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ENGINEERING EXHIBIT EE-1:

APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT

KM TELEVISION OF FLAGSTAFF, L.L.C.

KCFG-DT

DIGITAL TELEVISION CHANNEL 32
FLAGSTAFF, ARIZONA

MARCH 2006

FCC FACILITY NUMBER
35104

ENGINEERING EXHIBIT
IN SUPPORT OF
APPLICATION FOR MODIFICATION
OF CONSTRUCTION PERMIT

DIGITAL TELEVISION STATION KCFG-DT
FLAGSTAFF, ARIZONA

ENGINEERING EXHIBIT EE-1:

APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
KM TELEVISION OF FLAGSTAFF, L.L.C.
KCFG-DT
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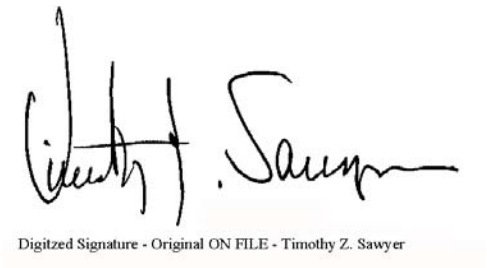
DECLARATION

I, Timothy Z. Sawyer, declare and that I have provided engineering services in the area of telecommunications since 1969. My qualifications are a matter of record with the Federal Communications Commission. I am a senior engineer with the firm of Mullaney Engineering, Inc., consulting radio telecommunications engineers with offices in Gaithersburg, Maryland.

The firm of Mullaney Engineering, Inc., has been retained by KM TELEVISION OF FLAGSTAFF, L.L.C., to prepare the instant engineering exhibit in support of ***an Application for Modification of Construction Permit - Digital Television Broadcast Station - KCFG-DT, Flagstaff, Arizona.*** (FCC FACILITY ID NUMBER: 35104).

All facts contained herein are true of my own knowledge except those stated to be on information and belief, and as to those facts, I believe them to be true. I declare under the penalty of perjury that the foregoing is true and correct.



Timothy Z. Sawyer
Executed on the 27th day of March 2006

ENGINEERING EXHIBIT EE-1:

APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
KM TELEVISION OF FLAGSTAFF, L.L.C.
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DIGITAL TELEVISION CHANNEL 32
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ENGINEERING STATEMENT

The technical exhibit, of which this narrative is part, was prepared on behalf of KM Television of Flagstaff, L.L.C., in support of an application to modify the construction permit of Television Station KCFG-DT, Flagstaff, Arizona. The FCC facility identification number is 35104.

The proposed station will operate on Digital TV Channel 32 with an effective radiated power (ERP) of 1000 kilowatts and an antenna height above average terrain (HAAT) of 343 meters utilizing a directional antenna.

Requirements to modify the authorized construction permit is a result of specifying a directional antenna. The current construction permit authorizes the use of a nondirectional antenna. No other changes are proposed.

No increase in the authorized effective radiated power of the station, the antenna location, or antenna height above ground, above mean sea level, or height above average terrain is requested. The protected and interference contours from this proposal do not exceed those currently authorized in any direction.

The proposed antenna modification is minor and will result in no increase in interference to other stations, nor will it result in an expansion of the currently authorized service area.

The proposal would not be subject to environmental processing in accordance with 47 C.F.R. §1.1306. This proposal does not involve a site location specified under 47 C.F.R. §1.1307 (a)(1)-(7), or involve high intensity lighting under 47 C.F.R. §1.1307(a)(8) or result in human exposure to radiofrequency radiation in excess of the applicable safety standards specified in 47 C.F.R. §1.1307(b).

This application conforms with all applicable rules and regulations of the Federal Communications Commission.

The proposed transmitting facility will consist of a 27-bay Andrew ATW27H3-HSS-32H directional antenna, side-mounted on an existing guyed, uniform cross-section, steel tower. The tower has been registered with the FCC and issued a Tower Registration Number of 1062157.

DIRECTIONAL ANTENNA DETAILS (FIGURE 1)

Figure 1 contains the details of the proposed directional antenna as required by the Commission's rules. A standard directional antenna with an antenna rotation to 225 Degrees True is proposed.

FCC F(50,90) COVERAGE CONTOURS (FIGURE 2)

The predicted 41 and 48 dBu f(50,90) coverage contours were calculated in accordance with the provisions of 47 C.F.R. §73.313. In accordance with current FCC practice, no consideration was given to terrain roughness correction factors.

The average terrain elevations from 3 to 16 kilometers from the proposed site were obtained from the N.G.D.C. 3-second terrain database. 360 radials, evenly spaced at 1-degree intervals were used for determining the average terrain elevations and the distance to the service contour.

The antenna radiation center heights above average terrain in the individual radial directions and the effective radiated power in the appropriate directions were used in conjunction with the appropriate F(50,90) curve contained with the Commission's rules.

The present (C.P.) and proposed contours have been drawn on the map in Figure 2. As the map in Figure 2 shows, the 48 dBu (City Grade) contour from this proposal completely encompasses the city of license, Flagstaff, Arizona.

POPULATION AND AREA

The population to be served within the predicted 41 dBu (f50,90) contour was determined by a computer program that adds the population of census districts whose centroids lie within the contour. The 2000 U.S. Census data was employed. The area within the 60 dBu contour was calculated by a computer program using a root mean square algorithm. The predicted 41 dBu contour encompasses 32014.62 square kilometers in which 274,010 persons reside.

GAIN/LOSS STUDY (FIGURE 3)

A detailed gain/loss study of the proposed service area is presented herein. This office has identified at least three (3) full service digital television stations which are predicted to provide service to all or part of the predicted loss areas as indicated on the map in Figures 3.

The predicted population loss is limited to 5,906 persons located within the loss area. The population loss is approximately 2.1 percent of the total population served by the current authorized permit.

Full Service Digital Television Stations that provide service within the loss area are:

Call Letters: KFPH-D.C File Number: BPCDT19990924AAS
Channel: 27

Call Letters: KTFL-D.C File Number: BPCDT19990923AAK
Channel: 18

Call Letters: KNAZ-D.C File Number: BMPCDT20020603AAP
Channel: 22

OTHER CONSIDERATIONS

The applicant recognizes its responsibility to remedy complaints of blanketing interference as required, and to protect existing facilities in accordance with the applicable rules.

No adverse impact (intermodulation or otherwise) on existing facilities or pending applications is anticipated. However, the applicant recognizes its responsibility to correct such matters if they occur as a result of its operation.

ENVIRONMENTAL CONSIDERATIONS

The proposed 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 Electromagnetic Fields."

Power density contribution from the proposed operation was computed using the appropriate equations of the OST Bulletin. The maximum radiated power is 1000 kilowatts on digital Television Channel 32. Using a "worst-case" relative field pattern of 0.1 for values all values 10 degrees and greater below the horizon, the power density was computed at a level of 2 meters above ground to be 0.1191 mW/cm^2 or 6.15 % of the recommended limit of 1.936 mW/cm^2 for a controlled area at the base of the tower and 30.8 % of the recommended limit of 0.387 mW/cm^2 for an uncontrolled area.

Therefore, at ground level (and 2 meters above), at the base of the tower, the potential for radiofrequency radiation exposure will be well within the FCC guidelines.

The "worst-case" minimum distance from the antenna was computed to be 9 meters for a controlled environment. As the minimum distance is more than 26.5 meters above ground level, no exposure in excess of the guidelines to workers is predicted to occur from this proposal at ground level.

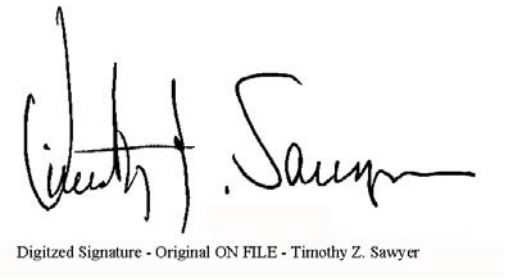
The permittee/licensee/applicant will coordinate with other users of the site and will reduce power or cease operation as necessary to protect persons having access to

the site, tower or antenna from radiofrequency electromagnetic fields in excess of the FCC guidelines.

Suitable warning signs and a fence or other devices will be placed at the base of the tower to prevent unauthorized access. If work is required on the tower, the power to the antenna will be terminated or reduced as required. The applicant will fully comply with the provisions contained within the OET bulletin.

Inquiries concerning the technical portion of this application should be directed to the office of the undersigned.

March 28, 2006



Timothy Z Sawyer
Mullaney Engineering, Inc.