

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS TELECASTING OF NEVADA, A CALIFORNIA LIMITED PARTNERSHIP, licensee of Class A Television Station KUVR-CA, Channel 68 in Reno, Nevada, in support of this Application for Construction Permit to specify operation on Channel 46 from the licensed transmitter site. This proposal is being submitted in response to the FCC's reclamation of the Channel 68 spectrum for reallocation to public safety services, thereby placing this Class A station in a displacement situation.

It is proposed to mount a standard Andrew directional antenna on the side of the existing 43-meter communications tower atop Slide Mountain. Exhibit 11 is a map upon which the predicted service contours are plotted. Exhibit 12 is a tabulation of operating parameters for the proposed facility.

The facility proposed herein has been evaluated with respect to its compliance with the FCC's interference Rules. As shown in Exhibit 13, the proposed Class A station meets the contour protection requirements of Sections 74.705, 74.706, and 74.707 with regard to full-power analog facilities, digital television authorizations, and other LPTV stations, respectively, except in four instances. Overlap exists between the interfering contour of the instant proposal and the protected contour of the following stations: KQCA-DT, Channel 46 in Stockton, California; K46CC, Channel 46 in Schurz, Nevada; KION(TV), Channel 46 in Monterey, California; and, K46FB, Channel 46 in Austin, Nevada. However, due to the nature of the terrain in the Reno area, it is believed that no interference to these stations would occur as a result of the operation of proposed KUVR-CA.

EXHIBITS 4-10

We then conducted Longley-Rice interference studies with regard to the above situations. We utilized the V-Soft Communications Probe II software and asked the computer to calculate interference within 1-kilometer cells. The software calculates signal levels at 0.1-kilometer increments along each azimuth studied and employs the 2000 U.S. Census to determine population within cells. If a cell is predicted to receive interference from some source other than proposed KUVR-CA, the population of that cell is not attributed to KUVR-CA interference (also known as "masking"). For our study, we utilized the beam-tilted vertical pattern of the proposed antenna and a main-lobe ERP of 93.9 kw.

The results of the Longley-Rice interference studies for KQCA-DT, K46CC, KION(TV), and K46FB are provided in Exhibits 14 through 17, respectively. They conclude that KUVR-CA, as proposed herein, would cause no interference to K46CC, KION and K46FB. In addition, proposed KUVR-CA would cause unmasked ("unique") interference to only 32 people within the KQCA-DT service area. This amounts to 0.001 percent of the 4,154,772 people that make up the KQCA-DT service population. Therefore, this proposal meets the FCC's *de minimis* interference standards.

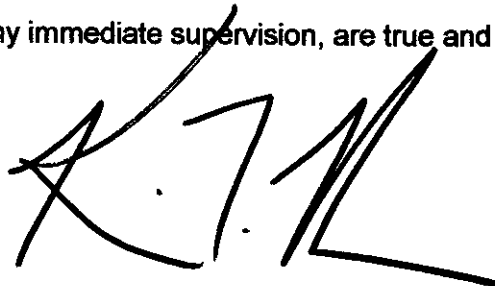
Accordingly, a waiver of Sections 73.6011, 73.6012, and 73.6013 of the FCC's Rules with regard to predicted interference to the above-mentioned stations is requested and believed to be justified.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. Due to the diminutive height of the tower (43 meters) and its location with respect to nearby airports, FCC antenna structure registration is not required.

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Reno facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 93.9 kw, an effective antenna height of 23 meters above ground, and the vertical pattern of the Andrew antenna, maximum power density two meters above ground of  $0.068 \text{ mw/cm}^2$  is calculated to occur 5 meters east of the base of the tower. Since this is only 15.4 percent of the  $0.44 \text{ mw/cm}^2$  reference for uncontrolled environments (areas with public access) for a facility operating on Channel 46 (662-668 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a large, sweeping flourish at the end.

KEVIN T. FISHER

December 4, 2002