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ENGINEERING STATEMENT

IN SUPPORT OF

AN APPLICATION TO MODIFY THE CONSTRUCTION PERMIT OF

KBSV-DT FILE No: BPEDT-20000728AEC

IN ORDER TO CORRECT ENGINEERING ERRORS

KBSV-DT CHANNEL 15-DT LICENSED AT CERES, CA

FCC FACILITY ID: 4939

BET-NAHRAIN, INC

DECEMBER 2, 2004

Purpose and Discussion

This engineering statement is in support of an FCC-340 Application make minor changes in an existing construction permit. It is being filed in order to correct several engineering errors contained in the outstanding Construction Permit: BPEDT-20000728AEC. The original application was based on incorrect information which had been supplied by the tower owner's technical consultant and the discrepancies were discovered during a recent visit and physical inspection of the proposed transmitter site. This application is being filed in order to correct these discrepancies.

Additionally, it was determined that the transmitter output specification did not state that the final output from the RF mask filter was only 0.9 kw instead of the advertised 1.0 kw TPO. This is requiring an antenna with more overall gain and with greater azimuth pattern efficiency.

Since the antenna COR has been corrected to a lower elevation, it is necessary to increase the ERP in order to compensate for the reduced HAAT and maintain the same general coverage area.

C. P. PERMITTED FACILITY

The permitted DTV transmitter facility parameters are:

N. 37-29-34.0
W. 121-13-29.0

Horizontal Polarization
ERP: 15.0 kw
RCAMSL: 368.0 m
RCAGL: 45.0 m
Overall Tower Ht: 50.0 M
Ant ID: Make: DIE Model: TFU-39DSC-R C170 Pattern: omnidirectional

PROPOSED CORRECTED FACILITY

The proposed DTV transmitter parameters are:

N. 37-29-34.0
W. 121-13-29.0

Horizontal Polarization
ERP: 18.7 kw
RCAMSL: 347.0 m
RCAGL: 15.0 m
Overall Tower Ht: 31.0 m AGL 363 m AMSL
Ant ID: Make: JAM Model: JA/LS-AK-12 Pattern: "peanut shape"

PROPOSED TRANMITTER SITE MAP

Exhibit E-1 is a USGS 1:24,000 Scale MAP showing the location of the permitted/proposed KBSV-DT transmitter site. There is no change in coordinates proposed.

SERVICE CONTOURS

Exhibit E-2 is a map showing the predicted F(50/90) 41-dBu contours of both the permitted and the proposed transmitter facilities. The coverage map shows that the proposed facility's f(50/90) 41-dBu contour is completely contained within the permitted 41-dBu contour, consequently, the modified pattern will maintain the interference protections to all other stations.

Exhibit E-3 is a polar plot of the Jampro antenna azimuth pattern with a tabulation of the relative field ratios: AZ-FI at ten degree azimuth increments. The antenna pattern center will be oriented at 66 degrees "T" as indicated in the FCC-340 technical information section..

ENVIRONMENTAL CONCERNS

As indicated above, the antenna is proposed to be a Jampro Antenna Co. model JA/LS-AK-12 which is a twelve element, 1.0 wavelength spaced system with a peanut shaped azimuth pattern. The elevation pattern and the underlying relative field reference table is shown in exhibit E-4

Engineering Exhibit E-5 is the result of a radiation density study at the proposed transmitter facility. The exhibit shows that the proposed antenna and transmission system is predicted to produce less than 50% of the ANSI recommended radiation density at two meters AGL (MPE) at and around the base of the antenna support structure for non-controlled transmitter sites. Furthermore, the tower site is at a remote location on private land and access is only through a locked gate.

The site is not likely to be visited by the general public. The tower has a perimeter fence with a locked gate which will further restrict access. The site also has posted "NO TRESPASSING" and "DANGER HIGH RADIATION LEVEL" signs which are visible from all directions.

Since site access is limited to only service and maintenance personnel, the site should be considered as a controlled site and the MPE is calculated to be below 10% of ANSI.

The applicant will coordinate with all other users at the site to insure that operations will cease, power reduced to a required level or maintenance time limited in accordance with the applicable standard should any maintenance in the area of high radiation on the antenna support structure be required.

Additionally, after construction has been completed and the station is technically operational, should the Commission request it, the licensee will conduct a radiation measurement program both with and without the proposed transmitter facility at full authorized power. The measurement report shall be made available to all concerned persons and/or organizations and be made a part of the Station's Public File.

REQUEST FOR EXPEDITED PROCESSING CONSIDERATION

The current FCC Construction Permit is set to expire on January 30, 2005.
The permitee has purchased the transmitter, exciter and all other necessary transmission & digital encoding equipment which is scheduled to be delivered on December 10, 2004. The antenna has also been ordered and is scheduled to be delivered on or before December 17, 2004 at which time all equipment will have been obtained and will be ready for immediate installation and testing.

The applicant Respectfully Request Expedited Processing Consideration in order to avoid cancellation of the Construction Permit after January 30, 2005.

CONCLUSION

After a thorough analysis of the proposed DTV transmitter facility, allocation/interference issues pertaining to this application and the lack of potential interference to all other licensed facilities, permitted facilities, applications and all other considerations, it is the opinion of this engineer that the transmitter facility, proposed herein, will meet the FCC rules as well as the intent of the rules.

- END OF ENGINEERING STATEMENT -

If anyone concerned with this engineering statement or the proposed transmitter facility or may require additional information or would like to discuss the enclosed request for modification of the outstanding Construction Permit of the new transmitter facilities, please contact the following:

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Respectfully Submitted

WILLIAM RICHARD GREEN / *12-2-2004*
William Richard Green Date