

ENGINEERING STATEMENT FOR STATION KDEV-LP

Prepared for

TIGER EYE BROADCASTING CORPORATION

DECEMBER 2002

This engineering statement has been prepared on behalf of Tiger Eye Broadcasting Corporation (Tiger Eye), licensee of low power television (LPTV) station KDEV-LP, Aurora, CO and is in support of an application to amend its displacement application (BPTTL20010801AFY) requesting operation on Channel 39.

At present KDEV-LP is licensed to operate on Channel 16 (N) (482-488 MHz) with 39.2 kW effective radiated power (ERP) and 1,736 meters antenna radiation center above mean sea level (RCAMSL) using a directional TV antenna. KDEV-LP filed a displacement application requesting operation on Channel 39 (+) with 35 kW ERP and 1,780 meters RCAMSL from a different antenna site and utilizing a different directional antenna.

The Commission has indicated that the instant application (BPTTL20010801AFY) has potential problems with stations KDEN(TV), Longmont, CO, and KBDI-DT, Broomfield, CO. Station KDEN(TV) is currently licensed to operate on analog TV Channel 25 (Z) with 5,000 kW ERP and 325 meters antenna height above average terrain (HAAT). KBDI-DT holds a construction permit to operate its DTV facility on Channel 38 with 1,000 kW ERP and 730 meters HAAT.

Antenna Site

The proposed KDEV-LP antenna site is unchanged from that shown in the application. The geographic coordinates (NAD-27) of the proposed KDEV-LP site are as follows: N 39° 40' 31", W 104° 52' 24".

TV Allocation Situation

As previously indicated, the FCC's TV allocation study indicates the proposed KDEV-LP Channel 39 operation is located within the predicted protected contours of the following two TV stations:

1. KDEN(TV), Channel 25, Longmont, CO
2. KBDI-DT, Channel 38, Broomfield, CO

KDEV-LP has conducted engineering studies based on the FCC OET Bulletin 69, which indicates the KDEV-LP proposal would not cause predicted interference to these two TV stations (see attached FLR studies for KDEN(TV) or KBDI-DT). Therefore, KDEV-LP requests a waiver of Sections 74.705 and 74.706 of the Commission's rules.

In addition, the FCC OET Bulletin 69 study indicates the proposed KDEV-LP operation would not exceed 48 dB D/U ratio with respect to KBDI-DT signal, and thus would comply with Section 74.706 of the Commission's rules.

The proposed operation of KDEV-LP would not receive any predicted interference from other analog TV, LPTV and TV translator stations. However, if the Commission's staff determines any predicted interference received by the proposed KDEV-LP operation from other such TV stations, KDEV-LP would either amend its proposal or accept interference to expedite grant of its proposal.