



ENGINEERING STATEMENT
OF
BENJAMIN L. PIDEK, P.E.
IN SUPPORT OF
MINOR CHANGE IN A LICENSED FACILITY
KVCT-DT
VICTORIA, TX

Background

Surtsey Media, LLC. (Surtsey) is the licensee of KVCT which has a construction permit to operate its post-transition DTV facility on Channel 11 (BMPCDT-20111103AGV)^{1/} at Victoria, TX, with an omni-directional ERP of 11.35 kW at an HAAT of 290m. The tower is located at the following coordinates:

(NAD27)
28° 50' 42" N
97° 07' 33" W

Surtsey now wishes to increase the KVCT ERP from 11.35 kW to its Appendix B power level of 18 kW.

^{1/} Surtsey recently filed an application for license to cover (BLCDDT-20120104AAJ) the KVCT construction permit and, therefore, it is applying for a minor change in a licensed facility rather than a minor modification of the KVCT construction permit.



Site

The proposed facility is located within the Mexican border zone; however, the proposed KVCT facility parameters match its Appendix B parameters exactly and the Mexican government has already approved the KVCT Appendix B facility coverage. Since the proposed change in ERP will not result in an increase in the KVCT noise-limited coverage beyond that of its Appendix B coverage in any direction, coordination with the Mexican government is not required.

Antenna System and Tower

KVCT will continue to operate with its existing side-mounted SWR SWDDPD 2-2-2/11 omni-directional antenna. The antenna has been placed on the tower (ASR#1238711) at the coordinates specified above and has a RCAMSL of 329m. The structure has an overall height of 360.3m AMSL (with appurtenances). Surtsey is not proposing to change the height of the structure and, therefore, neither FAA notification nor changes in the ASR are required.

The facility will have a horizontally polarized ERP of 18 kW (no vertical polarization component).

Coverage

The entire principal community of Victoria, TX is well within the predicted F(50,90) 43 dBu contour based on the proposed 18 kW ERP and, as mentioned above, the noise-limited coverage of the proposed KVCT facility matches the noise-limited coverage of the KVCT Appendix B facility.

Interference

No interference studies are necessary for the proposed KVCT facility as the proposed parameters match the parameters of its Appendix B facility exactly.



Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation (RFR). Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; however, since the structure is existing and registered, such conditions should not be an issue requiring further consideration as there will be no increase in height or change in width of the tower structure.

The location of the proposed facility is a multi-user site and it is assumed that the site is currently "in compliance" with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.001849 mW/cm^2 (assuming a conservative 50% relative field value in the elevation plane for angles between -90 degrees and -10 degrees), which is less than 1% of the limit (0.2 mW/cm^2) for maximum permissible exposure in public areas for a TV facility operating on Ch. 11 (198-204 MHz). The contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain "in compliance" with FCC guidelines.

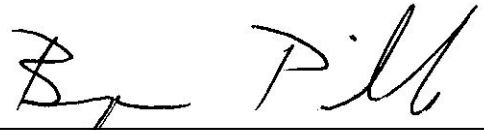
Surtsey agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower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



Benjamin L. Pidek, P.E.



John F. X. Browne, P.E.
January 5, 2012