

## **ENGINEERING STATEMENT**

OF

BENJAMIN L. PIDEK, P.E.

### IN SUPPORT OF

# **APPLICATION FOR NEW DIGITAL TV TRANSLATOR CONSTRUCTION PERMIT**

AND

**REQUEST FOR WAIVER** 

# КОСТ

CARLSBAD, NM

### **Background**

KOAT Hearst-Argyle Television, Inc. (Hearst) is the licensee of the full-service satellite television station KOCT-DT, Ch. 19, (BLCDT-20090616ABK, Facility ID 53908) at Carlsbad, NM. Hearst is proposing to convert KOCT from a full-service satellite station to a low-power digital translator and, in the instant application, is applying for a construction permit for a new digital translator. Hearst recognizes that the Commission presently has in place a "freeze" on the filing of applications for new translators; Hearst is, therefore, requesting of a waiver of the "freeze" as detailed in the request for waiver being submitted by counsel for Hearst.

Hearst is requesting, in the instant application, that all of parameters of the proposed translator facility (<u>i.e.</u>, power, height, coordinates) remain the same as that of its presently licensed full-service facility. The ERP of KOCT (15 kW) already meets the maximum allowable power level for UHF translators and, as a result, Hearst will not have to reduce the power level of KOCT to comply with the translator rules.

#### Site and Tower

The site and tower (ASR#1052108) of the proposed facility will remain the same as that of the licensed facility as will the height of the antenna radiation center. There will be no change in the overall height of the tower; thus, neither notification to the FAA nor change in the ASR is required.

The site is located within the Mexican Border zone; however, since the proposed digital translator facility will be identical to that of the licensed full-service facility, coordination with Mexico should not be required.

#### Antenna and Power

Hearst is proposing to operate the translator using the existing full-service KOCT Dielectric TLP-24A omni-directional antenna with a horizontally polarized ERP of 15.0 kW (the same power level as the licensed full-service facility).

#### **Interference**

An interference study was conducted using the proposed parameters with software that emulates that used by the Commission. The results of the OET-69 analysis indicate that there are no domestic full-service DTV or Class A stations predicted to receive more than the allowable 0.5% new interference from the proposed KOCT facility (as a translator) and, also, there are no analog or digital LPTV or translator stations predicted to receive more than the allowable 2% interference.



#### 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 existing tower structure.

The location of the proposed facility (the same as the existing 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). As Hearst will not be making any changes to its facility at the site, it will not be increasing the RFR in any way; therefore, the site will remain "in compliance" with FCC guidelines. Furthermore, the ground level RFR contributed to the site by the existing KOCT facility in public areas is calculated to be 0.000066 mW/cm<sup>2</sup>, which is less than 5% (and, in fact, less than 1%) of the MPE for public exposure (0.335333 mW/cm<sup>2</sup>) at Ch. 19 (500 MHz – 506 MHz).

Hearst 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 site or the structure. The site is fenced to prevent access to the controlled area around the towers and appropriate signage is in-place.

#### **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, 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.

Jfessionar F Benjamin L. Pidek, P.E. A Manue

John F. X. Browne, P.E. April 7, 2011