

EXHIBIT 11 & 12  
K48AC DIGITAL FLASH CUT  
ENGINEERING STATEMENT  
April 27, 2009

This application requests a “flash cut” authorization to change translator station K48AC, Kasilof, Alaska to a DTV translator. The proposed change will provide equal or better service to the public.

No physical changes are expected at the current broadcast location. Existing towers, buildings and antenna will be utilized. The station will receive DTV signals via a digital microwave. The microwave system will is authorized elsewhere.

Reference paragraph 13 of the form 346 Application:

Statement of Compliance with Section 74.709

The proposed DTV station will operate on channel 48 and will be located in Kasilof, Alaska. Section 74.709 of the rules does not apply to this proposed operation.

Statement of Compliance with Section 74.793(e-h)

All database search was conducted to discover all television stations operating on channels 41 through 62 within 200km of the proposed station. The predicted coverage of each station was determined using the Longley-Rice model. The coverage of each station was examined to determine if there was any coverage overlap with the proposed DTV station. There is no circumstance where population’s ability to receive the existing stations would be effected by the operation of this DTV translator station.

Statement of Compliance with Section 74.794(b).

The proposed channel 48 will not interfere with Radio Navigation Satellite Services and no special filtering will be required.

Statement of Compliance with Section 73.1030

There are no designated radio astronomy facilities near this station.

An examination of the proposed service area was done to determine if there is potential interference to the FCC monitoring station located in Kenai Alaska. Operation of this station will not cause interfering signal levels in excess of the criteria set forth in this section.

Reference paragraph 14 of the form 346 Application:

Statement regarding RFR exposure:

The antennas for this proposed operation and the operation of translator stations K56AQ, K61AN, K67AU are the sole source of non-ionizing radiation at this location. All other licensed emissions from the facility are in the microwave spectrum and will not have any exposure effect on the public or service personnel.

Using the formula described in OET-65a, the maximum possible exposure from each station was determined. The maximum possible exposure from each station is determined to be 0.15 mW/cm<sup>2</sup>, assuming a nominal downward radiation (0.1) from the antenna array. Therefore the maximum possible exposure to the public is 0.5 mW/cm<sup>2</sup>. That exposure level is well below the exposure criteria allowed for occupational and general public exposure.