

EXHIBIT 34 & 36

**ENGINEERING REPORT
REGARDING MODIFICATION OF
CONSTRUCTION PERMIT
OF DIGITAL TELEVISION STATION
KETS-DT
AT
LITTLE ROCK, ARKANSAS
CHANNEL 5 2.1 KW MAX ERP DA 548 METERS HAAT**

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Introduction

This engineering report has been prepared on behalf of Arkansas Educational Television Commission in support of its modification of application for a construction permit for a new educational Digital Television broadcast station at Little Rock, Arkansas. The proposed TV station will operate on VHF channel 5 (76-82 MHz).

By this application, Arkansas Educational Television Commission intends to modify its previously granted construction permit (File Number BMPEDT-20010815AAX) to change antennas and move the facility to a shared facility hosted by KASN-TV in Pine Bluff, Arkansas.

It is proposed to operate on Channel 5 with a directional antenna system with 2.1 kW maximum effective radiated power (ERP) and 548 meters radiation center height above average terrain (HAAT). The proposed directional antenna will provide the necessary protection to the other effected facilities.

Proposed Facility

The proposed antenna will be side-mounted on an existing guyed tower located approximately 2 miles west of Redfield, Arkansas. The tower will be shared with Television Station KASN-TV (Channel 38); and KASN-DT (Channel 39) both licensed to Pine Bluff, Arkansas. The geographic coordinates (NAD-27) of this existing tower are as follows:

North Latitude: 34° 26' 31"

West Longitude: 92° 13' 03"

The KASN tower is registered under ASRN # 1036554. The overall height of the tower is 579 meters above the ground (682 meters AMSL). The KASN antenna is top-mounted on this tower. The proposed KETS-DT antenna will be side-mounted.

The proposed antenna is an Andrew Model ALB1V1-HSCX-5. This directional antenna will operate with a maximum ERP of 2.1KW average. The pertinent manufacturers tabulated data is attached to this report.

The proposed facility meets the minimum coverage requirements of Little Rock, Arkansas in compliance with Section 73.625(a)(1) of the FCC Rules, as recently adopted by the FCC in MM Docket No. 00-39. The attached coverage map indicates the appropriate coverage contours.

The following is the elevation data of the proposed antenna.

Elevation Data

Elevation of the site above mean sea level	103 meters
Elevation of the top of supporting structure Above ground	579 meters
Elevation of the top of supporting structure Above mean sea level	682 meters
Height of antenna radiation center above ground	528 meters
Height of antenna radiation center Above mean sea level	632 meters
Height of antenna radiation center Above average terrain	548 meters

Allocation Considerations

This application is tendered to modify the existing construction permit to allow the KETS-DT facility to move to the shared facilities of KASN, and to change to an Andrew antenna. The new antenna location is approximately 3.7 kilometers (2.3 Miles) from the location in the granted construction permit (BMPEDT-20010815AAX) at the reference coordinates. Thus, it is believed that this move is within the allowable 5.0 kilometers under section 73.622 of the FCC rules.

However, the new proposed facilities specify radiation center above average terrain of 548 meters, which is approximately 18 meters higher than the granted construction permit HAAT of 530.5 meters. Therefore, a study was performed to determine the impact of the higher HAAT at the new location. The study was performed utilizing the FCC OET-69 methodology incorporated into a computer program by Techware. The study was **performed utilizing 1km grid cells**. The results of the study are in the table below. It is believed that this proposal meets all the requirements of the *de minimus* interference criteria.

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Summary of OET-69 Study for KETS-DT

Channel	Call Sign	City/State	Distance (km)	Status	Reference	% IX
05	KFSM-TV	Ft. Smith, Arkansas	228.5	CP	BPCT-19990920ABE	1.66
05	KFSM-TV	Ft. Smith, Arkansas	228.5	LIC	BLCT-1563	1.98
05	KALB-TV	Alexandria, Louisiana	379.3	LIC	BLCT-1555	0.01
05	K05KD	Carthage, Missouri	354.2	LIC	BLTV-19960508JL	0.0
05	WMC-TV	Memphis, Tennessee	227.6	LIC	BLCT-1042	1.34
06	KEMV-TV	Mountain View, AR	152.5	LIC	BLET-19800903KE	0.0
06	WABG-TV	Greenwood, Mississippi	195.9	LIC	BLCT-19821102KE	0.0

Note: This study utilized 1km Grid Cells.

Environmental Statement

Calculations based upon information supplied by the antenna manufacturer, Andrew Corporation, indicate field strengths below applicable standards from the tower base to a minimum distance of 304 meters (1,000 feet). This would encompass the area of greatest predictable activity and would not expose the general public to harmful levels of non-ionizing radiation.

The KETS-DT tower is located in a rural area consisting of pine forest owned by a large paper company, and as such is not in a historic district. The area is not located in any flood plains, restricted forest areas, protected wetlands, or wildlife refuges, etc.

The transmitter building, tower base, and guy wire anchor points are encircled with an eight-foot high chain link fence properly identified as a no trespassing, high RF radiation area.

It is the policy of KETS-DT that all RF power to the antenna is removed whenever riggers are working on the tower.