JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
E-mail
TIMOTHY Z. SAWYER

301 921-0115 Voice
301 590-9757 Fax
mullengr@aol.com

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-1:

KM LPTV OF CHICAGO-13, L.L.C.

CLASS A TELEVISION STATION WOCK-CA
CHANNEL 13, CHICAGO, IL

APPLICATION FOR AUTHORITY TO MAKE
CHANGES IN A CLASS A TELEVISION BROADCAST STATION

JANUARY 25, 2005

FCC FACILITY NUMBER
35092

ENGINEERING EXHIBIT

IN SUPPORT OF

AN APPLICATION FOR AUTHORITY TO MAKE

CHANGES IN A CLASS A TELEVISION BROADCAST STATION

CLASS A TELEVISION STATION WOCK-CA

CHICAGO, ILLINOIS

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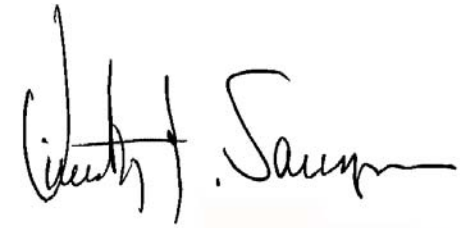
DECLARATION

I, Timothy Z. Sawyer, declare and that I have provided engineering services in the area of telecommunications since 1969. My qualifications are a matter of record with the Federal Communications Commission. I am a senior engineer with the firm of Mullaney Engineering, Inc., consulting radio telecommunications engineers with offices in Gaithersburg, Maryland.

The firm of Mullaney Engineering, Inc., has been retained by KM LPTV OF CHICAGO-13, L.L.C., to prepare the instant engineering exhibit in support of ***an application for authority to make changes in a Class A Television Broadcast Station WOCK-CA Chicago, Illinois.*** (FCC FACILITY ID NUMBER: 35092).

All facts contained herein are true of my own knowledge except those stated to be on information and belief, and as to those facts, I believe them to be true. I declare under the penalty of perjury that the foregoing is true and correct.



Timothy Z. Sawyer

Executed on the 25th day of January 2005

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KM LPTV OF CHICAGO-13, L.L.C.
CLASS A TELEVISION WOCK-CA
CHANNEL 13, CHICAGO, IL

APPLICATION FOR AUTHORITY TO MAKE
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NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement and the instant engineering exhibit of which it is part has been prepared on behalf of KM LPTV OF CHICAGO-13, L.L.C., (hereinafter "KM").

By means of the instant application, KM proposes to make changes to the directional antenna system utilized by station WOCK-CA. Specifically KM proposes to change the directional antenna pattern slightly, add mechanical beam tilt, and change the antenna location (and its elevation) atop the John Hancock Building in Chicago.

Currently WOCK-CA operates on Television Channel 13 employing an effective radiated power of 3.0 kilowatts toward the radio horizon. WOCK proposes to increase the peak maximum power to 6.12 kilowatts while maintaining 3.0 kilowatts of effective radiated power toward the radio horizon. Waivers of 47 C.F.R. §74.735 and §73.6007 are requested with respect to the peak power to be employed.

The facilities will be built to comply with the *FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* and the instant proposal is categorically excluded from environmental processing pursuant to the provisions of Section 1.1306 of the Commission's Rules. A more detailed discussion of environmental factors is included under the heading Environmental Considerations below.

Information requested by exhibits in response to questions on Section III of FCC Form 301-CA is incorporated in the following paragraphs, figures, and tables.

Processing of this application is requested under the rules currently in effect at the time of filing.

II. ENGINEERING DISCUSSION:

A. Transmitter/Antenna Location:

KM proposes to relocate its directional antenna atop the John Hancock Building from the East Tower to the West tower. In order to accommodate the antenna on the West tower (FCC Tower Registration Number: 1009013) the overall vertical aperture of the antenna has been reduced from four bays to two bays.

The antenna will be side-mounted on the west tower of the John Hancock Building with a center of radiation at 1280 feet (390.1 meters) above ground level (AGL), 1873 feet (570.9 meters) above mean sea level (AMSL). See Figure 1.

B. Coverage & Service Contours:

Figure 2, is a map showing the location of the present and proposed 74 dBu f(50,50) contours. The present 74 dBu contour serves a population of 2,211,083 persons. The proposed 74 dBu contour will provide service to 2,390,186 persons, a gain of 179,103 persons (a gain of 8.1 percent in total population).

C. Proposed Antenna:

As stated previously, the antenna consists of two bays (or levels), each bay consisting of two elements. One element is pointed at 215 degrees true and the other at 355 degrees true. Each element employs a downward mechanical beam tilt of 32 degrees (32 degrees below the horizon). Equal power division is employed to all elements.

The antenna is a custom composite antenna consisting of four horizontally polarized Scala CL-713 yagi antenna elements (two elements per bay/level). Information regarding the antenna is included in Figure 3. The antenna radiation relative field pattern toward the radio horizon is tabulated and plotted in Figure 4.

D. Allocation Study:

Use of the higher power below the horizon by WOCK-CA will not result in an increase in interference to any full service analog or digital television stations, Class A television stations, TV translator stations or any existing DTV allotments or applications.

The Commission's LP-1 computer program and the Longley Rice propagation method described in OET Bulletin No. 69 were used in this determination.

Figure 5 contains a map which shows the predicted overlap between this proposal and stations WREX-TV, Channel 13, Rockford, Il and Station WZZM-TV, Channel 13, Grand Rapids, MI. Each is discussed below:

WZZM-TV

The predicted F(50,10) 28 dBu contour from the proposed operation of WOCK-CA overlaps the predicted F(50,50) 56 dBu (Grade B contour) of WZZM-TV Grand Rapids, Michigan. As shown in Figure 5, the overlap area occurs entirely across a large body of water, Lake Michigan. Accordingly, a waiver of Sections 73.6011 and 74.705 of the Commission's Rules is hereby requested.

WREX-TV

Using a Longley-Rice terrain dependent propagation model in accordance with the Commission's OET Bulletin 69 to determine any potential impact by WOCK-CA within the present predicted WREX-TV Grade B protected contour. The baseline study which does not include WOCK-CA found a population of 1,465,061 persons served within WREX-TV's Grade B protected contour, using Census 2000 data. The study was rerun to include the WOCK-CA licensed facilities, and then run again with the facilities proposed herein. The results are shown below:

	INTERFERENCE POPULATION TO WREX –TV	PERCENTAGE OF BASELINE POPULATION
WOCK-CA LICENSE	9327	0.637
WOCK-CA PROPOSED	8447	0.577

As can be seen there is a reduction in predicted interference to WREX-TV by a grant of this proposal. Accordingly, KM respectfully requests a waiver of Sections 73.6011 and 74.705 of the Commission's rules, based on the results of the Longley-Rice terrain dependent propagation study presented herein, as

expressly permitted by Section 74.705(e) of the Commission's rules, since the proposed WOCK-CA facilities would not be likely to cause new interference to WREX-TV, but would reduce interference between the two stations.

E. Request for Waiver of 47 C.F.R §74.735 and §73.6007.

It is proposed to operate WOCK-CA with a maximum peak ERP of 6.12 kilowatts. In support of the waiver request of §74.735, which limits the ERP of LPTV stations operating on channels 2 through 13 to 3-kilowatts, the following facts are to be considered:

1. The increase in peak power by WOCK-CA will use the television spectrum more efficiently and effectively without creating/increasing interference to any other analog or digital television station.

2. The antenna will be placed in a clear area where superior antenna characteristics would be expected.

3. Potential interference by the propose operation is less than would be expected from a station operating at 6.12 kilowatts toward the radio horizon. The proposed operation directs a maximum of 3.0 kilowatts toward the radio horizon.

4. Improved service will be provided to those viewers in the immediate area of the transmitter site by the increased level of downward radiation of the signal.

5. The additional power will result in improved coverage of the principal community of license, Chicago, Illinois.

6. An increase in power as requested here will have no deleterious effect on other television services or the FCC's allotment policies.

   a. WOCK-CA is a protected Class A station, no new LPTV station proposing to operate on Channel 13 could be established to serve the area.

   b. The increase in peak power (below the radio horizon) would not limit the operation of or prejudice modification of existing or proposed analog full power TV stations' facilities because they are otherwise precluded from making such changes because of other technical or legal restrictions; or can maximize their power without regard to the WOCK-CA proposed operation.

7. Waiver of Section 74.735 has been granted for exactly the same reasons stated above to WWME-CA, Channel 23, Chicago, Il. , a same market station.

F. Environmental Considerations:

The applicant believes its proposal will not significantly affect the environment for the following reasons.

The proposal does not meet any of the criteria specified in Section 1.1307 of the FCC Rules. More specifically, the proposed facilities are not known to fall within any of the categories enumerated in Sections 1.1307(a)(1)-(7) and will not involve the use of high intensity white lights. Furthermore, operation of the proposed facility will not involve the exposure of workers or the general public to levels of radio frequency electromagnetic fields exceeding guidelines adopted by the Federal Communications Commission.

(The current FCC guidelines are based upon criteria contained in the National Council of Radiation Protection and Measurements (NCRP) Report No.86 (1986) and ANSI/IEEE C95.1-1992.)

With regard to the last item, the WOCK-CA antenna is to be mounted on the west tower atop the John Hancock building in a very complex radiofrequency environment. The building roof is inaccessible to the general public.

Based upon a worst case downward field value of 1.0 for all angles below the horizon and a peak horizontal power of 6.12 kilowatts, and an antenna height of 53 meters above the rooftop. The power density level 2 meters above the roof top is predicted to be 0.0487 mW/cm^2 or less. The computed power density is 4.9 % of the Commission's guidelines for a controlled area.

After commissioning of the proposed facility, power density measurements will be taken to determine the contribution of the WOCK-CA facility to the current radiation levels on the building roof. These measurements will be supplied to the Commission at the time of filing an application for station license.

The applicant will fully-cooperate and coordinate with all site users as required by the Commission's rules.

III. SUMMARY:

KM proposes to MODIFY the facilities of Class A Television Station WOCK-CA utilizing a DIRECTIONAL ANTENNA SYSTEM. The proposed station will operate on Television Channel 13.

Operation as proposed herein would not cause/increase any normally prohibited contour overlap, and would not have any significant impact on the environment. The proposed operation will not create any new or receive any new prohibited interference.

Waivers of Sections 73.6011 and 74.705 of the Commission's Rules are hereby requested as they pertain to Stations WREX-TV and WZZM-TV.

Waivers of Sections 74.735 and 73.6007 are requested and would serve the public interest in that it would allow WOCK-CA to increase its downward radiation ERP while maintaining its ERP to the radio horizon, thus preserving its current service area while improving the reception of its signal at all areas within the service area.

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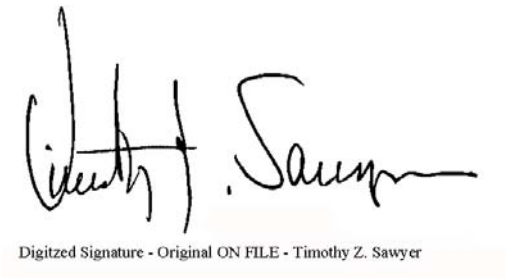
The proposed operation is fully in compliance with all other areas of the Commission's rules and applicable international agreements.

25 January 2005



Timothy Z. Sawyer