

TECHNICAL EXHIBIT  
DIGITAL FLASH-CUT APPLICATION FOR  
TV TRANSLATOR STATION K31HQ (FACILITY ID 125917)  
LORDSBURG, NEW MEXICO  
CH 31 0.123 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station K31HQ. Station K31HQ is licensed (BLTT-20060321ADZ) to operate on analog channel 31 with a Scala PR450U directional maximum (visual) effective radiated power (ERP) of 0.616 kW and an antenna height above mean sea level (RCAMSL) of 2452 meters.

Proposed Facilities

This application proposes digital operation on the current channel (31), at the current transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 32-34-57 N, 108-25-26 W. A Scala PR450U antenna, with a maximum ERP of 0.123 kW and antenna RCAMSL of 2452 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As shown on the map the licensed analog contour is completely encompassed by the proposed digital contour.

Results of the FCC's TOWAIR Program indicate that the existing 40 meter (131 feet) structure does not require registration as it does not exceed 200 feet and there are not airports within 8 kilometers of the existing site. Figure 2 shows the results of the FCC's TOWAIR Program.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 2000 U.S. Census, the proposal complies

with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

#### Mexican Coordination

The proposed transmitter site is located 91.1 kilometers from the U.S.-Mexican Border. Therefore, it is respectfully requested that the FCC coordinate this proposal with Mexico, if necessary. Figure 3 is a separation study based on the provisions of the U.S.-Mexican TV Agreement (June 1982) and the Memorandum of Understanding (MOU) between the United States and Mexico regarding the use of DTV Broadcasting Service along the common border. The separation requirements are applicable to full-power NTSC and DTV stations (but are not applicable to low power stations) but have been used for this analysis in an abundance of caution. As indicated, the proposed channel 31 digital operation complies with the separation requirements to all Mexican NTSC and DTV stations and allotments.

#### Radiofrequency Electromagnetic Field Exposure

The K31HQ facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OET Bulletin No. 65. This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields.

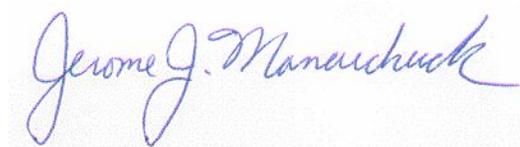
The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. As shown on Figure 4 (antenna vertical relative pattern), the maximum vertical relative field for depression

angles towards the tower base ( $-60^{\circ}$  to  $-90^{\circ}$ ) is less than 0.1. Therefore, using a vertical relative field value of 0.1, a maximum ERP of 0.123 kilowatts, and an antenna center of radiation height above ground level of 30 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0001 milliwatt per square centimeter ( $\text{mW}/\text{cm}^2$ ), or 0.026 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ( $0.38 \text{ mW}/\text{cm}^2$  for TV channel 31). Therefore, the facility complies with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect to control access to the site. In the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.

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 addressed by the tower owner.

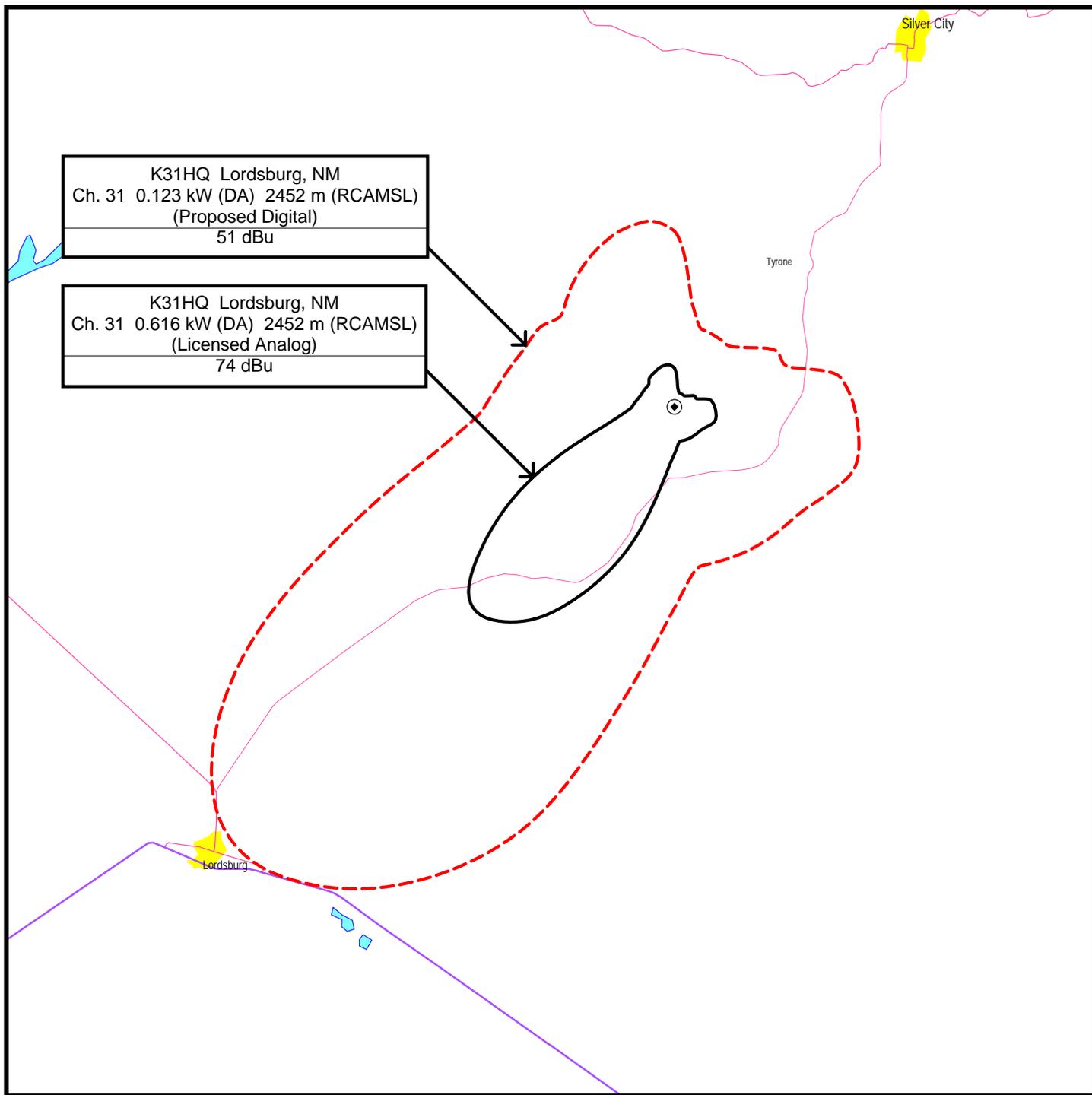
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.



Jerome J. Manarchuck

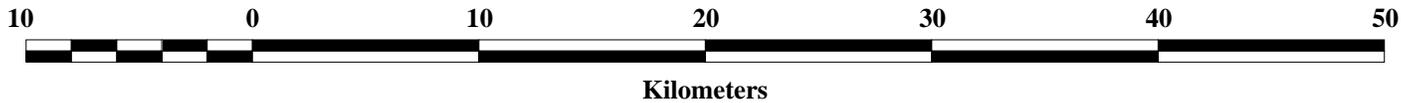
du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
(941) 329-6000

August 18, 2009



K31HQ Lordsburg, NM  
Ch. 31 0.123 kW (DA) 2452 m (RCAMSL)  
(Proposed Digital)  
51 dBu

K31HQ Lordsburg, NM  
Ch. 31 0.616 kW (DA) 2452 m (RCAMSL)  
(Licensed Analog)  
74 dBu



### COVERAGE COMPARISON

TV TRANSLATOR STATION K31HQ  
LORDSBURG, NEW MEXICO

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

## TOWAIR Determination Results

### \*\*\* NOTICE \*\*\*

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

#### DETERMINATION Results

**Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.**

#### Your Specifications

##### NAD83 Coordinates

Latitude	32-34-57.0 north
Longitude	108-25-28.0 west

##### Measurements (Meters)

Overall Structure Height (AGL)	40
Support Structure Height (AGL)	39
Site Elevation (AMSL)	2422

##### Structure Type

TOWER - Free standing or Guyed Structure used for Communications Purposes

#### [Tower Construction Notification](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Note: Notification does NOT replace [Section 106 Consultation](#).

CLOSE WINDOW

# TV Study

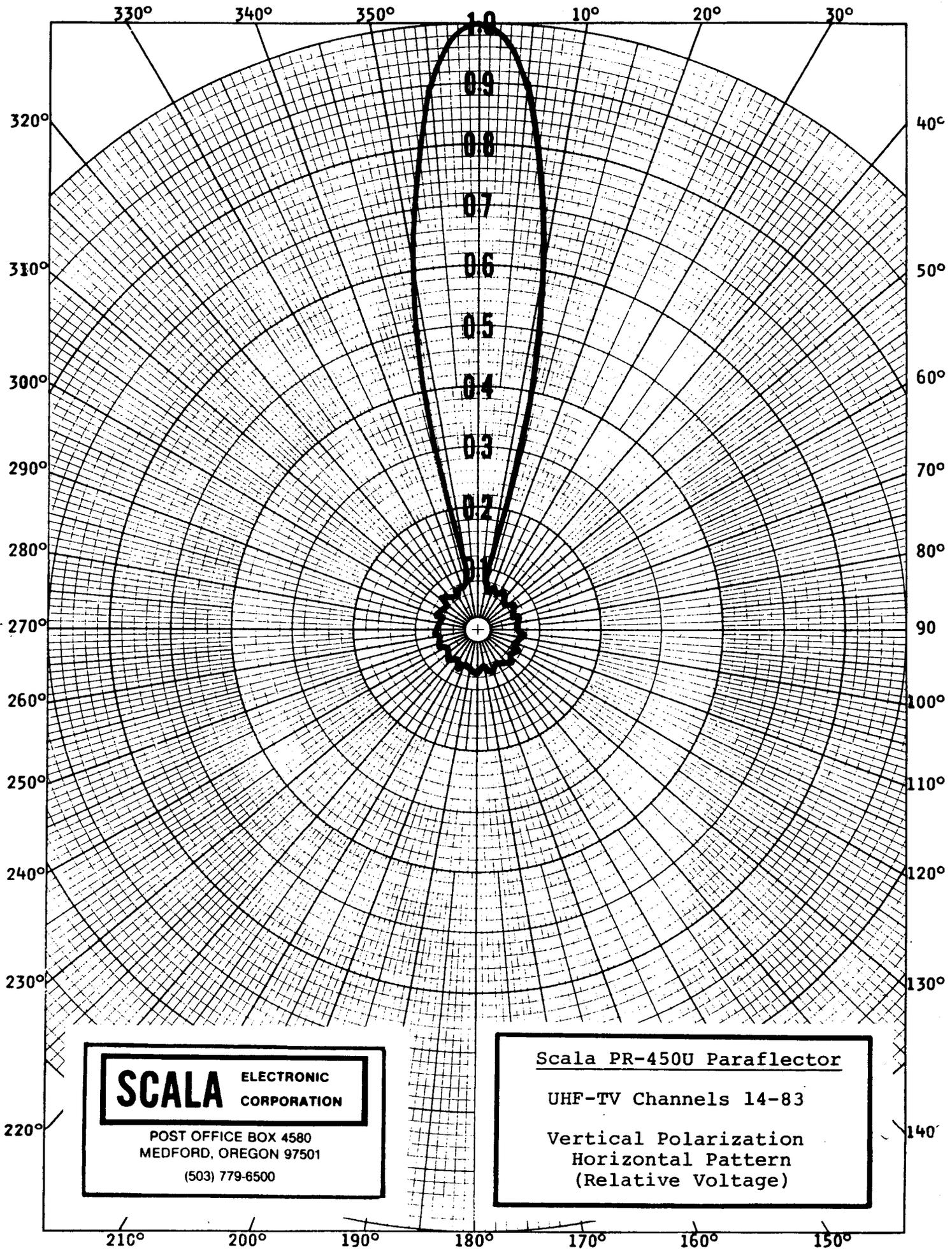
du Treil, Lundin, & Rackley, Inc., Sarasota, Florida



<b>Station Type:</b>	DT	<b>Station Coordinates:</b>	032-34-57 108-25-26 (NAD 27)		
<b>Station Channel:</b>	31	<b>Station Zone:</b>	II	<b>Equivalent Canadian Class:</b> C	
<b>Buffer Distance:</b>	km	<b>Comment:</b>	Comment:		

Callsign	Status	Channel	Service	Zone	City	State	Latitude	Dist. (km)	Min. (km)	Spacing (km)			
Facility ID	ARN			Class	DA	Ant ID	ERP (kW)	HAAT (m)	Rec Type	Longitude	Bear. (deg)	Max. (km)	Comment
D	DTVALT	31	DT	2	SOCORRO	NM	34-03-29	217.13	223.7	-6.57			
0						C	106-53-29	40.53	223.7	<b>SHORT</b>			

Figure 4



**SCALA** ELECTRONIC CORPORATION  
POST OFFICE BOX 4580  
MEDFORD, OREGON 97501  
(503) 779-6500

Scala PR-450U Paraflector  
UHF-TV Channels 14-83  
Vertical Polarization  
Horizontal Pattern  
(Relative Voltage)