

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS SOUTHERN CALIFORNIA LICENSE, L.L.C., permittee of KAZA-DT on Channel 47 in Avalon, California, in support of its Application for Construction Permit to operate an auxiliary facility.

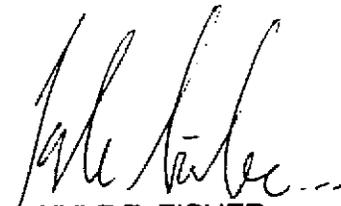
It is proposed to mount a PSI directional antenna at the 63-meter level of the existing 122-meter communications tower on which the main KAZA-DT antenna is to be mounted. Elevation and azimuth pattern data for the proposed antenna are provided in Exhibit B. Exhibit C is a map upon which the predicted service contours of the proposed auxiliary and authorized facilities are plotted. As shown, the proposed auxiliary Grade B service contour is completely contained within that authorized to KAZA-DT. A power density calculation is provided in Exhibit D.

It is important to note that, because this is an auxiliary application, the Commission's city-grade coverage requirements and interference Rules do not pertain. In addition, 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 proposed site. However, if such should occur, the owner of the station recognizes its obligation to take whatever corrective actions are necessary.

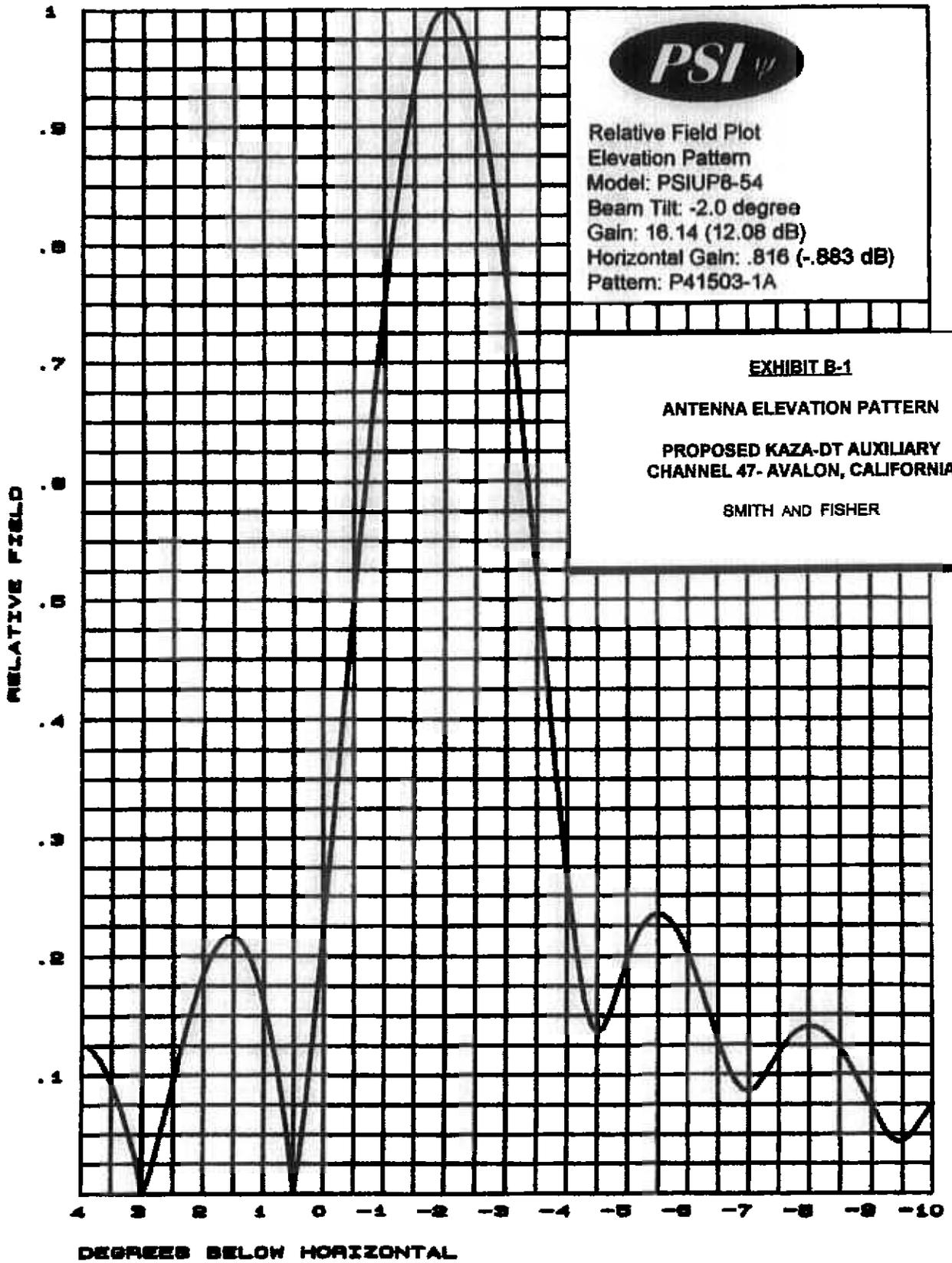
Since no change in the overall height or location of the existing tower is specified herein, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1221073 to this tower.

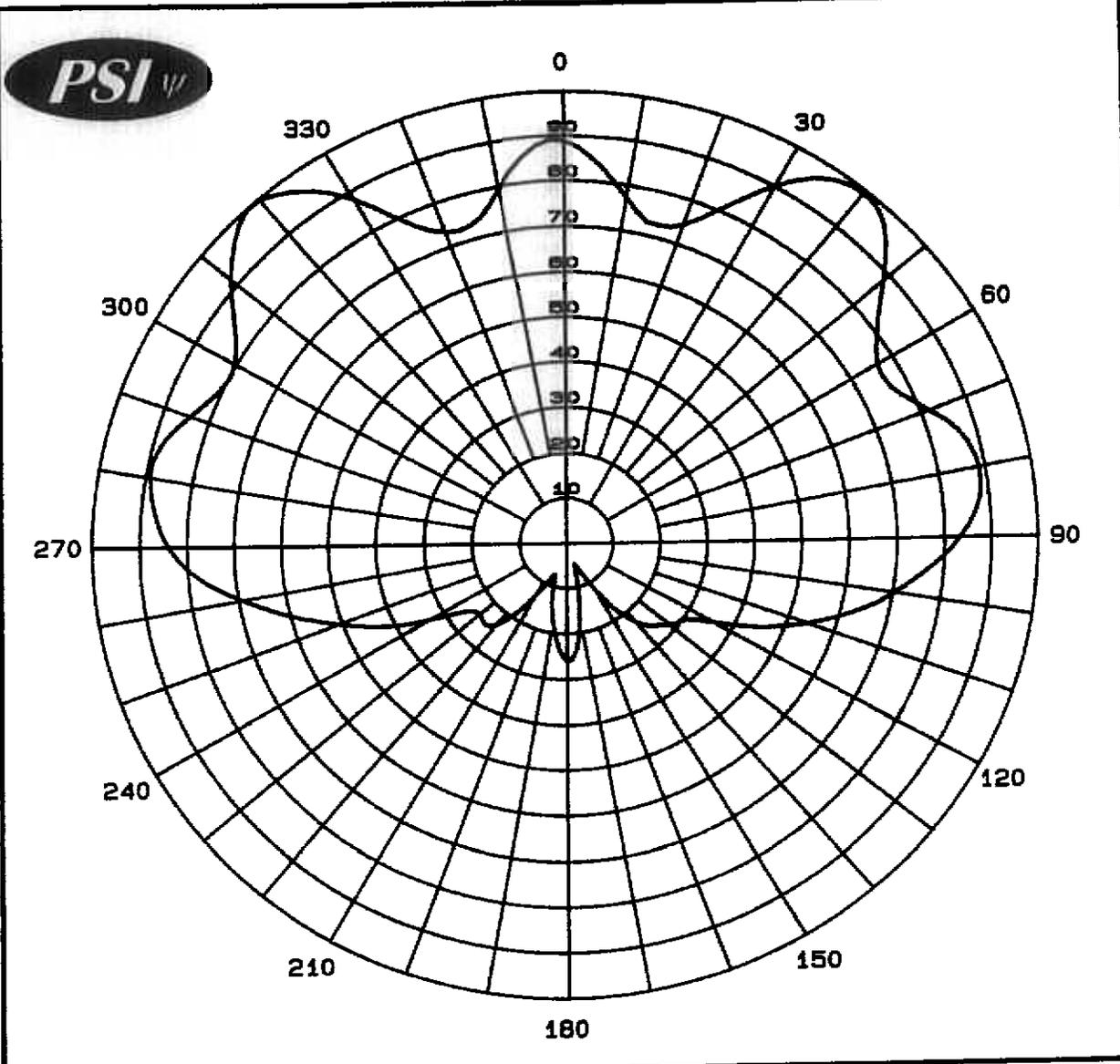
EXHIBIT A

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.


KYLE T. FISHER

July 25, 2005





**Calculated Relative Field
 Azimuth Plane Pattern
 Antenna: PSIUP8-47/54
 Type: UHF Broadband Panel
 Configuration: 8-Bays, 3-Around
 Peak Gain: 35.3 (15.48 dB)
 Channel: 47 KAZA Standby
 Pattern: P61505-2**

**Propagation Systems Inc.
 PO Box 113
 Ebensburg, PA 15931**

Note: Antenna will be mounted such that 0° on graph will be oriented at 225°T.

EXHIBIT B-2

**ANTENNA AZIMUTH PATTERN
 PROPOSED KAZA-DT AUXILIARY
 CHANNEL 47 - AVALON, CALIFORNIA**

SMITH AND FISHER

PROPAGATION SYSTEMS INC.

Relative Field Tabulation

KAZA DTV Standby System

Antenna Model: PSILUP8-47/54

Channel 47

Gain: 35.3 (15.48 dBd)

Pattern: P61505-2

Angle	Relative Field	Power Gain	Gain dB
0	0.889	27.90	14.48
10	0.773	21.09	13.24
20	0.744	19.54	12.91
30	0.903	28.78	14.59
40	0.995	34.95	15.43
50	0.884	27.59	14.41
60	0.765	20.66	13.15
70	0.820	23.74	13.75
80	0.887	27.77	14.44
90	0.832	24.44	13.88
100	0.701	17.35	12.39
110	0.539	10.26	10.11
120	0.356	4.47	6.51
130	0.285	2.87	4.57
140	0.228	1.84	2.64
150	0.112	0.44	-3.54
160	0.047	0.08	-11.08
170	0.162	0.93	-0.33
180	0.255	2.30	3.61
190	0.175	1.08	0.34
200	0.072	0.18	-7.38
210	0.125	0.55	-2.58
220	0.232	1.90	2.79
230	0.240	2.03	3.08
240	0.328	3.80	5.80
250	0.505	9.00	9.54
260	0.889	16.76	12.24
270	0.838	24.79	13.94
280	0.891	28.02	14.48
290	0.843	25.09	13.99
300	0.804	22.82	13.58
310	0.919	29.81	14.74
320	1.000	35.30	15.48
330	0.885	27.85	14.42
340	0.734	19.02	12.79
350	0.795	22.31	13.49

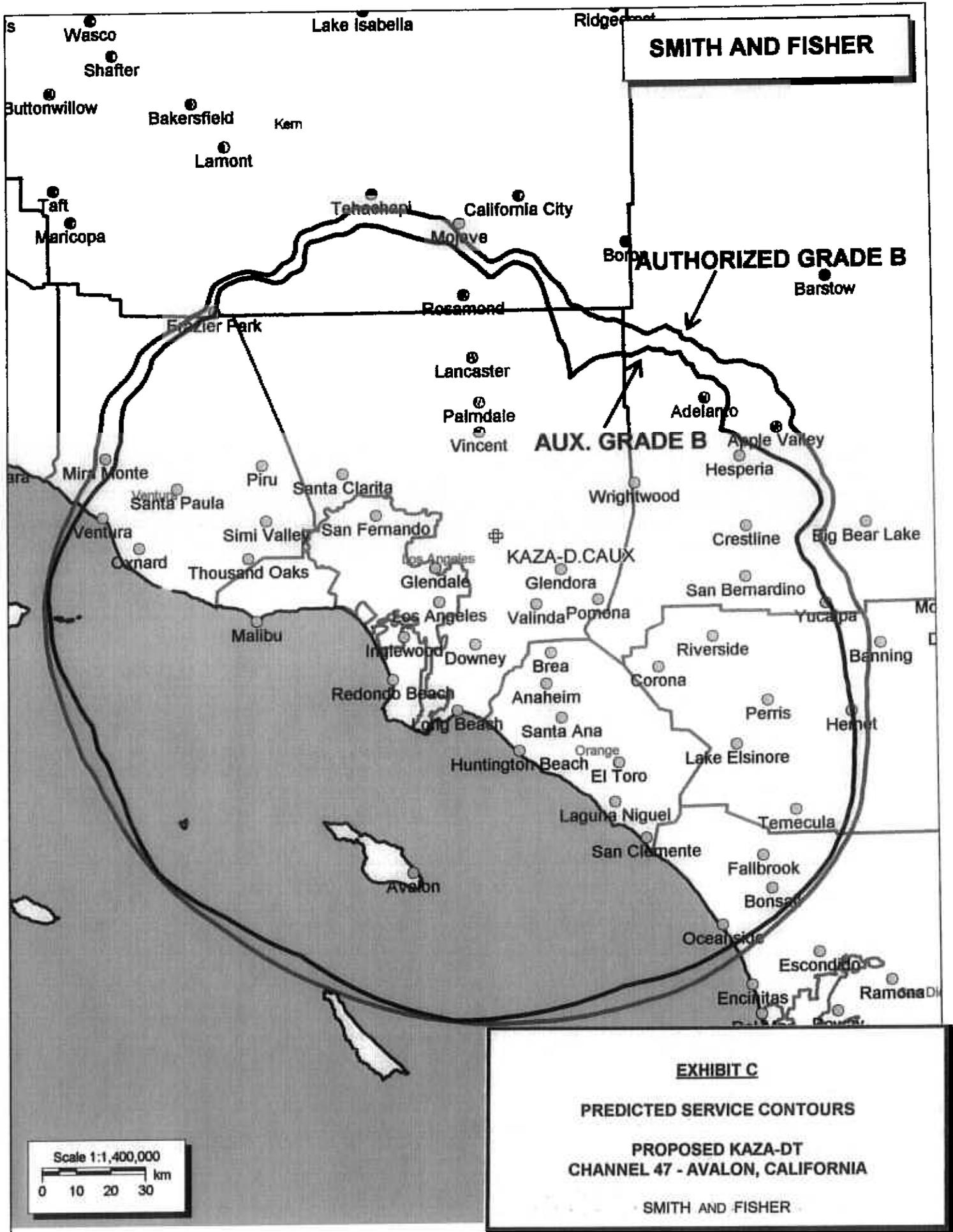
Note: Antenna will be mounted such that 0° on tabulation will be oriented at 225°T.

EXHIBIT B-3

ANTENNA RELATIVE FIELD VALUES

**PROPOSED KAZA-DT AUXILIARY
CHANNEL 47 - AVALON, CALIFORNIA**

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AUTHORIZED GRADE B

AUX. GRADE B

EXHIBIT C
PREDICTED SERVICE CONTOURS
PROPOSED KAZA-DT
CHANNEL 47 - AVALON, CALIFORNIA
 SMITH AND FISHER

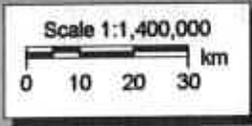


EXHIBIT D

POWER DENSITY CALCULATION
PROPOSED KAZA-DT AUXILIARY
CHANNEL 47 – AVALON, CALIFORNIA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Avalon facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 335 kw, an effective antenna height of 63 meters above ground, and the elevation pattern of the PSI antenna, maximum power density two meters above ground of 0.0054 mw/cm^2 is calculated to occur 865 meters from the base of the tower. Since this is only 1.2 percent of the 0.45 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 47 (668-674 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.