

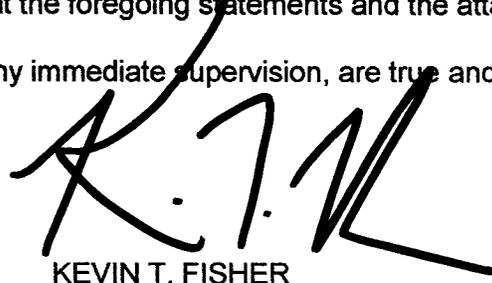
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of ROSEBURG BROADCASTING, INC., licensee of Low Power Television Station KAMK-LP, Channel 53 in Eugene, Oregon, in support of this Application for Construction Permit to specify operation on Channel 49 from the licensed KAMK-LP site. This proposal is being submitted in response to the Commission's reclamation of Channel 53 spectrum for future auction, thereby placing this LPTV station in a displacement situation.

It is proposed to mount a standard SWR directional antenna at the authorized height on the side of an existing 122-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 KAMK-LP 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 1041578 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

January 13, 2004

CONTOUR POPULATION
GRADE A (74 DBU) : 279,594
GRADE B (64 DBU) : 309,077

Smith and Fisher

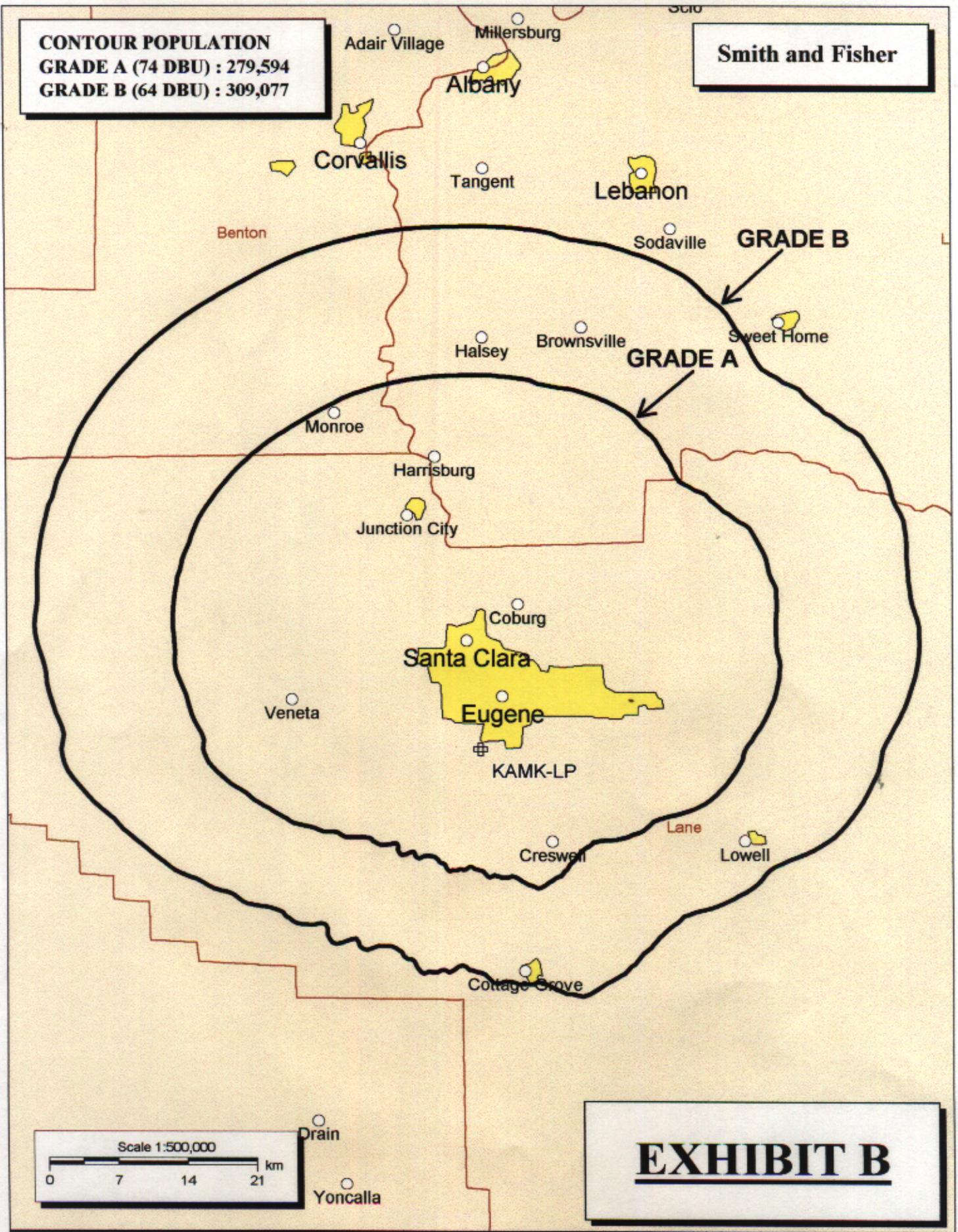


EXHIBIT B

PROPOSED OPERATING PARAMETERS

PROPOSED KAMK-LP
CHANNEL 49 - EUGENE, OREGON

Transmitter Power Output:	2.0 kw
Transmission Line Efficiency:	68.2%
Antenna Power Gain – Toward Horizon:	7.33
Antenna Power Gain – Main Lobe:	41.28
Effective Radiated Power – Toward Horizon:	10.0 kw
Effective Radiated Power – Main Lobe:	56.3 kw
Transmitter Make and Model:	Type-accepted
Rated Output	2.0 kw
Transmission Line Make and Model:	Andrew HJ8-50B
Size and Type:	3" air heliax
Length:	375 feet
Antenna Make and Model:	SWR SWLP16WL
Orientation	0 degrees true
Beam Tilt	2.4 degrees
Effective Height Above Ground:	107 meters
Effective Height Above Mean Sea Level:	494 meters

CONTOUR OVERLAP AND
LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED KAMK-LP
CHANNEL 49 – EUGENE, OREGON

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, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to two stations: KLSR-TV, Channel 34 in Eugene; and KPDX(TV), Channel 49 in Vancouver, Washington,

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 2-square kilometer cell size (except where noted), calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 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 KAMK-LP) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-3. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

EXHIBIT D-1

As a result, waiver of Section 74.705 of the Commission's Rules with respect to interference to KLSR-TV and KPDX is requested and believed to be justified based on the aforementioned Longley-Rice studies.

SMITH AND FISHER

EXHIBIT D-2

PROPOSED KAMK-LP
CH. 49 - EUGENE OR

REFERENCE 44 00 11 N LPTV Pwr = 10 kW, HAMS L COR= 494 M DISPLAY DATES
123 06 48 W DATA 01-07-04
SEARCH 01-13-04
..... Channel 49Z, 680 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin	
KLSRTV*CP	34Z	Eugene	OR	0.23	157.6	> 086.17	-85.89
KLSRTV*LI	34Z	Eugene	OR	0.62	110.5	> 092.22	-71.68
KPDX*	LI 49-	Vancouver	WA	171.32	9.5	> 228.57	-56.68
NEW*	AP 49Z	Bend	OR	142.76	90.3	> 132.15	10.61
K50CT*	LI 50N	Cottage Grove	OR	25.73	167.2	> 010.80	15.33
K49FV*	LI 49-	Roseburg	OR	86.91	191.2	> 051.80	35.11
KBSC-L	LI 49Z	Brookings	OR	235.22	203.2	> 196.28	38.94
KPDX-D	CPM 48	Vancouver	WA	171.29	9.5	> 127.68	43.61
NEW	AP 49+	Warm Springs	OR	171.30	55.1	> 117.91	53.39
NEW	AP 49Z	Yreka	CA	270.51	171.6	> 215.80	54.71
K49DM*	LI 49+	Coos Bay	OR	116.12	231.9	> 061.34	55.85
KPDX-D	LI 48	Vancouver	WA	171.32	9.5	> 112.93	58.39
K48GC	LI 48N	Florence	OR	77.25	266.4	> 017.05	60.20
KPDX	ALD 48	VANCOUVER	WA	171.29	9.5	> 107.24	64.05
NEW	AP 50N	Lincoln City	OR	112.00	318.8	> 042.64	69.36
K50GG	LI 50+	Salem	OR	109.11	358.8	> 038.90	70.21

* Actual radials antenna height and directional patterns used (if any)

INTERFERENCE SUMMARY
 PROPOSED KAMK-LP
 CHANNEL 49 – EUGENE, OREGON

<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>
KLSR-TV BPCT-19960711LL	CP	Eugene, OR	34	370,611	0	0
KLSR-TV BLCT-19910920KH	Lic.	Eugene, OR	34	380,013	271	<0.1
*KPDX(TV) BLCT-19990909AAD	Lic.	Vancouver, WA	49	1,785,696	6,459	0.4

*Study utilized 1.0-kilometer cell size and 0.1-kilometer increment spacing.