

Exhibit 7 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Ventana Television, Inc.
K26CR Kansas City, Missouri
Facility ID 49176
Ch. 45+ 150 kW

Introduction

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Categorical Exclusion

Ventana Television, Inc. ("Ventana") is the licensee of analog low power television station K26CR, Channel 26, Kansas City, Missouri, Facility ID 49176 (file number BLTTL-20030624ABG). K26CR has been displaced from Channel 26. The instant application requests authority to move from Channel 26 to Channel 45 at the same location on the existing 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. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with these FCC limits.

Exhibit 7 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 2 of 3)

Ventana proposes to simply replace the existing directional antenna and install the proposed antenna at the same elevation, such that its center of radiation is 159.9 meters above ground level. An effective radiated power (“ERP”) of 150 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer, the proposed K26CR antenna will have a relative field of 20 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 20 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 45 (center frequency 659 MHz) is 439.3 $\mu\text{W}/\text{cm}^2$.

Using formula 2 from OET 65, Supplement A, (assuming typical 10 percent aural carrier level), the formula for NTSC television transmitting antennas as used for calculating signal density in this analysis is:

$$S = \{33.4098 \times F^2 \times [(ERP_{\text{Visual}} \times 0.4) + ERP_{\text{Aural}}]\} / R^2$$

Where:

- S* = Plane Wave Power Density ($\mu\text{W}/\text{cm}^2$) at specified point
- F* = Relative Field Factor for Horizontal and Vertical Planes
- ERP_{Visual}* = total visual ERP in Watts
- ERP_{Aural}* = total aural ERP in Watts
- R* = distance in meters from center of radiation to the specified point.

Using this formula, the proposed facility would contribute a power density of 4.02 $\mu\text{W}/\text{cm}^2$ at locations two meters above ground level near the tower, or 0.9 percent of the general population/uncontrolled limit. At ground level locations away from the building, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters (such as the case at hand), are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five

Exhibit 7 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 3 of 3)

percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of various other facilities at and near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposed K26CR operation will not be caused at ground level locations near the site. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure attributable to the proposed K26CR facility would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

ENGINEERING EXHIBIT

Application for Construction Permit

prepared for

Ventana Television, Inc.

K26CR Kansas City, Missouri

Facility ID 49176

Ch. 45+ 150 kW

Table of Contents

FCC Form 346, Section III

Exhibit 6

Statement A

Allocation and Interference Considerations

Table I

Interference Analysis Results Summary

Exhibit 7

Statement B

Environmental Considerations

This material supplies a "hard copy" of the engineering portions of this application as entered April 29, 2004 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.

SECTION III - ENGINEERING DATA

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:
45

2. Frequency Offset: No offset Zero offset Plus offset Minus offset

3. Translator Input Channel No. :

4. Primary station proposed to be rebroadcast:

Call Sign	City	State	Channel
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5. Antenna Location Coordinates: (NAD 27)
 Latitude:
 Degrees 39 Minutes 1 Seconds 20 North South
 Longitude:
 Degrees 94 Minutes 30 Seconds 49 West East

6. Antenna Structure Registration Number: 1064715
 Not Applicable Notification filed with FAA

7. Antenna Location Site Elevation Above Mean Sea Level: 270.1 meters

8. Overall Tower Height Above Ground Level: 353 meters

9. Height of Radiation Center Above Ground Level: 159.9 meters

10. Maximum Effective Radiated Power (ERP) Towards Radio Horizon: 150 kW

11. Maximum ERP in any Horizontal and Vertical Angle: 150 kW

12. Transmitting Antenna:
 Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under [CDBS Public Access](http://svartifoss2.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm) (http://svartifoss2.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 DIE Model TLP24-M

Directional Antenna Relative Field Values: N/A (Nondirectional or Directional "Off-the-shelf")

Rotation (Degrees): 280 No Rotation

Degrees	Value										
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	

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.

CERTIFICATION

13. **Interference** : The proposed facility complies with all of the following applicable rule sections. Check all those that apply. Yes No

TV broadcast analog system protection. See Explanation in [Exhibit 6]

a. 47 C.F.R. Section 74.705

Digital TV station protection.

b. 47 C.F.R. Section 74.706

Low Power TV and TV translator station protection.

c. 47 C.F.R. Section 74.707

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 7]

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.

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 MARK B. PEABODY		Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature		Date 4/29/2004	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVE.			
City MANASSAS	State or Country (if foreign address) VA		Zip Code 20109 -
Telephone Number (include area code) 7033929090		E-Mail Address (if available) MPEABODY@CMDCONSULTING.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).

Exhibits

Exhibit 6

Description: EXHIBIT 6 - NATURE OF APPLICATION, ALLOCATIONS & INTERFERENCE CONSIDERATIONS

ATTACHED AS EXHIBIT 6

Attachment 6

Description
Exhibit 6 - Nature of Application, Allocations and Interference Considerations

Exhibit 7

Description: EXHIBIT 7 - ENVIRONMENTAL CONSIDERATIONS

ATTACHED AS EXHIBIT 7

Attachment 7

Description
Exhibit 7 - Environmental Considerations