Comprehensive Technical Exhibit

Application for Construction Permit
KCWY-DT – Casper, Wyoming
Bozeman Trail Communications Company
June, 2008

General

The following engineering statement and attached exhibits have been prepared for Bozeman Trail Communications Company, licensee of television station KCWY(TV) at Casper, Wyoming, and are in support of their application for construction permit for KCWY-DT post transition facilities.1

KCWY currently operates on channel 13 as an NTSC facility. KCWY was not assigned a DTV channel upon the commencement of the conversion to digital television. In the first round of channel elections, the applicant made no selection for a final channel, thereby choosing to participate in the second round.² In the second round, channel 12 was selected as the final channel for DTV operations.³ Although the CDBS indicates that the second round submission remains with a status of "tendered for filing", Appendix B lists channel 12 for the KCWY allotment.4

Therefore, pursuant to the Commission's DTV Table of Allotments in Appendix B of the <u>Eighth Report and Order</u>, KCWY-DT will operate on channel 12 in the post-transition environment. This application is being submitted to request a construction permit for the post-transition facilities for KCWY-DT. The parameters requested for this initial construction permit vary from those contained in the appropriate Appendix B allotment. Since sufficient variance exists from the proposed and allocated facilities, this application is being submitted as an application for maximization.

¹ The Facility ID for KCWY(TV) is 68713. ² See BFRECT-20050202AEN.

Status based on inspection CDBS data on June 12, 2008.

Discussion of KCWY-DT Allotment and Proposed Facilities

In the Commission's Table of Allotments, KCWY-DT is specified as operating in the post-transition environment on channel 12. The table specifies maximum effective radiated power of 3.2 kW at an antenna center of radiation at 534 meters above average terrain.⁵ The allocation lists an Antenna ID of 74727 for KCWY-DT. The geographic coordinates provided for the KCWY allocation are 42-44-26 North Latitude and 106-21-34 West Longitude.

KCWY seeks to construct its DTV facility at a different location, which is the site currently authorized for NTSC operations.⁶ The proposed site is located 4.33 kilometers from the Appendix B site at an azimuth of 85.5 degrees true as determined by the Commission's distance calculation method. The proposed site has geographic coordinates of 42-44-37 North Latitude and 106-18-24 West Longitude. The use of this second site is desirable as it would permit KCWY to utilize its authorized NTSC antenna system for post-transition DTV operations.

More importantly than the desire to utilize the authorized NTSC antenna system in the post-transition environment is the fact that the site specified in the Appendix B allocation is no longer available for use by the applicant. In addition, the antenna pattern contained within the KCWY Appendix B allocation is consistent with an antenna design that will not be permitted on the tower located at the proposed site due to structural loading considerations.

As a result of the change in site locations, and corresponding height parameters, the predicted noise limited service contour from the proposed facility will extend more than five miles along certain azimuths beyond the allotment noise limited contour. Due to the proposed change in

⁵ Height above average terrain value is apparently based on the sampling of the 8 cardinal radials with a 30 second terrain database and assumes a center of radiation of 2467 meters above mean sea level.

⁶ See BPCT-20060703ACA and BLCT-20080521ABN.

site location relative to the allocation, it is impractical to make a tabular comparison between the two contours. Exhibit E-1 however, is a map illustrating the allocated and proposed noise limited contours. This map confirms the greater than five mile extension along certain azimuths.

The proposed facility will not result in impermissible interference to other facilities in the region. Exhibits E-2 and E-3 comprise the outgoing interference study for the proposed facility. As these exhibits demonstrate, the proposed facility is not predicted to cause interference to any other relevant proposal or authorization.

Changes in the site location for KCWY-DT do not negatively affect the DTV service area population. Under Appendix B, KCWY-DT is specified as having a service area population of 70 thousand persons. Exhibit E-4 illustrates the proposed DTV service area, while Exhibit E-5 summarizes the relevant population calculations. As these two exhibits demonstrate, the service area of the proposed facility is 70,000 persons. The proposed service area population therefore matches the allocated service area population.

The proposed facility would operate with a maximum effective radiated power of 3.2 kW utilizing a directional antenna. The antenna that would be utilized by KCWY-DT is the same antenna that is currently being utilized by the KCWY NTSC facility. This antenna is a Kathrein-Scala (SCA) Model DRV-4/1. Its configuration is a four layer panel array, utilizing 4.5 degrees of electrical beam tilt. No mechanical beam tilt is utilized or proposed. The antenna would be located at a center of radiation of 2512 meters AMSL, which corresponds to a height of 572 meters above average terrain. Technical data for this proposed antenna is contained in Exhibit E-6.

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⁷ Height above average terrain figure is based on 360 radials using the NGDC 30 second linearly interpolated terrain database. The 8 radial height above average terrain is 553.4 meters.

The tower utilized by the proposed DTV is not utilized by several other FM facilities. It would not, however, be part of any AM radiation system and is not located in the vicinity of an AM radiation system. The proposed facility therefore complies with Section 73.625(c) of the Commission's Rules.

The facilities discussed above, including the proposed directional antenna system would provide the requisite coverage level over the community of license. Exhibit E-7 depicts the predicted 43 and 36 dBu F(50,90) contours along with the predicted Longley-Rice signal level bounded by the 36 dBu noise limited contour. As this map demonstrates, Casper, Wyoming, the community of license, would receive a signal level in excess of 43 dBu. In addition, the 43 dBu F(50,90) service contour encompasses all of Casper.

The requirements of Section 73.1030 of the Commission's Rules are not applicable in this particular case. The proposed facility would not operate in any of the zones described in the referenced section. In addition, the proposed facility is not in proximity to the protected FCC Field Installations described in Section 0.121 of the Commission's Rules. The structure utilized for the facilities described in this application has been registered with the Commission. The Commission has assigned an ASR number to this structure of 1033353.

The proposed KCWY-DT facility would not constitute a substantial environmental impact.

The absence of a significant environmental impact by the proposed facility is based on two considerations. The first of these considerations is the fact that the proposed facility would utilize the existing KCWY transmission facility. Since no new excavation or construction would result, no additional environmental impact to the area would ensue.

Secondly, the proposed facility would not constitute an RF exposure hazard to persons at the site. In addition to KCWY-DT, the structure would also be utilized by FM stations KWYY(FM), KMGW(FM), KTRS-FM, and KRVK(FM). The predicted power density for KCWY-DT was calculated using the equations contained in OET Bulletin 65, while the power density for the FM facilities was calculated using the Commission's FM model software package. The predicted power density for KCWY-DT is calculated as follows:

$$S = \frac{33.4(E_{_{Rel}})^{^{2}}(ERP)}{h^{^{2}}}$$

In the case of KCWY-DT, a worst case scenario that all energy radiated from the antenna is directed at the ground was considered. Therefore the relative field component of the above equation is set to 1.0 as a value. The ERP is the maximum effective radiated power in Watts which is 3200, while the height variable was set to 65 meters which is the KCWY-DT center of radiation minus 2 meters. The worst case power density, which is assumed to occur at all locations, is calculated to be $25.3 \,\mu\text{W/cm}^2$.

Using FM Model and the information contained in the CDBS FM database, the predicted power density for the FM stations was individually calculated. For KWYY(FM) the predicted power density is 65.0 μ W/cm² at 22 meters from the tower. The KMGW(FM) power density of 4.2 μ W/cm² at 20 meters from the tower, while the predicted power density for KTRS-FM is 26.4 μ W/cm² at 20 meters from the tower. The last FM station, KRVK(FM), has a predicted power density of 10.1 μ W/cm² at 22 meters from the tower.

The sum of the contributions from each of the FM facilities utilizing the tower is 105.7 μ W/cm² and is assumed to occur at all points in the vicinity of the tower. With the addition of the worst case calculated power density from KCWY-DT, the sum total is 131 μ W/cm². This power density, is less than the upper limit permissible under the uncontrolled environment condition of the applicable safety standard of 200 μ W/cm². The proposed facility would therefore not constitute an RF exposure hazard to persons at the site.

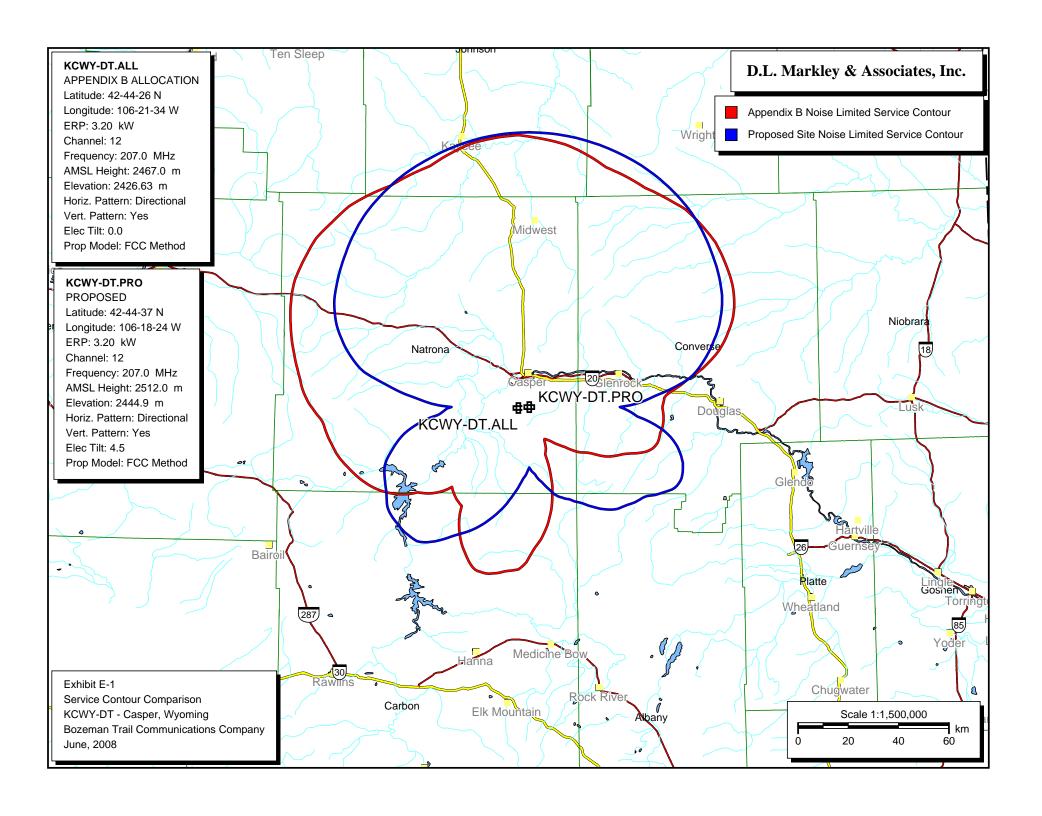
In order to protect workers having access to the tower from being exposed to levels of non-ionizing radiation which may exceed the applicable safety standards, the applicant certifies that it will coordinate with other present and future users of the site. Such coordination will include, but is not necessarily limited to, a reduction in transmitter power or cessation of operation.

<u>Affidavit</u>

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

Above signature is digitized copy of actual signature

Jeremy D. Ruck, PE June 12, 2008



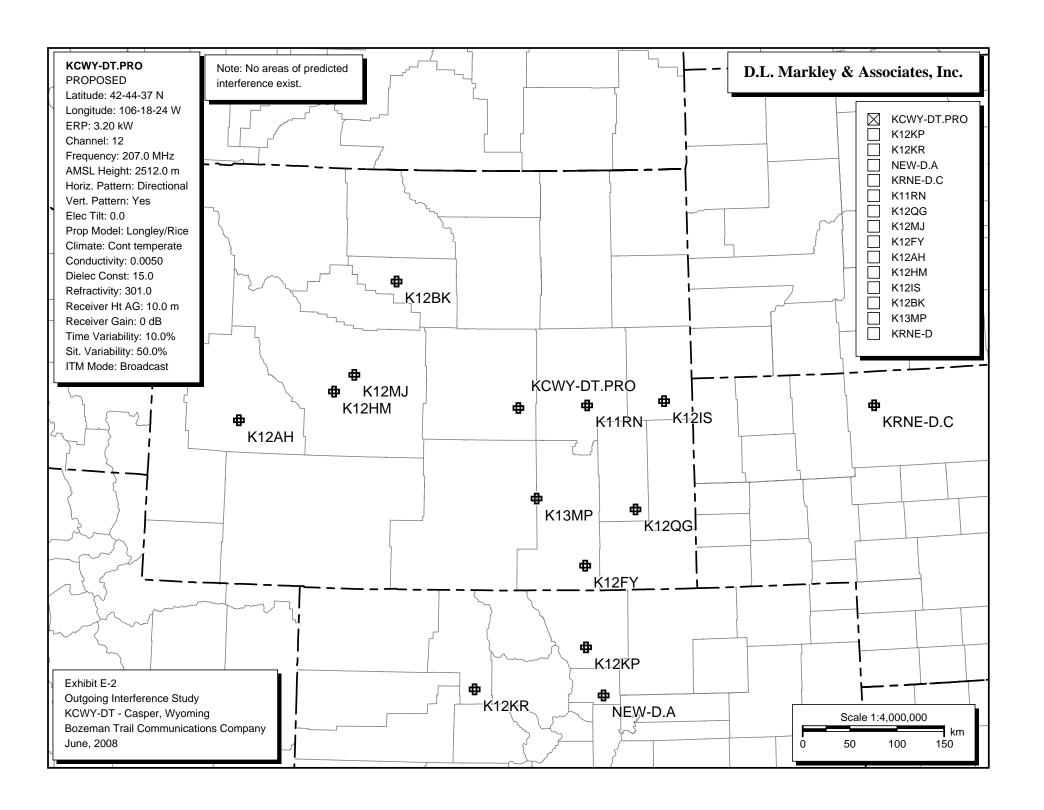


Exhibit E-3

Outgoing Interference Population Report Based on Proposed KCWY-DT Facilities.

KCWY-DT.PRO (12) Casper, WY - PROPOSED

Broadcast Type: Digital Service: V

Lat: 42-44-37 N Lng: 106-18-24 W ERP: 3.2 kW AMSL: 2512.0 m

TV Outgoing Interference Study

Signal Resolution: 2.0 km Consider NTSC Taboo: Yes

KWX error points are considered to be interference free coverage.

Default # of radials computed for contours: 72

Contours calculated using 8 radial HAAT. LR Profile Spacing Increment: 1.0 km Masked interference points are being

counted as interference.

Pop Centroid DB: 2000 US Census (SF1)

Study Date: 6/12/2008

TV Database Date: 6/10/2008

Primary Terrain: V-Soft 3 Second US Terrain Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

Stations Considered:

Call Letters	City	State	Dist	Bear	
K12KP (12N)	Glen Haven	CO	263.2	164.2	
K12KR (12N)	Toponas	CO	301.3	188.9	
NEW-D.A (12)	Boulder	CO	317.2	163.5	
KRNE-D.C (12)	Merriman	NE	376.5	89.6	
K11RN (11N)	Douglas	WY	72.8	87.9	
K12QG (12-)	Chugwater	WY	164.0	130.9	
K12MJ (12N)	Riverton, Etc.	WY	177.1	281.4	
K12FY (12N)	Big Laramie, Etc.	WY	181.3	157.0	
K12AH (12N)	Big Piney, Etc.	WY	296.1	267.5	
K12HM (12N)	Lander	WY	195.9	275.1	
K12IS (12N)	Lusk	WY	154.3	87.3	
K12BK (12N)	Worland	WY	185.8	316.1	
K13MP (13N)	Medicine Bow	WY	97.8	168.6	
KRNE-D (12)	MERRIMAN	NE	376.6	89.6	
Call	Area HUnits	 s Con	 tour	 Masked Ix	 Unmasked
K12KP (12N)	0.0	O	47	0	
K12KR (12N)	0.0)	17	0	

0.0

NEW-D.A (12)	0.0	0	126,459	0	0	0.0
KRNE-D.C (12)	0.0	0	35,910	0	0	0.0
K11RN (11N)	0.0	0	1,297	0	0	0.0
K12QG (12-)	0.0	0	425	0	0	0.0
K12MJ (12N)	0.0	0	12,032	0	0	0.0
K12FY (12N)	0.0	0	25,726	0	0	0.0
K12AH (12N)	0.0	0	39	0	0	0.0
K12HM (12N)	0.0	0	1	0	0	0.0
K12IS (12N)	0.0	0	5	0	0	0.0
K12BK (12N)	0.0	0	15	0	0	0.0
K13MP (13N)	0.0	0	0	0	0	0.0
KRNE-D (12)	0.0	0	33,295	0	0	0.0

Housing Units Population

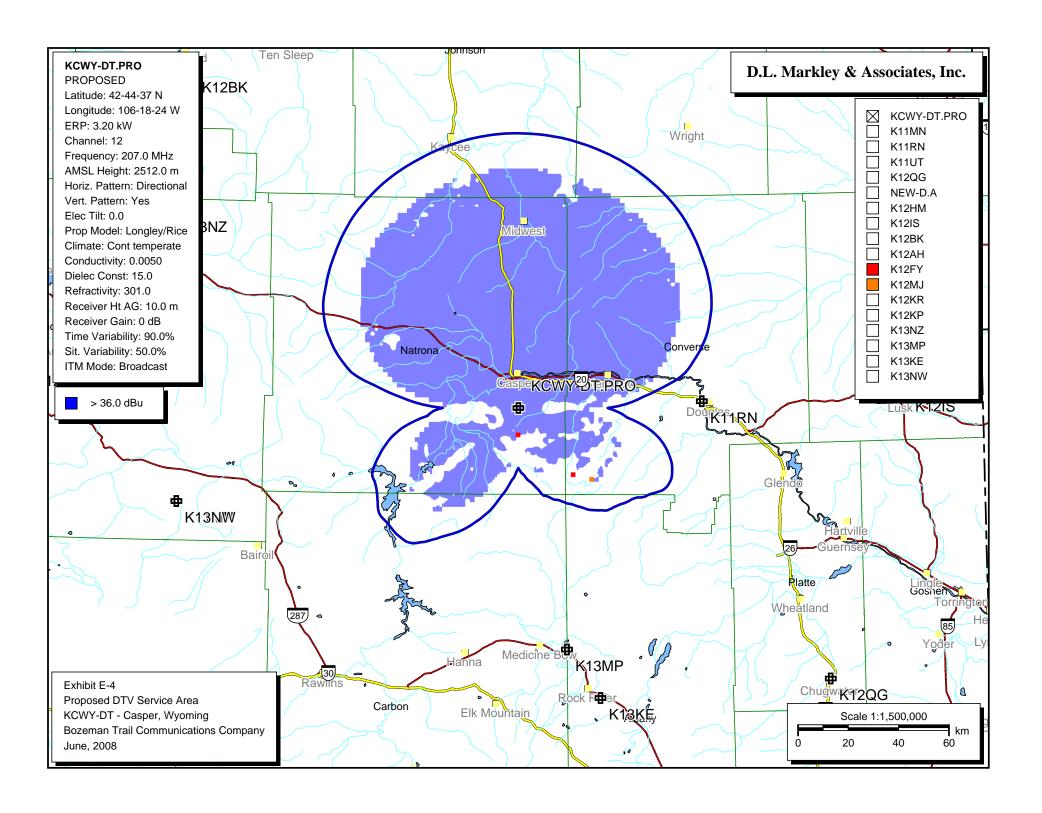


Exhibit E-5

DTV Service Area Population Tabulation Based on Proposed KCWY-DT Facilities

KCWY-DT.PRO (12) Casper, WY - PROPOSED

Broadcast Type: Digital Service: V

Lat: 42-44-37 N Lng: 106-18-24 W ERP: 3.2 kW AMSL: 2512.0 m

TV Incoming Interference Study

Interference Considered Within: FCC Contour: 36 dBu

Signal Resolution: 2.0 km

LR Profile Spacing Increment: 1.0 km

Consider NTSC Taboo: Yes

KWX error points are considered to be interference free coverage.

of radials computed for protected contour: 360
Protected contour calculated using 8 radial HAAT.

Threshold for reception: 36.0

Pop Centroid DB: 2000 US Census (SF1)

Study Date: 6/12/2008

TV Database Date: 6/10/2008

Primary Terrain: V-Soft 3 Second US Terrain Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

Percentages calculated using a baseline population of 70,000.

Stations which cause interference:

Call Letters	H Units	Population	%	Area (sq. km)
K12FY (12N)	0	0	0.000	7.21
K12MJ (12N)	0	0	0.000	3.61

Masking Summary:

	Total Interference		Unique Interference		
Call Letters	Population	%	Population	%	
K12FY (12N)	0	0.000	0	0.000	
K12MJ (12N)	0	0.000	0	0.000	

Stations considered which do not cause interference:

K11MN (11N)

K11RN (11N)

K11UT (11N)

K12QG (12-)

NEW-D.A (12)

K12HM (12N)

K12IS (12N)

K12BK (12N)

K12AH (12N)

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K12FY (12N)
K12MJ (12N)
K12KR (12N)
K12KP (12N)
K13NZ (13+)
K13MP (13N)
K13KE (13N)
K13NW (13N)
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	City 		Dist	
	Jeffrey City			
K11RN (11N)	Douglas	WY	72.8	87.9
K11UT (11N)	Buffalo	WY	178.8	350.1
K12QG (12-)	Chugwater	WY	164.0	130.9
NEW-D.A (12)	Boulder	CO	317.2	163.5
K12HM (12N)	Lander	WY	195.9	275.1
K12IS (12N)	Lusk	WY	154.3	87.3
K12BK (12N)	Worland	WY	185.8	316.1
K12AH (12N)	Big Piney, Etc.	WY	296.1	267.5
K12FY (12N)	Big Laramie, Etc.	WY	181.3	157.0
K12MJ (12N)	Riverton, Etc.	WY	177.1	281.4
K12KR (12N)	Toponas	CO	301.3	188.9
K12KP (12N)	Glen Haven	CO	263.2	164.2
K13NZ (13+)	Shoshoni	WY	158.0	299.8
K13MP (13N)	Medicine Bow	WY	97.8	168.6
K13KE (13N)	Rock River	WY	119.6	164.2
K13NW (13N)	Jeffrey City	WY	140.7	254.8

Totals for KCWY-DT.PRO (12)

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Calculation Area Population:
                            70,243 ( 12227.4 sq. km )
Not Affected by Terrain Loss:
                               70,000 ( 11732.0 sq. km )
Total NTSC Interference:
                                    0 ( 10.8 sq. km)
                                    0 (
DTV Only Interference:
                                             0.0 sq. km )
                                             0.0 sq. km )
Total DTV Interference:
                                    0 (
Interfered Population:
                                    0 (
                                            10.8 sq. km )
                                70,000 ( 11721.1 sq. km )
Interference Free:
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Percent Interference: 0.00

Terrain Blocked Population:
Contour Area Population: 243 (495.4 sq. km) Contour Area Population: 70,248

Interference Free Breakdown:

White: 64,249 (91.8%)

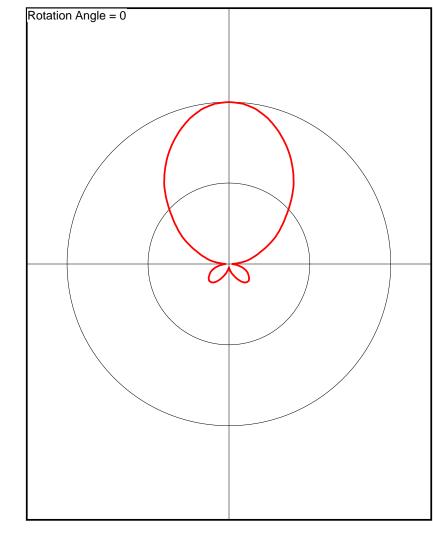
Black:	483	(0.7%)
Hispanic:	3,388	(4.8%)
Native American:	611	(0.9%)
Asian:	281	(0.4%)
Pacific Islander:	22	(0.0%)
Mixed Race:	897	(1.3%)
Other:	69	(0.1%)

Total: 70,000

	Housing Units	Population	% of County
Wyoming			
Campbell County			
County Pop	13,288	33,698	
KCWY-DT.PRO (12)	1	4	
Ix Free	1	4	100.00
Carbon County			
County Pop	8,307	15,639	
KCWY-DT.PRO (12)	2	3	
Ix Free	2	3	100.00
Converse County			
County Pop	5,669	12,052	
KCWY-DT.PRO (12)	1,779	3,788	
K12MJ (12N)	0	0	0.00
Ix Free	1,779	3,788	100.00
Johnson County			
County Pop	3,503	7,075	
KCWY-DT.PRO (12)	14	19	
Ix Free	14	19	100.00
Natrona County			
County Pop	29,882	66,533	
KCWY-DT.PRO (12)	29,633	66,186	
K12FY (12N)	0	0	0.00
Ix Free	29,633	66,186	100.00

Exhibit E-6 - Horizontal Plane Radiation Pattern Pre-Rotation Antenna Pattern....

on Antenna i attern	
Azimuth (deg)	Effective Field
0.0	1.000
5.0	0.993
10.0	0.970
15.0	0.931
20.0	0.880
25.0	0.823
30.0	0.760
35.0 40.0	0.692 0.620
45.0	0.539
50.0	0.460
55.0	0.393
60.0	0.330
65.0	0.262
70.0	0.200
75.0	0.152
80.0	0.110
85.0	0.057
90.0 95.0	0.020
100.0	0.031 0.060
105.0	0.086
110.0	0.110
115.0	0.127
120.0	0.140
125.0	0.152
130.0	0.160
135.0	0.159
140.0	0.150
145.0	0.132
150.0	0.110
155.0 160.0	0.089 0.070
165.0	0.054
170.0	0.040
175.0	0.027
180.0	0.020
185.0	0.027
190.0	0.040
195.0	0.054
200.0	0.070
205.0	0.089
210.0 215.0	0.110 0.132
220.0	0.150
225.0	0.159
230.0	0.160
235.0	0.153
240.0	0.140
245.0	0.127
250.0	0.110
255.0	0.086
260.0	0.060
265.0	0.031
270.0 275.0	0.020 0.057
280.0	0.057
285.0	0.153
290.0	0.200
295.0	0.262
300.0	0.330
305.0	0.393
310.0	0.460
315.0	0.539



320.0	0.620
325.0	0.692
330.0	0.760
335.0	0.823
340.0	0.880
345.0	0.931
350.0	0.970
355.0	0.993

Elevation Relative Note: Relative field same for all azimuths. Angle Field -18.00 0.209 -17.00 0.245 1.000 -16.00 0.272 -15.00 0.288 -14.00 0.292 -13.00 0.284 -12.00 0.262 0.900 -11.00 0.230 -10.00 0.192 -9.00 0.159 -8.00 0.159 -7.00 0.201 -6.00 0.277 0.800 -5.00 0.370 -4.00 0.468 -3.00 0.570 -2.00 0.667 -1.00 0.756 0.700 0.00 0.835 1.00 0.901 2.00 0.952 3.00 0.985 4.50 1.000 0.600 5.00 0.996 6.00 0.974 Field 7.00 0.933 8.00 0.878 9.00 0.808 Relative 0.500 10.00 0.728 11.00 0.639 12.00 0.544 13.00 0.449 14.00 0.356 15.00 0.270 0.400 16.00 0.197 17.00 0.152 18.00 0.143 19.00 0.165 20.00 0.196 0.300 21.00 0.224 22.00 0.242 23.00 0.250 0.250 24.00 25.00 0.237 0.200 26.00 0.220 27.00 0.194 28.00 0.164 29.00 0.129 30.00 0.089 31.00 0.052 0.100 32.00 0.013 33.00 0.024 34.00 0.057 35.00 0.088 36.00 0.113 0.000 37.00 0.134 .6.00 38.00 0.149 39.00 0.159 40.00 0.164 **Angle Below Horizontal** 41.00 0.164 42.00 0.160

Angle Relative **ERP** Field dBk. 0.209 -18.00 -8.550.245 -17.00-7.17 -16.00 0.272 -6.26 -15.00 0.288 -5.76 0.292 -14.00-5.64 -13.000.284 -5.88-12.000.262 -6.58-11.00 0.230 -7.71 -10.00 0.192 -9.28 -9.00 0.159 -10.92-8.00 0.159 -10.920.201 -7.00 -8.88 -6.000.277 -6.10-5.00 0.370 -3.58-4.00 0.468 -1.54-3.000.570 0.17 -2.000.667 1.53 -1.00 0.756 2.62 0.00 0.835 3.49 1.00 0.901 4.15 0.952 2.00 4.62 3.00 0.985 4.92 4.50 1.000 5.05 5.00 0.996 5.02 6.00 0.974 4.82 4.45 7.00 0.933 8.00 0.878 3.92 9.00 0.808 3.20 10.00 0.728 2.29 11.00 0.639 1.16 12.00 0.544 -0.2413.00 0.449 -1.9014.00 0.356 -3.9215.00 0.270 -6.3216.00 0.197 -9.06 17.00 0.152 -11.31 18.00 0.143 -11.84 19.00 0.165 -10.60 20.00 0.196 -9.10 21.00 0.224 -7.94 22.00 0.242 -7.27 23.00 0.250 -6.99 24.00 0.250 -6.99-7.45 25.00 0.237 -8.10 26.00 0.220 27.00 0.194 -9.19 28.00 -10.650.164 29.00 0.129 -12.74 30.00 0.089 -15.9631.00 0.052 -20.6332.00 0.013 -32.6733.00 0.024 -27.3434.00 0.057 -19.8335.00 0.088 -16.06 36.00 0.113 -13.89 37.00 0.134 -12.41 38.00 0.149 -11.48 -10.92 39.00 0.159 40.00 0.164 -10.65 41.00 0.164 -10.65 42.00 0.160 -10.87

Note: Relative field same for all azimuths. ERP in dBk based on maximum ERP azimuths.

