

ENGINEERING EXHIBIT

Request for Special Temporary Authorization prepared for

CBS Stations Group of Texas L.P.
KTVT(DT) Fort Worth, TX
Facility ID 23422

CBS Stations Group of Texas L.P. (“*CBS*”) is the licensee of KTVT(DT), Fort Worth, TX, Facility ID 23422. During the pre-transition period, KTVT operated on digital Channel 19 (BLCDT-20050628ABA). A Construction Permit (“CP”, BPCDT-20080328ACY) authorizes construction of the KTVT post-transition digital facility on Channel 11. KTVT is presently operating on Channel 11 pursuant to the CP and a license application is pending to cover the construction (BLCDT-20090612AGD). Since the transition date, many of KTVT’s viewers are experiencing significant difficulty in receiving KTVT’s Channel 11 digital signal, as described elsewhere in the STA request. This statement supports *CBS*’s request for Special Temporary Authority (“STA”) to operate KTVT on its pre-transition digital Channel 19 simultaneously¹ with the current digital Channel 11.

KTVT’s pre-transition Channel 19 facility is currently in use by station KTXA(DT) (Facility ID 51517 Fort Worth, TX), under common ownership with KTVT. KTXA was allotted Channel 19 for post-transition use in MB Docket 08-148², as a substitution of its original Channel 18 allotment in Appendix B of the Seventh Report and Order in MB Docket 87-268. To vacate Channel 19 for use by KTVT, a separate request for STA is being filed contemporaneously for KTXA to use its Channel 18 pre-transition facility.

¹Simultaneous operation is sought in the same manner as that regarding WHDH-TV Boston, MA, which was granted an STA to utilize both its post-transition Channel 7 and pre-transition Channel 42 facilities (BDSTA-20090615AEV).

²*Amendment of Section 73.622(i), Final DTV Table of Allotments, Television Broadcast Stations (Fort Worth, Texas)*, MB Docket No. 08-147, RM 11474, DA 08-2249, released October 7, 2008.

CBS herein proposes to operate KTVT on Channel 19, its pre-transition channel. The “Tech box” data within the STA request specifies the post-transition Channel 19 facility parameters as authorized for KTXA (BPCDT-20090504AAV, 750 kW, 500 m). CBS will submit a petition for rulemaking that will request a permanent change to Channel 19 for KTVT and to specify another UHF channel for KTXA.

A coverage contour map is supplied as **Figure 1**, demonstrating compliance with §73.625(a)(1) concerning principal community coverage. The contour comparison map of **Figure 2** supplies the coverage contours associated with the former KTVT analog Channel 11 facility and the proposed STA facility. Population counts using OET Bulletin 69³ analysis show that the proposed STA facility’s service population is 5,461,325 persons, which is 100.9 percent of the KTVT Appendix B population (5,412,414) and 103.1 percent of the pre-transition analog Channel 11 facility’s service population (5,299,398 persons).

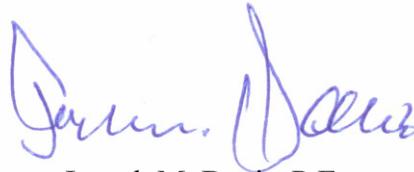
An interference study is not necessary, since the proposed STA facility is identical to the operation authorized to KTXA pursuant to its Construction Permit (BMPCDT-20090504AAV).

Regarding RF exposure, calculations per FCC OET Bulletin Number 65 considering 10 percent antenna relative field in downward elevations show that the signal density near the tower at two meters above ground level attributable to the proposed facility is $1.2 \mu\text{W}/\text{cm}^2$, which is 0.4 percent of the general population/uncontrolled maximum permitted exposure limit. This is well below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal’s contribution is less than five percent. The applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic field exposure in excess of FCC guidelines.

³FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission’s implementation of OET-69 show excellent correlation.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.



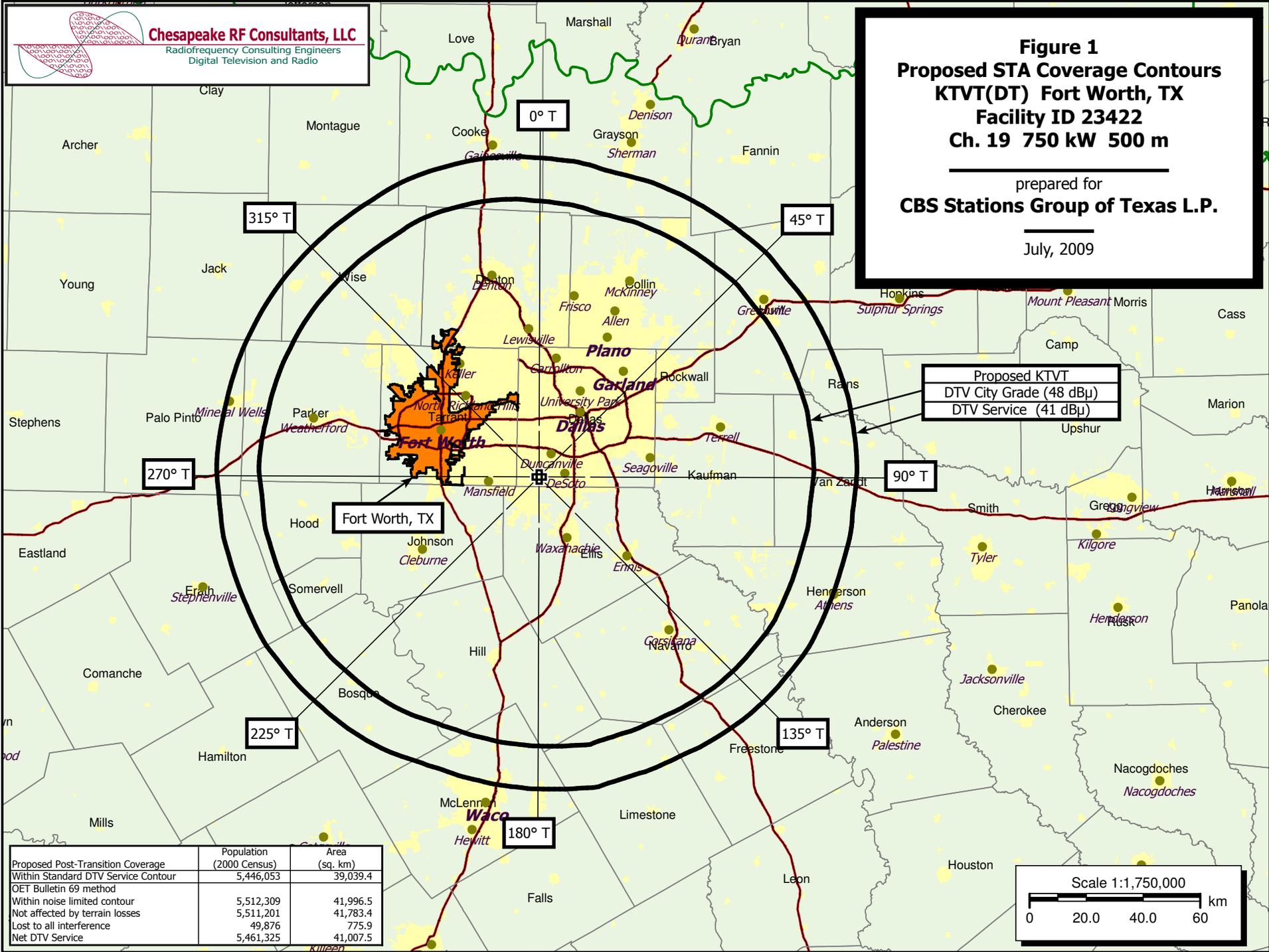
Joseph M. Davis, P.E.
July 6, 2009

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List of Attachments

Figure 1 Proposed STA Coverage Contours
Figure 2 Coverage Contour Comparison

Figure 1
Proposed STA Coverage Contours
KTVT(DT) Fort Worth, TX
Facility ID 23422
Ch. 19 750 kW 500 m
 prepared for
CBS Stations Group of Texas L.P.
 July, 2009



Proposed Post-Transition Coverage	Population (2000 Census)	Area (sq. km)
Within Standard DTV Service Contour	5,446,053	39,039.4
OET Bulletin 69 method		
Within noise limited contour	5,512,309	41,996.5
Not affected by terrain losses	5,511,201	41,783.4
Lost to all interference	49,876	775.9
Net DTV Service	5,461,325	41,007.5

