

DISPLACEMENT APPLICATION
JOSEPH W. SHAFFER
KTDF-LP LPTV STATION
CH 23- - 524-530 MHZ - 12.0 KW
SAN ANTONIO, TEXAS
January 2010

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Joseph W. Shaffer ("Shaffer"), licensee of LPTV station KTDF-LP, Channel 18-, San Antonio, Texas.¹ This application seeks a displacement facility for the station. KTDF-LP was forced to cease operation due to the commencement of program test of full power station KNIC-DT, Channel 18, Blanco, Texas. The KNIC-DT site is only 29.8 kilometers from the KTDF-LP location. An application to license KNIC-DT is pending (BLCDT-20091019ADG). This instant application seeks to displace KTDF-LP to analog Channel 23- at San Antonio, Texas. In addition to the change of channel, an alternate antenna will be used for Channel 23; the antenna center of radiation will be lowered and the effective radiated power will be raised slightly to 12.0 kilowatts.

The antenna system for the proposed KTDF-LP will be located on an existing structure. Therefore, the Federal Aviation Administration was not apprised of this proposal. The antenna supporting structure has been registered with the Commission and assigned Antenna Structure Registration Number 1054137.

1) KTDF-LP is presently silent due to being displaced by full power station KNIC-DT, Channel 18, Blanco, Texas.

The proposed KTDF-LP operation on Channel 23 complies with the Commission's interference rules, based on the use of the Longley-Rice OET-69 Bulletin.² It is noted that the terrain was sampled at 0.1 kilometer, and a signal cell size of 1.0 kilometer was used, with 2000 Census population reviews. Attached as Exhibit A is a tabulation of the results of the Longley-Rice review showing the proposed facility causes no interference to any other existing, applied for or proposed facility, based on the database used on the indicated study date. No full service station receives predicted interference above 0.5% of its population, caused by this instant proposal. No secondary LPTV station receives predicted interference above 2.0% of its population, caused by this instant proposal. Attached as Exhibit B is a review which shows the proposed KTDF-LP facility is in compliance with the Commission's RF exposure limits.

All other data used to certify compliance with the Commission's rules has been forwarded to Shaffer and is available for submission to the Commission on request.³

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- 2) The Longley-Rice model was implemented on the Probe 3 computer model from V-Soft Communications. This model has been found to closely replicate the results provided by the Commission's computer model.
 - 3) The undersigned is certifying only the radiofrequency exposure portion of the environmental analysis. All data regarding TV facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the request made herein.