



ENGINEERING STATEMENT
OF
JOHN F.X. BROWNE, P.E.
IN SUPPORT OF
MINOR AMENDMENT TO PENDING APPLICATION
KVCT-DT
Victoria, TX

Background

Surtsey Productions, Inc. (Surtsey) has filed an application for KVCT-DT, Channel 11 (20021107AAS Facility ID # 35846), specifying an omni-directional pattern with an ERP of 19.5 kW at a HAAT of 298 meters from a tower located at:

(NAD27)
28-50-26 NL
97-07-47 WL

Surtsey now wishes to relocate to a new site/tower and continue using an omni-directional antenna with a lower ERP of 18 kW.

Site

The proposed tower construction location is approximately 19 km west of Victoria. The proposed facility is located within the Mexican Border Zone and coordination with the Mexican administration is requested. The Antenna Structure Registration Number of the tower is



1238711 and the proposed site coordinates are:

(NAD27)

28-50-42 NL

97-07-33 WL

Antenna System and Tower

KVCT-DT will be co-located with KVCT-TV (Channel 19), KAVU-TV (Channel 25), and KAVU-DT (Channel 15). The proposed antenna (RFS 658) will be side-mounted on a newly constructed tower at the specified coordinates. The tower will have a height of 317 meters AGL (with appurtenances) and the antenna will have a center of radiation of 329 meters AMSL with an HAAT of 290 meters. The maximum ERP with this transmitting antenna will be 18 kW.

Coverage

The entire principal community of Victoria, TX is well within the predicted F(50,90) 43 dBu contour using the proposed 18 kW ERP and omni-directional antenna pattern.

Interference

Studies were made at the proposed parameters using software that emulates the software used by the FCC. Those studies indicate that there are no DTV or NTSC stations that would receive more than the de minimis interference as described in OET-69. The studies also indicate that the proposed site does not meet the contour overlap requirements of Section 73.613 with respect to KQUX-CA (20021206ABA). As allotted (*Report and Order* in MM Docket No. 01-161), KVCT-DT does not meet the overlap requirements. It can be seen in



Figure 1 that the proposed facility does not exceed the allotment contour overlap. Since the proposed facility does not exceed the allotment parameters ("checklist" application) and the allotment contour overlap is "grand fathered", the proposed facility should be exempt from the requirements. However, an OET-69 interference analysis was also conducted to determine the predicted interference from the proposed site to KQUX-CA. The interference was calculated to be 0.00% indicating that the proposed facility will cause no new interference to KQUX-CA. Given the above, no further consideration of KQUX-CA should be required.

Environmental/RFR

The proposed construction does not require preparation of an Environmental Assessment as it does not involve any of the factors listed in Section 1.1306.

The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000073 mW/cm^2 which is less than 5% of the MPE for public exposure (0.20 mW/cm^2) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

Surtsey agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a complaint environment for worker access. Workers will also be encouraged to wear personal RFR monitors when on the structure. The tower base will be enclosed by a locked security fence and appropriate signage warning of RFR hazards will be posted.

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,

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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.

A handwritten signature in black ink, appearing to read "John F.X. Browne", written over a horizontal line.

John F.X. Browne, P.E.

May 30, 2003

Proposed and Alloted KVCT-DT Contour Overlap

Red - Proposed KVCT-DT
Blue - Alloted KVCT-DT
Black - KQUX-CA

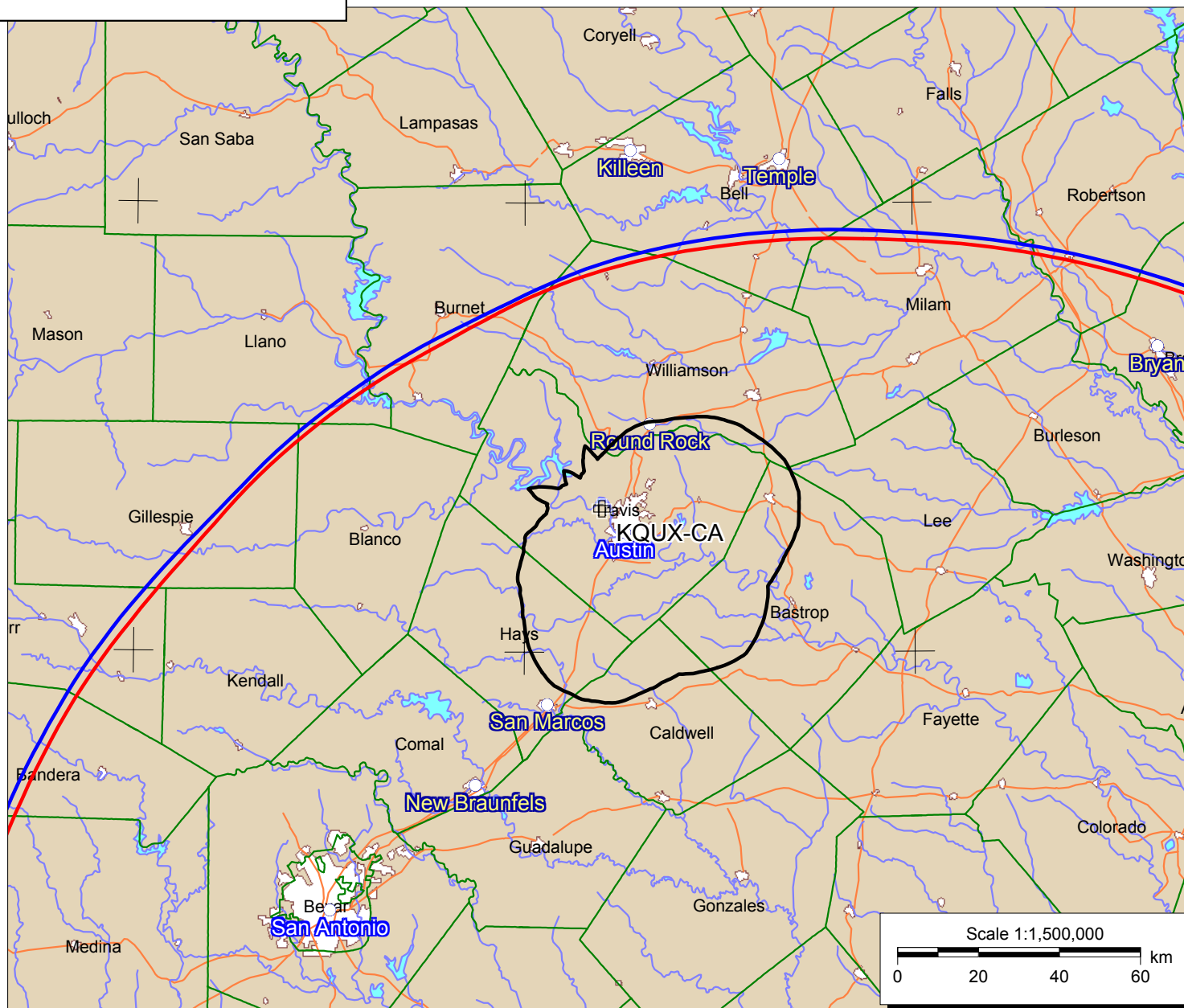


Figure 1