TECHNICAL EXHIBIT
DIGITAL FLASH CUT APPLICATION
STATION K35ER (FACILITY ID 31352)
SANTA MARIA, CALIFORNIA
CH 35 1.75 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an application to "flash-cut" to digital operation for Class A television station K35ER. Station K35ER is licensed to operate on analog channel 35 with a directional antenna maximum (visual) effective radiated power (ERP) of 20.8 kW and an antenna height above mean sea level (RCAMSL) of 500 meters (BLTTL-19980902JD). K35ER is proposing to flash cut to digital using its licensed directional antenna (re-oriented) at a new transmitter site.

Proposed Facilities

This application proposes to flash-cut to digital mode on channel 35 from an existing transmitter site atop Tepusquet Peak (same transmitter site as in the pending STA application for K35ER.[1] The proposed site coordinates are (NAD27): 34-54-37 N, 120-11-09 W. A Bogner (BOG), model B8UB directional antenna, oriented at 270° True, with a maximum ERP of 1.75 kW and antenna RCAMSL of 1020 meters is proposed. The tower registration number is 1032645.

Figure 1 is a map showing the licensed and proposed coverage contours. As is apparent on the map, the proposed 51 dBu digital contour will have some common contour overlap with the licensed 74 dBu contour.

[1] See BSTA-20071221AAD

Allocation Considerations

The proposed K35ER operation meets the FCC's 2%/0.5% post-transition interference standards to pertinent LPTV, Class A and DTV facilities using the procedures outlined in the FCC's OET-69 Bulletin and a standard 1 kilometer cell size and 1 kilometer terrain distance increment. If necessary, a waiver of the FCC rules is respectfully requested based on use of the FCC's OET-69 Bulletin.

The results of the interference analyses are summarized in Figure 2. For the studies, only the worst-case interference scenario was shown for each station. Detailed studies for any stations that were not predicted to receive any interference (i.e., no scenarios were generated) were not included.

The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

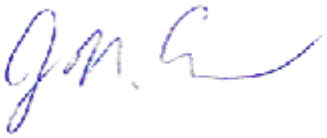
Radiofrequency Electromagnetic Field Exposure

The proposed K35ER facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 30 meters above ground level. The maximum proposed ERP is 1.75 kW. A conservative relative field value of 0.5 was assumed for the directional antenna's downward radiation (see Figure 3). The calculated power density at a point 2 meters (6.6 feet) above ground level is 0.019 mW/cm^2. This is less than 5% of the FCC's recommended limit of 0.4 mW/cm^2 for channel 35 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this is a multi-user site, an agreement will control site access. In the event that workers or other authorized personnel enter restricted areas or climb the tower,

appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

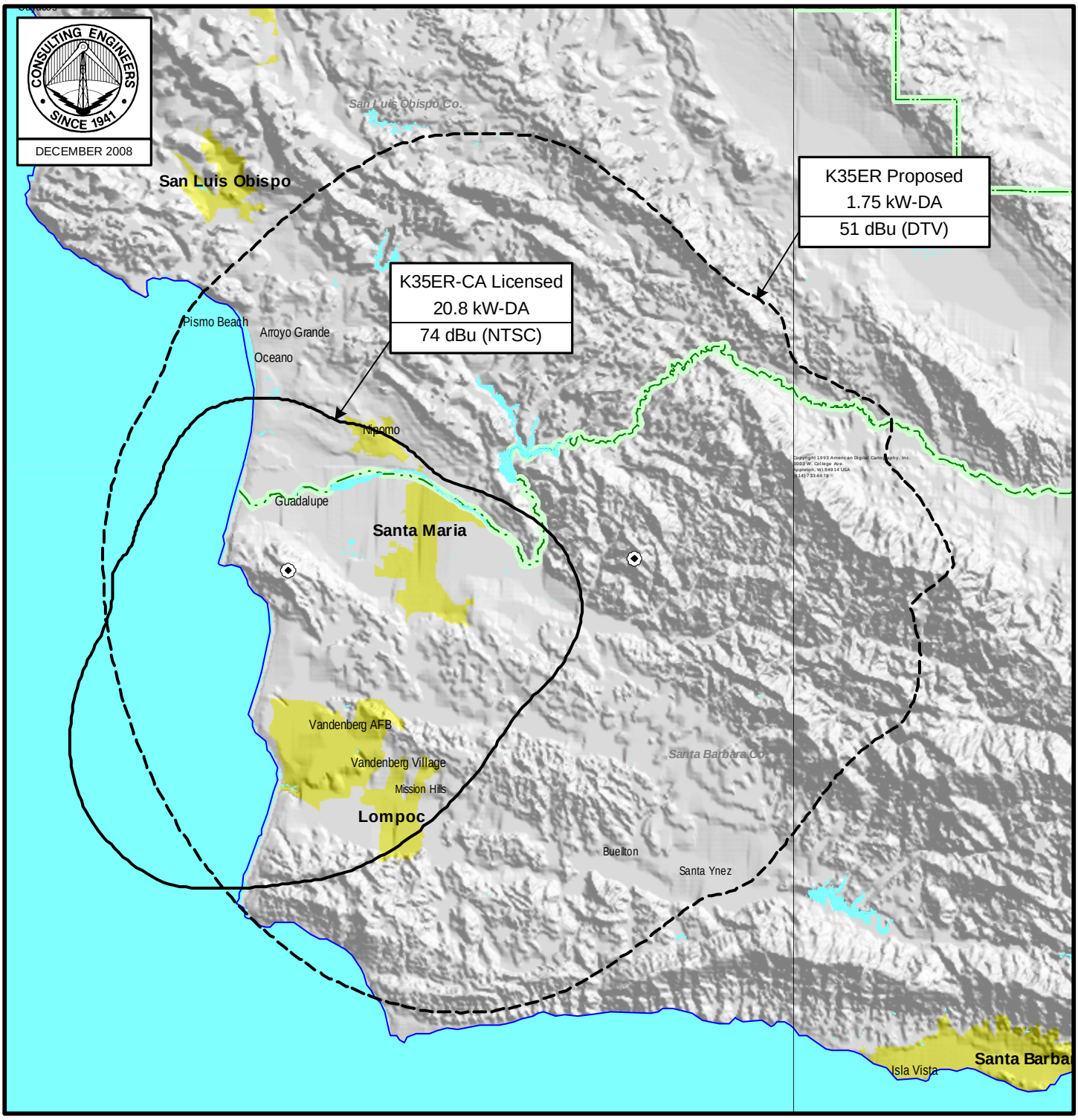


Jonathan N. Edwards

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

December 15, 2008

Figure 1



PREDICTED COVERAGE CONTOURS

STATION K35ER

SANTA MARIA, CALIFORNIA

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Census data selected: 2000
Post DTV Transition Database Selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 12-15-2008 Time: 10:58:58
Record Selected for Analysis

K35ER USERRECORD-01 SANTA MARIA CA US
Channel 35 ERP 1.75 kW HAAT 584. m RCAMSL 01020 m STRINGENT MASK
Latitude 034-54-37 Longitude 0120-11-09
Status APP Zone 2 Border
Dir Antenna Make CDB Model 00000000018180 Beam tilt N Ref Azimuth 270.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 1.0 km/side
Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	51.0 dBu F(50,90) (km)
0.0	0.191	546.3	39.0
45.0	0.075	323.0	27.4
90.0	0.109	504.9	34.5
135.0	0.075	534.0	33.0
180.0	0.191	721.5	41.8
225.0	1.750	749.5	56.4
270.0	1.750	769.8	56.8
315.0	1.750	522.3	52.1

Contour Overlap to Proposed Station

Station
KTAS 34 SAN LUIS OBISPO CA BLCDT20070222AAX causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station
KRCA 35 RIVERSIDE CA BPCDT20080620AIN causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station
KRCA-DR 35 RIVERSIDE CA BPRM20080204ADC causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station
K35ER 35 SANTA MARIA CA BSTA20071221AAD

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station
K35ER 35 SANTA MARIA CA BLTTL19980902JD

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station
KMCF-LP 35 VISALIA CA BLTTL20030303ACQ causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quiet zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Proposed Station

Channel	Call	City/State	ARN
35	K35ER	SANTA MARIA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
20	KSSY-LP	ARROYO GRANDE CA	0.0	LIC	BLTTL	-20080208AAB
34	NEW	BAKERSFIELD CA	133.5	APP	BNPTTL	-20000831AWI
34	KVPT-LP	BAKERSFIELD CA	143.8	LIC	BLTT	-20070223ABA
34	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCDT	-20070222AAX
34	KTAS	SAN LUIS OBISPO CA	65.8	PLN	DTVPLN	-DTVP1241
35	K35IW-D	BAKERSFIELD CA	156.8	APP	BMPDTL	-20070914ABF
35	K35IW-D	BAKERSFIELD CA	156.8	CP	BDCCDTL	-20061030AQU
35	KRVD-LP	BANNING CA	323.9	APP	BDISDTL	-20080312ADG
35	KRMV-LP	BANNING CA	323.9	APP	BDISDTL	-20060901AAT
35	K35BQ	DAGGETT, ETC. CA	299.9	LIC	BLTT	-19880307IA
35	K35DG	LA JOLLA CA	355.5	APP	BDFCDTA	-20060802ASH
35	K35DG	LA JOLLA CA	355.5	APP	BSTA	-20060531AHV
35	K35DG	LA JOLLA CA	355.5	LIC	BLTTA	-20060621AAL
35	NEW	PALM SPRINGS CA	383.8	APP	BDCCDTL	-20070420ABK
35	NEW	PALM SPRINGS CA	363.2	APP	BSFDTL	-20060630ATQ
35	K35HO-D	RIDGECREST CA	236.1	LIC	BLDTT	-20080401AUL
35	K35HO-D	RIDGECREST, ETC. CA	236.0	CP	BPTT	-20041201BZX
35	KRCA	RIVERSIDE CA	209.3	APP	BPCDT	-20080620AIN
35	KRCA-DR	RIVERSIDE CA	209.3	APP	BPRM	-20080204ADC
35	KCRA-TV	SACRAMENTO CA	390.6	CP	BPCDT	-20080208AEM
35	KCRA-TV	SACRAMENTO CA	390.6	PLN	DTVPLN	-DTVP1280
35	KCRA-TV	SACRAMENTO CA	389.0	LIC	BLCDT	-20040122ADR
35	KMCF-LP	VISALIA CA	195.6	LIC	BLTTL	-20030303ACQ
36	KBFK-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20040219ACE
36	KJCN-LP	PASO ROBLES CA	137.3	CP	BPTTL	-20070918ACL
36	KJCN-LP	PASO ROBLES CA	65.8	LIC	BLTTL	-19870602IA
38	KNXT-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20070524ADC
38	KPAL-LP	PALMDALE CA	184.5	LIC	BLTTL	-19900723II
38	KPAL-LP	PALMDALE CA	184.4	STA	BSTA	-20060104ACS
38	KPAL-LP	PALMDALE CA	184.4	STA	BSTA	-20050922AFW
38	KSKJ-CA	VAN NUYS CA	171.6	LIC	BLTTA	-20040625AAS
39	KABE-LP	BAKERSFIELD CA	156.8	STA	BSTA	-20041105BDJ
39	KABE-LP	BAKERSFIELD CA	156.8	LIC	BLTTL	-20071231AFG
42	KZKC-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20050428AAC
42	KSCZ-LP	COALINGA CA	156.3	LIC	BLTT	-19950912IC
42	KSBO-CA	SAN LUIS OBISPO CA	65.8	LIC	BLTTL	-19980902JA
43	KPMC-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20080418AAF
43	KTSB-LP	SANTA BARBARA CA	67.9	LIC	BLTTL	-19970620JD

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Analysis of Interference to Affected Station 4

DTV Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
34	KTAS	SAN LUIS OBISPO CA	DTVPLN	-DTVP1241

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN	-DTVP1208
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN	-DTVP1239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN	-DTVP1240
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN	-DTVP1242

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVP1241 PLN
HAAT 441.0 m, ATV ERP 82.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	425142	21033.5
not affected by terrain losses	412797	18684.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1140	363.6
lost to ATV IX only	1140	363.6
lost to all IX	1140	363.6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
34	KTAS	SAN LUIS OBISPO CA	BLCDT	-20070222AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDT	-20060628ABK
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN	-DTVP1208
34	KGPE	FRESNO CA	219.8	LIC	BLCDT	-20030702ABJ
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN	-DTVP1239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN	-DTVP1240
34	KMEX-TV	LOS ANGELES CA	267.8	APP	BMPCDT	-20080620AGO
34	KMEX-TV	LOS ANGELES CA	267.8	CP	BPCDT	-20080228ABI
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDT	-20030620ABV
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN	-DTVP1242
34	KFSF-TV	VALLEJO CA	310.7	APP	BPCDT	-20081031AAE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD	-01

Total scenarios = 10

Result key: 5
Scenario 5 Affected station 4 KTAS
Before Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDT 20070222AAX LIC
HAAT 453.0 m, ATV ERP 80.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	425149	21102.1
not affected by terrain losses	412196	18743.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	163	372.6
lost to ATV IX only	163	372.6
lost to all IX	163	372.6

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVP1240	PLN
34A CA VALLEJO	BPCDT	20081031AAE	APP

After Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDT 20070222AAX LIC
HAAT 453.0 m, ATV ERP 80.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	425149	21102.1
not affected by terrain losses	412196	18743.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2136	642.5
lost to ATV IX only	2136	642.5
lost to all IX	2136	642.5

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVP1240	PLN
34A CA VALLEJO	BPCDT	20081031AAE	APP
35A CA SANTA MARIA	USERRECORD01		APP

Percent new IX = 0.4793%
Worst case new IX 0.4793% Scenario 5

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
34	KTAS	SAN LUIS OBISPO CA	DTVPLN	-DTVP1241

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDT	-20060628ABK
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN	-DTVP1208
34	KGPE	FRESNO CA	219.8	LIC	BLCDT	-20030702ABJ
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN	-DTVP1239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN	-DTVP1240
34	KMEX-TV	LOS ANGELES CA	267.8	APP	BMPCDT	-20080620AGO
34	KMEX-TV	LOS ANGELES CA	267.8	CP	BPCDT	-20080228ABI
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDT	-20030620ABV
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN	-DTVP1242
34	KFSF-TV	VALLEJO CA	310.7	APP	BPCDT	-20081031AAE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD	-01

Total scenarios = 10

Result key: 15
Scenario 5 Affected station 5 KTAS
Before Analysis

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVP1241 PLN
HAAT 441.0 m, ATV ERP 82.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	425142	21033.5
not affected by terrain losses	412797	18684.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1148	371.6
lost to ATV IX only	1148	371.6
lost to all IX	1148	371.6

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVP1240	PLN
34A CA VALLEJO	BPCDT	20081031AAE	APP

After Analysis

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVP1241 PLN
HAAT 441.0 m, ATV ERP 82.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	425142	21033.5

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   not affected by terrain losses    412797      18684.6
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV        3202        649.5
   lost to ATV IX only                 3202        649.5
   lost to all IX                      3202        649.5

 Potential Interfering Stations Included in above Scenario     5

34A CA FRESNO               BLCDT     20030702ABJ  LIC
34A CA LOS ANGELES          DTVPLN    DTVP1240     PLN
34A CA VALLEJO              BPCDT     20081031AAE  APP
35A CA SANTA MARIA          USERRECORD01           APP

Percent new IX =    0.4990%
Worst case new IX    0.4990% Scenario      1

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     Analysis of Interference to Affected Station  39

Analysis of current record
Channel     Call           City/State        Application Ref. No.
   35      K35ER      SANTA MARIA CA            USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 34   KTAS     SAN LUIS OBISPO CA         65.8  LIC    BLCDT     -20070222AAX
 34   KTAS     SAN LUIS OBISPO CA         65.8  PLN    DTVPLN    -DTVP1241
 35   K35IW-D  BAKERSFIELD CA            156.8  APP    BMPDTL    -20070914ABF
 35   K35IW-D  BAKERSFIELD CA            156.8  CP     BDCCDTL   -20061030AQU
 35   KRVD-LP  BANNING CA                323.9  APP    BDISDTL   -20080312ADG
 35   KRMV-LP  BANNING CA                323.9  APP    BDISDTL   -20060901AAT
 35   K35DG    LA JOLLA CA               355.5  APP    BDFCDTA   -20060802ASH
 35   NEW      PALM SPRINGS CA           383.8  APP    BDCCDTL   -20070420ABK
 35   NEW      PALM SPRINGS CA           363.2  APP    BSFDTL    -20060630ATQ
 35   K35HO-D  RIDGECREST CA             236.1  LIC    BLDTT     -20080401AUL
 35   KRCA     RIVERSIDE CA              209.3  APP    BPCDT     -20080620AIN
 35   KRCA-DR  RIVERSIDE CA              209.3  APP    BPRM      -20080204ADC
 35   KCRA-TV  SACRAMENTO CA             390.6  CP     BPCDT     -20080208AEM
 35   KCRA-TV  SACRAMENTO CA             390.6  PLN    DTVPLN    -DTVP1280
 35   KCRA-TV  SACRAMENTO CA             389.0  LIC    BLCDT     -20040122ADR
 35   KMCF-LP  VISALIA CA                195.6  LIC    BLTTL     -20030303ACQ

 Total scenarios =   14

Result key:       23
Scenario        3  Affected station       39  K35ER
Before Analysis

Results for: 35A CA SANTA MARIA          USERRECORD01           APP
   HAAT  584.0 m, ATV ERP    1.8 kW
                                POPULATION   AREA (sq km)
   within Noise Limited Contour      265596       6199.1
   not affected by terrain losses    251987       5312.1
   lost to NTSC IX                     4984         42.9
   lost to additional IX by ATV        2136        112.2
   lost to ATV IX only                 2739        138.6
   lost to all IX                      7120        155.1

 Potential Interfering Stations Included in above Scenario     3

35N CA VISALIA              BLTTL     20030303ACQ  LIC
34A CA SAN LUIS OBISPO      BLCDT     20070222AAX  LIC
35A CA BAKERSFIELD          BMPDTL    20070914ABF  APP
35A CA RIVERSIDE            BPCDT     20080620AIN  APP

Result key:       26
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Scenario        6  Affected station       39  K35ER
Before Analysis

Results for: 35A CA SANTA MARIA          USERRECORD01           APP
   HAAT  584.0 m, ATV ERP    1.8 kW
                                POPULATION   AREA (sq km)
   within Noise Limited Contour      265596       6199.1
   not affected by terrain losses    251987       5312.1
   lost to NTSC IX                     4984         42.9
   lost to additional IX by ATV        2136        112.2
   lost to ATV IX only                 2739        138.6
   lost to all IX                      7120        155.1

 Potential Interfering Stations Included in above Scenario     6

35N CA VISALIA              BLTTL     20030303ACQ  LIC
34A CA SAN LUIS OBISPO      BLCDT     20070222AAX  LIC
35A CA BAKERSFIELD          BDCCDTL   20061030AQU  CP
35A CA RIVERSIDE            BPCDT     20080620AIN  APP

Result key:       29
Scenario        9  Affected station       39  K35ER
Before Analysis

Results for: 35A CA SANTA MARIA          USERRECORD01           APP
   HAAT  584.0 m, ATV ERP    1.8 kW
                                POPULATION   AREA (sq km)
   within Noise Limited Contour      265596       6199.1
   not affected by terrain losses    251987       5312.1
   lost to NTSC IX                     4984         42.9
   lost to additional IX by ATV        2136        111.2
   lost to ATV IX only                 2739        137.6
   lost to all IX                      7120        154.2

 Potential Interfering Stations Included in above Scenario     9

35N CA VISALIA              BLTTL     20030303ACQ  LIC
34A CA SAN LUIS OBISPO      DTVPLN    DTVP1241     PLN
35A CA BAKERSFIELD          BMPDTL    20070914ABF  APP
35A CA RIVERSIDE            BPCDT     20080620AIN  APP

Result key:       32
Scenario       12  Affected station       39  K35ER
Before Analysis

Results for: 35A CA SANTA MARIA          USERRECORD01           APP
   HAAT  584.0 m, ATV ERP    1.8 kW
                                POPULATION   AREA (sq km)
   within Noise Limited Contour      265596       6199.1
   not affected by terrain losses    251987       5312.1
   lost to NTSC IX                     4984         42.9
   lost to additional IX by ATV        2136        111.2
   lost to ATV IX only                 2739        137.6
   lost to all IX                      7120        154.2

 Potential Interfering Stations Included in above Scenario    12

35N CA VISALIA              BLTTL     20030303ACQ  LIC
34A CA SAN LUIS OBISPO      DTVPLN    DTVP1241     PLN
35A CA BAKERSFIELD          BDCCDTL   20061030AQU  CP
35A CA RIVERSIDE            BPCDT     20080620AIN  APP

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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BOGNER BROADCAST EQUIPMENT CORP.
603 Cantiague Rock Road
WESTBURY, NEW YORK 11590

BOGNER VERTICAL PLANE RADIATION PATTERN B8U( )

LOW & MEDIUM POWER

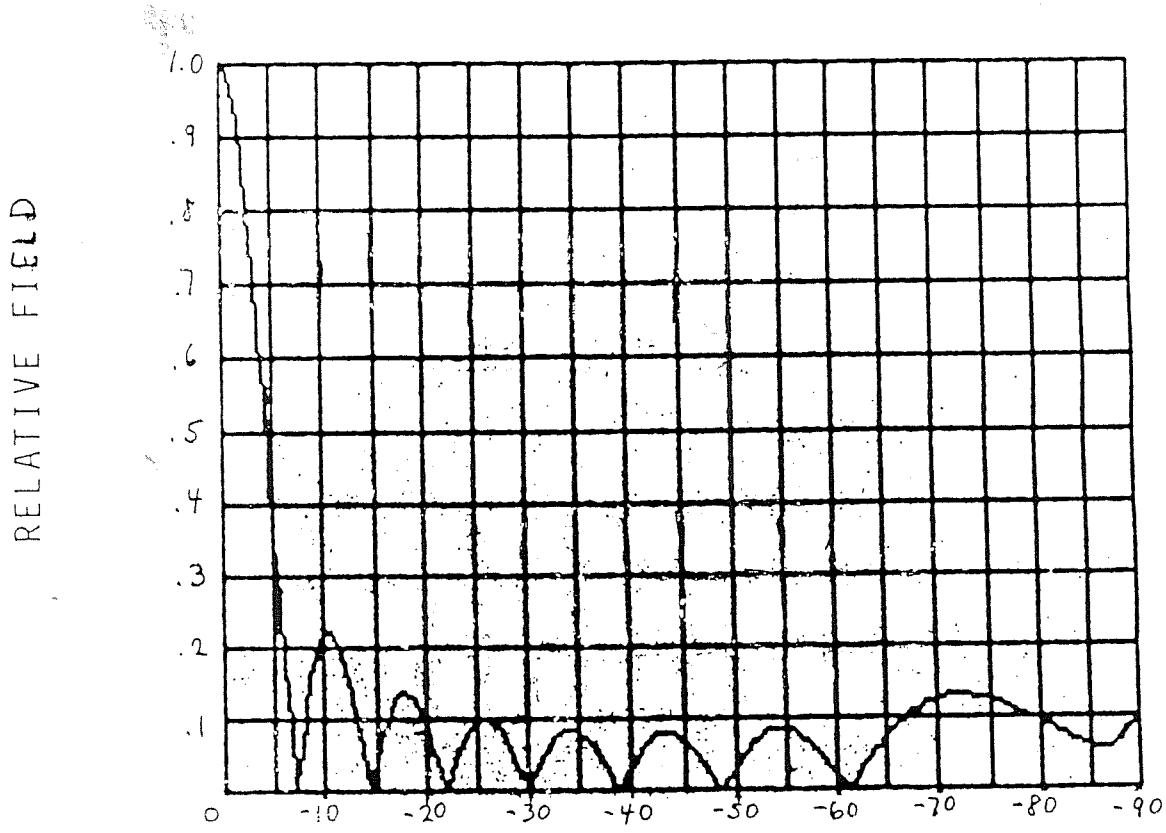

Figure 3