

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR KNDF-LP

KNDF-LP
FCC File No. BLTTL-19980928JD
Facility ID. No. 68574

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for displacement relief and the grant of a construction permit for KNDF-LP (Facility ID. 68574; File No. BLTTL-19980928JD). Station KNDF-LP is presently licensed to operate on NTSC channel 57, and, as such, is located on an out of core channel. This displacement application proposes to relocate KNDF-LP to channel 39.

The proposed operational parameters for KNDF-LP are as follows:

Frequency Offset:	MINUS OFFSET
Antenna radiation center height above ground level:	125 meters
Maximum effective radiated power:	49 KW
Antenna type and model #:	AND ALP16L1-HSOC
Antenna Orientation	90 Degrees
Transmitter Site	26-15-22.7 N 98-13-48.9 W

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, 74.708 and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, Class A LPTV, LPTV, or Land Mobile facilities other than:

NTSC Full-Power station KTLM, Channel 40, Rio Grande, TX (Facility ID. 62354)

DTV KMBH, Channel 38, Harlingen, TX (Facility ID. 56079)

LPTV NEW, Channel 39, Corpus Christi, TX (Facility ID. 128603)

However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards these three facilities. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that there will be absolutely no prohibited interference from the operation of the proposed facility. Accordingly, applicant requests a waiver of Sections 74.705, 74.706, and 74.707 based upon the results of the OET 69 analysis.

Full Service NTSC Facility

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power station listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KTLM, CH 40Z RIO GRANDE CITY, TX FILE NO. BLCT-19991019AAU LICENSE	541,962	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause no interference to KTLM.

DTV Facility

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 74.706, with regard to the effect of the proposed station on the following DTV facility:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KMBH, CH 38 HARLINGEN, TX DTV ALLOTMENT	661,376	0 (0.0%)
KMBH, CH 38 HARLINGEN, TX FILE NO. BLEDT-20031023ABO LICENSE	672,946	0 (0.0%)

As indicated in the above table, there will be no prohibited interference caused by the operation of the proposed station to KMBH.

LPTV Facility

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 74.707, with regard to the effect of the proposed station on the following LPTV facility:

NEW, CH 39 CORPUS CHRISTI, TX FILE NO. BNPTTL-20000831BEB APPLICATION	247,770	0 (0.0%)
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As indicated in the above table, there will be no prohibited interference caused by the operation of the proposed station to the aforementioned LPTV facility.

Land Mobile

There are no cochannel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 39 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 49 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is .054 milliwatt per square centimeter (MW/CM²), or 13% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.414 MW/CM² for TV channel 39). However, as this is a multi-user site, measurements will be made to substantiate compliance with the 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.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.