ENGINEERING STATEMENT

OF

JOHN F.X. BROWNE, P.E.

IN SUPPORT OF APPLICATION

FOR

MINOR CHANGE IN LICENSED FACILITY

KUNU-LP

VICTORIA, TX

Background

Saga Broadcasting, LLC (Saga) is the licensee of television translator station KUNU-LP, CH21, (BLTT-19990728JB, Facility ID. 31516) at Victoria, TX. Saga proposes to increase the ERP of this facility from 1 kW to 25 kW and change to a different omni-directional antenna that would accommodate co-owned low power TV facilities KXTS-LP and KVTX-LP. Saga would also relocate the antenna to the top of the (registered) tower that is presently being used and place it in such a manner so as not to increase the overall height of that structure.

Site and Tower

The tower and location remain the same as specified for the licensed facility. The tower is registered (ASRN 1042767). Since the antenna would be mounted atop the tower is such a manner so as not to increase the overall height of the structure, the FAA would not need to be notified nor would the ASR need to be changed. The center of radiation would be at 146.4m AGL (173.5m AMSL) which is 1.6m lower than the authorized antenna height at this location.

Antenna and Power

The proposed antenna is a Dielectric TUA-O4-8/32M-1-T omni-directional radiator. The antenna would be placed at a height resulting in an HAAT of 125.3m (173.5m AMSL). The proposed ERP is 25 kW. The predicted F(50,50) 74 dBu contour would completely encompass the city of Victoria, TX.

Interference

An interference study was conducted using the proposed parameters with software that emulates that used by the Commission. That study shows that there would be no predicted interference to any NTSC station, Class A station, or LPTV station however there would be a contour overlap with KXAN-DT CH21 in Austin, TX. A Longley-Rice evaluation of this interference shows it to be 0.1%. We therefore request a waiver of the overlap rule [74.706(d)] based on an interference study using the Longley-Rice methodology.

Environmental/RFR

This construction does not involve any of the conditions that require an Environmental Assessment as specified in 47 CFR Section 1.1311.

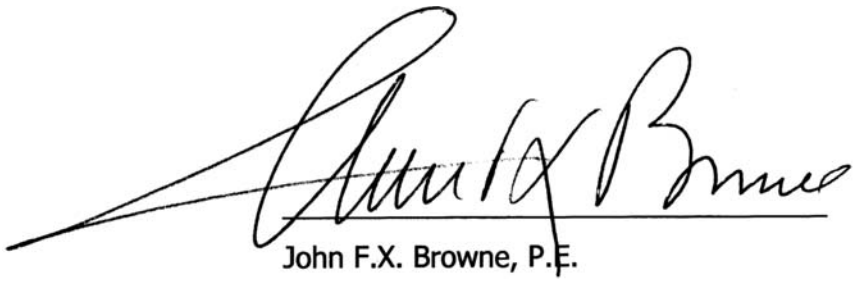
The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000278 mW/cm^2, which is less than 1% of the MPE for public exposure (0.335 mW/cm^2) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

Saga agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will also be encouraged to wear personal RFR

monitors when on the structure. A locked security fence will enclose the tower base and appropriate signage warning of RFR hazards will be in place.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.

September 16, 2004