

TECHNICAL EXHIBIT  
AMENDMENT TO THE  
DIGITAL FLASH-CUT APPLICATION FOR  
TV TRANSLATOR STATION K29DP (FACILITY ID 48587)  
LORDSBURG, NEW MEXICO  
CH 29 0.027 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an amendment to the currently pending flash-cut application (BDFCDTT-20060331ABI) for TV translator station K29DP. Station K29DP currently has a pending application for operation on digital channel 29 with a maximum directional ERP of 0.027 kilowatts and an antenna RCAMSL of 1519 meters. This amendment proposes to correct the site coordinates specified in the pending application.

Proposed Facilities

This amendment proposes to correct the coordinates for the proposed digital operation on channel 29, and also to decrease the antenna RCAMSL. The site location is described by the following coordinates: 32° 19' 40" N, 108° 43' 35" W (NAD27). A Scala 4DR-4-2HN directional antenna, with a maximum directional ERP of 0.027 kW and antenna RCAMSL of 1377 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

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 K29DP 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.<sup>1</sup>

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 Figure 2 (antenna vertical relative pattern), the maximum vertical relative field for depression angles towards the tower base (-60° to -90°) is less than 0.28. Therefore, using a vertical relative field value of 0.28, a maximum directional ERP of 0.027 kilowatts, and an antenna center of radiation height above ground level of 9 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0014 milliwatt per square centimeter ( $\text{mW}/\text{cm}^2$ ), or 0.37 percent of the Commission's recommended limit applicable to general

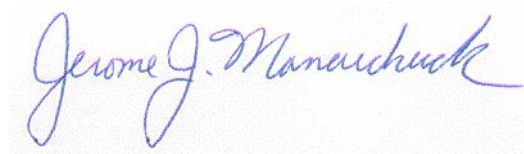
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<sup>1</sup> See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and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

population/uncontrolled exposure areas ( $0.38 \text{ mW/cm}^2$  for TV channel 29). Therefore, the facility complies with the FCC's 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 to control access to the site. In the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.

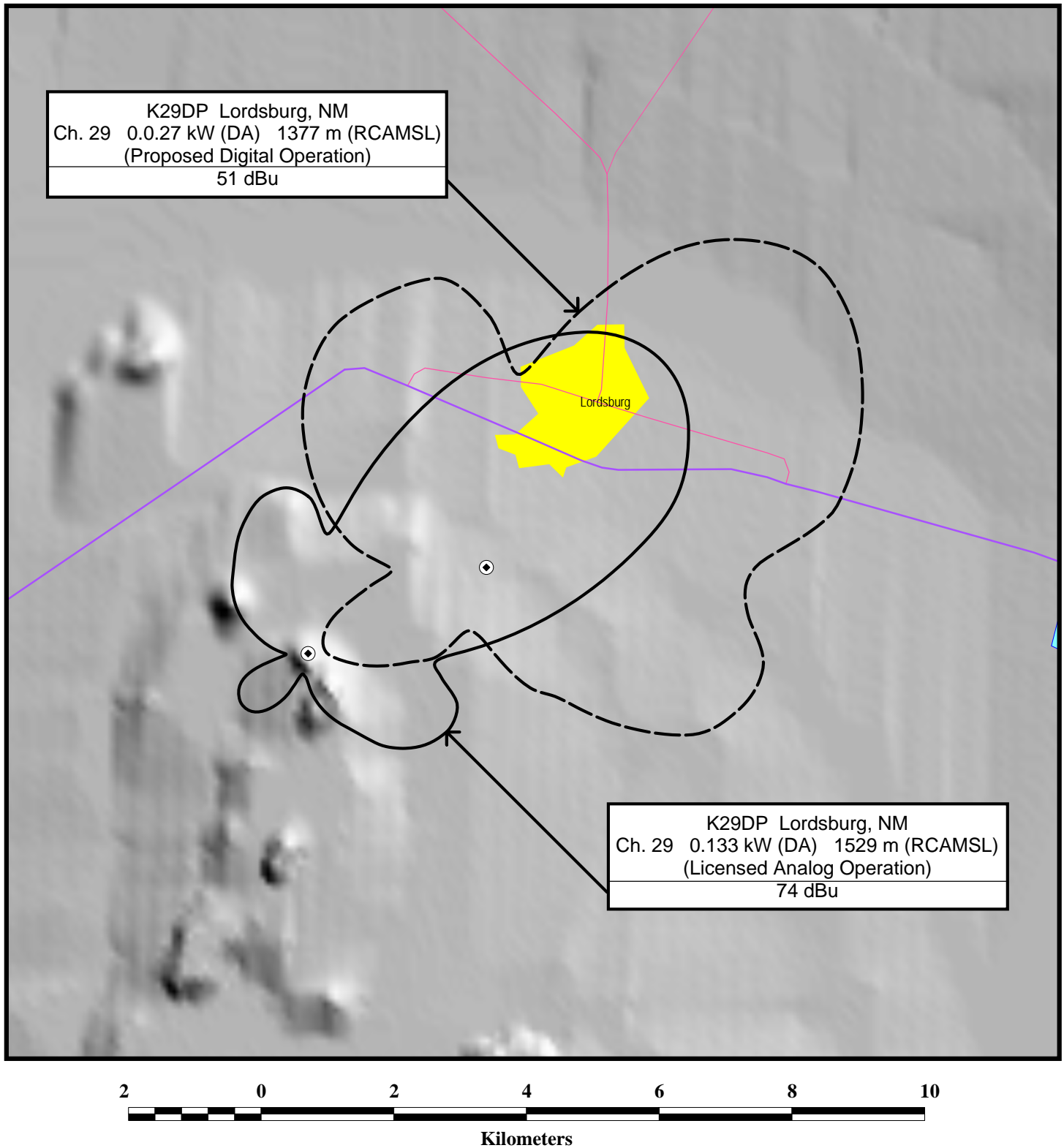
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.



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May 24, 2007



## FCC PREDICTED COVERAGE CONTOURS

LPTV STATION K29DP  
LORDSBURG, NEW MEXICO  
CH 29 0.027 kW (DA) 1377 m (RCAMSL)

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

Figure 2

