TECHNICAL EXHIBIT
DISPLACEMENT RELIEF APPLICATION FOR
CLASS A STATION KOXO-CA
FACILITY ID 71080
NEWBERG, OREGON
CH 6 0.012 KW

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a displacement relief application for Class A station KOXO-CA at Newberg, Oregon (Facility ID: 71080). Specifically, this application proposes to modify the KOXO-CA licensed operation by specifying an analog operation on VHF channel 6 (82–88 MHz).

Displacement Relief Eligibility

Station KOXO-CA is currently licensed to operate on NTSC channel 51 (692-698 MHz) with a non-directional antenna maximum ERP of 95 kW and an antenna RCAMSL of 525 meters. However, co-channel DTV station KOHD on channel 51 at Bend, Oregon, is located 195.6 kilometers from the KOXO-CA transmitter site, therefore KOXO-CA qualifies for displacement.

Class A station KOXO-CA proposes to displace to analog channel 6 from its licensed analog transmitter site and employ a Scala TVO-4 non-directional antenna. There is no proposed change in transmitter site.

This application is considered a "minor change" in facilities pursuant to Section 73.3572, as it is a displacement relief application and the proposed 62 dBu contour will overlap a portion of the licensed 74 dBu contour (see Figure 1).

Proposed Operation

Station KOXO-CA proposes to operate on analog channel 6 (82-88 MHz) with a Scala TVO-4 non-directional antenna, a maximum ERP of 0.012 kW and an RCAMSL of 525 meters. The Scala TVO-4 non-directional antenna will be mounted at the 183 meter level on an existing 282 meter tower. The FCC Tower Registration Number for the existing structure is 1204059.

Response to Paragraph 11

A study has been conducted for the proposed facility using the OET Bulletin 69 interference model.[1] The results indicate that the proposed operation will not create prohibited interference to stations in the Land Mobile Radio Service (LMRS) or other existing, authorized or proposed NTSC or DTV full-power, LPTV, TV translator or Class A stations.

Canadian Protection

The proposed channel 6 operation will be located 305.9 kilometers from the closest point of the US-Canadian common border. Therefore, consideration was given to the existing US-Canadian TV Agreement (1994). Pursuant to the existing Agreement, analog stations will be referred if the pertinent interfering contour would fall within the territory of the other country. The pertinent interfering contour applicable towards co-channel NTSC stations is the 2 dBu, F(50,10) contour for nonoffset stations. The pertinent interfering contour applicable towards co-channel DTV operations is the 21.7 dBu, F(50,10) contour. Figure 2 depicts the locations of both the 2 dBu, F(50,10) and 21.7 dBu, F(50,10) interfering contours based on the proposed channel 6 facilities. As indicated on Figure 2, neither the 2 dBu, F(50,10) nor the 21.7 dBu, F(50,10) contour overlaps Canadian land area. Therefore, it is not believed necessary to refer the proposal to Canada.

Response to Paragraph 12 - Environmental Protection Act

The proposed KOXO-CA facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation of the Bulletin. Using a worst case vertical relative field value of 1.0, a maximum ERP of 0.012

[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 1 km and distance terrain increment of 1 km were employed. A Sun based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

kilowatts, the calculated power density at 2 meters above ground level at the base of the tower is less than 0.0001 milliwatts per square centimeter (mW/cm^2), or less than 0.05% percent of the Commission's recommended limit of 0.2 mW/cm^2 for TV channel 6 applicable to general population/uncontrolled exposure areas. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the new RF emission rules.

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 place 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.

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

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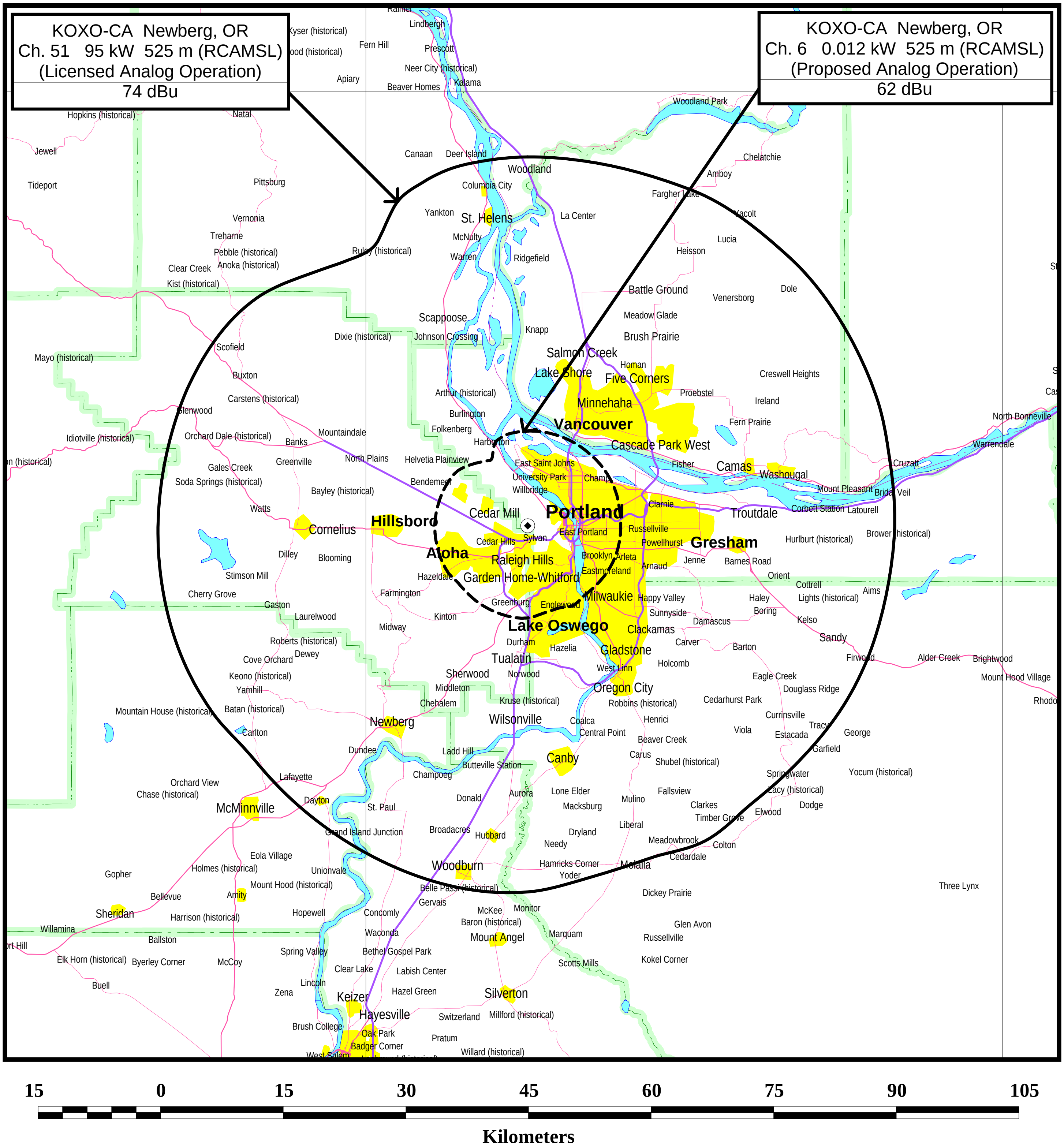
Figure 1

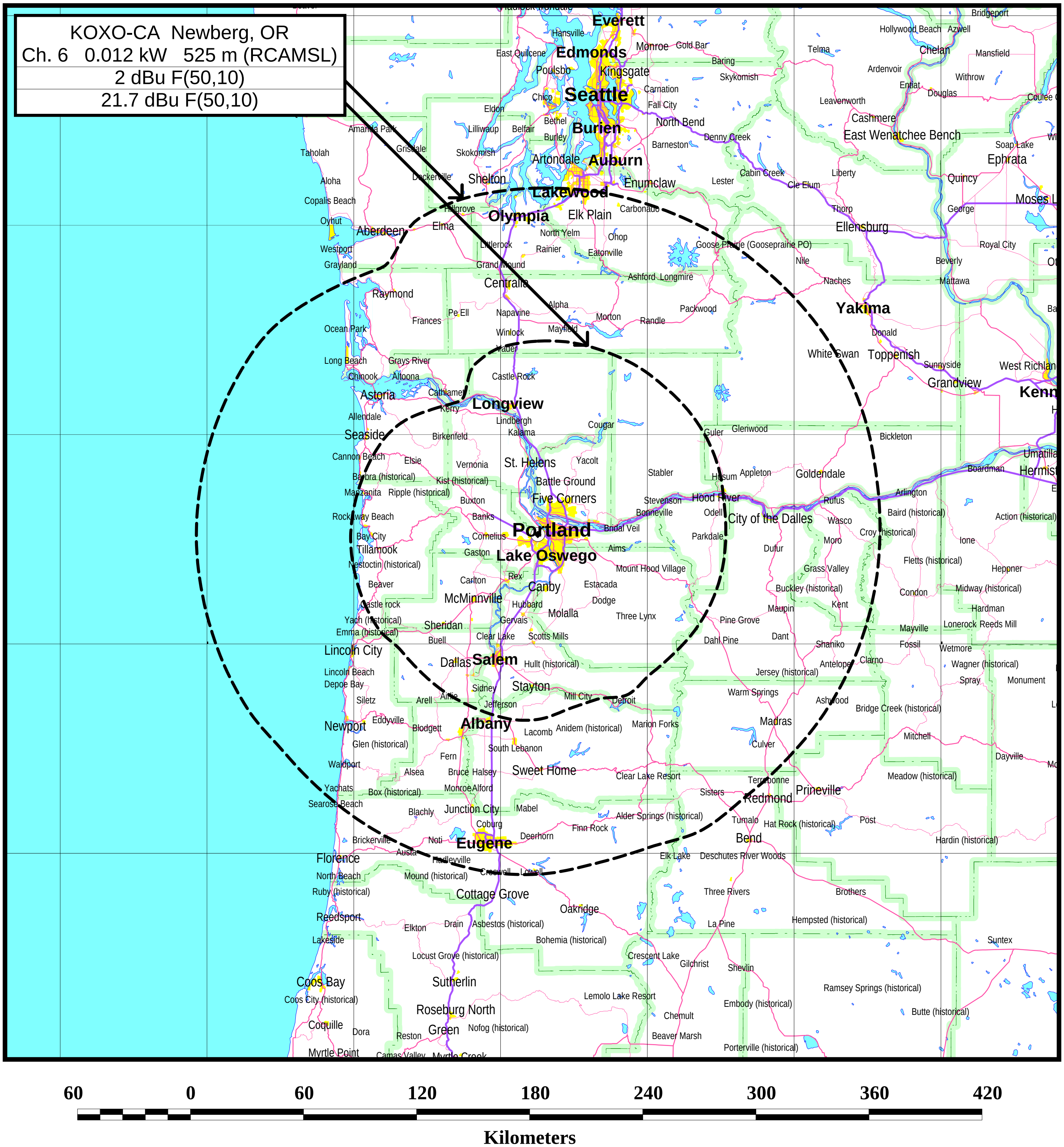


FCC PREDICTED COVERAGE CONTOURS

CLASS A STATION KOXO-CA
NEWBERG, OREGON
CH 6 0.012 KW 525 M (RCAMSL)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 2



CANADIAN ALLOCATION STUDY

CLASS A STATION KOXO-CA
NEWBERG, OREGON
CH 6 0.012 KW 525 M

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