON CITY NV	147.1	LIC	BLTT-20030424AAB	---	none

Table 1
Interference Analysis Results Summary
 (page 2 of 2)



Chesapeake RF Consultants, LLC

Radiofrequency Consulting Engineers
 Digital Television and Radio

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist</u> <u>(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
29	K69IE	RENO NV	181.5	APP	BPTTL-20020701ABK	---	none
29	K29BN	SILVER SPRINGS NV	195.6	LIC	BLTT-19891211IB	---	none
31	KMAX-TV	SACRAMENTO CA	68.8	LIC	BLCT-20021125AAK	---	none
32	KSTV-LP	SACRAMENTO CA	67.2	LIC	BLTTL-20070716ADI	---	none
32	KSTV-LP	SACRAMENTO CA	67.2	APP	BSTA-20070612ABW	---	none
36	KICU-TV	SAN JOSE CA	122.4	LIC	BLCT-19881116KE	---	none

SECTION III - ENGINEERING DATA (Digital)

TECHNICAL SPECIFICATIONS
 Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number:
28

2. Translator Input Channel No. :

3. Primary station proposed to be rebroadcast:

Facility Identifier	Call Sign	City	State	Channel
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4. Antenna Location Coordinates: (NAD 27)
 Latitude:
 Degrees 38 Minutes 7 Seconds 10 North South
 Longitude:
 Degrees 120 Minutes 43 Seconds 27 West East

5. Antenna Structure Registration Number: 1050375
 Not Applicable [Exhibit 10] Notification filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: 834.5 meters

7. Overall Tower Height Above Ground Level: 128 meters

8. Height of Radiation Center Above Ground Level: 75.7 meters

9. Maximum Effective Radiated Power (ERP): 15 kW

10. Transmitter Output Power: 1 kW

11. a. Transmitting Antenna:
 Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under [CDBS Public Access](http://fjallfoss.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm) (http://fjallfoss.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search.
 Nondirectional Directional "Off-the-shelf" Directional composite
 Manufacturer PSI Model PSILP8ANR-28-CP CIRCULARLY POLARIZED

b. Electrical Beam Tilt: 2 degrees Not Applicable

c. Directional Antenna Relative Field Values: N/A (Nondirectional or Directional "Off-the-shelf")
 Rotation (Degrees): 226 No Rotation

Degrees	Value										
0	1	10	0.976	20	0.912	30	0.822	40	0.721	50	0.617
60	0.52	70	0.438	80	0.375	90	0.323	100	0.276	110	0.237
120	0.205	130	0.172	140	0.13	150	0.099	160	0.103	170	0.133
180	0.161	190	0.133	200	0.103	210	0.099	220	0.13	230	0.172
240	0.205	250	0.237	260	0.276	270	0.323	280	0.375	290	0.438
300	0.52	310	0.617	320	0.721	330	0.822	340	0.912	350	0.976

Additional Azimuths

[Relative Field Polar Plot](#)

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

12. Out-of-channel Emission Mask: Simple Stringent

CERTIFICATION

13. **Interference** : The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030. Yes No
 See Explanation in [Exhibit 11]

14. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an **Exhibit is required.** Yes No
 See Explanation in [Exhibit 12]

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic

exposure in excess of FCC guidelines.

15. **Channels 52-59.** If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:

The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.

Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

16. **Channels 60-69.** If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:

Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreements(s) with 700 MHz public safety regional planning committee(s) and state administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.

Pursuant to Section 74.786(e), the applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.

PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOSEPH M. DAVIS, P.E.		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 7/28/2008	
Mailing Address CHESAPEAKE RF CONSULTANTS, LLC 11993 KAHNS ROAD			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20112 -
Telephone Number (include area code) 7036509600		E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Any specified rotation has already been applied to the plotted pattern.
Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.

