

TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
FCC FILE NO. BLTTL-20050119AAV
LPTV STATION K45IE
FACILITY ID 128356
VAIL, COLORADO
CH 45 0.055 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application for construction permit for LPTV station K45IE on channel 45 at Vail, Colorado (Facility ID: 128356; File No. BLTTL-20050119AAV). Specifically, K45IE proposes to change transmitter site location, to decrease its antenna radiation center above mean sea level, and to change the orientation of its directional antenna system. No other changes are proposed, including no change in ERP, channel (45), frequency offset designation (z), or community of license (Vail). As detailed below, this application is considered a "minor change" in facilities pursuant to Section 73.3572.

Proposed Operation

It is proposed to operate on channel 45 with a "zero" carrier frequency offset, a directional antenna maximum ERP of 0.055 kW and an RCMSL of 2274 meters. It is proposed to side-mount an "off-the-shelf" Scala model CL-1483 "yagi" directional antenna (Antenna ID 20779) on a 10 foot pole on top of a two story building. The Scala CL-1483 directional antenna will be oriented with the main lobe oriented at 0 degrees true rather than the currently licensed orientation of 180° true.

Response to Paragraph 6 - Antenna Registration

FAA notification or tower registration will not be required as the overall height does not exceed two hundred feet, and there are no airports within 8 kilometers of the site.

Minor Change Application

Figure 1 depicts the licensed and herein proposed 74 dBu contours for K45IE. As indicated, the licensed 74 dBu contour overlaps a portion of the proposed 74 dBu contour. Therefore, the proposed modification is considered a "minor" change in facilities pursuant to Section 73.3572.

Response to Paragraph 13(a) - TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed K45IE operation will not create prohibited interference to other existing, authorized or proposed TV broadcast analog (NTSC) full-power stations.

Response to Paragraph 13(b) - DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed K45IE operation on channel 45 is not predicted to cause interference to any allotted, proposed or actual DTV operating facilities on channels 44, 45 and 46.¹

Response to Paragraph 13(c) - LPTV/TV Translator, Class A Station Protection

A study has been conducted which indicates that the K45IE proposal will not create prohibited interference to other existing, authorized or proposed LPTV, TV Translator and Class A stations with the exception TV translator station K44DF on channel 44 at Eagle, Colorado (BLTT-19920121IY). However, based on the provisions of the OET-69 Bulletin as permitted by FCC rules [Section 74.707(e)], K45IE's proposed operation complies with the FCC's interference criteria towards K44DF as no interference is predicted to be caused.

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.

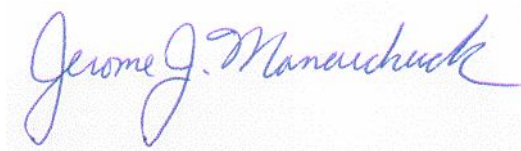
Environmental Considerations

The proposed K45IE television 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". The calculated power density at the base of the tower was calculated using the appropriate equation of the Bulletin.

As indicated on Figure 2, the vertical plane relative field does not exceed 0.15 at angles down toward the rooftop (-60° to -90° elevation). Therefore, using a greater than expected vertical relative field value of 0.15 towards the rooftop, a maximum visual effective radiated power of 0.055 kilowatts and 10 percent aural power, and an antenna center of radiation height above the rooftop of 3 meters, the calculated power density at 2 meters above the rooftop is 0.0207 milliwatt per square centimeter (mW/cm^2), or 4.7% percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.44 \text{ mW}/\text{cm}^2$ for TV channel 45). As this is less than 5 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas, the proposal will comply with the RF emission limits.

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 access the rooftop 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

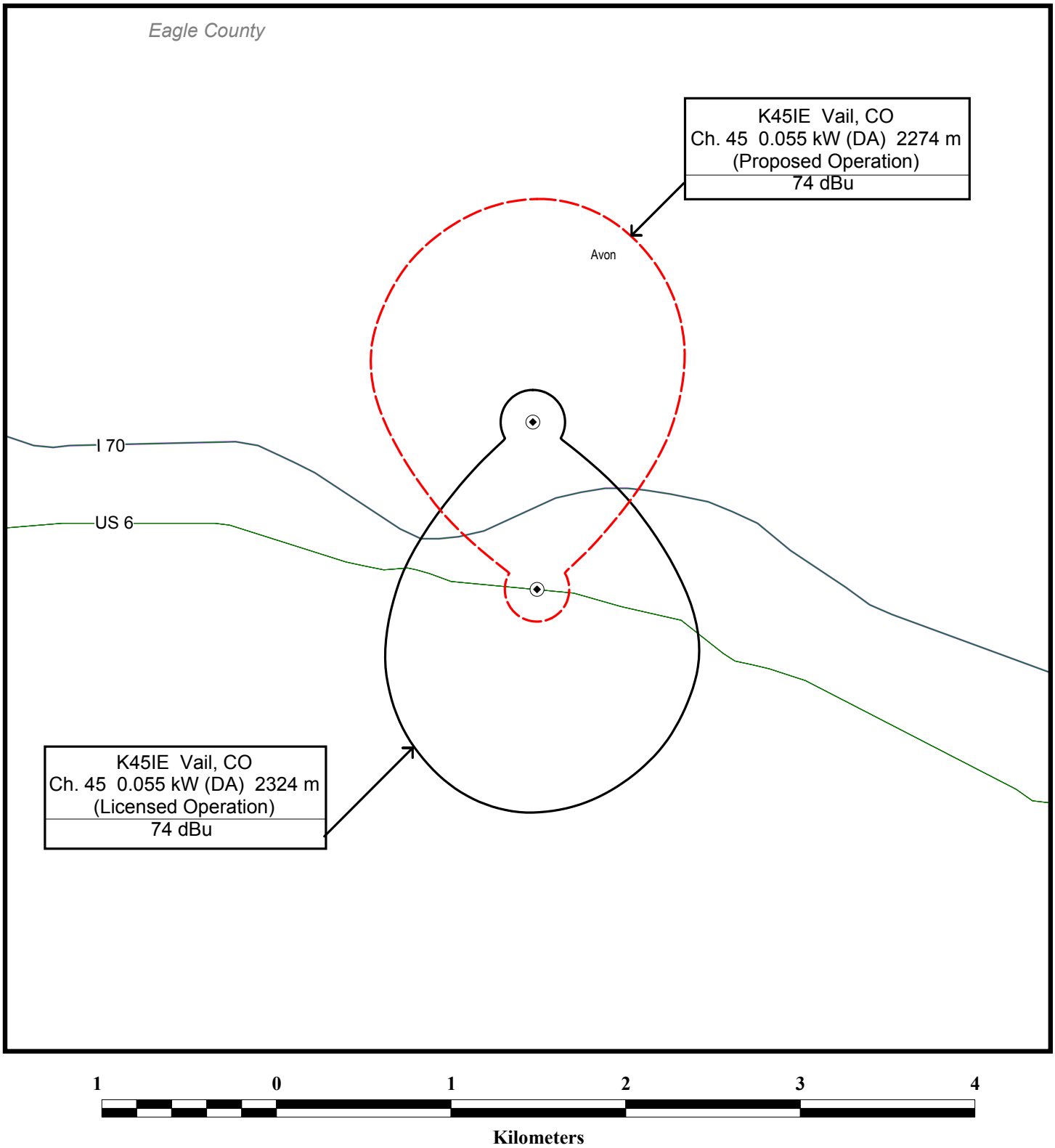
clothing and/or RFR exposure monitors or scheduling work when
the stations are at reduced power or shut down.



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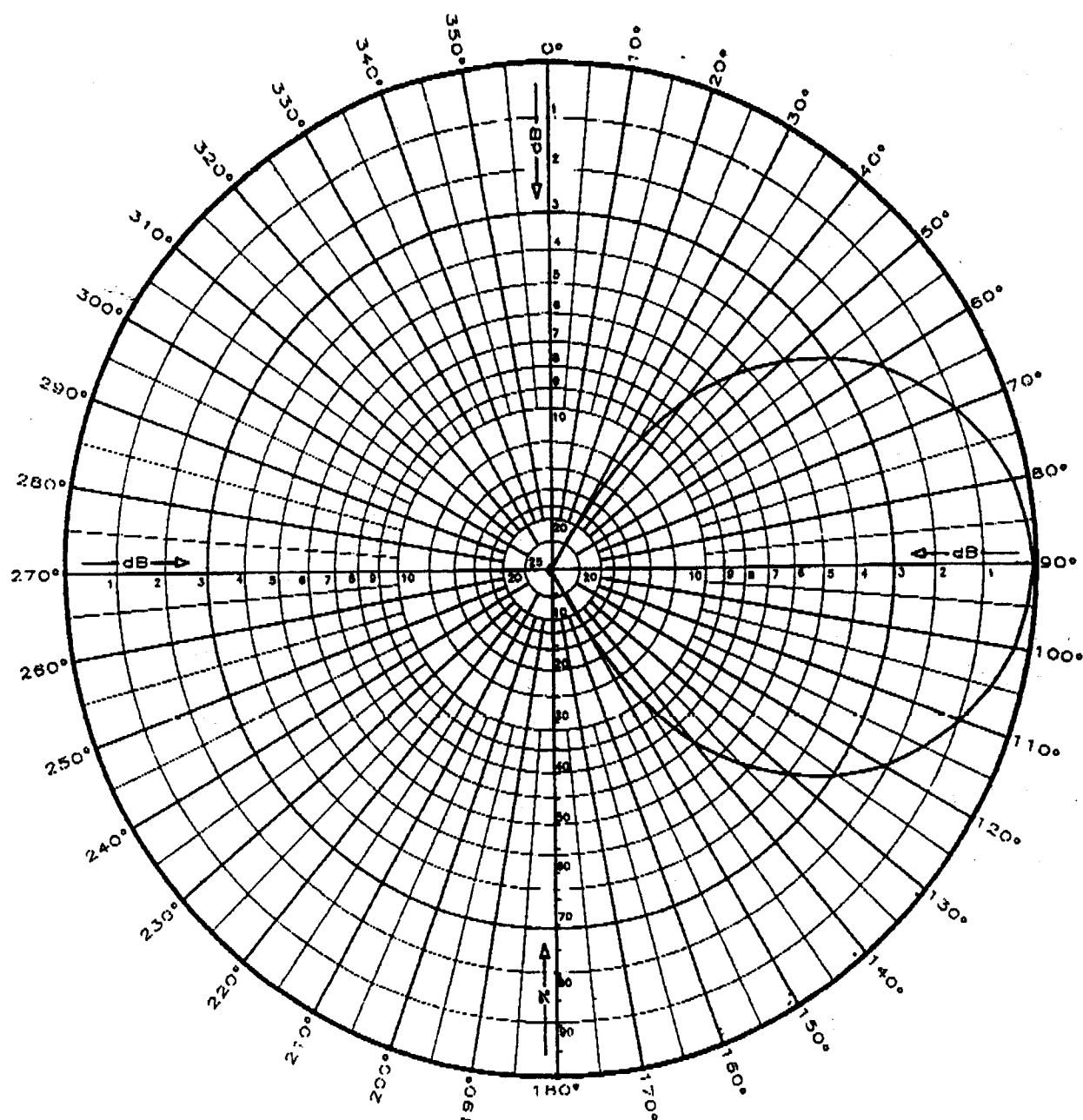
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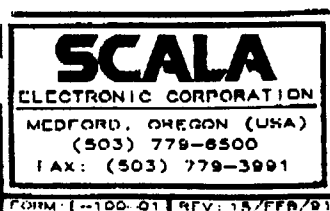
PREDICTED 74 dBu COVERAGE CONTOURS

LPTV STATION K45IE
VAIL, COLORADO
CH 45 0.055 KW (DA) 2274 m (RCAMSL)

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



SCALA MODEL CL-1483 LOG-PERIODIC
 FREQUENCY: 470 - 890 MHZ.
 GAIN: 8.0 dBd.
 POWER GAIN: 6.3
 HORIZONTAL POLARIZATION
 VERTICAL PLANE PATTERN



SCALA CL-1483 LOG-PERIODIC
HORIZONTAL POLARIZATION - VERTICAL PLANE PATTERN

AZIMUTH	RELATIVE VOLTAGE	RELATIVE dB	DBD	POWER GAIN
0	0.010	-40.0	-32.0	0.001
10	0.010	-40.0	-32.0	0.001
20	0.015	-36.5	-28.5	0.001
30	0.115	-18.8	-10.8	0.083
40	0.440	-7.1	0.9	1.230
50	0.632	-4.0	4.0	2.512
60	0.790	-2.0	6.0	3.981
70	0.900	-0.9	7.1	5.129
80	0.975	-0.2	7.8	6.026
90	1.000	0.0	8.0	6.310
100	0.975	-0.2	7.8	6.026
110	0.900	-0.9	7.1	5.129
120	0.790	-2.0	6.0	3.981
130	0.632	-4.0	4.0	2.512
140	0.440	-7.1	0.9	1.230
150	0.115	-18.8	-10.8	0.083
160	0.015	-36.5	-28.5	0.001
170	0.010	-40.0	-32.0	0.001
180	0.010	-40.0	-32.0	0.001
190	0.010	-40.0	-32.0	0.001
200	0.010	-40.0	-32.0	0.001
210	0.010	-40.0	-32.0	0.001
220	0.010	-40.0	-32.0	0.001
230	0.010	-40.0	-32.0	0.001
240	0.010	-40.0	-32.0	0.001
250	0.010	-40.0	-32.0	0.001
260	0.010	-40.0	-32.0	0.001
270	0.010	-40.0	-32.0	0.001
280	0.010	-40.0	-32.0	0.001
290	0.010	-40.0	-32.0	0.001
300	0.010	-40.0	-32.0	0.001
310	0.010	-40.0	-32.0	0.001
320	0.010	-40.0	-32.0	0.001
330	0.010	-40.0	-32.0	0.001
340	0.010	-40.0	-32.0	0.001
350	0.010	-40.0	-32.0	0.001