TECHNICAL EXHIBIT
DIGITAL FLASH CUT APPLICATION
STATION KEZT-CA (FACILITY ID 52890)
SACRAMENTO, CALIFORNIA
CH 23 4.5 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an application to "flash-cut" to digital operation for Class A television station KEZT-CA. Station KEZT-CA is licensed to operate on analog channel 23 with a directional antenna maximum (visual) effective radiated power (ERP) of 12.2 kW and an antenna height above mean sea level (RCAMSL) of 94 meters (BLTTL-19970918JA).

Proposed Facilities

This application proposes to flash-cut to digital mode on channel 23 at the current transmitter site, using the current antenna. The site coordinates have been corrected due to tower registration (NAD27): 38-33-59 N, 121-28-47 W. An SWR (Systems with Reliability), model SWLP12OI directional antenna (oriented at 90 degrees True) with a maximum ERP of 4.5 kW and antenna RCAMSL of 95 meters is proposed. The antenna structure registration number for the existing tower is 1021057.

Figure 1 is a map showing the licensed and proposed coverage contours. As is apparent on the map, the proposed 51 dBu digital contour will have some common contour overlap with the licensed 74 dBu contour.

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. The proposal appears to comply with the FCC's OET-69 Bulletin processing procedures. If necessary, a waiver of the FCC rules is respectfully requested based on use of the FCC's OET-69 Bulletin.

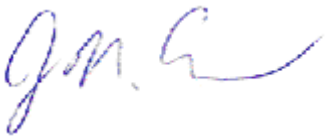
The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed KEZT-CA facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 87 meters above ground level. The proposed maximum ERP is 4.5 kW. A conservative relative field value of 0.5 was assumed for the directional antenna's downward radiation. The calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 0.006 $mW/cm^2$. This is less than 5% of the FCC's recommended limit of 0.35 $mW/cm^2$ for channel 23 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this is a multi-user site, an agreement with the other station(s) will control site access. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

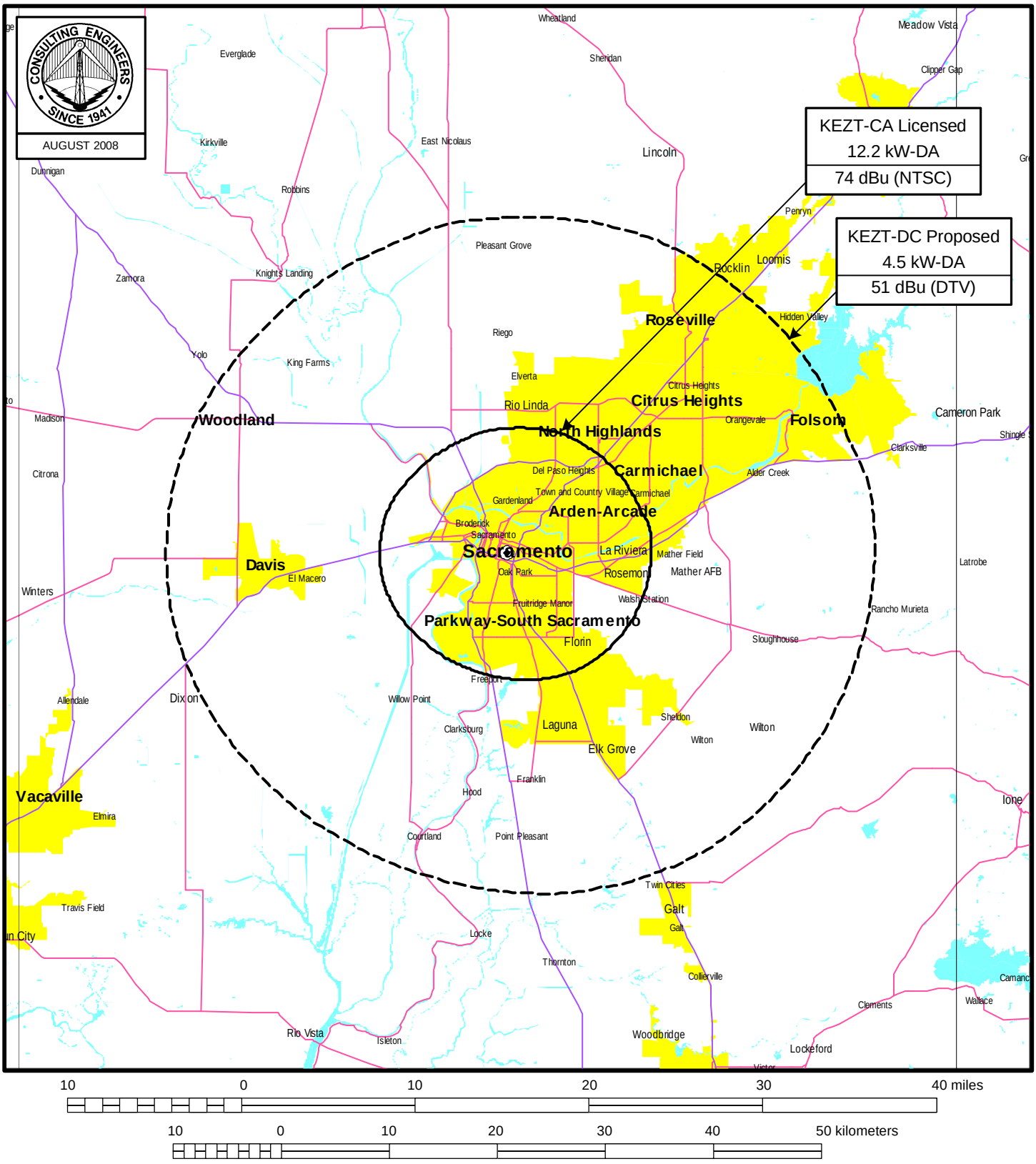


Jonathan N. Edwards

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

August 1, 2008

Figure 1




# PREDICTED COVERAGE CONTOURS

STATION KEZT-CA

SACRAMENTO, CALIFORNIA

du Treil, Lundin & Rackley, Inc Sarasota, Florida