

TECHNICAL EXHIBIT  
DIGITAL FLASH-CUT APPLICATION FOR  
CLASS A STATION KHPF-CA (FACILITY ID 35923)  
FREDERICKSBURG, TEXAS  
CH 44 0.043 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for Class A station KHPF-CA. Station KHPF-CA is licensed (BLTTA-20021004AAC) to operate on analog channel 44 with a directional antenna maximum (visual) effective radiated power (ERP) of 9 kW and an antenna height above mean sea level (RCAMSL) of 626 meters.

Freeze Compliance

This application can be accepted for filing as it does not request a change which is consider “frozen” by FCC’s Public Notice (DA 04-2446) released August 3, 2004, *Freeze on the filing of Certain TV and DTV Requests for Allotment or Service Area Changes*. Specifically, the proposed 51 dBu contour will not result in an extension of the currently licensed 74 dBu contour (see below).

Proposed Facilities

This application proposes digital operation on the current channel (44), at the current transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 30-15-35 N, 98-53-13 W. A Scala SL-8 antenna, oriented at 0 degrees true, with a maximum ERP of 0.043 kW and antenna RCAMSL of 626 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, the 51 dBu contour does not result in an extension of the 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. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. 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 KHPF-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 90 meters above ground level. The proposed maximum ERP is 0.043 kW. Based on a worst-case vertical relative field of 1.0, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 0.05% of the FCC's recommended limit of  $0.44 \text{ mW/cm}^2$  for channel 44 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. 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.

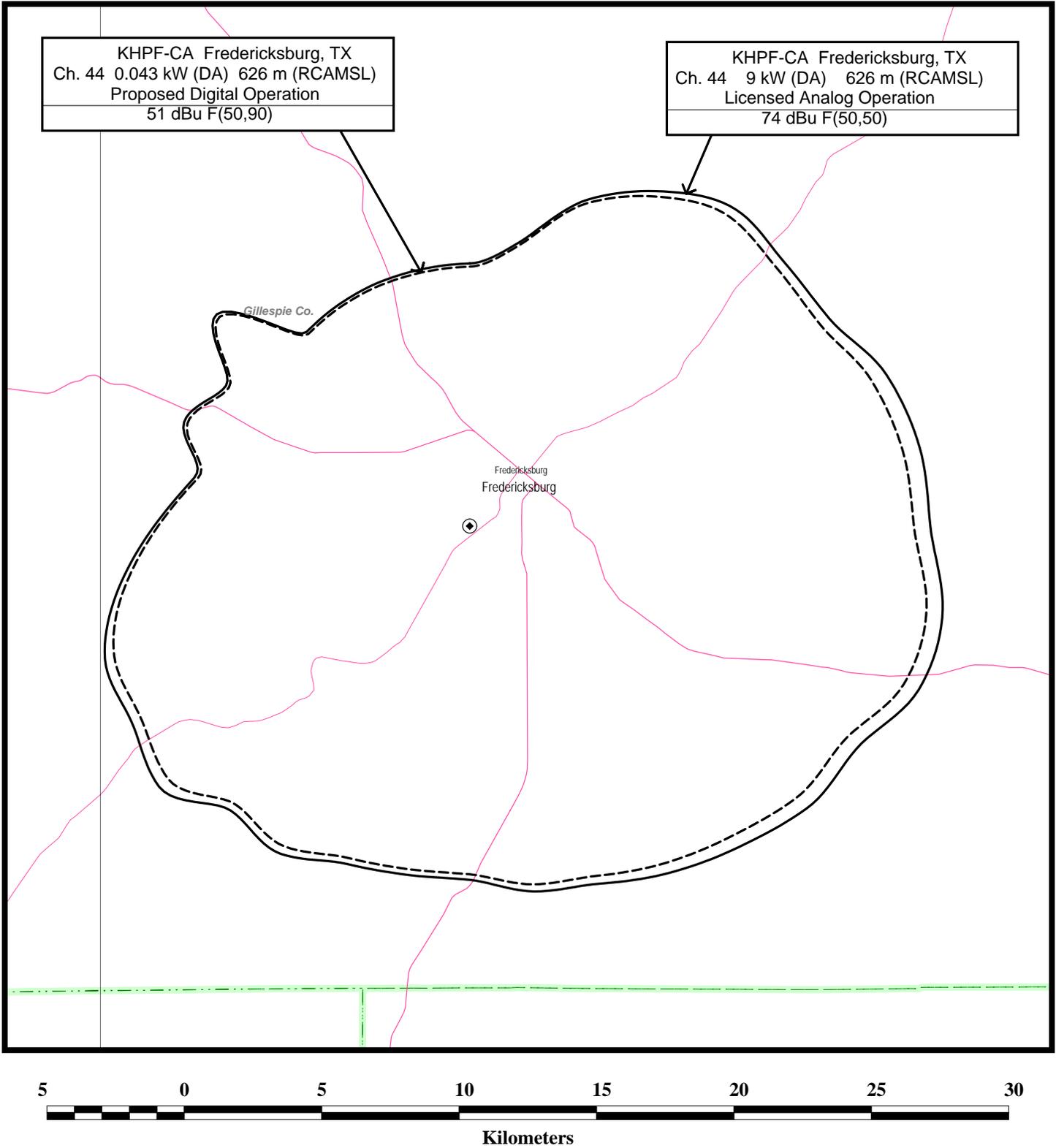
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

A handwritten signature in black ink, appearing to read 'T. Howell', is centered on the page.

Thomas Howell

du Treil, Lundin & Rackley, Inc.  
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March 23, 2006



**FCC PREDICTED COVERAGE CONTOURS**

CLASS A STATION KHPF-CA  
FREDERICKSBURG, TEXAS  
CH 44 0.043 KW (DA) 626 M (RCAMSL)

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