

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
TV TRANSLATOR STATION KITL-LP (FACILITY ID 73450)
BOISE, IDAHO
CH 20 15 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station KITL-LP. Station KITL-LP is licensed (BLTTL-20011009AAW) to operate on analog channel 20 with a directional antenna maximum (visual) effective radiated power (ERP) of 23.4 kW and an antenna height above mean sea level (RCAMSL) of 1800 meters. Station KITL-LP is also authorized (BPTTL-20051104AAL) to operate on analog channel 20 with a directional antenna maximum (visual) effective radiated power (ERP) of 150 kW and an antenna height above mean sea level (RCAMSL) of 1800 meters.

Proposed Facilities

This application proposes digital operation on the current channel (20), at the current transmitter site and with the currently licensed antenna. The transmitter site coordinates remain (NAD27): 43-44-23 N, 116-08-14 W. A Scala 4DR-16-2HW directional antenna, with a maximum ERP of 15 kW and antenna RCAMSL of 1800 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog), the authorized 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, the proposed 51 dBu contour overlaps both the licensed and authorized 74 dBu contours.

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 1990 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.

Radiofrequency Electromagnetic Field Exposure

The KITL-LP facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provide assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

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

¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

Figure 2 (antenna vertical relative pattern), the maximum vertical relative field for depression angles towards the tower base (-60° to -90°) is less than 0.25. Therefore, using a vertical relative field value of 0.25, a maximum directional ERP of 15 kilowatts and an antenna center of radiation height above ground level of 16 meters, the calculated power density at two meters above ground level at the base of the tower is 0.1598 milliwatt per square centimeter (mW/cm^2), or 47.0 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.34 \text{ mW}/\text{cm}^2$ for TV channel 20). However, as this is a multi-user site, measurements will be made to substantiate compliance with the 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 place to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

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

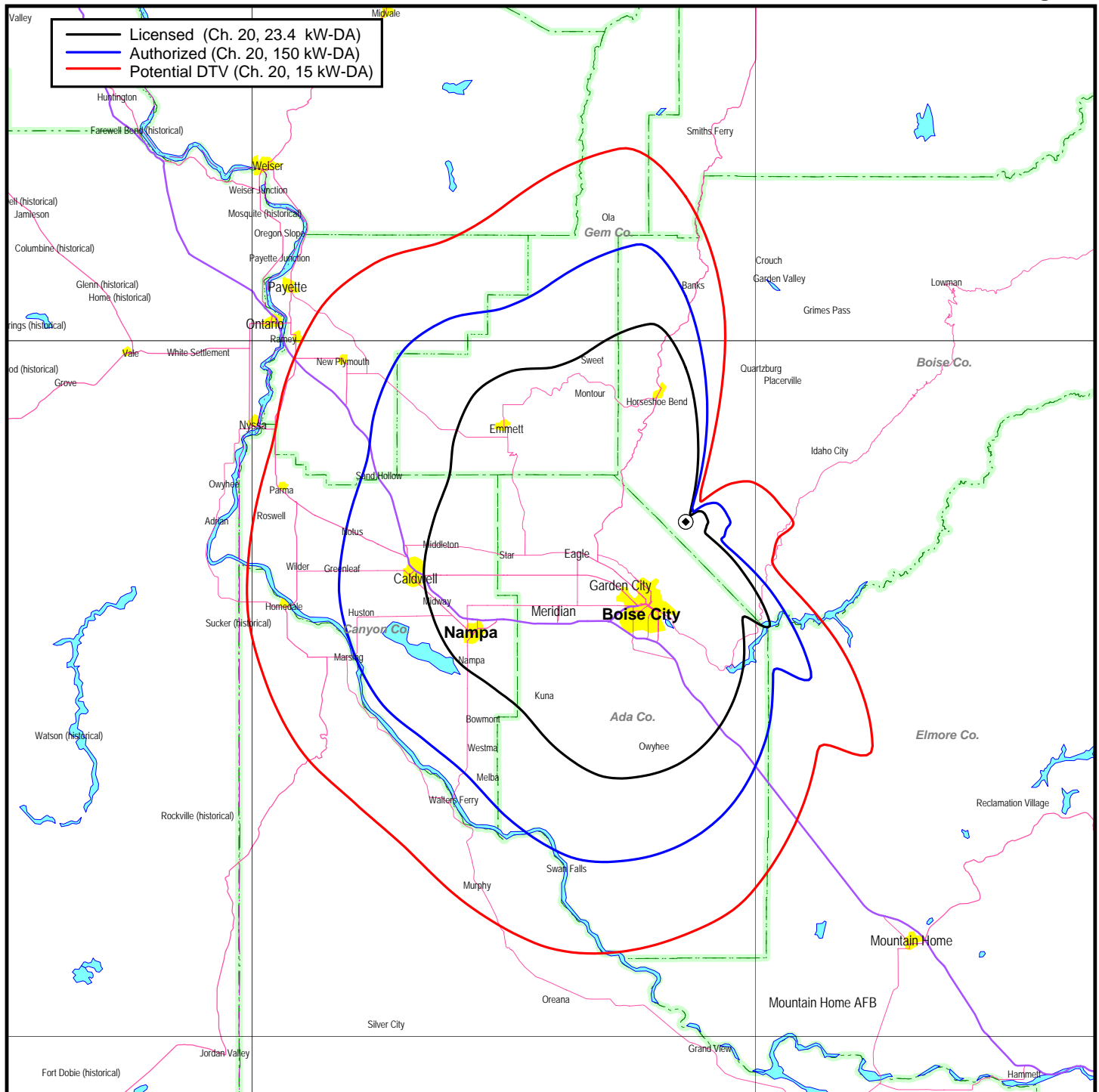


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Figure 1



20	0	20	40	60	80	100	120
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Kilometers

PREDICTED FCC CONTOURS

LPTV STATIO KITL-LP
BOISE, IDAHO

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

Figure 2

