
WILLOUGHBY & VOSS

TECHNICAL STATEMENT
IN SUPPORT OF CONSTRUCTION PERMIT APPLICATION
EAST TEXAS BROADCASTING, INC. (KPLT-FM)
PARIS, TEXAS

INTRODUCTION

The firm of Willoughby & Voss, has been retained by East Texas Broadcasting, Inc., to prepare the attached FCC Form 301, Section III-B, seeking authority to relocate the antenna, increase the antenna height and increase effective radiated power of FM Station KPLT at Paris, Texas. This is a minor change application and is not filed in response to a filing window.

FACILITIES

KPLT Channel 299C2 proposes to change transmitter location to an existing tower, increase its center of radiation HAAT from 92 meters to 150 meter and increase the effect radiated power from 35.0 kW to 50.0 kW. The proposed KPLT operation will be di-plexed into the same antenna with station KBUS Channel 270C2, also of Paris, Texas. No other changes are proposed.

ALLOCATIONS

A spacing study using the criteria detailed in §73.207 was performed at the proposed site. This study shows that the instant proposal meets all requirements necessary for a grant of this application.

The proposed site was chosen using the criteria specified in §73.315 of the Commission's Rules. The entire city limits of Paris, are encompassed by the required 70 dBu contour.

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AERONAUTICAL AND ENVIRONMENTAL CONSIDERATIONS

The proposed support structure is an existing guyed, uniform cross-section steel tower. The applicant proposes no change which will extend the height of this existing structure. Tower Registration #1053813 identifies this support structure.

This application, if granted, does not constitute a major action as defined in §1.1305 and 1.1307, however, a statement related to non-ionizing radiation evaluation, follows.

RF EXPOSURE COMPLIANCE

A determination of compliance with specified guidelines for human exposure to radiofrequency radiation was made using Tables 5 and 6 of Supplement A of OET Bulletin Number 65 (Edition 97-01), or by the formula which derived the tables.

The maximum ERP (horizontal + vertical) of the diplexed stations KPLT-FM and KBUS will be 200 kilowatts, and the center of radiation of a 12 bay ERI Rototiller antenna will be 134.7 meters above ground level the proposed operation complies with both the controlled and uncontrolled exposure guidelines for individuals located at ground level. The following four pages are a tabulation of power densities beginning at the base of the tower to a horizontal distance of 100 meters, for both the controlled and uncontrolled criteria.

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KPLT & KBUS DIPLEXED

Environment = Controlled, Maximum = 1000 μ W/sq cm

HORZ. DISTANCE FROM FM RADIATOR Vs POWER DENSITY (Microwatt/Square cm)
 ERI/Jampro Roto, 12 Spc.= 1 W, Pwr H.=100 Pwr V.=100 COR= 134.7M
 Dist(Meters) PD (H) PD (V) Total(uW/cm2) Percent Max.

	5.52	5.52	11.05	1.1
1	5.52	5.52	11.05	1.1
2	5.52	5.52	11.05	1.1
3	5.52	5.52	11.04	1.1
4	5.52	5.52	11.04	1.1
5	5.52	5.52	11.03	1.1
6	5.51	5.51	11.02	1.1
7	5.50	5.50	11.01	1.1
8	5.50	5.50	10.99	1.1
9	5.49	5.49	10.97	1.1
10	5.47	5.47	10.95	1.1
11	5.46	5.46	10.92	1.1
12	5.50	5.50	11.00	1.1
13	5.75	5.75	11.49	1.1
14	5.99	5.99	11.99	1.2
15	6.24	6.24	12.48	1.2
16	6.48	6.48	12.96	1.3
17	6.71	6.71	13.43	1.3
18	6.94	6.94	13.89	1.4
19	7.16	7.16	14.32	1.4
20	7.37	7.37	14.74	1.5
21	7.56	7.56	15.12	1.5
22	7.74	7.74	15.48	1.5
23	7.90	7.90	15.79	1.6
24	8.07	8.02	16.09	1.6
25	8.34	8.08	16.41	1.6
26	8.58	8.11	16.68	1.7
27	8.78	8.12	16.90	1.7
28	8.95	8.09	17.05	1.7
29	9.09	8.04	17.13	1.7
30	9.18	7.95	17.13	1.7
31	9.22	7.84	17.06	1.7
32	9.22	7.69	16.90	1.7
33	9.16	7.50	16.67	1.7
34	9.05	7.29	16.34	1.6
35	8.89	7.04	15.93	1.6
36	8.68	6.76	15.44	1.5
37	8.29	6.54	14.84	1.5
38	7.86	6.29	14.16	1.4
39	7.40	6.01	13.41	1.3
40	6.91	5.69	12.60	1.3
41	6.40	5.34	11.73	1.2
42	5.87	4.96	10.83	1.1
43	5.33	4.56	9.89	1.0
44	4.78	4.15	8.93	0.9
45	4.24	3.72	7.97	0.8
46	3.71	3.29	7.00	0.7
47	3.20	2.87	6.06	0.6

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Dist (M) PD (H) PD (V) Total (uW/cm2) Percent max.

48	2.70	2.45	5.15	0.5
49	2.24	2.05	4.29	0.4
50	1.81	1.67	3.48	0.3
51	1.42	1.32	2.75	0.3
52	1.08	1.01	2.09	0.2
53	0.78	0.73	1.51	0.2
54	0.52	0.50	1.02	0.1
55	0.32	0.31	0.63	0.1
56	0.17	0.16	0.33	0.0
57	0.07	0.06	0.13	0.0
58	0.01	0.01	0.02	0.0
59	0.00	0.00	0.00	0.0
60	0.03	0.03	0.06	0.0
61	0.10	0.10	0.20	0.0
62	0.19	0.19	0.39	0.0
63	0.31	0.31	0.63	0.1
64	0.45	0.45	0.90	0.1
65	0.60	0.59	1.20	0.1
66	0.76	0.74	1.50	0.2
67	0.91	0.89	1.80	0.2
68	1.06	1.02	2.07	0.2
69	1.18	1.13	2.32	0.2
70	1.29	1.23	2.52	0.3
71	1.37	1.30	2.68	0.3
72	1.43	1.35	2.77	0.3
73	1.45	1.36	2.82	0.3
74	1.45	1.35	2.80	0.3
75	1.41	1.31	2.72	0.3
76	1.35	1.24	2.59	0.3
77	1.26	1.15	2.41	0.2
78	1.15	1.05	2.20	0.2
79	1.02	0.93	1.96	0.2
80	0.89	0.80	1.69	0.2
81	0.75	0.67	1.42	0.1
82	0.60	0.54	1.15	0.1
83	0.47	0.42	0.88	0.1
84	0.34	0.30	0.64	0.1
85	0.23	0.20	0.43	0.0
86	0.14	0.12	0.26	0.0
87	0.07	0.06	0.13	0.0
88	0.02	0.02	0.04	0.0
89	0.00	0.00	0.00	0.0
90	0.01	0.00	0.01	0.0
91	0.03	0.03	0.06	0.0
92	0.08	0.07	0.15	0.0
93	0.14	0.12	0.27	0.0
94	0.22	0.19	0.41	0.0
95	0.31	0.27	0.57	0.1
96	0.39	0.34	0.74	0.1
97	0.48	0.42	0.90	0.1
98	0.57	0.49	1.06	0.1
99	0.64	0.55	1.19	0.1
100	0.70	0.61	1.31	0.1

KPLT-FM RADIO
NARRATIVE

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KPLT & KBUS DIPLEXED

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12	5.50	5.50	11.00	5.5
13	5.75	5.75	11.49	5.7
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73	1.45	1.36	2.82	1.4
74	1.45	1.35	2.80	1.4
75	1.41	1.31	2.72	1.4
76	1.35	1.24	2.59	1.3
77	1.26	1.15	2.41	1.2
78	1.15	1.05	2.20	1.1
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97	0.48	0.42	0.90	0.5
98	0.57	0.49	1.06	0.5
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100	0.70	0.61	1.31	0.7

KPLT-FM RADIO
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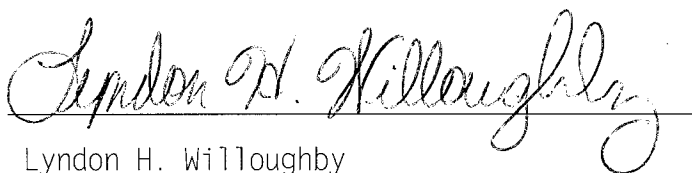
In the case of occupational exposure when maintenance personnel are within 16.5 meters of the bottom bay (101.4 meters AGL), the transmitter will be turned off.

CERTIFICATION

I certify and state under penalty of perjury, that I have prepared this statement and its associated exhibits on behalf of East Texas Broadcasting, Inc., and that I have examined the material contained herein and found it to be accurate and true to the best of my knowledge and belief.

I further certify that I have made such filings with the FCC and my credentials are a matter of record.

October 29, 2002

A handwritten signature in cursive script, reading "Lyndon H. Willoughby", written over a horizontal line.

Lyndon H. Willoughby
Willoughby & Voss
Technical Consultant to:

East Texas Broadcasting, Inc.

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