

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KAZH LILCENSE, LCC – DEBTOR – IN – POSSESSION, permittee of KAZH-DT, Channel 41 in Baytown, Texas, in support of its application for modification of Construction Permit BPCDT-19991101ADZ , to operate with a different antenna at the new height.

It is proposed to mount an ERI directional antenna at the 575-meter level of the existing 601-meter tower on which the present KAZH(TV) antenna is mounted. Exhibit B provides elevation and azimuth pattern data for the proposed antenna. Exhibit C is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 48 dBu service contour. An interference study is included in Exhibit D, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer. A power density calculation is provided in Exhibit E.

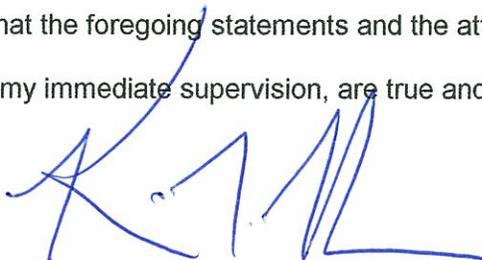
It is important to note that, while the proposed effective radiated power of 1000 kw exceeds that allowable in Section 73.622(f)(8)(i) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (KPRC-DT, Channel 35 in Houston, Texas), as allowed in Section 73.622(f)(5) of the Rules. The area within the noise limited contour of proposed KAZH-DT is 39,998 square kilometers, whereas the area within that of KPRC-DT, as allotted, is 45,583 square kilometers.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the KAZH-DT site.

However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. In addition, the FCC issued Antenna Structure Registration Number 1064696 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.



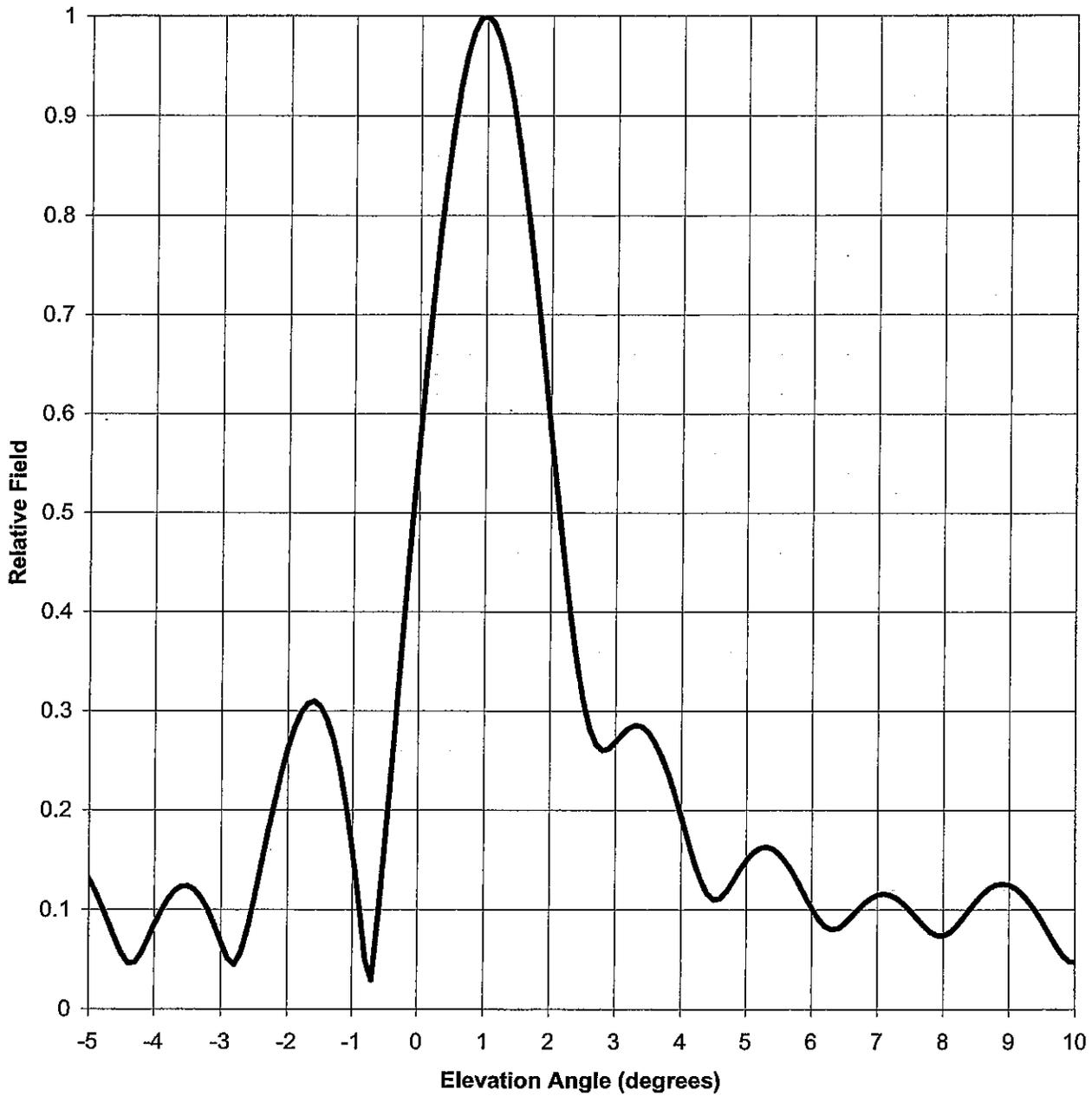
KEVIN T. FISHER

July 31, 2008

ELEVATION PATTERN

TYPE: CH41ELH
Directivity: Numeric dBd
Main Lobe:
Horizontal:

Beam Tilt: _____
Polarization: Horizontal
Channel: 41 (DTV)
Location: Baytown, TX



Electronics Research, Inc.
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

EXHIBIT B-1

ANTENNA ELEVATION PATTERN

PROPOSED KAZH-DT
CHANNEL 41 - BAYTOWN, TEXAS
[MODIFICATION OF BPCDT-19991101ADZ]

SMITH AND FISHER

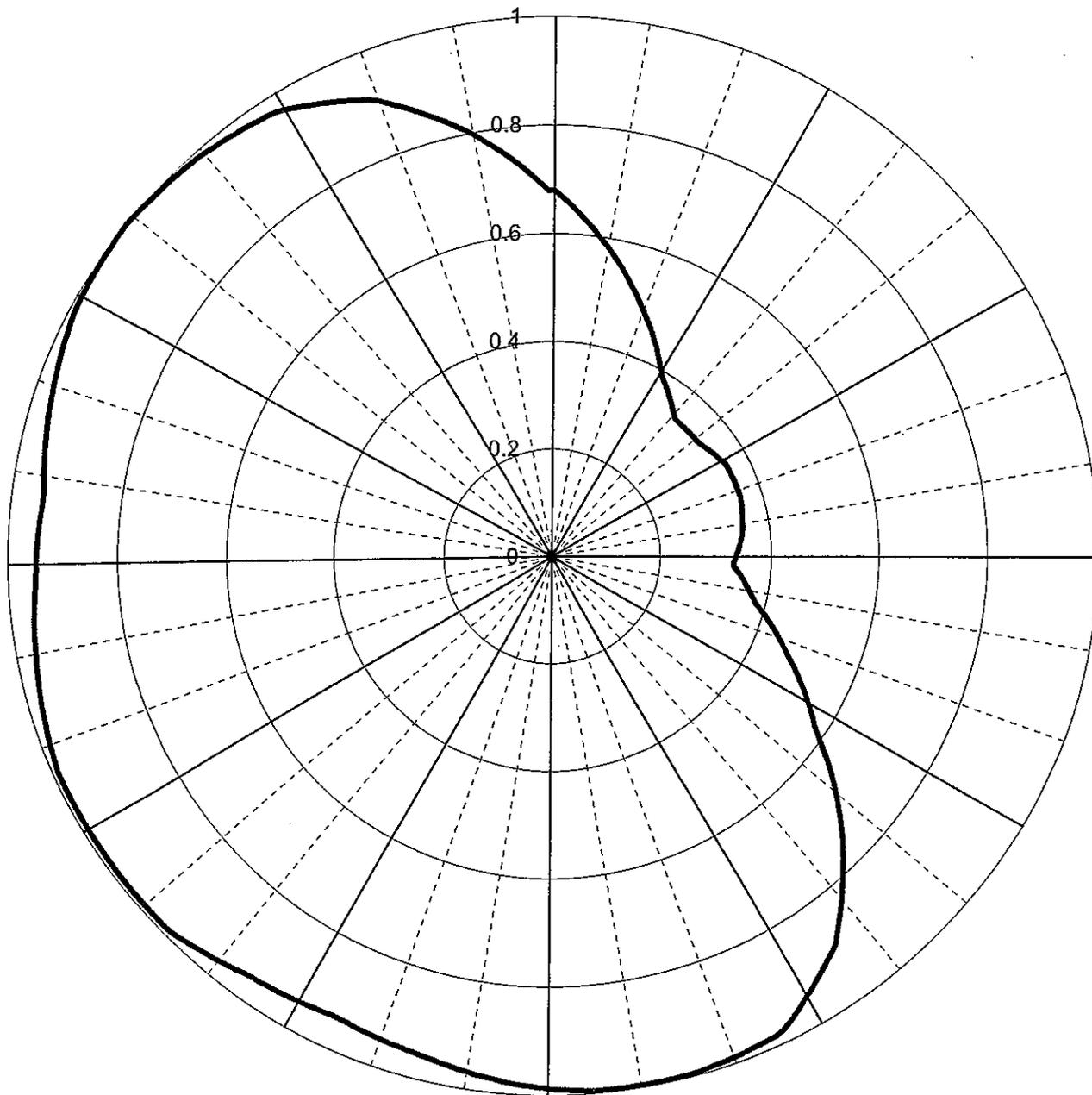
AZIMUTH PATTERN

TYPE: CH41AZH
Numeric dB

Polarization: Horizontal
Channel: 41 (DTV)

Directivity:

Location: Baytown, TX



Note: Pattern shape and directivity may vary with channel and mounting configuration.



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EXHIBIT B-2

ANTENNA AZIMUTH PATTERN

PROPOSED KAZH-DT
CHANNEL 41 – BAYTOWN, TEXAS
[MODIFICATION OF BPCDT-19991101ADZ]

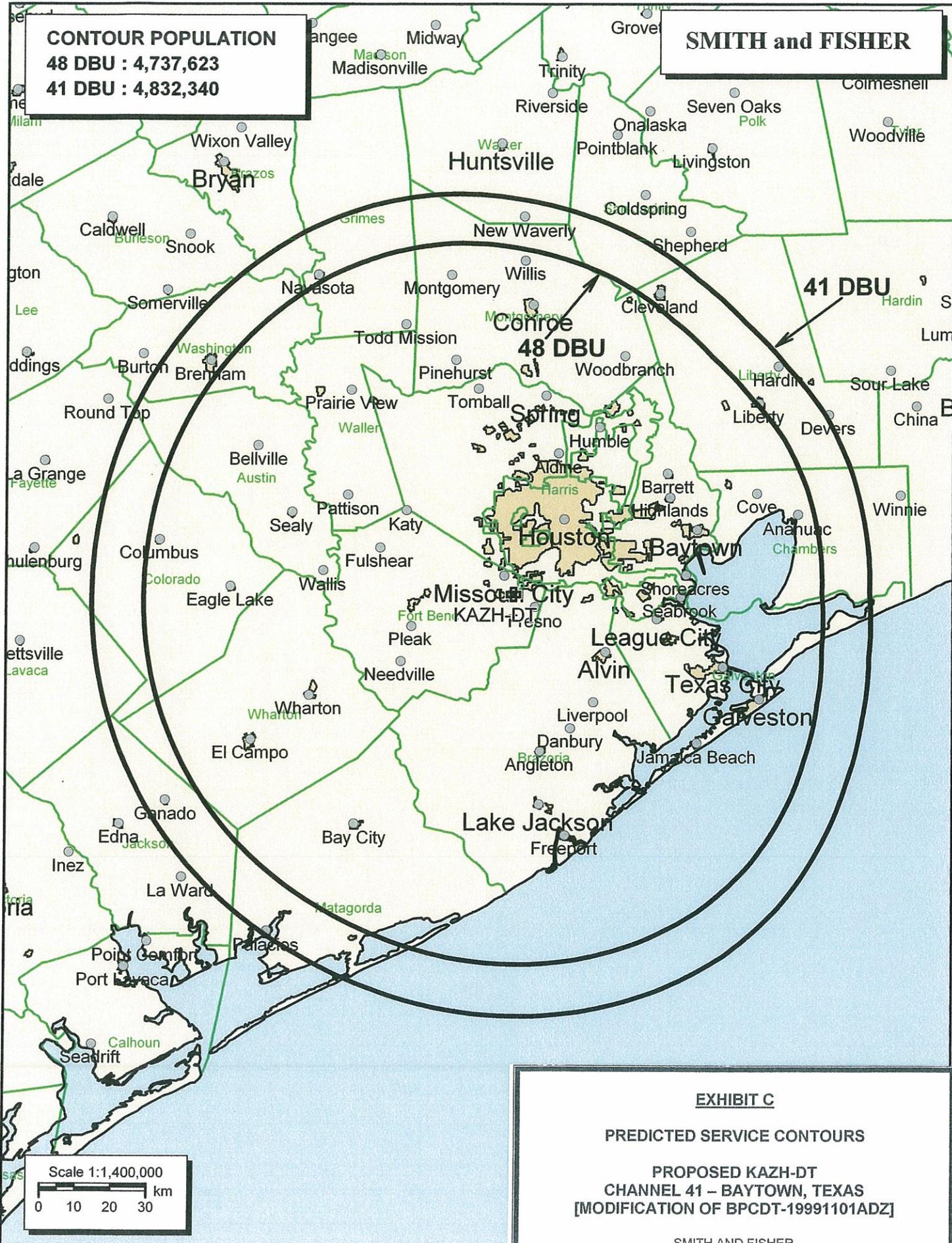
SMITH AND FISHER

ANTENNA AZIMUTH PATTERN DATA
PROPOSED KAZH-DT
CHANNEL 41 – BAYTOWN, TEXAS
[MODIFICATION OF BPCDT-19991101ADZ]

<u>Azimuth</u> (° T)	<u>Relative</u> <u>Field</u>	<u>ERP</u> (dbk)	<u>Azimuth</u> (° T)	<u>Relative</u> <u>Field</u>	<u>ERP</u> (dbk)
0	0.68	26.7	180	0.99	29.9
10	0.58	25.3	190	0.97	29.7
20	0.49	23.8	200	0.95	29.6
30	0.40	22.0	210	0.95	29.6
40	0.35	20.9	220	0.97	29.7
50	0.34	20.6	230	0.99	29.9
60	0.36	21.1	240	0.99	29.9
70	0.36	21.1	250	0.98	29.8
80	0.35	20.9	260	0.96	29.6
90	0.34	20.6	270	0.95	29.6
100	0.37	21.4	280	0.95	29.6
110	0.44	22.9	290	0.97	29.7
120	0.54	24.6	300	0.99	29.9
130	0.68	26.7	310	1.00	30.0
140	0.83	28.4	320	0.99	29.9
150	0.94	29.5	330	0.97	29.7
160	0.99	29.9	340	0.90	29.1
170	1.00	30.0	350	0.80	28.1

CONTOUR POPULATION
48 DBU : 4,737,623
41 DBU : 4,832,340

SMITH and FISHER



INTERFERENCE STUDY

PROPOSED KAZH-DT
CHANNEL 41 – BAYTOWN, TEXAS
[MODIFICATION OF BPCDT-19991101ADZ]

The instant application specifies an ERP of 1000 kw (directional) at 580 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KAZH-DT to other pertinent stations are tabulated in Exhibit D-2.

As shown, the proposed KAZH-DT facility would not contribute more than 0.5% interference (beyond that which is caused by the allotted KAZH-DT facility) to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KAZH-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

INTERFERENCE STUDY SUMMARY
PROPOSED KAZH-DT
CHANNEL 41 – BAYTOWN, TEXAS
[MODIFICATION OF BPCDT-19991101ADZ]

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From KAZH-DT*</u>	<u>%</u>
KWEX-DT Allotment	San Antonio, TX	41	1,853,217	10	<0.1
KWEX-TV BLCT-19970331SG	San Antonio, TX	41	1,811,028	472	<0.1
KPXB(TV) BLCT-19930427KE	Conroe, TX	49	4,187,508	0	0

*Above that caused by the allotment facility.

Note: This study utilized a cell size of 2.0 km and an increment spacing of 1.0 km.

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED KAZH-DT
CHANNEL 41 – BAYTOWN, TEXAS

[MODIFICATION OF BPCDT-19991101ADZ]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Baytown facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 1000 kw (H, V), an antenna radiation center 575 meters above ground, and the elevation pattern of the ERI antenna, maximum power density two meters above ground of 0.00020 mw/cm^2 is calculated to occur 101 meters southwest of the base of the tower. Since this is less than 0.1 percent of the 0.42 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 41 (632-638 MHz), a grant of this proposal may be considered a minor environmental action with respect to public and occupational ground-level 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.