

TECHNICAL EXHIBIT
AMENDMENT TO
APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
LPTV STATION KJOI-LP
FACILITY ID 130272
CALIENTE, CALIFORNIA
CH 12 3 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared on behalf of Gary M. Cocola Family Trust, Gary M. Cocola, Trustee (herein "Gary Cocola") in support of an amendment to the pending application for modification of construction permit (BMPTVL-20051223AAG) for LPTV station KJOI-LP at Caliente, California (Facility ID: 130272). Station KJOI-LP is currently authorized (BNPTVL-2000830BLD) to operate on channel 12 with a directional antenna maximum effective radiated power (ERP) of 3 kilowatts and an antenna radiation center height above mean sea level (RCAMSL) of 911.4 meters. It also has a pending application (BMPTVL-20051223AAG) which proposes to relocate the KJOI-LP transmitter site, change the directional antenna system and increase the RCAMSL to 1051 meters.

Purpose of Amendment

This amendment addresses the distance between the proposed site and Visalia, California, which is one of the top 125 geographically restricted markets, and requests a waiver of the applicable geographic restriction. No changes are proposed, including no change in channel (12), frequency offset (zero), ERP, RCAMSL or community of license (Caliente). As detailed below, this application is considered a "minor change" in facilities pursuant to Section 73.3572.

Proposed Operation

LPTV station KJOI-LP plans to provide free over the air Spanish language entertainment. It proposes to relocate to an new site described by the following coordinates, N 35° 26' 16", W 118° 44' 28" and to operate on channel 12 (204-210 MHz) with a "zero" carrier frequency offset employing a Dielectric model THB-C1-1H/1HD-1 directional antenna with a main lobe orientation of 260 degrees true. The maximum ERP will be 3 kilowatts at any horizontal or vertical angle. The antenna

radiation center height above mean sea level will be at 1051 meters.

Waiver of Geographic Restrictions

In Notice and Filing Requirements Regarding July 31 through August 4, 2000 Limited Low Power Television/Television Translator/Class A Television Auction Filing Window (herein "Notice"), the FCC announced an auction filing window for applications for new construction permits and for major changes in existing facilities for low power television and television translator stations (LPTV). The Notice specified a geographic restriction for these applications, such that transmitting antenna site coordinates could not be located within 121 kilometers (75 miles) of the reference coordinates of the top 125 markets. Nevertheless, the Notice provided for waiver of the geographic restriction where an applicant demonstrates that a proposed facility is shielded by terrain barriers from the applicable television market cities. Through this extension of the Commission's policy on terrain shielding, the FCC ensured that "opportunities will not be foreclosed for additional low power TV and TV translator service in locales that are completely insulated from TV signals emanating from the applicable TV market cities due to substantial terrain obstructions."

The FCC explained in the Notice that the geographic restriction was necessitated by the Commission's implementation of the digital television (DTV) service, and that the geographic restriction was necessary to minimize the extent to which LPTV and TV translator service might be disrupted by existing or future DTV station operations.

At least three August 2000 Window applicants have filed for new or improved facilities at the Mt. Adelaide antenna farm outside of Caliente, California. This site lies just short of the 121 kilometer restriction set forth in the Notice. The Commission granted construction permits to two of the three applicants. By this amendment, Gary Cocola requests a waiver of the geographic restriction, this waiver would be consistent with the Notice and the Commission's actions on KJOI-LP's competitors' substantially similar applications.

(1) Minimal Intrusion of Geographic Restriction

The proposed site is located 110.72 kilometers from the Visalia reference coordinates listed in Attachment A of the Public Notice. It is believed this is a minimal intrusion into the restricted area, as the requirement is 121 kilometers and the proposed site falls only 10.28 kilometers short of the requirement. This only amounts to 8% of the required distance.

(2) Terrain Shielding Toward Visalia

The Notice indicated that requests for a terrain shielding waiver must be supported by an appropriate number of profiles showing the terrain between the proposed community of service (Caliente) and the applicable TV market cities, and that the signals of full-service stations in these cities could not be directly received in the proposed community.

(a) Terrain Profiles from Caliente to Visalia

Sheet 1 of Figure 1 is a map showing three evenly spaced radials (radials 328°, 331°, and 334°) from the reference point (N 35-17-28 W 118-37-37) of Caliente, California through the city limits of Visalia, California. Sheets 2 thru 4 of Figure 1 are terrain profiles along these three radials. As shown, there is significant terrain between the KJOI-LP community of license and Visalia.

(b) No Visalia Full-Power TV Stations Provide Service to Caliente

According to the FCC's CDBS, NTSC stations KNXT-TV and KMPH-TV are the only two full service TV stations licensed to Visalia, California. Sheets 5 thru 8 of Figure 1 are maps depicting the Longley-Rice predicted coverage for the NTSC and DTV operations of stations KNXT and KMPH-TV. The Longley-Rice Predicted Coverage maps were generated assuming without consideration given to loss due to clutter. Clear areas on the maps show where a Longley-Rice predicted Grade B (64 dBu) or Noise Limited (41 dBu) signal is predicted, and blue shaded areas are areas where the signal is predicted to be less than a Grade B or Noise-Limited signal. As shown on the maps, none of the NTSC or DTV facilities are predicted to provide a Grade B or Noise-Limited signal to Caliente.

(3) No Predicted DTV Interference to be Caused or Received

At this point in time, the DTV channel election process is essentially complete. An interference analysis of the proposed facility shows that no interference is predicted to be caused to any authorized, licensed, or certified post transition operations of any first adjacent or co-channel DTV operations. In addition, the proposal is not predicted to receive any interference from either current or post transition DTV operations. Figure 3 is a copy of an interference received study prepared for the proposed KJOI-LP operation based on the OET-69 procedures. As shown on sheet 3 of Figure 3, the proposed facility is not predicted to receive interference from any proposed, allotted, authorized or licensed DTV operations. Thus, it is believed the proposal will not adversely impact and will not be adversely impacted by any DTV operations.

(4) The FCC Has Approved Substantially Similar Applications

The Commission has authorized two other LPTV stations in KJOI-LP's local market that initially filed during the August 2000 filing window, and subsequently have relocated to site locations which do not meet the minimal geographic distance restriction toward Visalia. Specifically, during the August 2000 filing window, the FCC received the initial applications for LPTV station K13YV on channel 13 and LPTV station KEBK-LP on channel 47, both at Bakersfield, California (BNPTVL-200000830AWQ and BNPTTL-20000831ATV). It is our understanding from the applicant that KJOI-LP competes directly with these stations, which makes commensurate geographic coverage necessary to place KJOI-LP on a level playing field.

Both K13YV and KEBK-LP have been authorized to co-locate at a site located 110.74 kilometers from the Visalia reference coordinates, that is, 0.02 kilometers closer to the Visalia reference coordinates than the instant KJOI-LP proposal. [(Subsequently, KEBK-LP modified (and ultimately licensed, BLTTTL-20060420ADA) its facilities to Mt. Breckenridge, which is just 115.79 kilometers from the Visalia reference coordinates.)]

Conclusion

This amendment demonstrates that a waiver of the geographic restriction is justified because there would be minimal intrusion into the geographically restricted area,

Caliente is terrain shielded from Visalia, the signals of the full-service stations licensed to Visalia are not receivable in Caliente, and the proposed facility is not predicted to impact or be impacted by any DTV operations.

Minor Change Application

Figure 4 depicts the licensed and herein proposed 68 dBu contours for KJOI-LP. As indicated, the proposed 68 dBu overlaps a portion of the licensed 68 dBu contour. Therefore, the proposed modification is considered a "minor change" in facilities pursuant to Section 73.3572.

Response to Paragraph 6 - Antenna Structure Registration Number

Station KJOI-LP proposes to side-mount a Dielectric THB-C1-1H/1HD-1 directional antenna at the 15-meter level on an existing 30.2 meter tower. As indicated by Figure 6, the existing tower does not require tower registration based on the FCC's TOWAIR program.

Response to Paragraph 13 - TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed KJOI-LP operation will not create prohibited interference to other existing, authorized or proposed TV broadcast analog (NTSC) full-power stations. Interference calculations for the proposed KJOI-LP operation are summarized below.

Protected TV Station	Service Population	Proposed Interference Population
KCOY-TV, NTSC Ch. 12 Santa Maria, CA LIC (BLCT-2301)	633,130	233 (0.04%)

Response to Paragraph 13 - DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed KJOI-LP operation on channel 12 complies with the FCC's 0.5% interference threshold criteria to all allotted,

proposed or actual DTV operating facilities on channels 11, 12 & 13.¹

Response to Paragraph 13 - LPTV/TV Translator, Class A Station Protection

A study has been conducted using the provisions of Sections 74.707 and 74.708 which indicates that the KJOI-LP proposal will not create prohibited interference to other existing, authorized or proposed LPTV, TV Translator and Class A stations. Interference calculations for the proposed KJOI-LP operation are summarized below.

Protected LPTV/Class A Station	Service Population	Proposed Interference Population
KKEY-LP, LPTV Ch. 11 Bakersfield, CA (BLIVL-20031016ABY)	--	0 (0.00%)
K12HL, LPTV Ch. 12 Lake Isabella, CA (BLTIV-4462)	--	0 (0.00%)
K13YV, LPTV Ch. 13 Bakersfield, CA (BNPTVL-20000830AWQ)	--	0 (0.00%)

Environmental Considerations

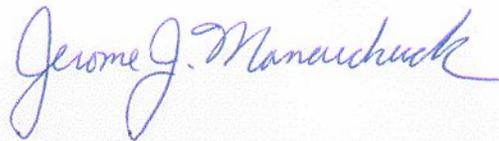
The proposed KJOI-LP television facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". The calculated power density at the base of the tower was calculated using the appropriate equation of the Bulletin.

Figure 5 depicts the vertical pattern data for the proposed directional antenna. Using a vertical relative field value of 0.168 at depression angles towards the tower base (-60° to -90° elevation), a maximum visual ERP of 3 kilowatts and 10

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. A Sun based processor computer system was employed.

percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0084 milliwatts per square centimeter (mW/cm^2), or 4.2% percent of the Commission's recommended limit of $0.20 \text{ mW}/\text{cm}^2$ for TV channel 12 applicable to general population/uncontrolled exposure areas. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the FCC's RF emission rules.

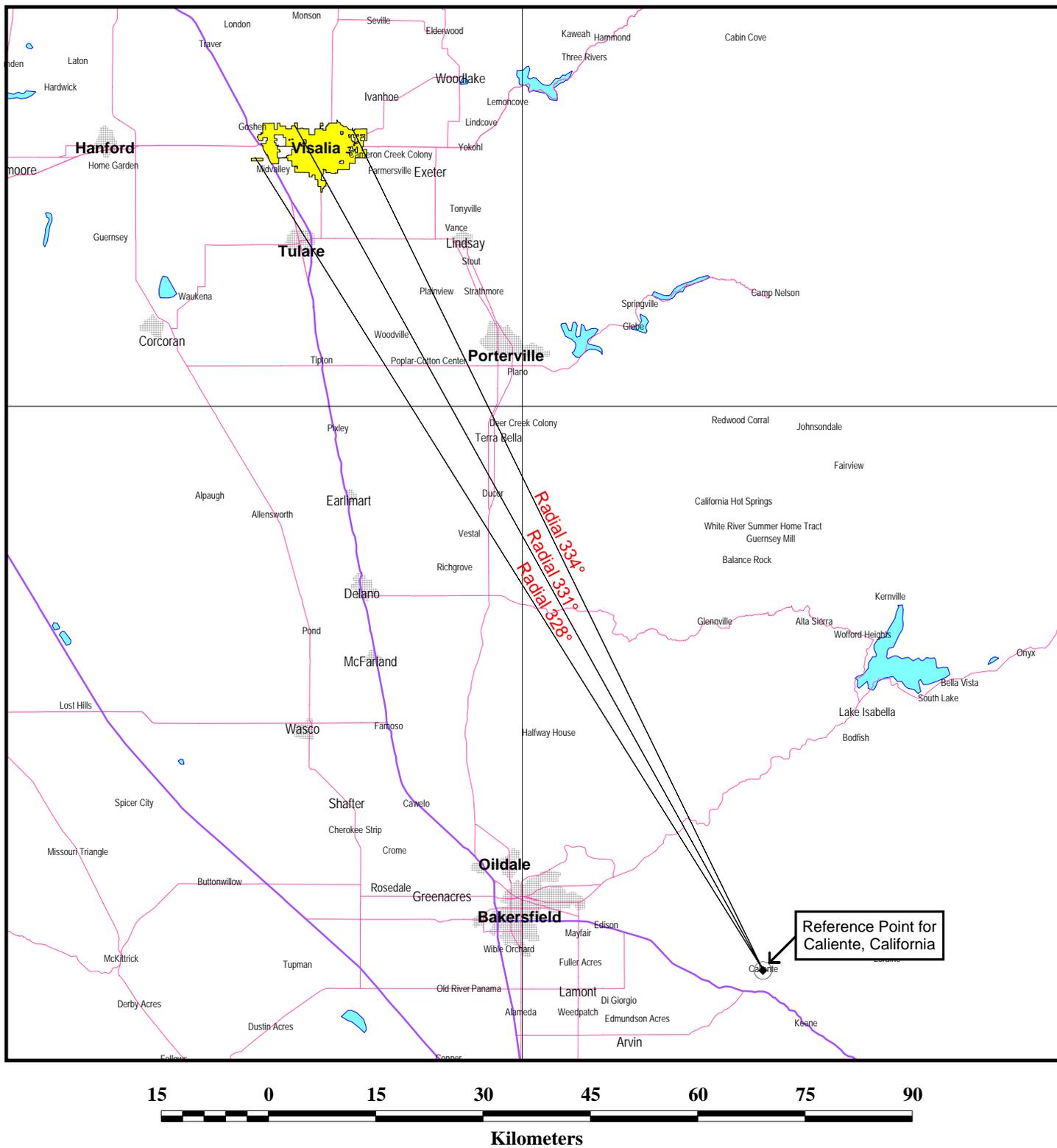
Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures 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.



Jerome J. Manarchuck

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August 17, 2006



TERRAIN PROFILES FROM CALIENTE TO VISALIA

LPTV STATION KJOI-LP
CALIENTE, CALIFORNIA
CH 12 3 KW (DA)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 1 - Sheet 2 of 4

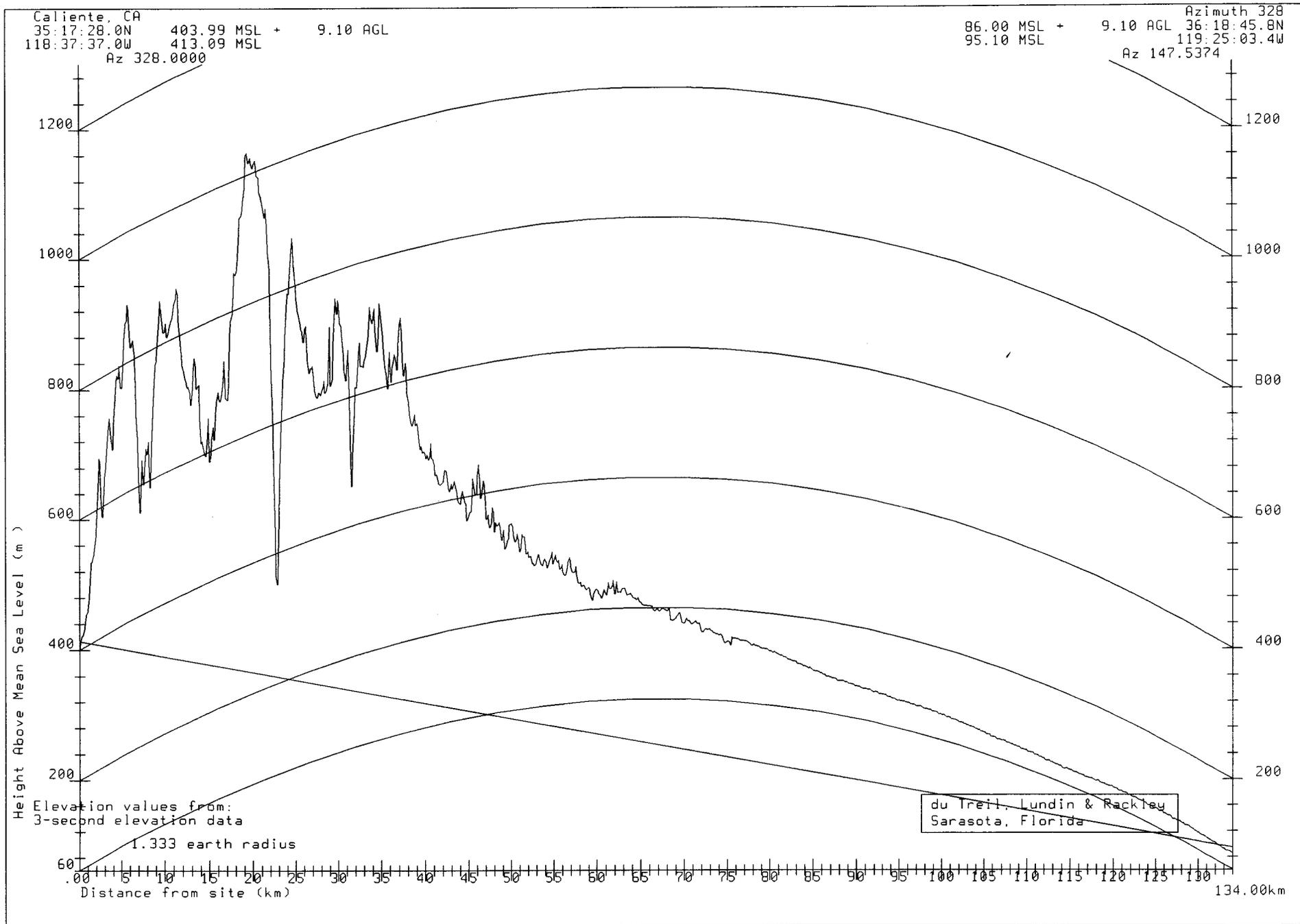
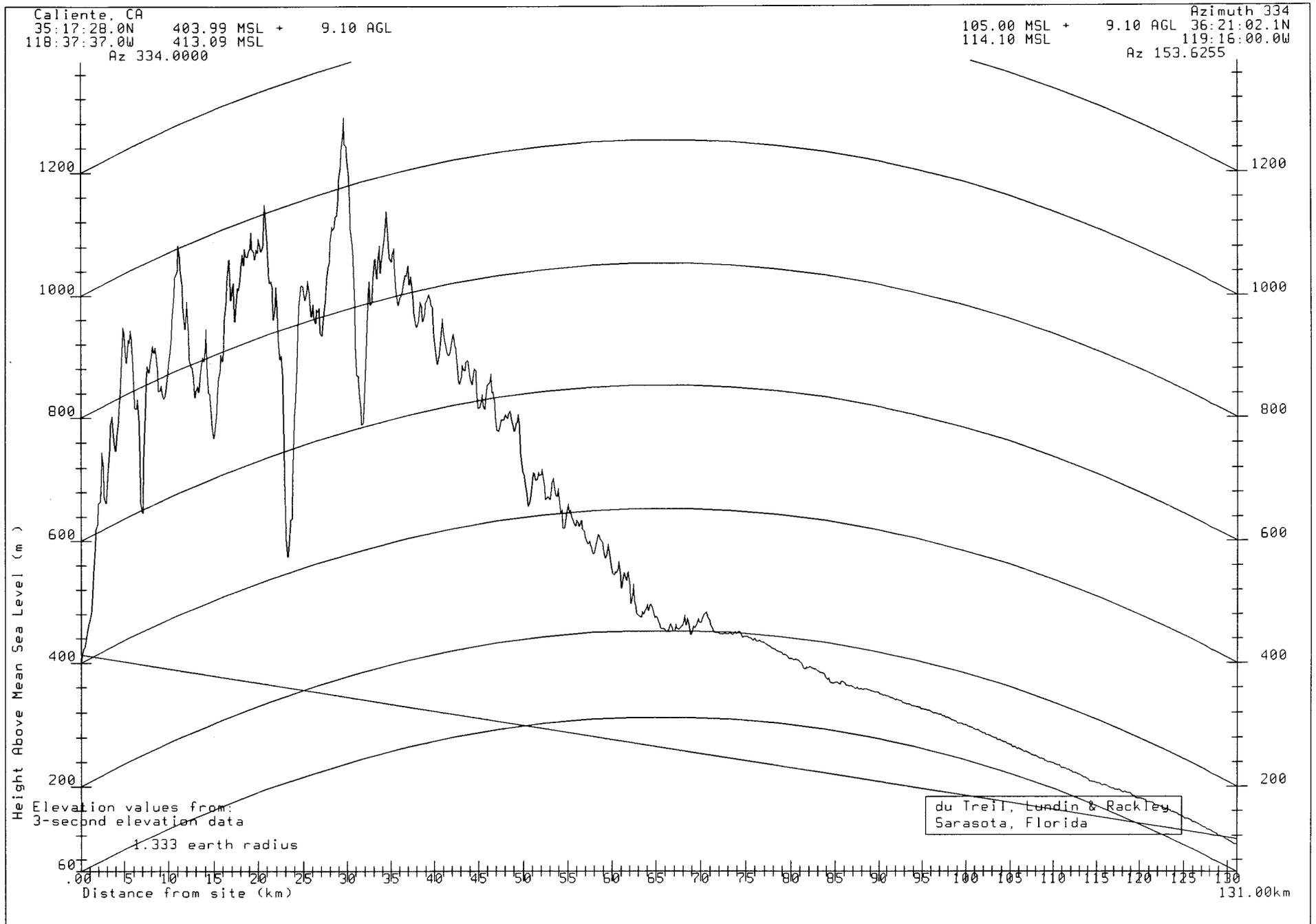
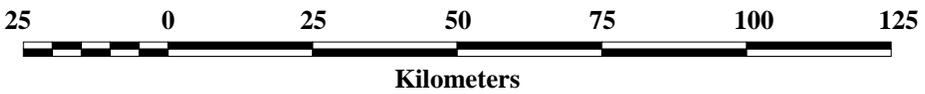
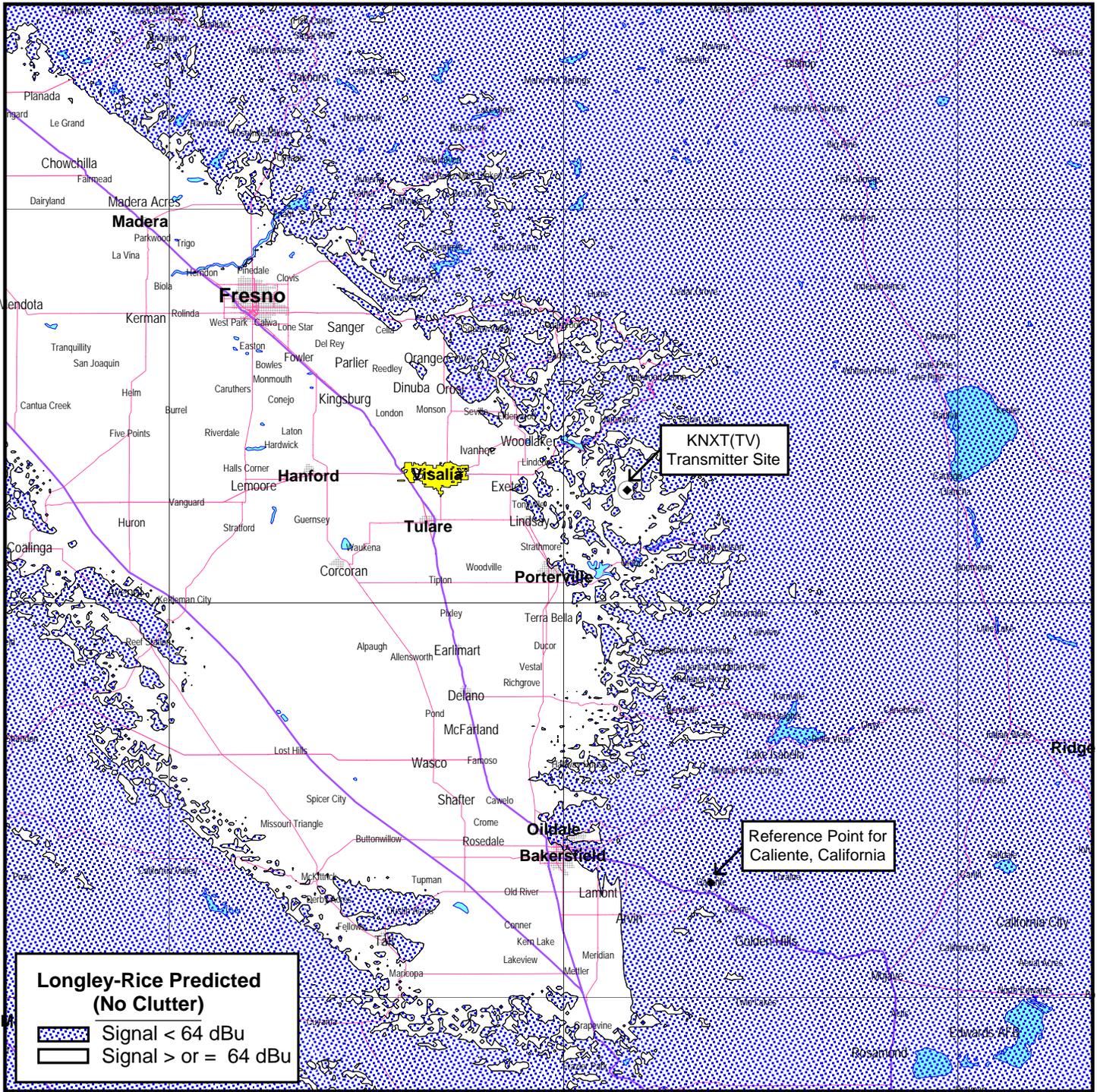


Figure 1 - Sheet 3 of 4



Figure 1 - Sheet 4 of 4

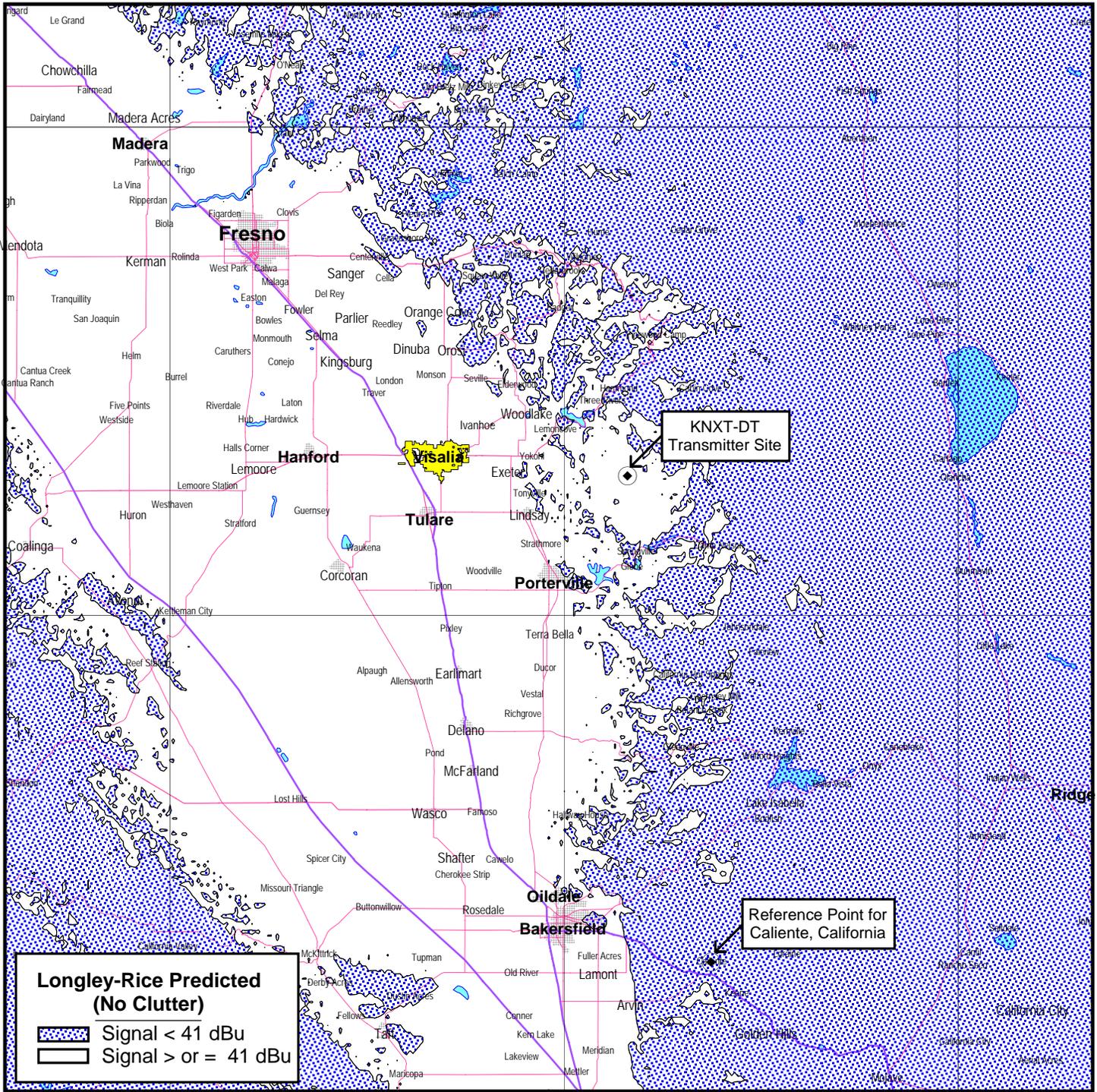




LONGLEY-RICE PREDICTED COVERAGE

TV STATION KNXT(TV)
 VISALIA, CALIFORNIA
 CH 49 2140 KW (DA) 834 M

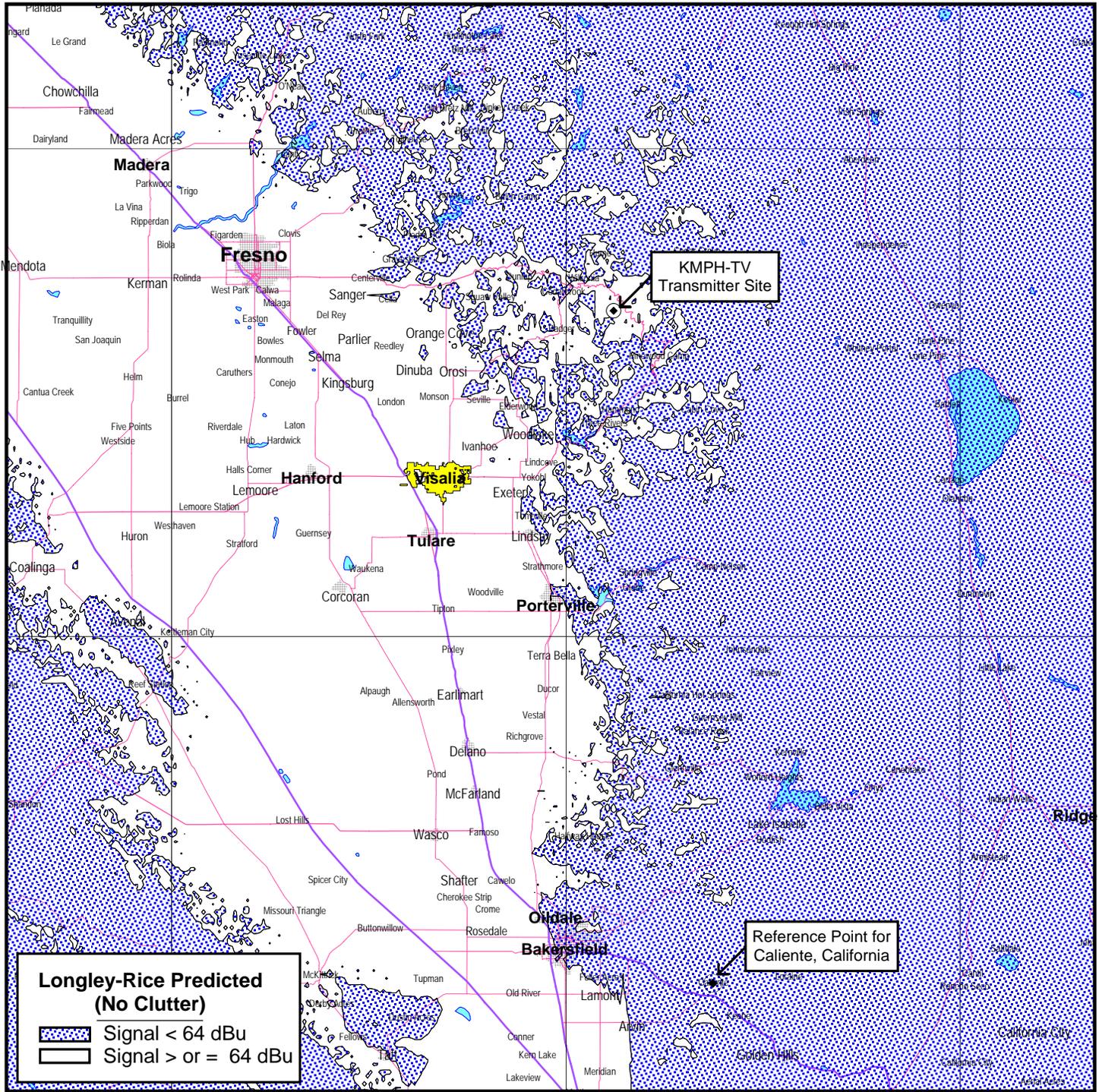
du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237



LONGLEY-RICE PREDICTED COVERAGE

DTV STATION KNXT-DT
VISALIA, CALIFORNIA
CH 50 185 KW 834 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

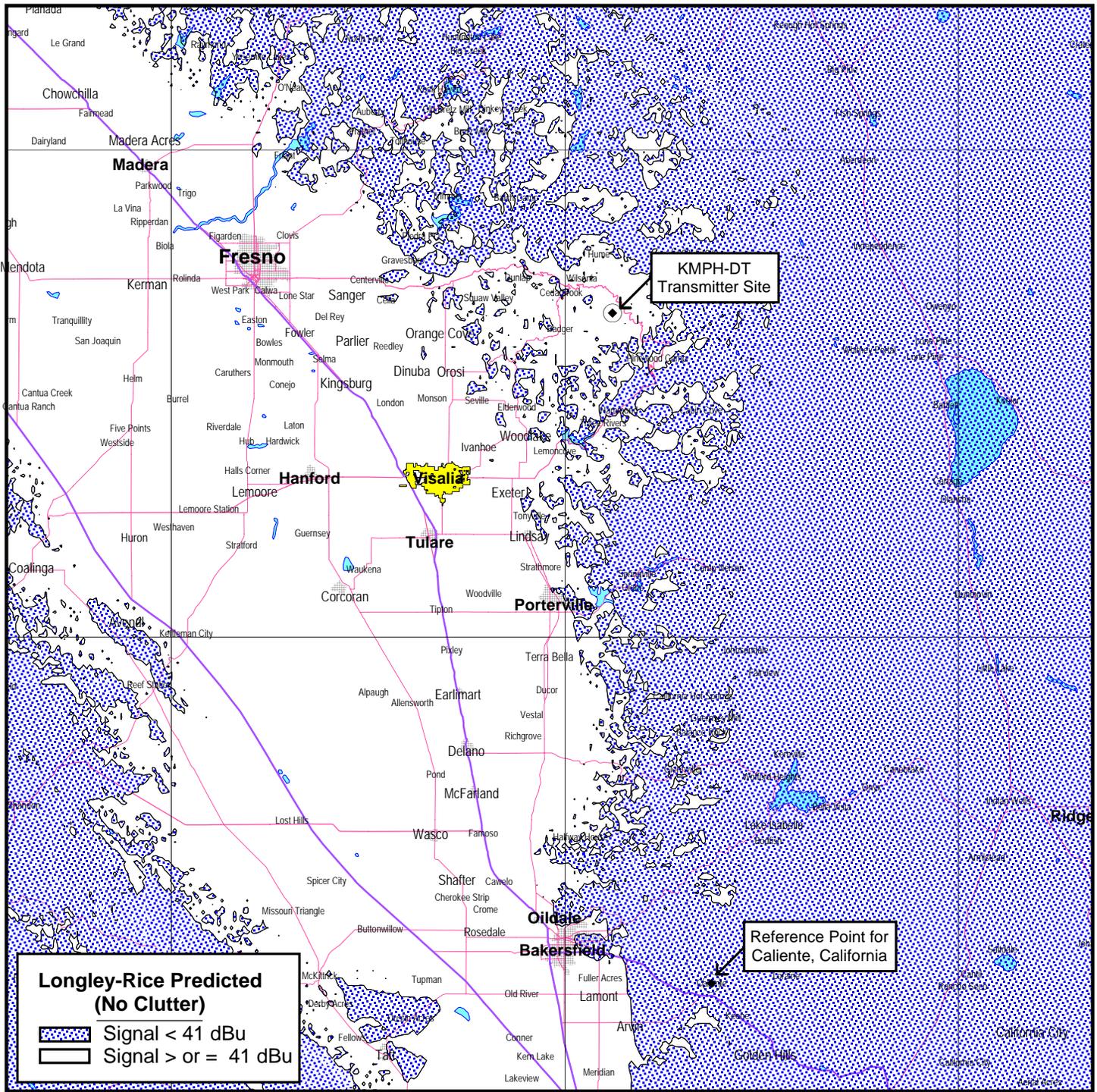


25 0 25 50 75 100 125
Kilometers

LONGLEY-RICE PREDICTED COVERAGE

TV STATION KMPH-TV
VISALIA, CALIFORNIA
CH 26 3240 KW (DA) 792 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237



LONGLEY-RICE PREDICTED COVERAGE

DTV STATION KMPH-DT
VISALIA, CALIFORNIA
CH 28 219 KW (DA) 763 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Census data selected: 1990
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 08-03-2006 Time: 09:41:54

Record Selected for Analysis

KJOI-LP BMPTVL -20051223AAG CALIENTE CA US
Channel 12 ERP 3. kW HAAT 00824 m RCAMSL 01051 m
Latitude 035-26-16 Longitude 0118-44-28
Status APP Zone Border M Offset Z
Dir Antenna Make CDB Model 00000000071267 Beam tilt N Ref Azimuth 0.0
Last update 00000000 Cutoff date 00000000 Docket
Comments
Applicant GARY M. COCOLA FAMILY TRUST; GARY M.

Cell Size for Service Analysis 2.0 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)	68.0 dBu F(50,50) (km)
0.0	0.000	204.0	1.0
45.0	0.005	33.0	2.1
90.0	0.024	33.0	3.1
135.0	0.000	202.5	1.0
180.0	0.045	608.8	14.0
225.0	1.844	733.6	47.2
270.0	2.893	824.9	53.2
315.0	0.785	570.7	34.6

Contour Overlap Evaluation from LPTV Station to Full Service TV & DTV

Contour overlap to station
KCOY-TV 12 SANTA MARIA CA BLCT 2301

Contour Overlap Evaluation from LPTV to Full Service TV & DTV Complete

Contour Overlap Evaluation from LPTV Station to LPTV Stations

Station inside contour of station
KKEY-LP 11 BAKERSFIELD CA BLTVL 20031016ABY

Contour overlap to station
K12HL 12 LAKE ISABELLA CA BLTTV 4462

Station inside contour of station
K13YV 13 BAKERSFIELD CA BNPTVL 20000830AWQ

Contour Overlap Evaluation from LPTV to LPTV Stations Complete

Contour Overlap to Proposed Station

Station
KKEY-LP 11 BAKERSFIELD CA BLTVL20031016ABY

Is inside contour of station
KJOI-LP 12 CALIENTE CA BMPTVL 20051223AAG

Station
K12HL 12 LAKE ISABELLA CA BLTTV4462 causes

Contour overlap to station
KJOI-LP 12 CALIENTE CA BMPTVL 20051223AAG

Station
K13YV 13 BAKERSFIELD CA BNPTVL20000830AWQ

Is inside contour of station
KJOI-LP 12 CALIENTE CA BMPTVL 20051223AAG

Contour Overlap Evaluation to Proposed Station Complete

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance
Distance to border = 355.5km

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

	Proposed Station			
Channel	Call	City/State	ARN	
12	KJOI-LP	CALIENTE CA	BMPTVL	20051223AAG

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
11	KKEY-LP	BAKERSFIELD CA	0.2	LIC	BLTVL	-20031016ABY
12	K12HL	LAKE ISABELLA CA	40.1	LIC	BLTTV	-4462
12	KCOY-TV	SANTA MARIA CA	143.7	LIC	BLCT	-2301
13	K13YV	BAKERSFIELD CA	0.2	CP	BNPTVL	-20000830AWQ

%%%

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
12	KJOI-LP	CALIENTE CA	BMPTVL	-20051223AAG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
11	KKEY-LP	BAKERSFIELD CA	0.2	LIC	BLTVL	-20031016ABY
12	K12HL	LAKE ISABELLA CA	40.1	LIC	BLTTV	-4462
12	K12QD-D	RIDGECREST, ETC. CA	83.8	CP	BPTTV	-20041129ABP
12	KNTV-DT	SAN JOSE CA	334.4	PLN	DTVPLN	-DTVP0095
12	KCOY-TV	SANTA MARIA CA	143.7	LIC	BLCT	-2301
12	KTNV	LAS VEGAS NV	338.6	LIC	BLCDT	-20020501AAA
12	KTNV	LAS VEGAS NV	338.6	LIC	BPRM	-20000418AAE
13	K13YV	BAKERSFIELD CA	0.2	CP	BNPTVL	-20000830AWQ

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 5 KJOI-LP
Before Analysis

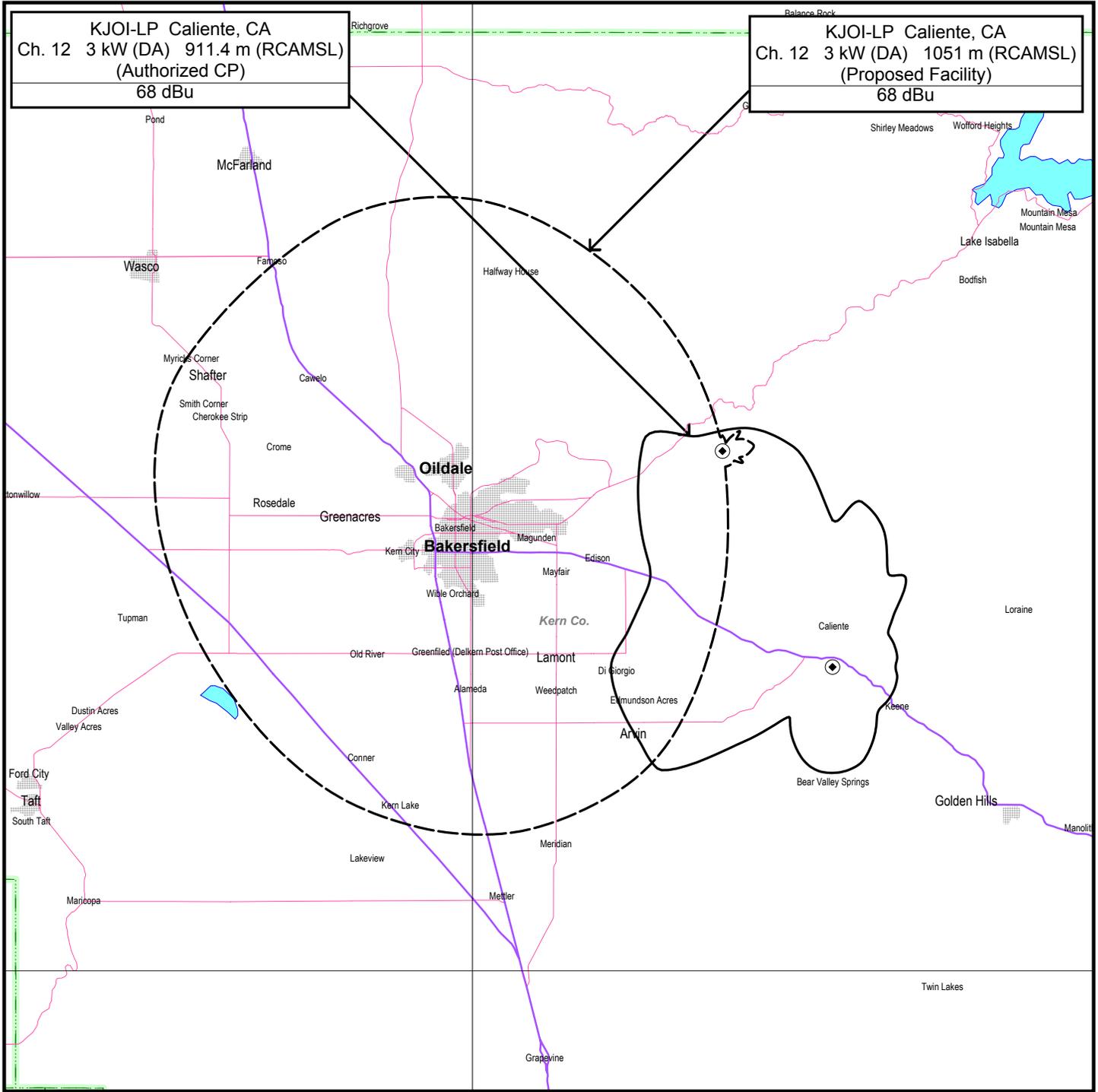
Results for: 12N CA CALIENTE	BMPTVL	20051223AAG	APP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	355763	2550.0	
not affected by terrain losses	355763	2526.1	
lost to NTSC IX	10353	411.0	
lost to additional IX by ATV	0	0.0	
lost to all IX	10353	411.0	

Potential Interfering Stations Included in above Scenario 1

11N CA BAKERSFIELD BLTVL 20031016ABY LIC
#####

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Figure 4



KJOI-LP Caliente, CA
Ch. 12 3 kW (DA) 911.4 m (RCAMSL)
(Authorized CP)
68 dBu

KJOI-LP Caliente, CA
Ch. 12 3 kW (DA) 1051 m (RCAMSL)
(Proposed Facility)
68 dBu

10 0 10 20 30 40 50 60 70
Kilometers

FCC PREDICTED 68 dBu COVERAGE CONTOURS

LPTV STATION KJOI-LP
CALIENTE, CALIFORNIA
CH 12 3 KW (MAX-DA) 1051 M (RCAMSL)

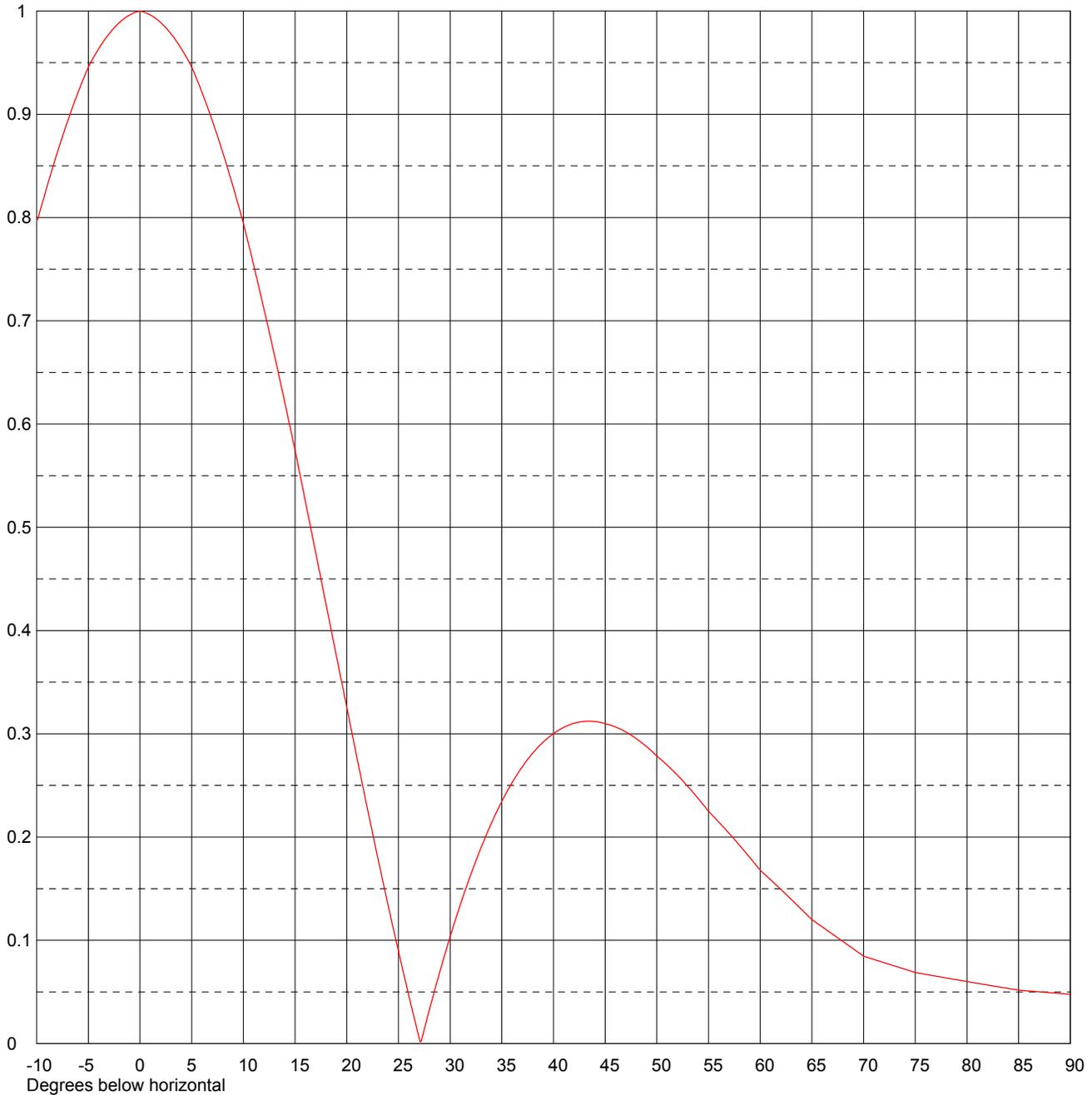
du Treil, Lundin & Rackley, Inc. Sarasota, Florida



Proposal Number
Date **21 Dec 2005**
Call Letters
Location
Customer
Antenna Type **THB-C1-1H/1HD-1**
Revision
Channel **12**

ELEVATION PATTERN

RMS Gain at Main Lobe	2.4 (3.80 dB)	Beam Tilt	0.00 Degrees
RMS Gain at Horizontal	2.4 (3.80 dB)	Frequency	207.00 MHz
Calculated / Measured	Calculated	Drawing #	2H024000-2070-90



Remarks:



Antenna Structure Registration

[FCC](#) > [WTB](#) > [ASR](#) > [Online Systems](#) > TOWAIR

[FCC Site Map](#)

TOWAIR Determination Results

[? HELP](#)

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*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates

Latitude	35-26-16.0 north
Longitude	118-44-31.0 west

Measurements (Meters)

Overall Structure Height (AGL)	30.2
Support Structure Height (AGL)	30.2
Site Elevation (AMSL)	1036

Structure Type

TOWER - Free standing or Guyed Structure used for Communications Purposes

[Tower Construction Notification](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Note: Notification does NOT replace [Section 106 Consultation](#).

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ASR Online