

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of DR. JOSEPH A. ZAVALETTA, licensee of Digital Television Station KVAW-DT, Channel 18 in Eagle Pass, Texas, in support of its request for Special Temporary Authority to operate post-transition on Channel 18 with its present digital facility, authorized in BLCDT-20061115ABD, until such time as it can construct its post-transition DTV facility on Channel 24 (its allotment channel). No changes in the operating parameters of the licensed facility are proposed herein. However, it is important to note that there are two errors in the Commission's records concerning the licensed KVAW-DT facility. First, the antenna height above ground is 76 meters, not 324 meters. [The resulting radiation center above mean sea level is 324 meters, not 570 meters.] Second, the antenna pattern relative field value at 130° (40° T with proper antenna rotation) is 0.63, not 0.3. These corrections appear in the instant application.

The STA is necessary because the proposal to operate on Channel 24 is still pending at the Commission (BPCDT-20080402AAG), due to Mexican coordination issues.

Exhibit B is a map upon which the noise-limited contours of analog KVAW(TV) (Channel 16), and the present KVAW-DT facility on Channel 18 are plotted. We have performed a Longley-Rice based coverage analysis for the Channel 18 DTV facility and find that the interference-free service population is 47,508 (based on the 2000 U. S. Census). The coverage completely encompasses the interference-free service population (47,225) of analog KVAW. Because no change in the licensed KVAW-DT coverage is proposed herein, no present viewer of KVAW-DT will be disenfranchised by this proposal. On these bases,

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this proposal meets the Commission's 85% coverage requirement for post-transition STA facilities.

Finally, we have conducted a Longley-Rice interference study (based on the methodology contained in the FCC's *OET Bulletin 69*). The results of that study are provided in Exhibit C. It concludes that the proposed temporary post-transition operation of the KVAW-DT facility on Channel 18 will not cause more than 0.5 percent interference to any post-transition digital television facility or Class A low power television station.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

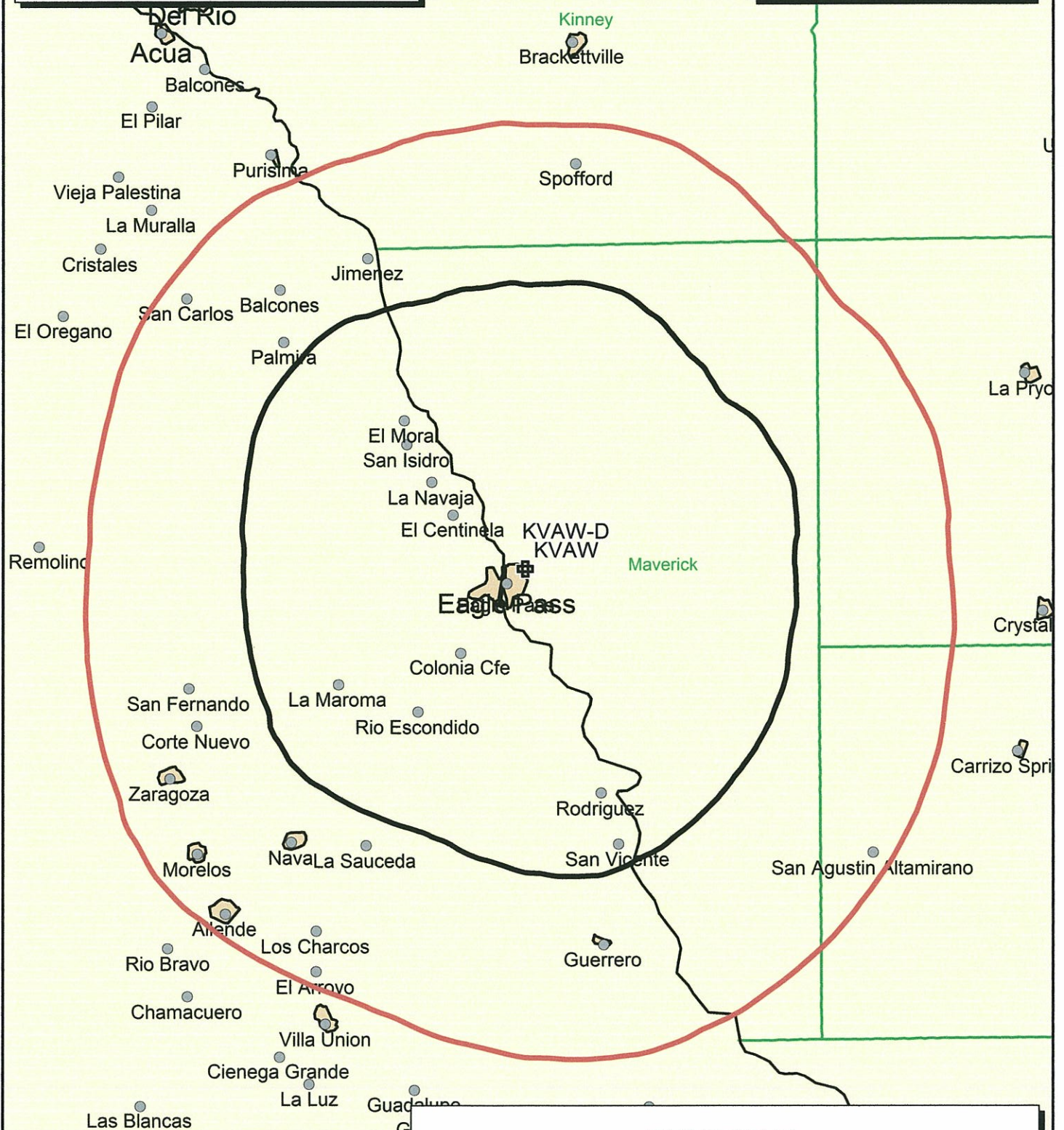


KEVIN T. FISHER

November 6, 2008

**Smith and Fisher**

- ANALOG CH. 16 NOISE-LIMITED CONTOUR
- DIGITAL CH. 18 NOISE-LIMITED CONTOUR



**EXHIBIT B**  
**SERVICE CONTOUR COMPARISON**  
**KVAW (CH. 16) VS. KVAW-DT (CH. 18)**

Scale 1:675,000

0 9 18 27 km

Puente Negro

INTERFERENCE STUDY  
PROPOSED KVAW-DT STA  
CHANNEL 18 – EAGLE PASS, TEXAS

The instant application specifies an ERP of 50 kw (directional) at 79 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 post-transition operation of KVAW-DT on Channel 18 to other pertinent stations are tabulated in Exhibit C-2.

As shown, the proposed KVAW-DT facility would not contribute more than 0.5% interference 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 C-2

## INTERFERENCE STUDY SUMMARY

PROPOSED KVAW-DT STA  
CHANNEL 18 – EAGLE PASS, TEXAS

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From KVAW-DT</u>	<u>%</u>
KNIC-DT Allotment	Blanco, TX	18	1,769,846	6	<0.1

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