

EXHIBIT A

ENGINEERING STATEMENT

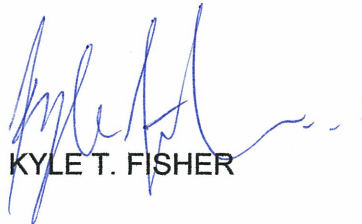
The engineering data contained herein have been prepared on behalf of THE CITY OF VALE, licensee of television translator K13NC, Channel 13 in Vale, Oregon, in support of this Application for Construction Permit to specify digital operation on Channel 19 from the licensed K13NC site. This proposal is being submitted in response to the Commission's assignment of Channel 13 to KTRV-DT in Nampa, Idaho. The site of KTRV-DT is located 94 kilometers from that of K13NC, thereby placing this translator in a displacement situation.

It is proposed to mount an RFS directional antenna at the 10-meter level of an existing 15-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 51 dBu contour encompasses a significant portion of the Grade A contour that obtains from the licensed analog K13NC facility. Operating parameters for the proposed facility are tabulated in Exhibit C. An interference study is provided in Exhibit D, and a power density calculation follows as Exhibit E.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. Due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC antenna structure registration is not required. This conclusion is supported by the Commission's TOWAIR program.

EXHIBIT A

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KYLE T. FISHER

September 23, 2010



**CONTOUR POPULATION**

**51 DBU : 8,450**

**41 DBU : 11,558**

**SMITHANDFISHER**

Huntington

Wetzel

Payette

Ontario

Fruitland

Payette

New Plymouth

Vaie

K13NC-D

Nyssa

Parma

Adrian

Notus

Wilder

Greenleaf

Caldwell

Mid

Homedale

Canyon

51 DBU

41 DBU

Scale 1:450,000

0 6 12 18 km

**EXHIBIT B**

EXHIBIT C

PROPOSED OPERATING PARAMETERS

PROPOSED K13NC-D  
CHANNEL 19 – VALE, OREGON

Transmitter Power Output:	-13.0 dBk (0.05 kW)
Transmission Line Loss:	0.53 dB
Antenna Power Gain – Main Lobe:	10.4 dB
Effective Radiated Power – Main Lobe:	-3.13 dBk (0.49 kW)
Transmitter Make and Model:	Type-accepted
TX Line Make/ Model:	Andrew LDF5-50B/LDF4-50A
Size and Type:	7/8" AND 1/2" foam heliax
Length:	50 feet
Antenna Make and Model:	RFS LPR4SK
Orientation	90 degrees true
Beam Tilt	None
Radiation Center Above Ground:	10 meters
Radiation Center Above Mean Sea Level:	812 meters



LONGLEY-RICE INTERFERENCE STUDY  
PROPOSED K13NC-D  
CHANNEL 19 – VALE, OREGON

We conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than that proposed K13NC-D) already is predicted to exist (also known as "masking"). A summary of the results of this study is provided in Exhibit D-2. It concludes that the facility proposed herein causes no significant new interference to any of the potentially affected analog or digital full-power or low-power television stations.

It is important to note that interference to two applications for new LPTV stations in Boise, ID and Nampa, ID (BNPDTL-20090825BBI and BNPDTL-20090825BEW, respectively) can be ignored due to the Commission's priority to grant displacement applications over new LPTV applications.

As a result, it is believed that the proposed K13NC-D facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

## INTERFERENCE SUMMARY

PROPOSED K13NC-D  
CHANNEL 19 – VALE, OREGON

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
KITL-LP BDFCDTL-20090618AAO	CP	Boise, ID	20	464,452	21	<0.1
NEW LPTV BNPDTL-20090825BEW	App.	Nampa, ID	19	136,505	259	0.2
NEW LPTV BNPDTL-20090825BBI	App.	Boise, ID	19	206,425	31,616	15.3*

\* see discussion in Exhibit D-1

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED K13NC-D  
CHANNEL 19 – VALE, OREGON

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Vale facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 0.49 kw, an antenna radiation center 10 meters above ground, and the vertical pattern of the RFS antenna, maximum power density two meters above ground of  $0.018 \text{ mw/cm}^2$  is calculated to occur 17 meters east of the base of the tower. Since this is only 5.4 percent of the  $0.34 \text{ mw/cm}^2$  reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 19 (500-506 MHz), this proposal may be considered a minor environmental action with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.