

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of DR. JOSEPH A. ZAVALLETTA, licensee of KVAW-DT in Eagle Pass, Texas, in support of this amendment to his pending Application for Construction Permit BPCDT-20080402AAG, which specifies operation with a maximized post-transition DTV facility on Channel 24 from a new site. The purpose of this amendment is to make a small correction in site coordinates, overall tower height, and antenna height.

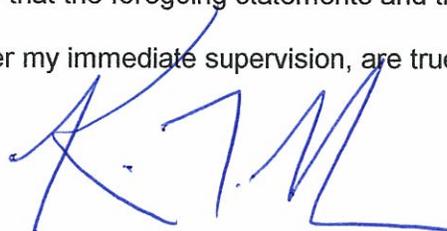
It is now proposed to mount a standard ERI omnidirectional antenna at the 600-meter level of a proposed 610-meter tower near Batesville, Texas. Exhibit B provides an elevation pattern for the proposed antenna. Exhibit C is a map upon which the revised service contours are plotted. As shown, the city of license is still completely contained within the proposed 48 dBu service contour. An interference study is included in Exhibit D, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometers. A power density calculation is provided in Exhibit E.

It is also important to note that the proposed effective radiated power of 1000 kw and effective antenna height of 605 meters exceed the maximum allowable values listed in Section 73.622(f)(8)(i) of the Commission's Rules and a waiver of that Rule is respectfully requested.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the new KVAW-DT site. However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since construction of a new tower is proposed herein, the FAA has been notified of this application. Under Aeronautical Study Number 2008-ASW-5983-OE, the FAA issued a Determination of No Hazard for the proposed structure. Once the Determination becomes final, the applicant will register the structure with the FCC. Once it is issued, the applicant will then submit the ASR number as a supplement to this application. In addition, the applicant will undertake an environmental study of the proposed tower and its location. The results of that study will also be provided to the Commission.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



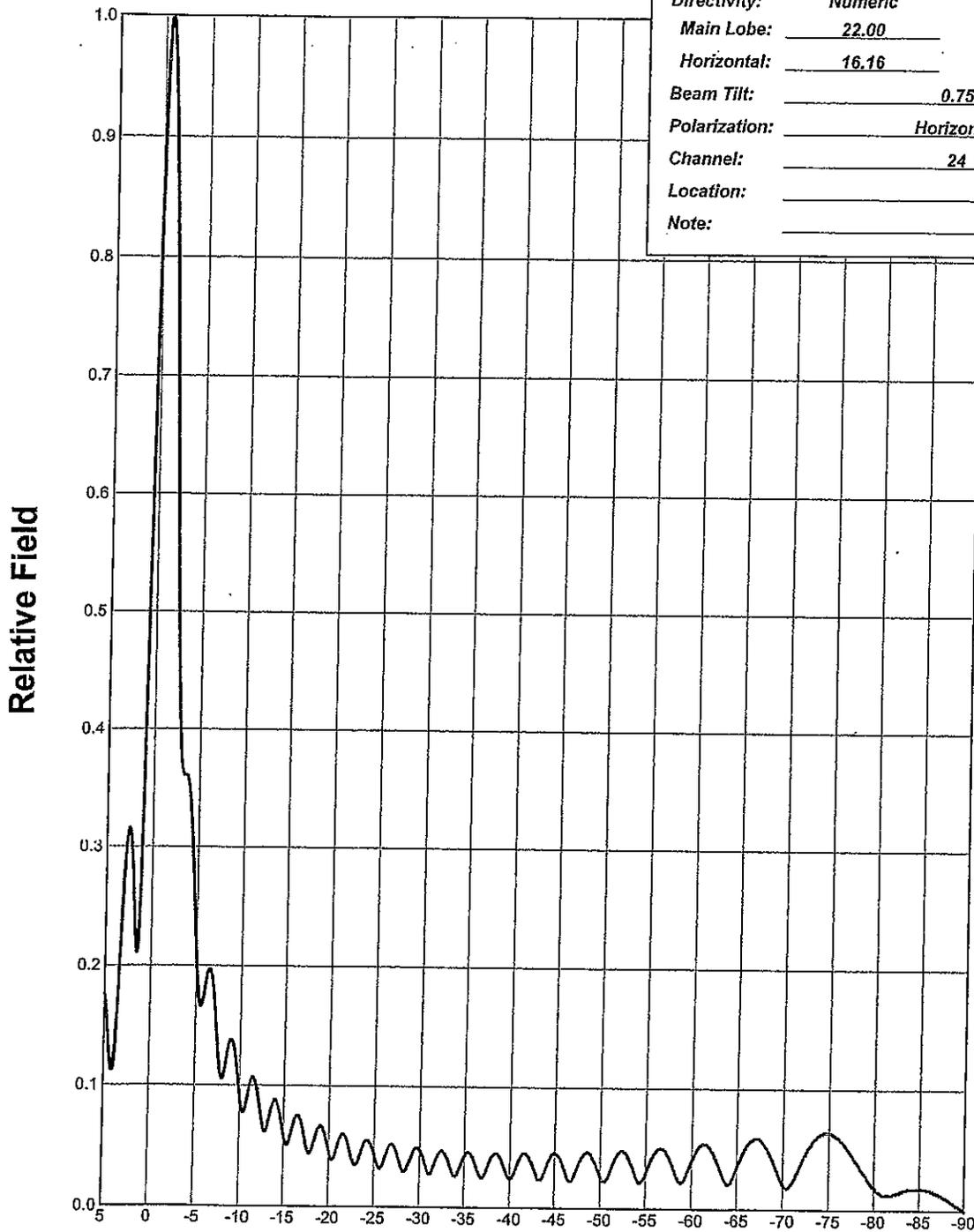
KEVIN T. FISHER

December 10, 2008



ELEVATION PATTERN

Type:	ATW22H3H	
Directivity:	Numeric	dBd
Main Lobe:	22.00	13.42
Horizontal:	16.16	12.08
Beam Tilt:	0.75	
Polarization:	Horizontal	
Channel:	24	
Location:		
Note:		



Electronics Research, Inc.
7777 Gardner Road
Chandler, Indiana U.S.A 47610

EXHIBIT B

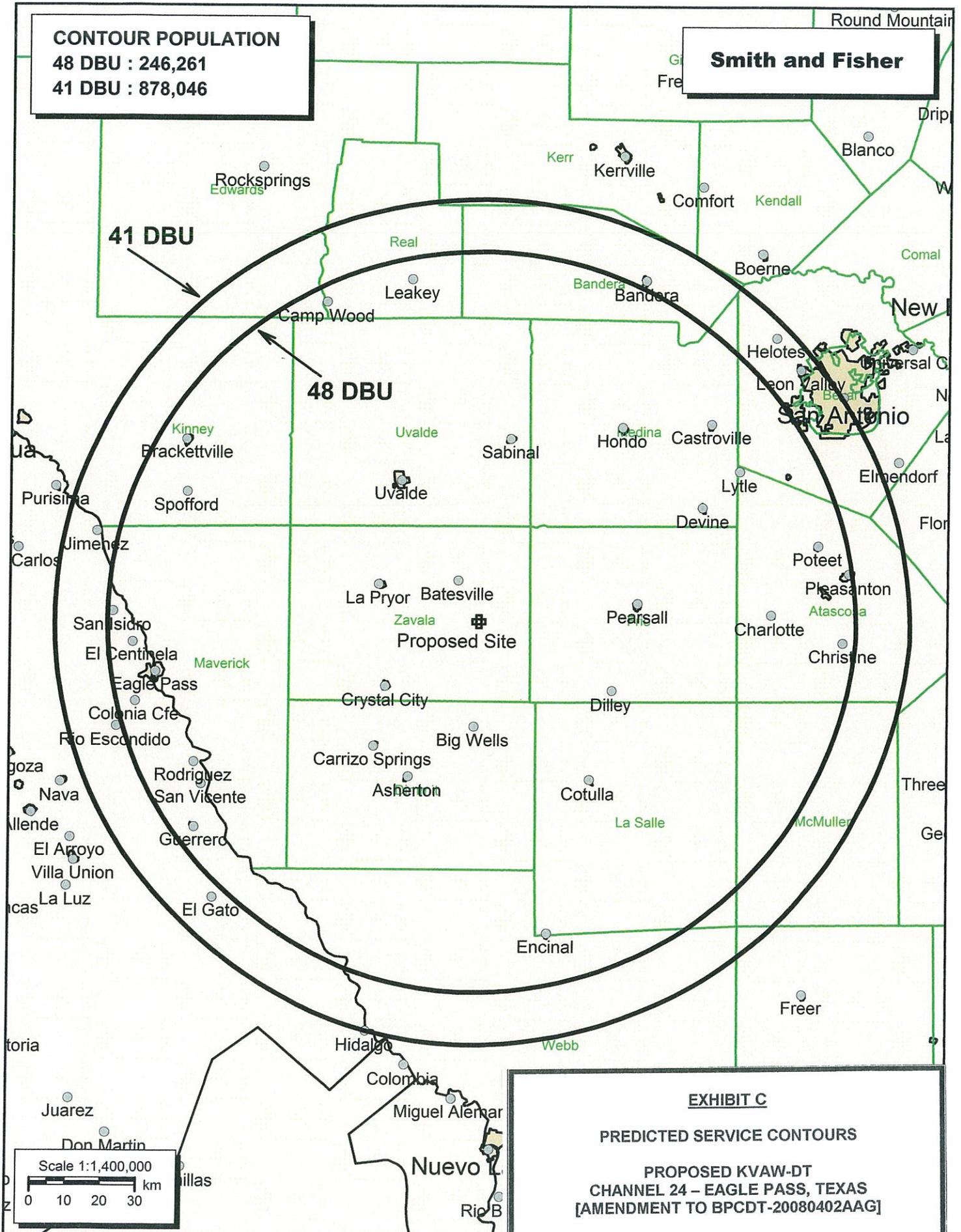
ANTENNA ELEVATION PATTERN

PROPOSED KVAW-DT
CHANNEL 24 - EAGLE PASS, TEXAS
[AMENDMENT TO BPCDT-20080402AAG]

SMITH AND FISHER

CONTOUR POPULATION
48 DBU : 246,261
41 DBU : 878,046

Smith and Fisher



INTERFERENCE STUDY
PROPOSED KVAW-DT
CHANNEL 24 – EAGLE PASS, TEXAS
[AMENDMENT TO BPCDT-20080402AAG]

The instant application specifies an ERP of 1000 kw (omnidirectional) at 605 meters above average terrain, which we have determined to be allowable under the FCC's recently approved interference standards with respect to various post-transition digital television facilities as they will exist on or before February 17, 2009, the date by which all stations must operate with the parameters recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed KVAW-DT to other pertinent stations are tabulated in Exhibit D-2.

As shown, the proposed KVAW-DT facility would not contribute more than 0.5% interference (beyond that which is caused by the allotted KVAW-DT facility) to the service population of any potentially affected post-transition DTV station.

A Longley-Rice interference study also reveals that the proposed KVAW-DT facility does not cause significant (0.5%) interference within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT D-2

INTERFERENCE STUDY SUMMARY
PROPOSED KVAW-DT
CHANNEL 24 – EAGLE PASS, TEXAS
[AMENDMENT TO BPCDT-20080402AAG]

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From KVAW-DT</u>	<u>%</u>
[NO STATIONS AFFECTED]					

Note: This study utilized a cell size of 2.0 km and an increment spacing of 1.0 km.

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED KVAW-DT
CHANNEL 24 – EAGLE PASS, TEXAS
[AMENDMENT TO BPCDT-20080402AAG]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Eagle Pass facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 1000 kw, an antenna radiation center 600 meters above ground, and the elevation pattern of the ERI antenna, maximum power density two meters above ground of 0.00034 mw/cm^2 is calculated to occur 161 meters from the base of the tower. Since this is only 0.1 percent of the 0.35 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 24 (530-536 MHz), a grant of this proposal may be considered a minor environmental action with respect to public and occupational ground-level exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.