DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

FCC FORM 301, EXHIBIT 39
ENGINEERING EXHBIT
APPLICATION FOR MODIFICATION
OF CONSTRUCTION PERMIT
KTVU PARTNERSHIP
STATION KFOX-DT
EL PASO, TEXAS
CH 15 1,000 KW (MAX-DA, BT) 602 METERS

This engineering exhibit was prepared on behalf of KTVU Partnership (hereinafter KTVU), permittee of station KFOX-DT, El Paso, Texas, in support of an FCC Form 301 application for modification of construction permit

KFOX-DT is authorized (FCC File Number BMPCDT-20020516AAP) for digital television (DTV) operation on channel 15 (476 to 482 megahertz (MHz)) with 1,000 kilowatts (kW) maximum average effective radiated power (ERP), horizontally polarized, and 604 meters antenna radiation center height above average terrain (HAAT) from a site located at geographic coordinates 31° 48' 55" North Latitude, 106° 29' 20" West Longitude, referenced to the 1927 North American Datum (NAD 27).

The instant application proposes no change in the authorized KFOX-DT maximum average ERP and proposes to decrease the KFOX-DT antenna radiation center HAAT from 604 meters to 602 meters to conform the authorized antenna radiation center HAAT with that computed using the FCC's *tv_proc*ess computer program. The proposed KFOX-DT antenna radiation center height remains at 102 meters above ground level (AGL).

As was the case in the previous applications for the now-authorized KFOX-DT facilities, the instant application proposes KFOX-DT maximum average ERP and antenna radiation center HAAT in excess of the limits of Section 73.622(f)(8). The proposed KFOX-DT ERP and antenna radiation center HAAT are permitted under the rules because:

1. The ERP and antenna radiation center HAAT proposed herein are virtually identical to the authorized KFOX-DT facilities. The instant application seeks to conform the relative field factors of the authorized antenna to the as-built measurements of the manufacturer and the KFOX-DT antenna radiation HAAT to the HAAT computed by the FCC computer software. Figure 1 of this

engineering exhibit is a comparison of the authorized and proposed KFOX-DT noise limited 41 dBμ F(50,90) coverage contours.

2. With respect to the proposed KFOX-DT facilities, the proposed maximum average ERP does not exceed 1000 kW and the proposed antenna radiation center HAAT is less than 610 meters.

3. Section 73.622(f)(5) of the FCC Rules permits KFOX-DT to increase ERP and antenna radiation center HAAT up to that needed to provide the same geographic coverage area as the largest station within their market, which, in this case, is TV station KDBC-TV, El Paso, Texas.

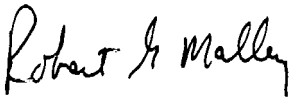
KDBC-TV is authorized (FCC File Number BLCT-19840531KF) for analog television (TV) operation on channel 4 (66 to 72 MHz) with 100 kW peak visual ERP, horizontally polarized, and 475 meters antenna radiation center HAAT from a site located at geographic coordinates 31° 47' 46" North Latitude, 106° 28' 57" West Longitude (NAD 27). The licensed KDBC-TV site is located 2.2 kilometers southeast of the KFOX-DT site.

Figure 2 of this engineering exhibit is a map showing the locations of the licensed KDBC-TV Grade B 47 dBμ F(50,50) contour and the proposed KFOX-DT noise limited 41 dBμ F(50,90) contour. The licensed KDBC-TV Grade B contour encloses U.S. land area of 26,588 square kilometers. The proposed KFOX-DT service contour encloses U.S. land area of 26,353 square kilometers. The proposed KFOX-DT geographic coverage area is 99.1 percent of the KDBC-TV geographic coverage area, so the proposed KFOX-DT facilities do not result in coverage exceeding that of the largest station in the market in compliance with the pertinent rule.

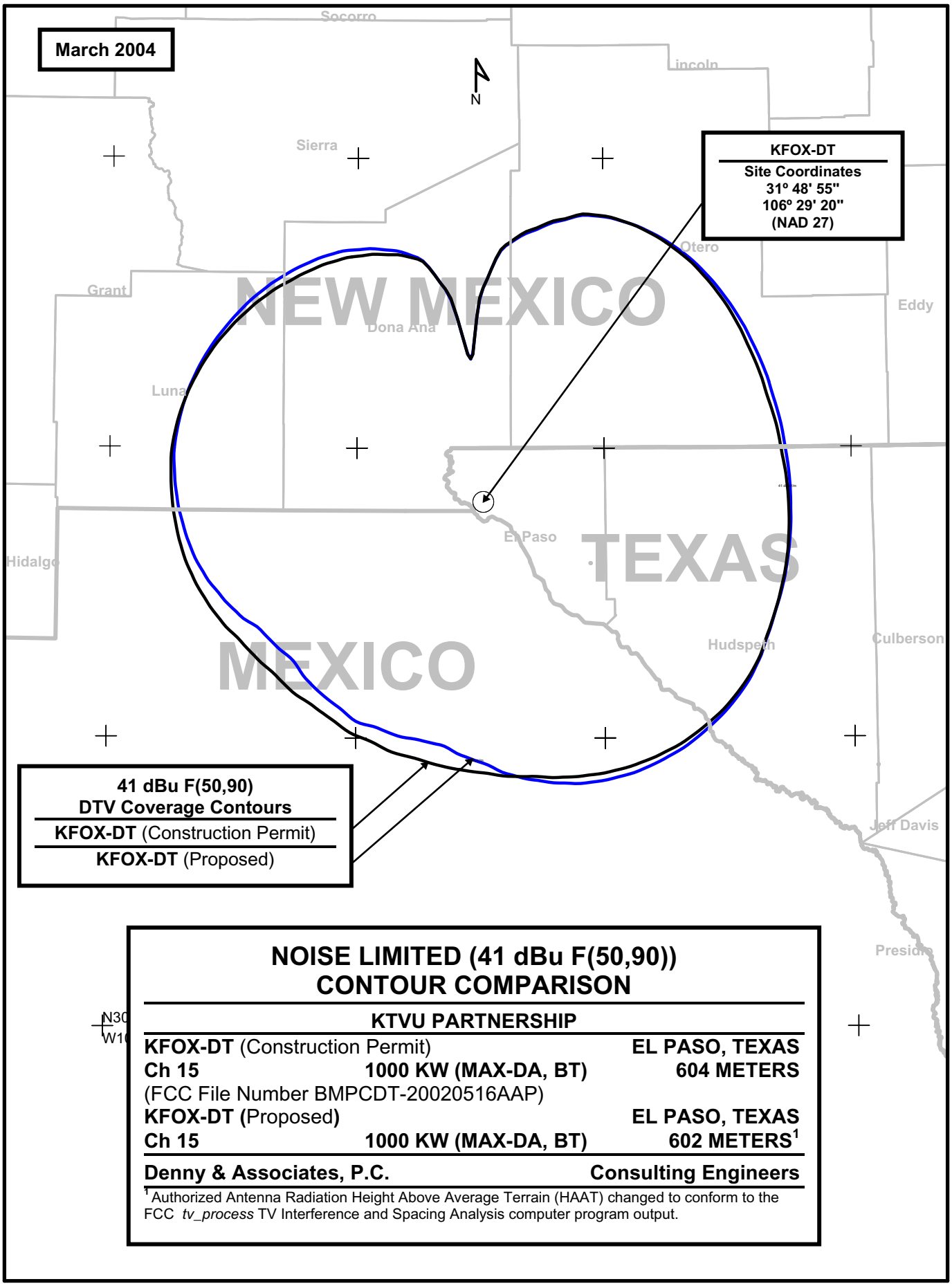
In reviewing the map of Figure 2 of this exhibit, it is important to note that the decreased distances to both stations' contours to the north result form local terrain affects and not from antenna radiation characteristics. Due to the frequency difference and site location difference involved between KFOX-DT and KDBC-TV, KFOX-DT would have to reduce power substantially in order for the resulting KFOX-DT noise limited contour to be completely enclosed by the KDBC-TV Grade B contour in the area to the north of the stations' transmitter sites.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on March 18, 2004.



Robert G. Mallery



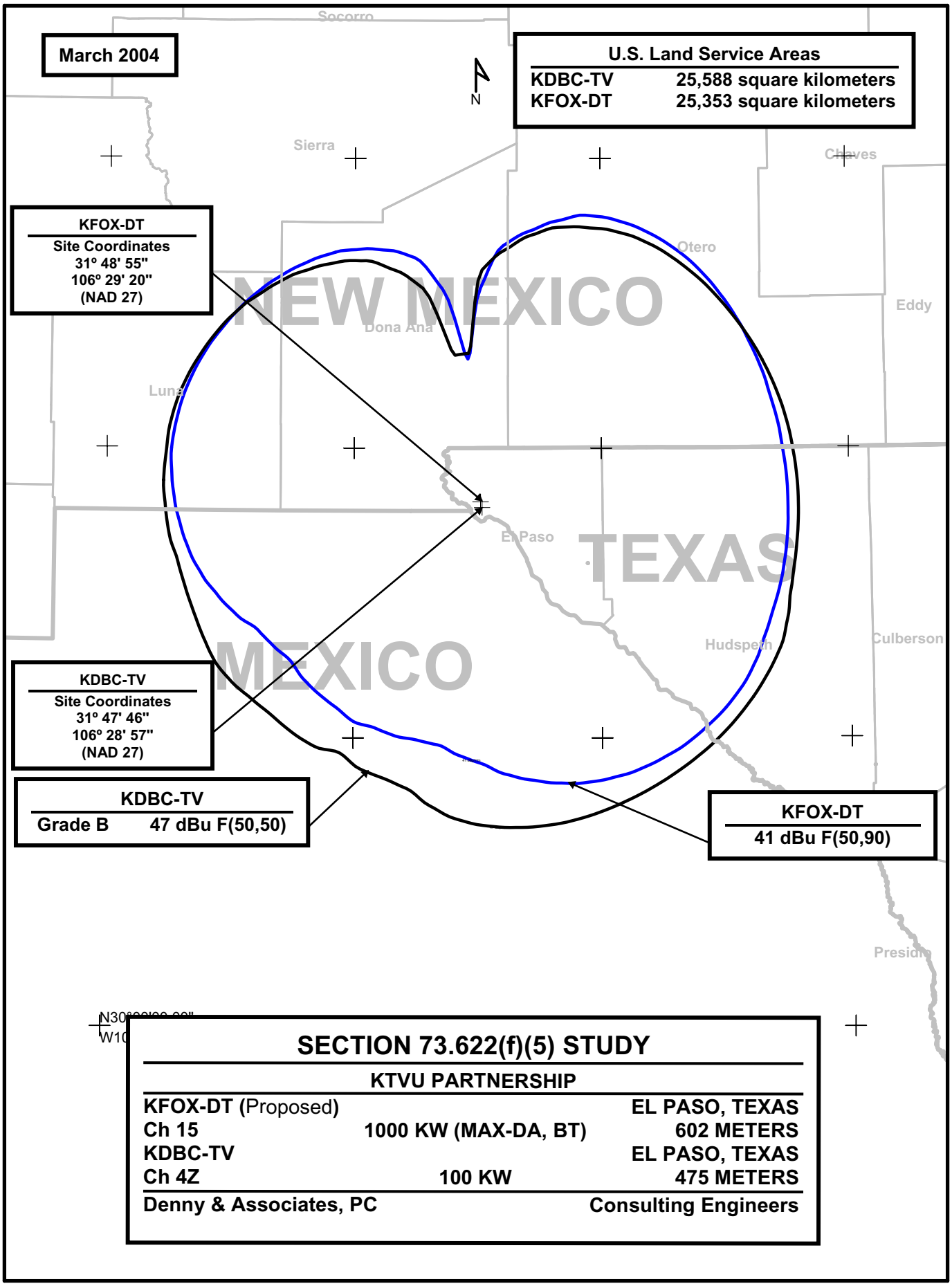
NOISE LIMITED (41 dBu F(50,90)) CONTOUR COMPARISON

KTVU PARTNERSHIP

KFOX-DT (Construction Permit)		**EL PASO, TEXAS**
Ch 15	**1000 KW (MAX-DA, BT)**	**604 METERS**
(FCC File Number BMPCDT-20020516AAP)		
KFOX-DT (Proposed**)**		**EL PASO, TEXAS**
Ch 15	**1000 KW (MAX-DA, BT)**	**602 METERS**[1]

Denny & Associates, P.C. **Consulting Engineers**

[1] Authorized Antenna Radiation Height Above Average Terrain (HAAT) changed to conform to the FCC *tv_process* TV Interference and Spacing Analysis computer program output.


March 2004
U.S. Land Service Areas
KDBC-TV 25,588 square kilometers
KFOX-DT 25,353 square kilometers
N
KFOX-DT
Site Coordinates
31° 48' 55"
106° 29' 20"
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KDBC-TV
Grade B 47 dBu F(50,50)
KFOX-DT
41 dBu F(50,90)
NEW MEXICO
TEXAS
MEXICO
Socorro
Sierra
Otero
Chaves
Eddy
Dona Ana
Luna
El Paso
Hudspeth
Culberson
Presidio
SECTION 73.622(f)(5) STUDY
KTVU PARTNERSHIP
KFOX-DT (Proposed) EL PASO, TEXAS
Ch 15 1000 KW (MAX-DA, BT) 602 METERS
KDBC-TV EL PASO, TEXAS
Ch 4Z 100 KW 475 METERS
Denny & Associates, PC Consulting Engineers
KILOMETERS
-25
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