

EXHIBIT A

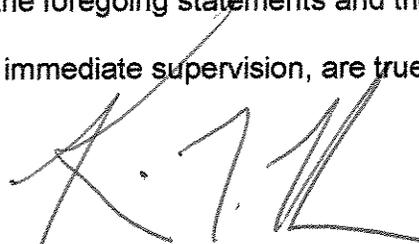
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FOX TELEVISION STATIONS, INC., licensee of television translator K63DX, Channel 63 in Wadena, Minnesota, in support of this Application for Construction Permit to specify operation on Channel 33 from the licensed K63DX site. This proposal is being submitted in response to the Commission's reclamation of Channel 63 spectrum for re-allotment to public safety services, thereby placing this translator in a displacement situation.

It is proposed to mount a standard ERI omnidirectional antenna at the authorized height on the side of an existing 151-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 74 dBu contour encompasses a significant portion of that which obtains from the licensed K63DX facility. Operating parameters for the proposed facility are tabulated in Exhibit C. A contour overlap analysis and interference study are provided in Exhibit D, and a power density calculation follows as Exhibit E.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1031884 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

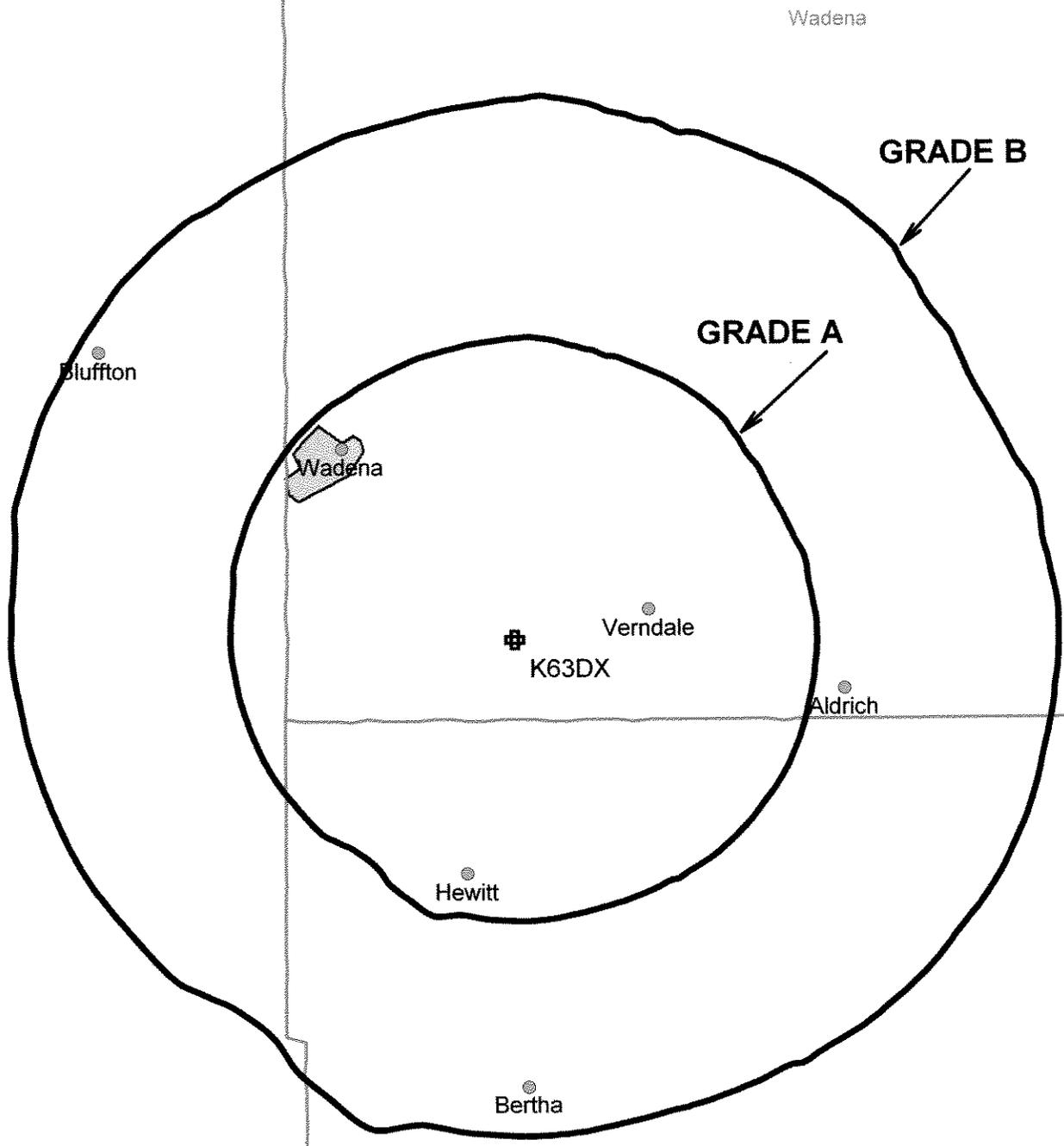


KEVIN T. FISHER

February 13, 2008

**CONTOUR POPULATION**  
**GRADE A (74 DBU) : 6,927**  
**GRADE B (64 DBU) : 10,582**

**SMITH and FISHER**



**EXHIBIT B**

## PROPOSED OPERATING PARAMETERS

PROPOSED K63DX  
CHANNEL 33 – WADENA, MINNESOTA

Transmitter Power Output:	100 watts
Transmission Line Efficiency:	56.6%
Antenna Power Gain – Toward Horizon:	14.06
Antenna Power Gain – Main Lobe:	14.06
Effective Radiated Power – Toward Horizon:	0.8 kw
Effective Radiated Power – Main Lobe:	0.8 kw
Transmitter Make and Model:	Type-accepted
Rated Output	0.1 kw
Transmission Line Make and Model:	Andrew HJ7-50A
Size and Type:	1-5/8" air foam heliax
Length:	475 feet*
Antenna Make and Model:	ERI AL8
Orientation	Omnidirectional
Beam Tilt	1.75 degrees
Radiation Center Above Ground:	137 meters
Radiation Center Above Mean Sea Level:	549 meters

\*estimated

CONTOUR OVERLAP AND  
LONGLEY-RICE INTERFERENCE STUDIES  
PROPOSED K63DX  
CHANNEL 33 – WADENA, MINNESOTA

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D-2. The study is based on contour protection requirements of Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710 of the FCC's Rules with respect to analog and digital full-power, analog and digital low power television stations, and Land Mobile allotments. It concludes that the facility proposed herein meets these requirements except to one station: KDLH-DT, Channel 33 in Duluth, Minnesota. [It is important to note that the licensee of K63DX presently has an outstanding construction permit for K33IU-D, a companion channel LPTV facility in Wadena. It is intended that the instant application will supplant the K33IU-D authorization.]

We then conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to KDLH-DT. The software utilizes a 1.0-square kilometer cell size (except where noted), calculates signal strength at 0.1 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed K63DX) already is predicted to exist (also known as "masking"). The results of

EXHIBIT D-1

this study are provided in Exhibit D-3. It concludes that the facility proposed herein causes no significant new interference to KDLH-DT.

As a result, waiver of Section 74.706 of the Commission's Rules with respect to interference to KDLH-DT is requested and believed to be justified based on the aforementioned Longley-Rice study.

SMITH AND FISHER

EXHIBIT D-2

PROPOSED K63DX  
CH. 33 - WADENA, MN

REFERENCE

46 23 23 N  
95 04 03 W

LPTV Pwr = 0.8 kW, HANSL COR= 549 M

DISPLAY DATES

DATA 02-09-08  
SEARCH 02-12-08

..... Channel 33-, 584 MHz .....

Call	Channel	Location	Dist	Azi	FCC	Margin
KDLH-D CPM	33	Duluth	MN 230.66	77.8	> 287.11	-56.45
DK33ET LI	33Z	Aitkin	MN 92.78	79.5	> 085.29	7.49
K33JK- CP	33	Granite Falls	MN 180.65	192.9	> 163.46	17.19
K32FY LI	32-	Park Rapids	MN 60.33	4.3	> 042.47	17.86
K18DG LI	18Z	Alexandria	MN 58.62	210.1	> 033.40	25.22
K32EB LI	32Z	Alexandria	MN 58.62	210.1	> 027.62	31.00
K34AF LI	34Z	Alexandria	MN 58.62	210.1	> 026.82	31.80
KVNJ-L AP	33Z	Fargo	ND 146.56	291.6	> 112.30	34.26
K34IR- CP	34	Walker	MN 86.65	25.2	> 044.57	42.08
AL836 AL	33Z	Crookston	MN 193.49	323.4	> 150.02	43.47
KVNJ-L ST	33Z	Fargo	ND 142.33	293.1	> 085.46	56.87
KAAL-D CPM	33	Austin	MN 341.97	153.2	> 284.57	57.40
K18GF LI	18Z	Little Falls	MN 71.49	133.7	> 013.66	57.83
ALK19B AL	19Z	St. Cloud	MN 115.98	142.5	> 055.65	60.33
K33CR LI	33+	Appleton	MN 152.60	208.5	> 086.13	66.47

INTERFERENCE SUMMARY  
PROPOSED K63DX  
CHANNEL 33 – WADENA, MINNESOTA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
KDLH-DT BMPCDT-20060519AAE	CP	Duluth, MN	33	249,186	0	0

EXHIBIT E

POWER DENSITY CALCULATION  
PROPOSED K63DX  
CHANNEL 33 – WADENA, MINNESOTA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Wadena facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 0.8 kw, an antenna radiation center 137 meters above ground, and the vertical pattern of the ERI antenna, maximum power density two meters above ground of  $0.0000068 \text{ mw/cm}^2$  is calculated to occur 122 meters from the base of the tower. Since this is less than 0.1 percent of the  $0.39 \text{ mw/cm}^2$  reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 33 (584-590 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.