

EXHIBITS 4, 5, 6, 7, and 8
AMENDED DISPLACEMENT APPLICATION FOR KVIT-LP

KVIT-LP
FCC File No. BLTTA-20010709ABP
Facility ID. No. 13200
Victoria, Texas
Channel No. 28

This Amended Technical Exhibit is attached to FCC Form 301-CA in support of the Applicant's request for displacement relief and the grant of a construction permit for KVIT-LP, Victoria, Texas (BLTTA-20010709ABP, Facility ID. 13200).

Station KVIT is presently licensed to operate on NTSC Channel 28. Station KORO-TV of Corpus Christi, Texas also operates on Channel 28. In addition, KORO-TV has filed a pending application to change transmitter sites. The co-channel operation of KORO-TV causes significant interference to KVIT-LP. Specifically, the operation of KORO-TV causes 14% interference to KVIT-LP within its protected contour and the pending application of KORO-TV is predicted to cause 14.5% interference to KVIT-LP. Accordingly, KVIT-LP files this displacement relief application for channel 18 in Missouri City, Texas.

The proposed operational parameters for KVIT-LP are as follows:

Channel	34
Frequency Offset:	ZERO OFFSET
Antenna radiation center height above ground level:	350 meters
Maximum effective radiated power:	40 KW
Antenna type and model #:	Andrew ALP24L3-HSER-18
Transmitter site coordinates	29-34-16 N 95-30-38 W
Tower registration number	1064696

A study has been conducted using the provisions of sections 74.705, 74.706, and 74.707 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, or LPTV facilities other than those listed in the tables that follow. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the stations listed below. Attached is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no problematic interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Sections 74.705, 74.706 and 74.707 based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power, DTV, and LPTV stations.**

DTV Facilities

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 74.703, with regard to the effect of the proposed station on the following DTV facilities:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KPRC-DT, CH 35 HOUSTON, TX FILE # BLCDT-19991022ABJ	3,902,265	0 (0.0%)
KVCT*, CH 34 VICTORIA, TX DTV ALLOCATION	138,361	0 (0.0%)
KVCT-DT, CH 34 VICTORIA, TX CONSTRUCTION PERMIT FILE # BPCDT-19991027ACU	155,943	0 (0.0%)
KPRC-TV, CH 35 HOUSTON, TEXAS DTV ALLOCATION	3,902,173	0 (0.0%)

As indicated in the above table, there will be no interference created by the operation of the proposed station with regard to the above DTV facilities.

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below of is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KRIV, CH 26Z LICENSE HOUSTON, TEXAS BLCT-19820429KK	3,816,582	0 (0.0%)
KTXH, CH 20 CONSTRUCTION PERMIT HOUSTON, TEXAS BPCT-20000106AAR	3,808,578	0 (0.0%)
KTXH, CH 20 LICENSE HOUSTON, TEXAS BLCT-19821117KG	3,786,905	0 (0.0%)
KITU, CH 34 LICENSE BEAUMONT, TEXAS FILE # BLET-19860724KF	535,602	35 (0.006%)

As indicated in the above table, pursuant to an OET60 analysis there will be virtually no interference caused by the proposed station to the above listed NTSC full power facilities and

any interference caused will be far below the .5% rounding tolerance allowed for such calculations.

LPTV Facilities

An interference analysis was conducted using 74.707 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the LPTV and Class A LPTV Facilities shown in the table below. As indicated in the table below, the operations of the proposed station will result in virtually no interference to persons within the LPTV facility's protected contours.

Protected LPTV Station	FCC Service Population	Proposed Interference Population
KRHD-LP, CH 34 LICENSE BRYAN, TX FILE # BLTTL-19990915AVR	115,779	38 (0.032%)
K33DB, CH 33 CONSTRUCTION PERMIT HOUSTON, TX FILE# BPTT-JG0601AY	2,612,942	0 (0.0%)
K33DB, CH 33 LICENSE HOUSTON, TX FILE# BLTT-19920623JD	2,404,050	0 (0.0%)

As indicated in the above table, the interference levels created by the operation of the proposed station are clearly far below the 0.5% "rounding allowance" permitted for such calculations.

Environmental Considerations

The proposed LPTV facilities for Channel 34 , Missouri City, Texas were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 1, a maximum visual effective radiated power of 40 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.005 milliwatt per square centimeter (MW/CM²), or 1.2% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.394 mW/cm² for TV channel 34). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.