

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of COMMUNITY EDUCATIONAL TELEVISION, INC., licensee of KLUJ(TV) in Harlingen, Texas and applicant for KLUJ-DT on Channel 34, in support of this amendment to its pending Application for Construction Permit BPEDT-19991021ABU, to specify a reduction in effective radiated power in an effort to address Mexico's concern regarding interference to its digital television allotment on Channel 33 in Matamoros, Tamaulipa.

According to an FCC letter dated February 5, 2004, to the owners of KLUJ, the Mexican government has objected to the above-referenced KLUJ-DT proposal because it would "limit the operation of Channel 33 in Matamoros". Further, the letter directs the applicant to utilize the Longley-Rice methodology in order to show that proposed KLUJ-DT does not cause more than 2 percent interference to the service population of the Matamoros facility. However, other than site coordinates, there are no power or height values specified for the Mexican allotment in the *Memorandum of Understanding (MOU) between the Secretary of Communications and Transportation of the United Mexican States and the Federal Communications Commission of the United States, released July 22, 1998*. Without knowing such operating parameters for the Matamoros facility, one cannot properly conduct a Longley-Rice interference analysis. Therefore, we are proposing to reduce the effective radiated power of KLUJ-DT from 500 kw to 200 kw as a "good faith" response to the Mexican interference concerns. If the Mexican government continues to believe that the

EXHIBIT A

KLUJ-DT proposal causes too much interference to the Matamoros DTV allotment, it is respectfully requested that the Commission's International Bureau ask Mexico to reveal the operating parameters of the Matamoros allotment facility they want to protect. These parameters should include the facility's effective radiated power, the antenna height above mean sea level, and the relative field values of the antenna, if it is directional.

Exhibit B provides unchanged directional antenna pattern data for proposed KLUJ-DT. Exhibit C is a map upon which the predicted service contours are plotted. As shown, the city of license is still completely contained within the proposed 48 dBu service contour. Since the proposed ERP is greater than that specified in the allotment in certain directions, an interference study is included in Exhibit D. A power density calculation is provided in Exhibit E.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate near the new KLUJ-DT site. However, if such should occur, the owner of KLUJ-DT recognizes its obligation to take whatever corrective actions are necessary.

Since no change in the 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 1047398 to this tower.

EXHIBIT A

KLUJ-DT is located in the Harlingen DMA. Based on the area within the service contours of the other DTV authorizations in the market, the facility proposed herein does not exceed the largest of these service areas, as shown in the following tabulation:

<u>Call</u>	<u>City State</u>	<u>CH.</u>	<u>File Number</u>	<u>41 dBu Area (sq. km.)</u>
KGBT-DT	Harlingen, TX	31	BLCDT-20030619ABF	25,671
KNVO-DT	McAllen, TX	49	BPCDT-19991025ACS	25,027
KRGV-DT	Weslaco, TX	13	BLCDT-20020904AAR	37,052
KTLM-DT	Rio Grande City, TX	20	BPCDT-19991026ACA	28,317
KVEO-DT	Brownsville, TX	24	BPCDT-19991018AAY	33,704
KLUJ-DT	Harlingen, TX	34	Proposed	18,552

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

March 4, 2004