

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
LPTV STATION KMSG-LP
FACILITY ID 65762
FRESNO, CALIFORNIA
CH 39 50 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application for modification of construction permit (CP) for LPTV station KMSG-LP at Fresno, California (Facility ID: 65762; File No. BPTTL-20030822AEX). Specifically, this application proposes to modify the KMSG-LP CP operation by changing the transmitter site location, changing the directional antenna system, increasing the proposed maximum directional effective radiated power (ERP), and decreasing the antenna radiation center height above mean sea level (RCMSL). No other changes are proposed. This application is considered a "minor change" in facilities pursuant to Section 73.3572, as there will be no change in frequency (output channel) and the proposed 74 dBu contour will overlap a portion of the licensed 74 dBu contour (Figure 1).

It is proposed to operate on channel 39 (620-626 MHz) with a "plus" carrier frequency offset and employing a SBP UP-6-NC directional antenna. The ERP will be 50 kW. The antenna will be mounted at the 11.3 meter (37 foot) level on the existing tower.

TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed KMSG-LP operation will not create prohibited interference to other existing, authorized or proposed NTSC full-power stations, except with respect to NTSC station KSEE(TV) on channel 24 at Fresno, California. Therefore, a waiver of Section 74.705 is requested with respect to KSEE(TV). Justification for the waiver request is provided below.

Station KSEE operates on channel 24 which is 15 channels below the KMSG-LP's proposed channel 39 operation (UHF picture image taboo). Based on the provisions of the OET-69

Bulletin as permitted by FCC rules [Section 74.705(e)], it is believed that KMSG-LP's proposed operation complies with the FCC's interference criteria towards KSEE's licensed operation. Specifically, calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid. The results of the OET Bulletin No. 69 are tabulated below (see also Figure 2) and, as indicated, the proposal complies with the FCC's 0.5% interference threshold criteria towards KSEE.¹

Protected NTSC Station	FCC Service Population	Proposed Interference Population
KSEE(TV), Ch. 24, Fresno, CA Licensed (BLCT-2300)	--	0 (0.00%)

The results of the OET Bulletin No. 69 interference analyses indicate that the proposed KMSG-LP operation complies with the FCC's 0.5% "rounding allowance" for such calculations (see paragraph 78 of MM Docket No. 00-10). Thus, it is believed that the KMSG-LP operation complies with the FCC's interference standards towards all NTSC stations and allotments.

DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed KMSG-LP operation on channel 39 will not cause prohibited interference to any allotted, proposed or actual DTV operating facilities on channels 38, 39 or 40. Interference calculations for the proposed KMSG-LP operation are summarized below (see also Figure 2).

DTV Station	FCC Service Population	Proposed Interference Population
KCNS, Ch. 39, San Francisco, CA CP (BPCDT-19991101AFD)	5,219,357	141 (0.01%)
KVPT, Ch. 40, Fresno, CA CP (BPEDT-20000425AAG)	--	0 (0.00%)

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. A Sun based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin 69.

Class A/LPTV/TV Translator Protection

A study has been conducted using the provisions of Section 74.707 which indicates that the KMSG-LP proposal will not create prohibited interference to other existing, authorized or proposed LPTV or Class A stations except with respect to licensed and authorized operations of LPTV station KHSC-LP on channel 38 at Fresno, California, and Class A station KABE-CA on channel 39 at Bakersfield, California. However, with respect to each station, interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin.

Interference calculations for the proposed KMSG-LP operation are summarized below (see also Figure 2).

LPTV/Class A Station	FCC Service Population	Proposed Interference Population
KHSC-LP, Ch. 38, Fresno, CA Authorized (BPTTL-20040115ADF)	--	0 (0.00%)
Licensed (BLTTL-20031212ABR)	--	0 (0.00%)
KABE-CA, Ch. 39, Bakersfield, CA Licensed (BLTTL-19810209IM)	--	0 (0.00%)

The results of the OET Bulletin No. 69 interference analyses indicate that the proposed operation complies with the FCC's 0.5% "rounding allowance" for such calculations (see paragraph 78 of MM Docket No. 00-10). Thus, it is believed that the proposed KMSG-LP operation complies with the FCC's interference standards towards all LPTV and Class A stations.

Response to Paragraph 14 - Environmental Protection Act

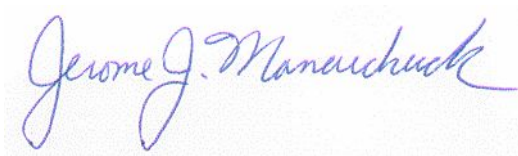
The proposed KMSG-LP facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation."² The calculated power density at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a visual effective radiated power of 50

² 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.

kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground at the tower base will be 0.3863 mW/cm². Since this is a controlled site, this is 18.6% of the recommended limit of 2.08 mW/cm² for channel 39 applicable to controlled exposure areas. 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 effect in the event that workers or other authorized personnel enter the restricted area or climb the tower 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.

Finally, it is noted that this technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner as part of the tower registration process.

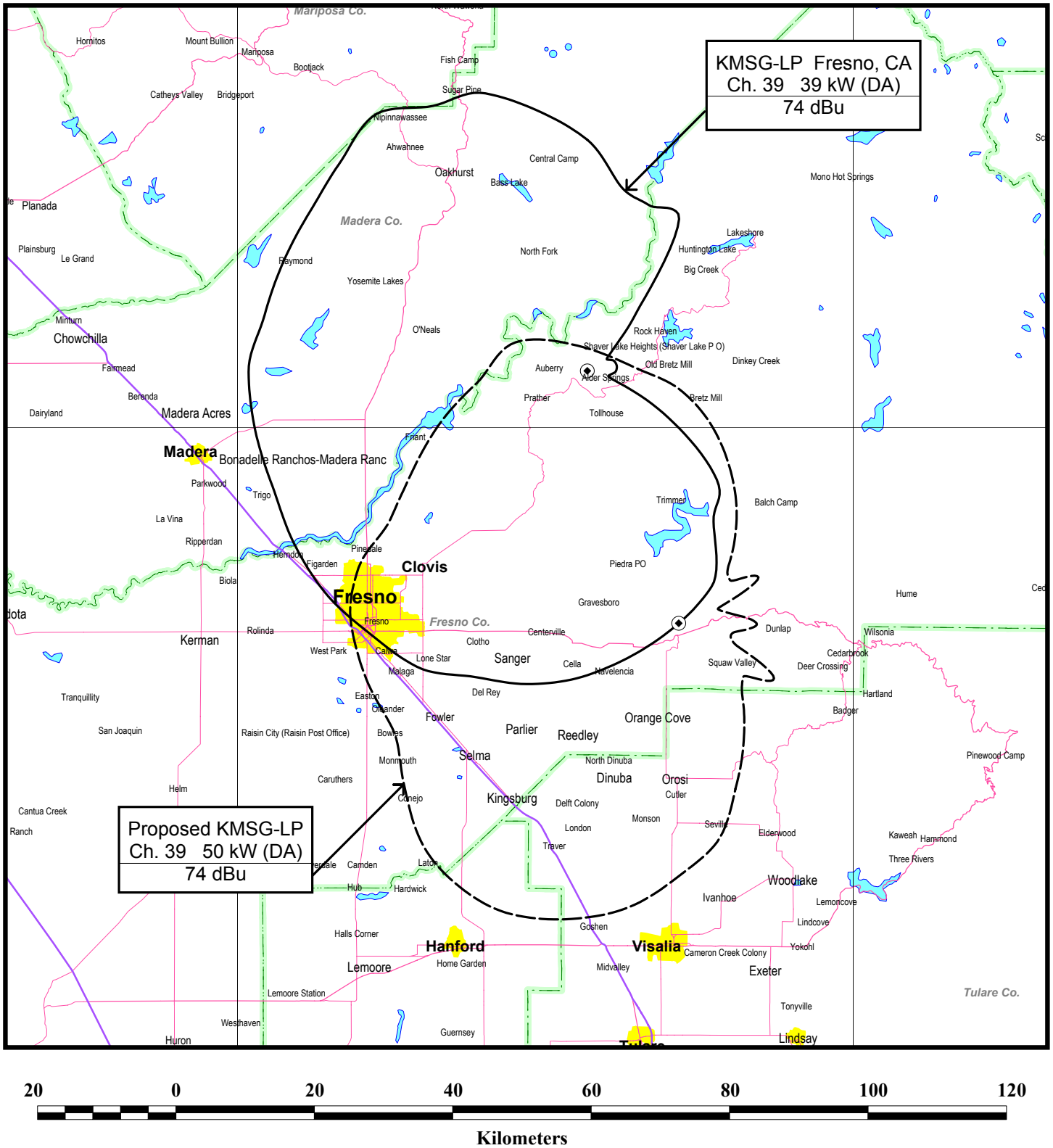


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July 28, 2004

Figure 1



FCC PREDICTED 74 dBu CONTOURS

LPTV STATION KMSG-LP
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CH 39 50 KW (MAX-DA)

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

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TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-28-2004 Time: 11:46:31

Record Selected for Analysis

KMSG-LP USERRECORD-01 FRESNO CA US
Channel 39 ERP 50. kW HAAT 854. m RCAMSL 01035 m
Latitude 036-44-46 Longitude 0119-16-57
Status APP Zone 2 Border Offset +
Dir Antenna Make CDB Model 00000000065204 Beam tilt N Ref Azimuth 270.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	6.401	628.9	31.1
45.0	0.004	351.8	2.4
90.0	0.003	458.6	2.2
135.0	0.004	567.4	2.5
180.0	5.148	794.8	32.5
225.0	34.312	854.2	46.9
270.0	32.763	778.1	45.2
315.0	41.485	621.3	43.8

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Summary of OET-69 Analysis with Respect to TV Stations

Facility Number	Channel	Call	City, State	Status	Application Prefix	Application Reference Number
1	24	KSEE	FRESNO, CA	LIC	BLCT	2300

Summary of Interference Analysis for Worst-Case Scenarios						
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline
1	--	--	--	*	--	0.50
						pass

* Proposal causes no interference.

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Summary of OET-69 Analysis with Respect to DTV Stations

Facility Number	Channel	Call	City State	Status	Application Prefix	Application Reference Number
1	39	KCNS	SAN FRANCISCO, CA	CP	BPCDT	19991101AFD
2	40	KVPT-DT	FRESNO, CA	CP	BPEDT	20000425AAG

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	120,145	120,286	5,219,357	141	0.00	0.5	pass
2	--	--	--	*	--	0.5	pass

* Proposal causes no interference.

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Summary of OET-69 Analysis with Respect to CLASS A/LPTV/TV Translator Stations

Facility Number	Channel	Call	City State	Status	Application Prefix	Application Reference Number
1	38	KHSC-LP	FRESNO, CA	CP	BPTTL	20040115ADF
2	38	KHSC-LP	FRESNO, CA	LIC	BLTTL	20031212ABR
3	39	KABE-CA	BAKERSFIELD, CA	LIC	BLTTL	19810209IM

Summary of Interference Analysis for Worst-Case Scenarios						
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline
1	--	--	--	*	--	0.50
2	--	--	--	*	--	0.50
3	--	--	--	*	--	0.50

* Proposal causes no interference.