

## **ENGINEERING EXHIBIT**

### **Application for Digital Flash-Cut Construction Permit**

prepared for

**Caballero Acquisition Inc.**  
KVMM-CA Santa Barbara, CA  
Facility ID 18741  
Ch. 41 (digital) 15 kW

*Caballero Acquisition Inc. ("CAI")* is the licensee of Class A Television station KVMM-CA, analog Channel 41, Santa Barbara, CA, Facility ID 18741 (BLTTLA-20040625AAH). *CAI* herein proposes herein to flash-cut KVMM-CA to digital operation on Channel 41. The instant application is intended to be filed on August 4, 2008 in response to the FCC's lifting of the August 3, 2004 "freeze" concerning displacement channel relief and expansion in service area.<sup>1</sup>

The proposed facility will operate on Channel 41 using a "stringent" out of channel emission mask. **Figure 1** depicts the 51 dBμ coverage contours of the proposed facility, as well as that of the KVMM-CA licensed analog Channel 41 facility. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna is a PSI model PSILP8BB-41-CP and will employ circular polarization. The antenna will be side-mounted on the existing antenna support structure in place of the licensed KVMM-CA antenna. The tower structure is not presently registered with the FCC, as it is an existing structure of less than 61 meters overall height above ground and there are no known landing areas within 8 km according to the FCC's "TOWAIR" slope test program. No marking or lighting specifications are presently required. Since no change to the structure's overall height is proposed, FAA notification and commensurate FCC registration are not necessary.

---

<sup>1</sup>Public Notice "Commission Lifts the Freeze On the Filing of Certain Class A Television Applications Effective August 4, 2008" DA 08-1644, released July 14, 2008.

A detailed interference study per OET Bulletin 69<sup>2</sup> shows that the proposal complies with the Commission's interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. The results, summarized in **Table 1**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations).

The nearest FCC monitoring station is 407 km distant at Livermore, CA. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The site is not located within the areas requiring coordination with "quiet" zones specified in §73.1030(a) and (b). The site location is beyond the border areas requiring international coordination.

One licensed AM station is located within 3.2 km of the site (KTMS 990 kHz, Santa Barbara, CA, 0.6 km distant). The instant proposal would replace an antenna on an existing supporting structure which is not base insulated or detuned at an AM frequency, and would not change the overall structure height. Further, the structure's overall height is less than 10 electrical degrees at KTMS' frequency. In accordance with recent FCC Staff policy (*e.g.*, see BPH-20061220ABW), coordination with the nearby AM station is therefore not expected to be necessary, and it is requested that a condition requiring AM station pattern measurements not be placed on the KVMM-CA Construction Permit.

---

<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

### **Human Exposure to Radiofrequency Electromagnetic Field (Environmental)**

The proposed transmitting antenna will be installed on an existing antenna support structure. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The transmitting location is a mountaintop site in the Santa Ynez Mountains overlooking Santa Barbara. There are numerous other transmitting facilities at this site area situated on various antenna supporting structures. *CAI* will participate in a radiofrequency ("RF") electromagnetic field exposure safety program, along with other broadcasters and FCC licensees that utilize the mountaintop antenna site area. Following construction of the proposed facility, *CAI* will conduct RF exposure measurements (and/or detailed calculations) to evaluate the level of RF exposure resulting from the KVMM-CA digital facility. As necessary, based on these results and considering all emitters, appropriate exposure abatement procedures will be established and followed, in order to comply with the Commission's exposure limits. Such abatement procedures may involve the restriction of access to certain areas and/or facility modifications to reduce RF levels.

Considering the post-construction measurement and an appropriate abatement program, the general public and workers will not be exposed to RF levels in excess of the Commission's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, authorized personnel will be trained and/or supervised as necessary for access to any "controlled" areas. *CAI* will coordinate exposure procedures with all pertinent stations.

## **Certification**

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.

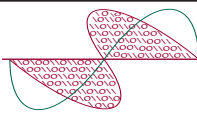
Joseph M. Davis, P.E.  
August 1, 2008

**Chesapeake RF Consultants, LLC**  
11993 Kahns Road  
Manassas, VA 20112  
703-650-9600

## List of Attachments

Figure 1      Coverage Contour Comparison  
Table 1      Interference Analysis Results Summary  
Form 301-CA   Saved Version of Engineering Sections from FCC Form at Time of Upload

*This material was entered August 1, 2008 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*



**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

**Figure 1**  
**Coverage Contour Comparison**  
**KVMM-CA Santa Barbara, CA**  
**Facility ID 18741**  
**Ch. 41 (digital) 15 kW**

prepared for  
**Caballero Acquisition Inc.**

August, 2008

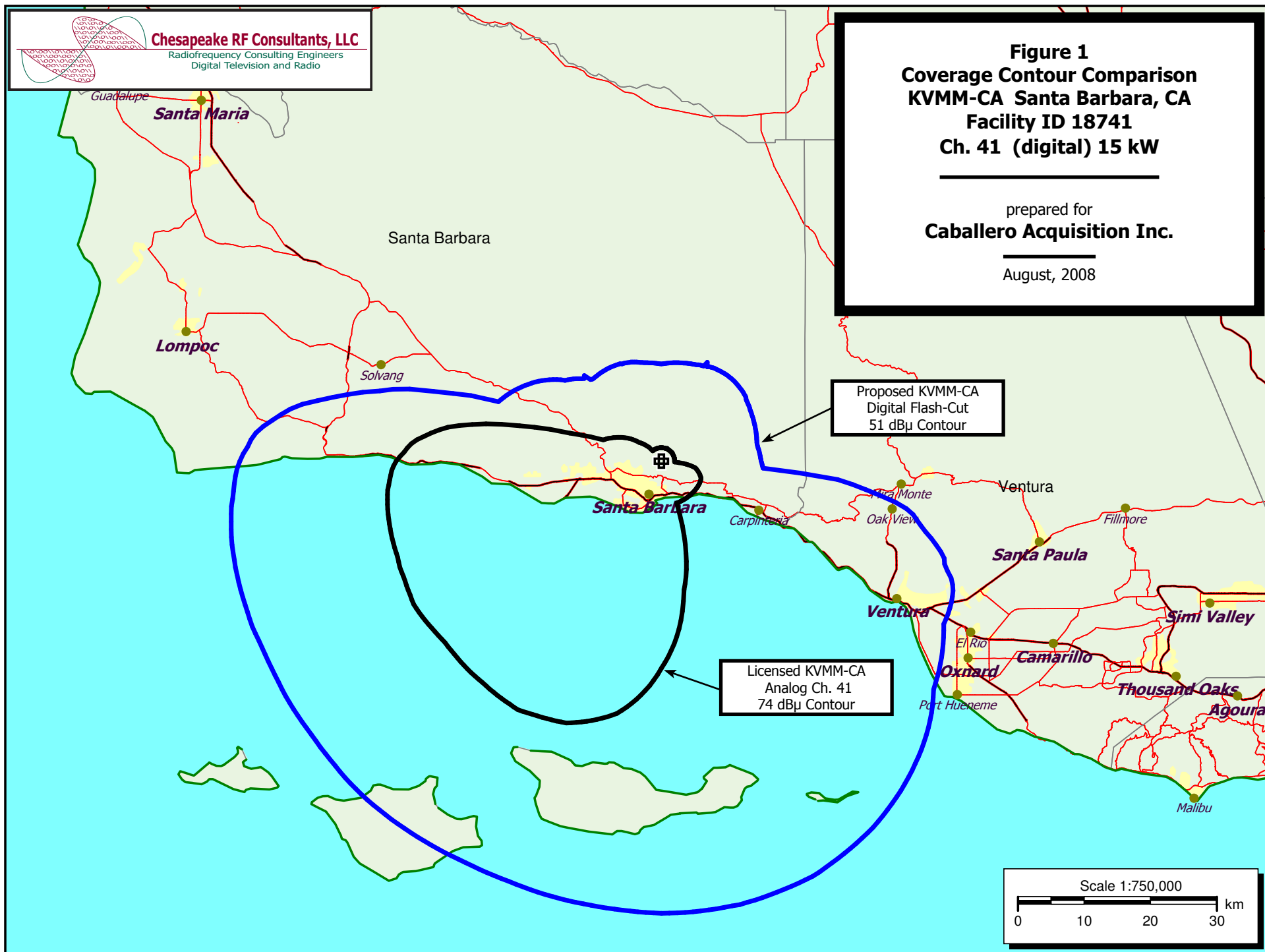


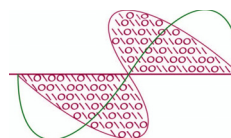
Table 1

**Interference Analysis Results Summary**

prepared for

**Caballero Acquisition Inc.**

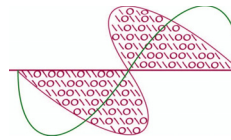
KVMM-CA Santa Barbara, CA

**Chesapeake RF Consultants, LLC**Radiofrequency Consulting Engineers  
Digital Television and Radio

Ch.	Call	City/State	Dist	Status	Application Ref. No.	---Population (1990 Census)---	
			(km)			Baseline	New Interference
26	K26GN	LANCASTER CA	135.0	CP	BPTTL-20080425ABG	---	none
26	K26GN	LANCASTER CA	135.0	LIC	BLTT-20011226AAL	---	none
26	K26FT	SANTA BARBARA CA	0.1	LIC	BLTT-20020418AAW	---	none
33	KTAS	SAN LUIS OBISPO CA	133.6	LIC	BLCT-19900416KF	---	none
33	KSMV-LP	SIMI VALLEY CA	100.3	APP	BPTTL-20010514AAW	---	none
34	KVPT-LP	BAKERSFIELD CA	137.6	LIC	BLTT-20070223ABA	---	none
34	NEW	BAKERSFIELD CA	123.0	APP	BNPTTL-20000831AWI	---	none
38	KNXT-LP	BAKERSFIELD CA	137.7	LIC	BLTTL-20070524ADC	---	none
38	KPAL-LP	PALMDALE CA	134.3	LIC	BLTTL-19900723II	---	none
38	KPMR	SANTA BARBARA CA	26.7	LIC	BMLCT-20051228ACS	---	none
38	KSKJ-CA	VAN NUYS CA	112.4	LIC	BLTTA-20040625AAS	---	none
39	960328KH	BAKERSFIELD CA	137.8	APP	BPET-19960328KH	---	none
40	NEW	BARSTOW CA	184.1	APP	BDCCDTL-20060922ACI	---	none
40	NEW	BARSTOW CA	184.1	APP	BSFDTL-20060630CDQ	---	none
40	KTBN-TV	SANTA ANA CA	150.6	LIC	BLCT-19830418KH	---	none
40	KWSM-LP	SANTA MARIA CA	67.8	LIC	BLTTL-20030414AAS	---	none
41	K41JN	BAKERSFIELD CA	123.0	CP	BNPTTL-20000831AUF	---	none
41	K41JN	CALIENTE CA	147.7	CP MOD	BMP TTL-20080219BJQ	---	none
41	K41JN	CALIENTE CA	124.8	CP MOD	BMP TTL-20070709AGG	---	none
41	K41CY	DAGGETT CA	258.5	LIC	BLTT-19900817IE	---	none
41	KTFF-LP	FRESNO CA	290.6	LIC	BLTTL-20020722AAJ	---	none
41	NEW	GONZALES CA	289.4	APP	BSFDTL-20060630AZK	---	none
41	NEW	INDIO/PALM SPRINGS CA	305.6	APP	BDCCDTL-20070410AAT	---	none
41	KLCS	LOS ANGELES CA	150.6	LIC	BLEDT-20030507AAS	12,553,038	14,168 (0.14%)
41	KLCS-DT	LOS ANGELES CA	150.6	PLN	DTVPLN-DTVP1151	12,553,038	38,445 (0.31%)
41	KLCS	LOS ANGELES CA	150.6	CP	BPEDT-20080326AJE	12,553,038	13,488 (0.11%)
41	K41CB	LUCERNE VALLEY CA	256.4	LIC	BLTT-19880428IC	---	none
41	NEW	MONTEREY CA	303.3	APP	BSFDTL-20060630CFD	---	none
41	K41GO	RIDGECREST CA	213.8	LIC	BLTT-20040212ADO	---	none
41	K41GO	RIDGECREST CA	213.8	CP	BPTT-20041216AAS	---	none
41	K41GO	RIDGECREST CA	213.8	CP	BDFCDTT-20051004ADL	---	none
41	KZSD-LP	SAN DIEGO CA	298	LIC	BLTTL-20030507AAF	---	none
41	KLXV-DT	SAN JOSE CA	352.9	PLN	DTVPLN-DTVP1152	---	none
41	NEW	SAN LUIS OBISPO CA	133.6	APP	BSFDTL-20060630CKJ	---	none
41	NEW	SANTA MARIA CA	96.4	APP	BSFDTL-20060630AWX	278,176	0 (0.00%)

**Table 1****Interference Analysis Results Summary**

(page 2 of 2)

**Chesapeake RF Consultants, LLC**Radiofrequency Consulting Engineers  
Digital Television and Radio

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>---Population (1990 Census)---</u>	
			<u>(km)</u>			<u>Baseline</u>	<u>New Interference</u>
41	NEW	YUCCA VALLEY CA	267.4	APP	BDCCDTT-20070411AAK	---	none
41	KPVM-LP	PAHRUMP NV	388.6	LIC	BLTTL-20040205ADL	---	none
42	KZKC-LP	BAKERSFIELD CA	137.7	CP	BDFCDTL-20061122AEA	---	none
42	KZKC-LP	BAKERSFIELD CA	137.7	LIC	BLTTL-20050428AAC	---	none
42	KWHY-TV	LOS ANGELES CA	150.9	LIC	BLCDDT-20060629AFB	12,167,487	34,104 (0.28%)
42	KWHY-DT	LOS ANGELES CA	150.2	PLN	DTVPLN-DTVP1183	---	none
42	KSBO-CA	SAN LUIS OBISPO CA	133.6	LIC	BLTTL-19980902JA	---	none
43	KPMC-LP	BAKERSFIELD CA	137.7	LIC	BLTTL-20080418AAF	---	none
43	KTSB-LP	SANTA BARBARA CA	0.1	LIC	BLTTL-19970620JD	---	none
44	KFUL-LP	SAN LUIS OBISPO CA	133.6	LIC	BLTTL-20051017ABX	---	none
45	KUVI-TV	BAKERSFIELD CA	137.8	LIC	BLCT-19881229KF	---	none
45	K45DU	VENTURA CA	33.9	LIC	BLTT-19960124JF	---	none
49	KPXA-LP	SANTA MARIA CA	96.4	CP	BDISTTL-20070320AMK	---	none

**SECTION III PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOSEPH M. DAVIS, P.E.	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 8/1/2008	
Mailing Address CHESAPEAKE RF CONSULTANTS LLC 11993 KAHNS ROAD		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20112-
Telephone Number (include area code) 7036509600	E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**SECTION III - Engineering (Digital)****TECHNICAL SPECIFICATIONS**

Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

**TECH BOX**

1.	Channel Number: 41																																																																																				
2.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 34 Minutes 27 Seconds 57 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 119 Minutes 40 Seconds 38 <input checked="" type="radio"/> West <input type="radio"/> East																																																																																				
3.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable [Exhibit 8] <input type="checkbox"/> Notification filed with FAA																																																																																				
4.	Antenna Location Site Elevation Above Mean Sea Level: 640.2 meters																																																																																				
5.	Overall Tower Height Above Ground Level: 8 meters																																																																																				
6.	Height of Radiation Center Above Ground Level: 3.7 meters																																																																																				
7.	Maximum Effective Radiated Power (ERP): 15 kW																																																																																				
8.	Transmitter Output Power: 1.4 kW																																																																																				
9.	a. Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://fjallfoss.fcc.gov/prod/cdbforms/pubacc/prod/cdb_pa.htm">CDBS Public Access</a> (http://fjallfoss.fcc.gov/prod/cdbforms/pubacc/prod/cdb_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. <input type="radio"/> Nondirectional <input checked="" type="radio"/> Directional "Off-the-shelf" <input checked="" type="radio"/> Directional composite  Manufacturer PSI Model PSILP8BB-41-CP CIRCULARLY POLARIZED  b. Electrical Beam Tilt: 3 degrees <input type="checkbox"/> Not Applicable  c. Directional Antenna Relative Field Values: <input type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf") Rotation (Degrees): 220 <input type="checkbox"/> No Rotation <table><thead><tr><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th></tr></thead><tbody><tr><td>0</td><td>1</td><td>10</td><td>0.98</td><td>20</td><td>0.95</td><td>30</td><td>0.96</td><td>40</td><td>0.98</td><td>50</td><td>0.97</td></tr><tr><td>60</td><td>0.89</td><td>70</td><td>0.72</td><td>80</td><td>0.52</td><td>90</td><td>0.33</td><td>100</td><td>0.24</td><td>110</td><td>0.24</td></tr><tr><td>120</td><td>0.23</td><td>130</td><td>0.21</td><td>140</td><td>0.2</td><td>150</td><td>0.21</td><td>160</td><td>0.22</td><td>170</td><td>0.24</td></tr><tr><td>180</td><td>0.25</td><td>190</td><td>0.24</td><td>200</td><td>0.22</td><td>210</td><td>0.21</td><td>220</td><td>0.2</td><td>230</td><td>0.21</td></tr><tr><td>240</td><td>0.23</td><td>250</td><td>0.24</td><td>260</td><td>0.24</td><td>270</td><td>0.33</td><td>280</td><td>0.52</td><td>290</td><td>0.72</td></tr><tr><td>300</td><td>0.89</td><td>310</td><td>0.97</td><td>320</td><td>0.98</td><td>330</td><td>0.96</td><td>340</td><td>0.95</td><td>350</td><td>0.98</td></tr></tbody></table> Additional Azimuths	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0	1	10	0.98	20	0.95	30	0.96	40	0.98	50	0.97	60	0.89	70	0.72	80	0.52	90	0.33	100	0.24	110	0.24	120	0.23	130	0.21	140	0.2	150	0.21	160	0.22	170	0.24	180	0.25	190	0.24	200	0.22	210	0.21	220	0.2	230	0.21	240	0.23	250	0.24	260	0.24	270	0.33	280	0.52	290	0.72	300	0.89	310	0.97	320	0.98	330	0.96	340	0.95	350	0.98
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value																																																																										
0	1	10	0.98	20	0.95	30	0.96	40	0.98	50	0.97																																																																										
60	0.89	70	0.72	80	0.52	90	0.33	100	0.24	110	0.24																																																																										
120	0.23	130	0.21	140	0.2	150	0.21	160	0.22	170	0.24																																																																										
180	0.25	190	0.24	200	0.22	210	0.21	220	0.2	230	0.21																																																																										
240	0.23	250	0.24	260	0.24	270	0.33	280	0.52	290	0.72																																																																										
300	0.89	310	0.97	320	0.98	330	0.96	340	0.95	350	0.98																																																																										

**Relative Field Polar Plot**

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided

for which a "No" response is provided.	
10.	<b>Out-of-channel Emission Mask:</b> <input type="radio"/> Simple <input checked="" type="radio"/> Stringent
<b>CERTIFICATION</b>	
11.	<p><b>Interference.</b> The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027 and 74.794(b).</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 9]</p>
12.	<p><b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an <b>Exhibit is required.</b></p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 10]</p>
13.	<p><b>Channels 52-59.</b> If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:</p> <p><input type="checkbox"/> The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.</p>
<b>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</b>	

Any specified rotation has already been applied to the plotted pattern.

Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.

