

TECHNICAL STATEMENT  
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT  
TELEVISION STATION KECY-DT  
EL CENTRO, CALIFORNIA  
CHANNEL 48 950 KW 414 M

This Technical Statement was prepared on behalf of television broadcast station KECY-DT, El Centro, California, in support of an application for modification of construction permit. The instant application proposes a correction in the KECY-DT specified coordinates and a correction of the elevation data.

The KECY-DT transmitter site coordinates are corrected from 33-03-19 North Latitude / 114-49-39 West Longitude to 33-03-19 North Latitude / 114-49-44 West Longitude, a 5-second increase in longitude. There will be no change in the KECY-DT proposed antenna or effective radiated power (ERP). However, the elevation data for KECY-DT are corrected to reflect the correct site elevation (624 m AMSL). The proposed KECY-DT facility is proposed to operate with a non-directional ERP of 950 kW (no change) and antenna radiation center HAAT of 414 m (a reduction of 36 m due to the 36-m reduction in site elevation).

The proposed changes will result in a reduction in the predicted 41 dBu, f(50,90) noise-limited contour relative to the authorized predicted 41 dBu, f(50,90) noise-limited contour. Therefore, the proposal meets the terms of the FCC *Filing Freeze* for television stations.\* Figure 1 is a map illustrating the predicted coverage contours of the proposed KECY-DT facility and the predicted 41 dBu, f(50,90) noise-limited contour of the KECY-DT construction permit facility.

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\* See August 2004 *Filing Freeze* PN, DA 04-2446 (MB rel. Aug. 3, 2004).

Antenna Structure Registration

The FCC antenna structure registration number for the KECY-DT tower is 1225054. The FAA has been notified of the tower site coordinate correction. Once an FAA determination has been received for the corrected location, the antenna structure registration for the KECY-DT tower will be modified to reflect the correct geographic coordinate information and elevation information.

Environmental Considerations

With respect to the potential for human exposure to radio frequency (RF) radiation, calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground based on the following conservative assumptions, with the following results:

Call Sign	Channel	Average ERP (kW)	Distance (m)	Relative Field Factor <sup>†</sup>	FCC Limit <sup>‡</sup> (mW/cm <sup>2</sup> )	Percentage of Limit
KECY-DT	48	950	72	0.05	0.449	3.4%

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 3.4% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing. The applicant, in coordination

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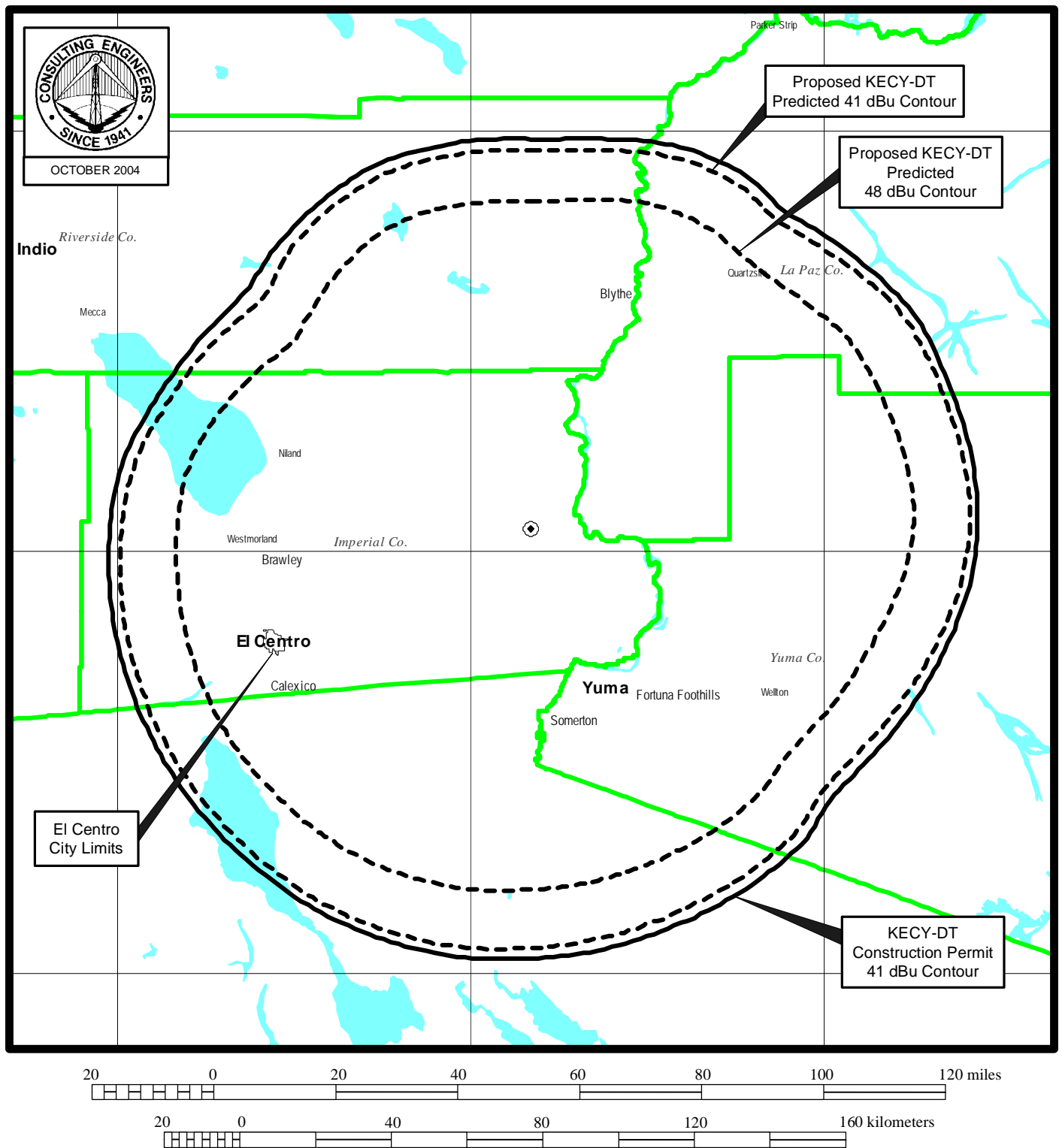
<sup>†</sup> This is a conservative estimate of the relative field factor in the downward direction.

<sup>‡</sup> for general population/uncontrolled environments

with other users of the transmission facility, shall reduce power or cease operation as necessary to protect persons having access to the KECY-DT tower or antenna from radio frequency radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr.

October 27, 2004



## PREDICTED COVERAGE CONTOURS

TELEVISION STATION KEYC-DT  
EL CENTRO, CALIFORNIA  
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Transmitting Antenna Manufacturer's Elevation Pattern Data

(three pages follow)

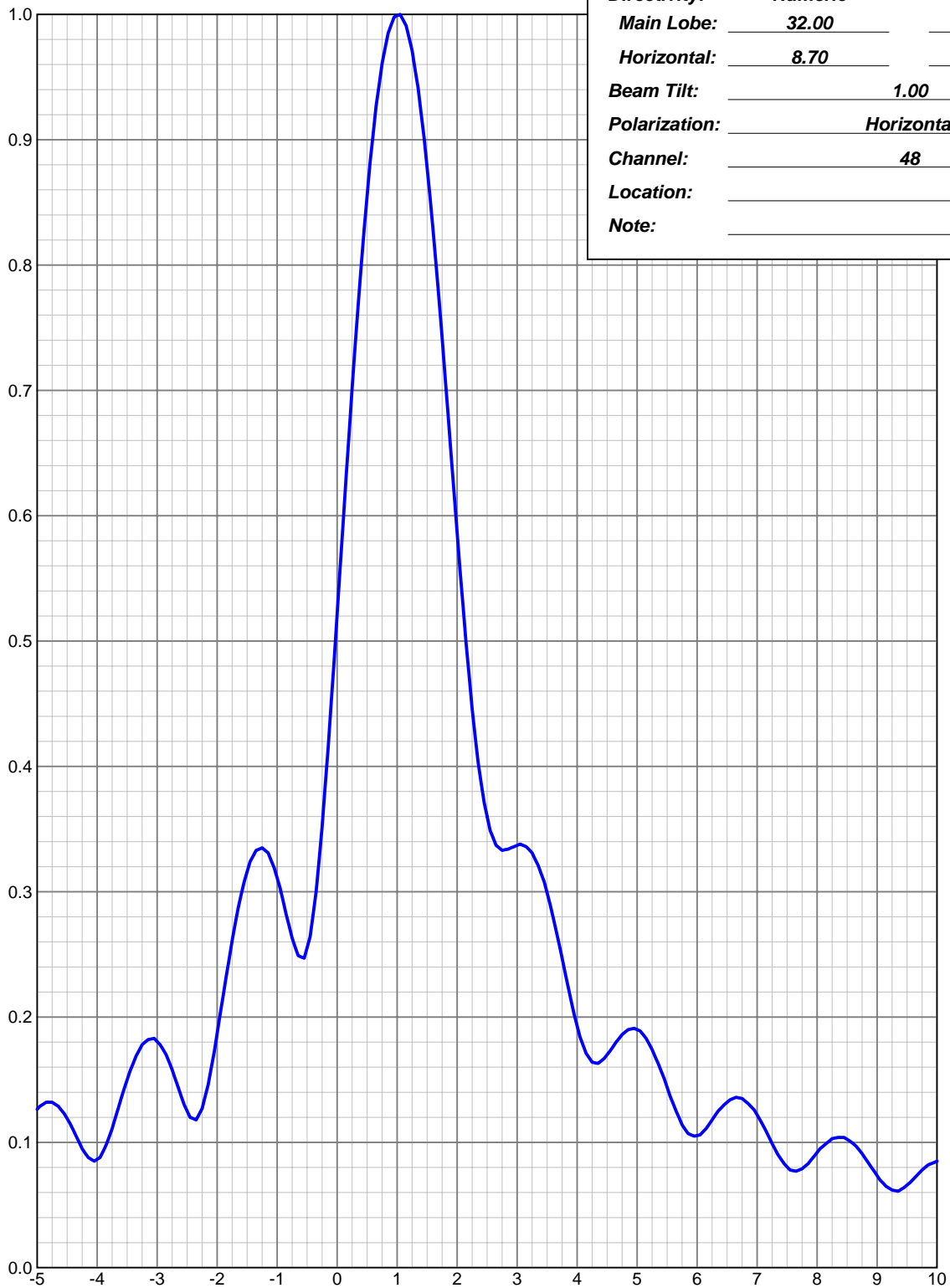


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## ELEVATION PATTERN

Type:	ATW32H4H	
Directivity:	Numeric	dBd
Main Lobe:	32.00	15.05
Horizontal:	8.70	9.40
Beam Tilt:	1.00	
Polarization:	Horizontal	
Channel:	48	
Location:		
Note:		

Relative Field



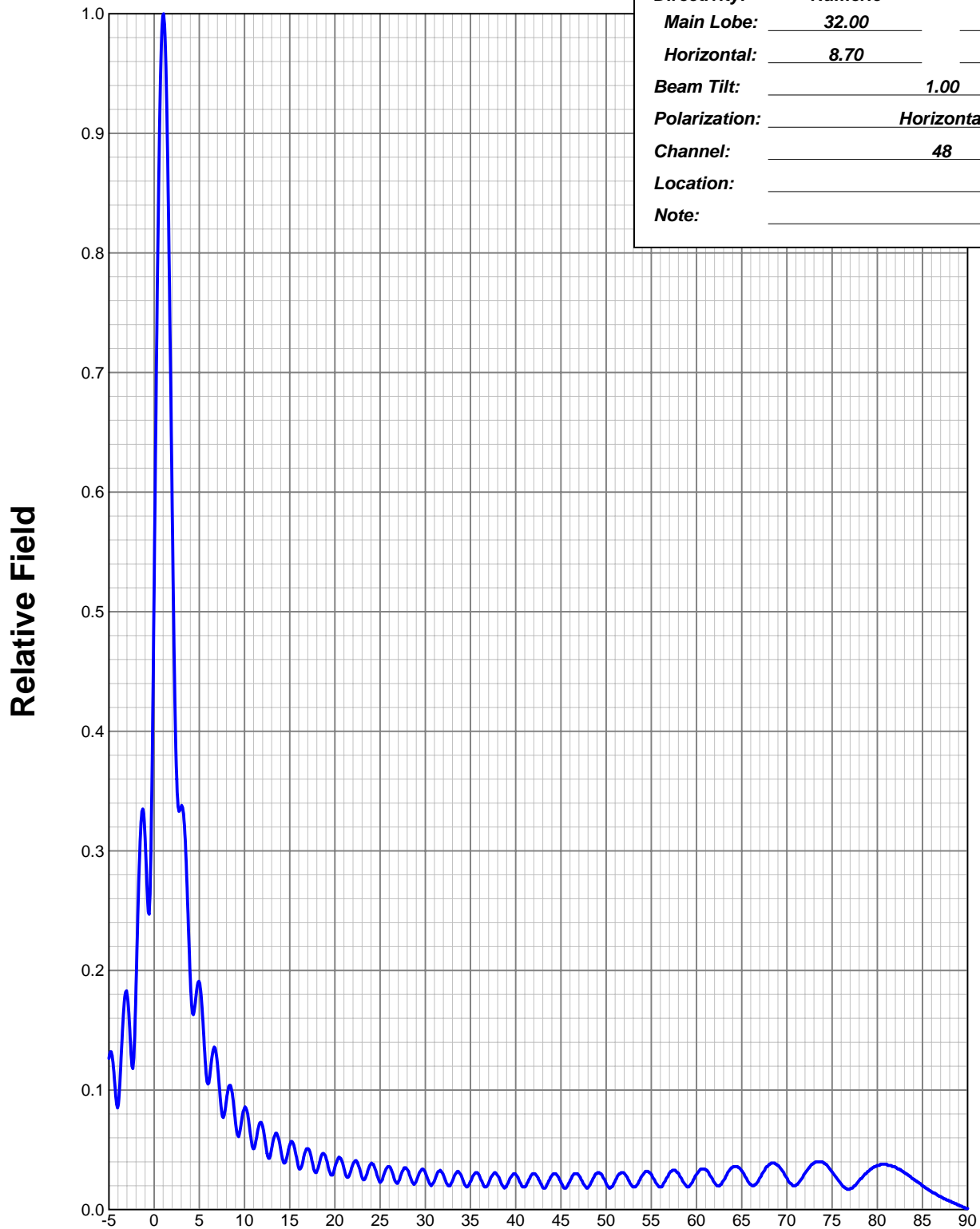
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## ELEVATION TABULATED DATA

Type: ATW32H4H

Polarization: Horizontal

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
-5.00	0.127	-17.96	6.50	0.132	-17.59	42.00	0.030	-30.46	88.00	0.007	-43.10
-4.75	0.132	-17.59	6.75	0.135	-17.39	43.00	0.019	-34.66	89.00	0.004	-47.96
-4.50	0.119	-18.49	7.00	0.122	-18.27	44.00	0.029	-30.90	90.00	0.001	-60.00
-4.25	0.095	-20.45	7.25	0.099	-20.09	45.00	0.023	-32.77			
-4.00	0.086	-21.26	7.50	0.081	-21.88	46.00	0.024	-32.40			
-3.75	0.111	-19.09	7.75	0.079	-22.05	47.00	0.029	-30.90			
-3.50	0.150	-16.48	8.00	0.092	-20.72	48.00	0.019	-34.66			
-3.25	0.178	-14.99	8.25	0.103	-19.74	49.00	0.031	-30.31			
-3.00	0.181	-14.87	8.50	0.103	-19.79	50.00	0.022	-33.15			
-2.75	0.158	-16.03	8.75	0.091	-20.82	51.00	0.024	-32.40			
-2.50	0.125	-18.06	9.00	0.074	-22.67	52.00	0.031	-30.31			
-2.25	0.127	-17.92	9.25	0.062	-24.15	53.00	0.019	-34.42			
-2.00	0.187	-14.56	9.50	0.066	-23.61	54.00	0.029	-30.90			
-1.75	0.261	-11.67	9.75	0.078	-22.16	55.00	0.030	-30.60			
-1.50	0.316	-10.01	10.00	0.085	-21.41	56.00	0.019	-34.42			
-1.25	0.335	-9.50	11.00	0.051	-25.85	57.00	0.031	-30.31			
-1.00	0.311	-10.14	12.00	0.070	-23.16	58.00	0.031	-30.31			
-0.75	0.263	-11.60	13.00	0.051	-25.85	59.00	0.019	-34.42			
-0.50	0.256	-11.85	14.00	0.051	-25.93	60.00	0.030	-30.60			
-0.25	0.352	-9.07	15.00	0.054	-25.35	61.00	0.034	-29.50			
0.00	0.522	-5.65	16.00	0.035	-29.12	62.00	0.023	-32.96			
0.25	0.702	-3.07	17.00	0.051	-25.85	63.00	0.025	-32.22			
0.50	0.855	-1.36	18.00	0.032	-29.90	64.00	0.036	-29.00			
0.75	0.961	-0.35	19.00	0.044	-27.23	65.00	0.033	-29.76			
1.00	0.999	-0.01	20.00	0.036	-29.00	66.00	0.021	-33.56			
1.25	0.971	-0.26	21.00	0.035	-29.24	67.00	0.027	-31.54			
1.50	0.878	-1.14	22.00	0.038	-28.40	68.00	0.038	-28.52			
1.75	0.742	-2.59	23.00	0.027	-31.37	69.00	0.037	-28.64			
2.00	0.587	-4.63	24.00	0.039	-28.29	70.00	0.027	-31.54			
2.25	0.446	-7.01	25.00	0.023	-32.77	71.00	0.021	-33.76			
2.50	0.360	-8.87	26.00	0.036	-28.87	72.00	0.031	-30.31			
2.75	0.333	-9.55	27.00	0.023	-32.77	73.00	0.039	-28.18			
3.00	0.337	-9.45	28.00	0.034	-29.50	74.00	0.040	-28.07			
3.25	0.331	-9.60	29.00	0.024	-32.40	75.00	0.032	-30.03			
3.50	0.299	-10.49	30.00	0.031	-30.17	76.00	0.021	-33.35			
3.75	0.247	-12.15	31.00	0.024	-32.40	77.00	0.018	-35.14			
4.00	0.193	-14.29	32.00	0.029	-30.75	78.00	0.025	-32.22			
4.25	0.164	-15.70	33.00	0.024	-32.40	79.00	0.032	-29.90			
4.50	0.170	-15.39	34.00	0.028	-31.06	80.00	0.037	-28.64			
4.75	0.186	-14.61	35.00	0.024	-32.58	81.00	0.038	-28.40			
5.00	0.190	-14.42	36.00	0.028	-31.06	82.00	0.036	-29.00			
5.25	0.174	-15.19	37.00	0.022	-33.15	83.00	0.031	-30.17			
5.50	0.144	-16.83	38.00	0.029	-30.90	84.00	0.026	-31.87			
5.75	0.114	-18.86	39.00	0.020	-33.98	85.00	0.020	-33.98			
6.00	0.106	-19.53	40.00	0.030	-30.60	86.00	0.015	-36.48			
6.25	0.118	-18.56	41.00	0.019	-34.42	87.00	0.011	-39.17			



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