

Exhibit 7 - Statement A
CONSTRUCTED FACILITIES
prepared for
KATV, LLC
KATV-DT Little Rock, Arkansas
Facility ID: 33543
Ch. 22 1000 kW 515 m

KATV, LLC (“KATV”) is the permittee of digital television station KATV-DT, Little Rock, Arkansas. *KATV* has completed construction of the DTV facility authorized in the construction permit (“CP”), FCC File No. BMPCDT-20080619ALF, and has commenced program tests in accordance with Section 73.1620(a)(1) of the FCC Rules.

During the construction phase of the project, the antenna specification was modified from an ERI ATW27H3-ETO-22H antenna to an ERI ATW32H3-ETO-22H antenna. The top section of the supporting structure was modified to compensate for the additional antenna height and to maintain the center of radiation as authorized. Also, as a result, the overall tower height remains unchanged. Plots of the vertical plane (elevation) patterns (both Hpol and Vpol) for the replacement antenna are provided in **Exhibit 7-Figures 1 and 1A**. A summary of the antenna and line system gains and losses is provided in the attached **Exhibit 7–Table 1**.

Human Exposure to Radiofrequency Radiation

Because of the change in antenna the KATV-DT operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission’s OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the KATV-DT transmitting system complies with the cited adopted guidelines.

The installed KATV-DT antenna has a center of radiation 359.6 meters above ground level. An ERP of 1000 kilowatts, horizontally polarized, and 250 kW vertically polarized, is employed. According to elevation pattern data provided by the antenna manufacturer¹, the KATV-DT antenna

¹ See **Exhibit 7 – Figures 1 and 1A**

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has a maximum relative field of 13.6 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 13.6 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 22 (center frequency 521 MHz) is 347.3 µW/cm².

OET-65’s formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, the KATV-DT facility contributes a calculated power density of 6 µW/cm² at two meters above ground level near antenna support structure, or 1.7 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of the any other facilities using this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the KATV-DT operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

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Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal are not caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

EXHIBIT 7 - FIGURE 1
ANTENNA VERTICAL PLANE (HPOL ELEVATION)
RELATIVE FIELD PATTERN

prepared February 2009 for
KATV, LLC.
KATV(TV) Little Rock, Arkansas
Facility ID 33543
Ch. 22 1000 kW 515 m
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

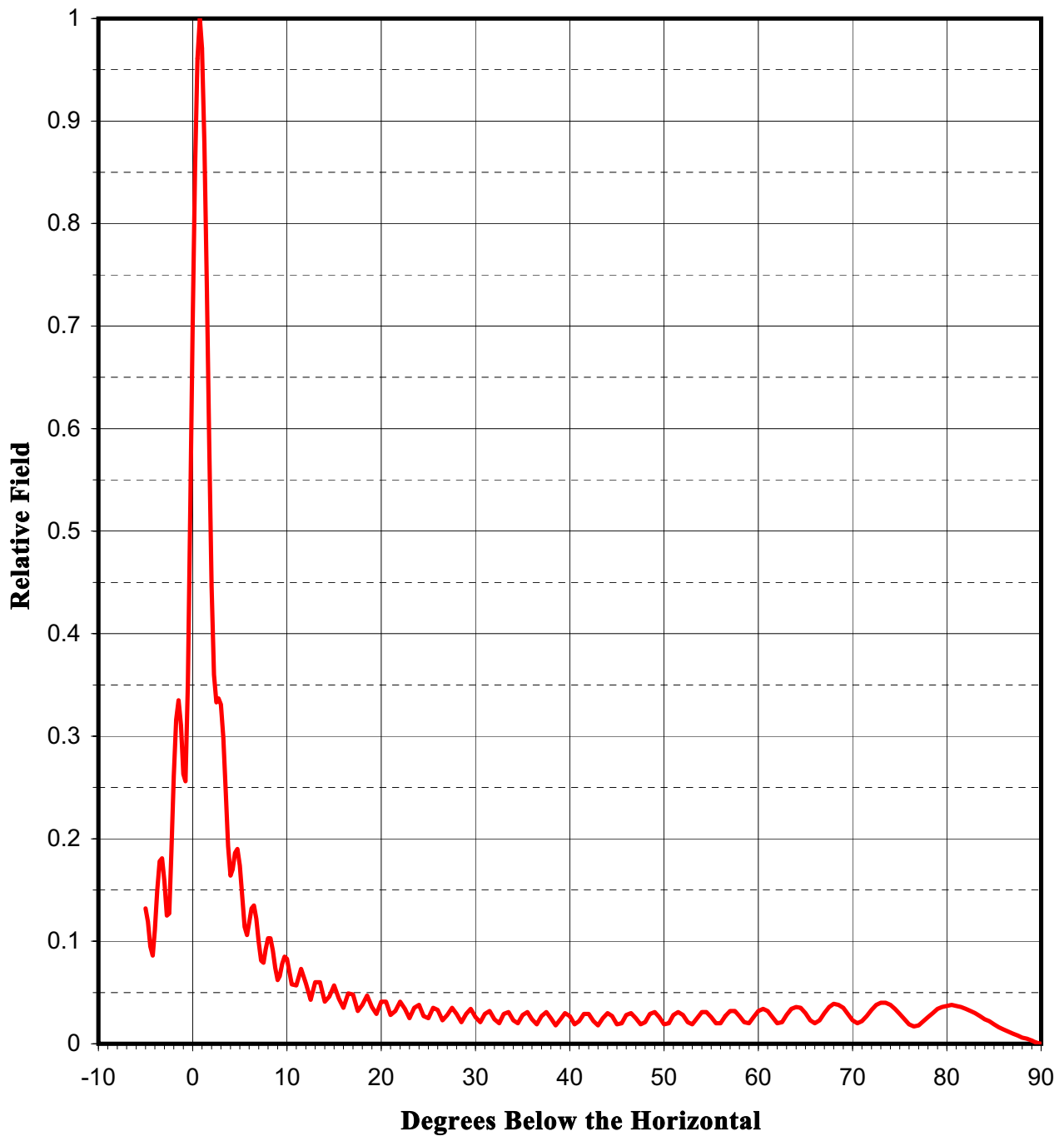


EXHIBIT 7 - FIGURE 1A
ANTENNA VERTICAL PLANE (VPOL ELEVATION)
RELATIVE FIELD PATTERN

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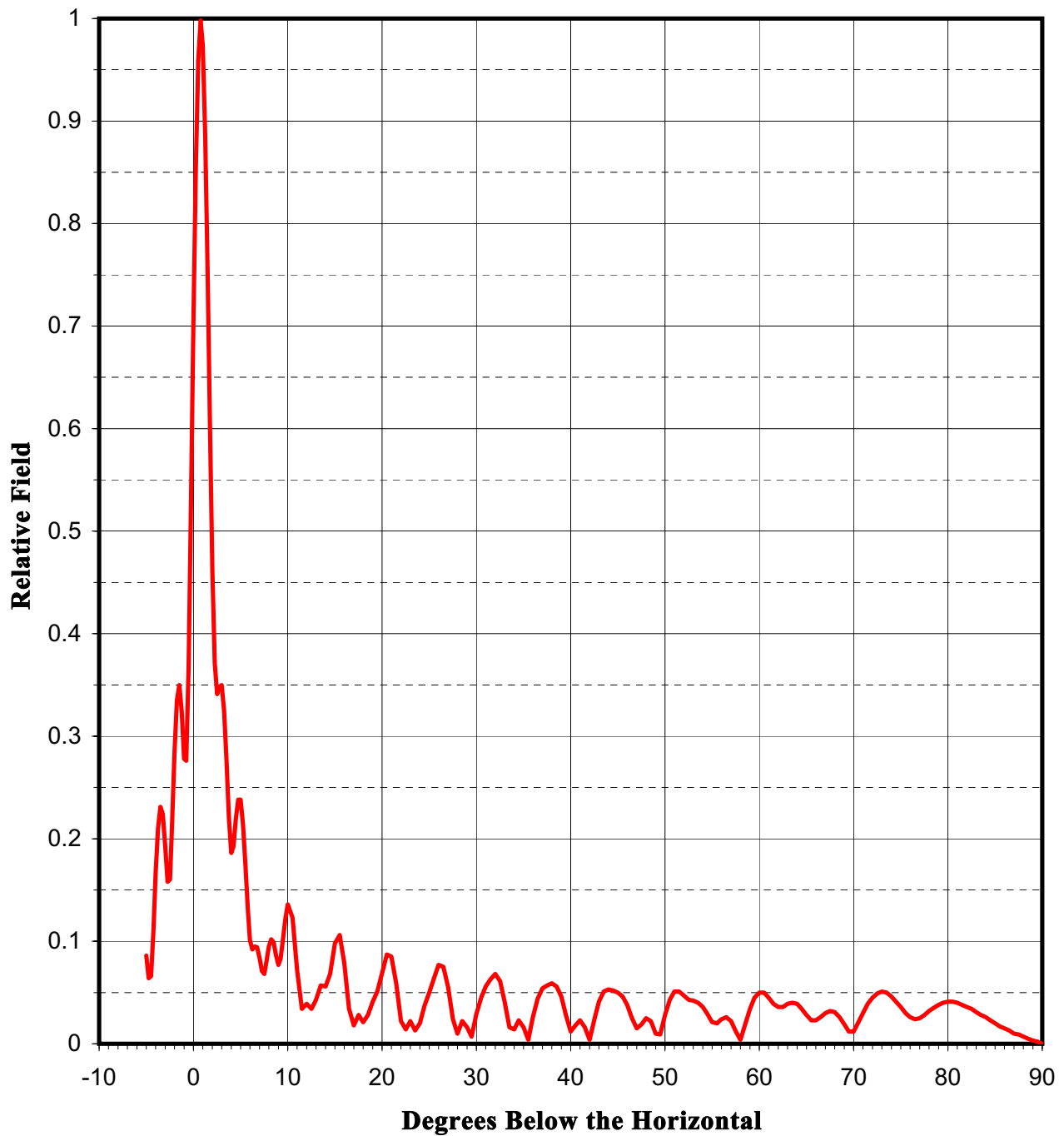


Exhibit 7 - Table 1
ANTENNA / LINE SYSTEM GAINS AND LOSSES
prepared February 2009 for
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License to Cover Constuction Permit BMPCDT-20080619ALF

Authorized Effective Radiated Power:	1000 kW	30.00 dBk
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Antenna System

ERI	Max Power Gain:	26.49	14.23 dB
ATW32H3-ETO-22H			
	Antenna Input Power:	37.76 kW	15.77 dBk

Line and Other Losses

7 3/16" MACXLine	Efficiency:	0.778	
Length 1252 ft	Loss:		1.09 dB
	Total Losses:		1.09 dB

<u>Transmitter Power Output:</u>	48.5 kW	16.86 dBk
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