

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR LPTV K67BL

K67BL
FCC File No. BLTT-2168
Facility ID. No. 52925

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 K67BL (BLTT-2168, Facility ID. 52925). K67BL is presently licensed to out of core NTSC channel 67. Applicant proposes to move K67BL to in core NTSC channel 26.

The proposed operational parameters for K67BL are as follows:

Frequency Offset:	PLUS OFFSET
Antenna radiation center height above ground level:	330 meters
Maximum effective radiated power:	75 KW
Maximum ERP toward Horizon	6.44 KW
Antenna type and model #:	ANT ACB16CR
Antenna Orientation	345 Degrees
Antenna Mechanical Downtilt	3.5 Degrees
Transmitter Site	32-35-19 N 96-58-05 W

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than NTSC Full-Power stations KDAF, Channel 33, Dallas, TX, KDFI, Channel 27, Dallas, TX, KMPX, Channel 29, Decatur, TX, KUVN, Channel 23, Garland, TX; LPTV facility K25FW, Channel 25, Corsicana, TX; and DTV facilities KTEN-DT, Channel 26, Ada, OK, and KXXV-DT, Channel 26, Waco, TX. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations. 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 no prohibited interference will be caused by 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 with regard to the aforementioned NTSC Full Power, DTV, and LPTV facilities.**

The amended station will employ 3.5 degrees mechanical downtilt to protect other facilities in the area. The tilt was applied at 345 degrees relative to true north, which is also the orientation of the antenna. The maximum power at the horizon is 6.44 KW ERP. The maximum power at the downtilted angle (3.5) degrees is 75 KW.

Full Service NTSC Facilities

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 stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KDAF, CH 33 DALLAS, TX FILE NO. BLCT-20000821ACP LICENSE	4,021,513	0 (0.0%)
KDFI-TV, CH 27 DALLAS, TX FILE NO. BLCT-20000207ACD LICENSE	4,034,754	0 (0.0%)
KDFI-TV, CH 27 DALLAS, TX FILE NO. BPCT-20000121AAQ CONSTRUCTION PERMIT	4,058,906	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BLCT-19860926KU LICENSE	3,649,293	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BMPCT-20011210AAB CONSTRUCTION PERMIT	4,067,925	0 (0.0%)
KMPX, CH 29 DECATUR, TX FILE NO. BLCT-19930927KF LICENSE	3,723,881	0 (0.0%)
KDFI-TV, CH 27 DALLAS, TX FILE NO. BMPCT-20020613AAN APPLICATION	4,040,285	0 (0.0%)

As shown by the table above, the facility proposed by this application will not cause objectionable interference to existing NTSC facilities or construction permits. Specifically, no interference will be caused above 0.5%, the “rounding allowance” permitted for such calculations.

DTV Facilities

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 74.703 and 74.706, with regard to the effect of the proposed station on the following DTV facilities:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KTEN-DT, CH 26 ADA, OK FILE NO. BPCDT-19991007AAW CONSTRUCTION PERMIT	464237	273 (0.1%)
KXXV-DT, CH 28 WACO, TX FILE NO. BPCDT-19991020ABZ CONSTRUCTION PERMIT	1,078,398	1476 (0.1%)
KTEN, CH-26 ADA, OK DTV ALLOTTMENT	442,099	0 (0.0%)
KVVX, CH28 WACO, TX DTV ALLOTTMENT	700,492	13 (.002%)

As indicated in the above table, there will be virtually zero interference caused by the operation of the proposed station to any DTV facilities and the deminimis predicted interference is far below the .5% rounding allowance permitted for such calculations.

LPTV Facilities

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 facilities:

Protected LPTV Station	FCC Service Population	Proposed Interference Population
K25FW, CH 25 CORSICANA, TX FILE NO. BLTTL-20000320AAR LICENSE	1,446,574	6168 (0.4%)
K25FW, CH 25 CORSICANA, TX FILE NO. BMPTTL-20000207ABE CONSTRUCTON PERMIT MOD	1,298,179	5827 (0.4%)

As the above table indicates, the proposed facility will not cause objectionable interference to K25FW.

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 26 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 75 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.011 milliwatt per square centimeter (MW/CM²), or 3% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.362 MW/CM² for TV channel 26). 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.