

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF
CONSTRUCTION PERMIT
LPTV STATION K66FN
FCC FILE NO. BMJPTT-20000831CKN
LOW POWER TV STATION K66FN
FACILITY ID 57448
SALT LAKE CITY, UTAH
CH 66 38 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application for modification of the construction permit for Low Power TV station K66FN at Salt Lake City, Utah (Facility ID: 57448; File No. BMJPTT-20000831CKN). The purpose of this application is to change transmitter site and increase the effective radiated power (ERP) and antenna radiation center height above mean sea level (RCAMSL). No other changes are proposed including no change in directional antenna system, city of license, channel or carrier frequency offset. As detailed below, this application is considered a "minor change" in facilities pursuant to Section 73.3572.

Minor Change Application

Figure 1 depicts the authorized (BMJPTT-20000831CKN) and herein proposed 74 dBu contours for K66FN. As indicated, the proposed 74 dBu contour encompasses a portion of the authorized 74 dBu contour. Therefore, the proposed modification is considered a "minor" change in facilities pursuant to Section 73.3572.

Proposed Facilities

It is proposed to side-mount the directional antenna on an authorized 83 meter supporting structure (FAA Study No. 2002-ANM-998-OE) and operate on K66FN's current channel 66 (782-788 MHz) with a "minus" carrier frequency offset using an Andrew model ALP16L10CSW66 "off-the-shelf", circularly polarized directional antenna (FCC antenna ID 40171) oriented at 136° true and incorporating 2.5 degrees of electrical beam tilt. The maximum ERP towards the radio horizon will be 38 kW

(H&V), and the maximum ERP at any horizontal or vertical angle will be 150 kW (H&V).

Response to Paragraph 13(a) - TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed K66FN operation will not create prohibited interference to other existing, authorized or proposed NTSC full-power stations.

Response to Paragraph 13(b) - DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed K66FN operation on channel 66 complies with the FCC's 0.5% interference threshold criteria to all allotted, proposed or actual DTV operating facilities on channels 65, 66 and 67.

Response to Paragraph 13(c) - LPTV/TV Translator/Class A TV Protection

A study has been conducted which indicates that the K66FN proposal will not create prohibited contour overlap to other existing, authorized or proposed LPTV/TV Translator/Class A TV stations with the exception of the following:

K66EH, Ch. 66, Delta & Oak City, UT (License, BLTT-19921109IL)
K66AA, Ch. 66, Duchesne, UT (License, BLTT-925)
K66FC, Ch. 66, Rural Randolph, UT (License, BLTT-19960216JD)
K66BK, Ch. 66, Salina & Redmond, UT (License, BLTT-19800414IN)

However, based on the provisions of the OET-69 Bulletin as permitted by FCC rules [Section 74.707(e)] it is believed that K66FN's proposed operation complies with the FCC's interference criteria towards these stations. Specifically, calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid. The results of the OET Bulletin No. 69 are tabulated on Figure 2 and, as indicated, the proposal complies with the FCC's 0.5% interference threshold.

Response to Paragraph 14 - Environmental Protection Act

The proposed K66FN LPTV facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation."¹ The calculated power density 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 0.15, a maximum visual effective radiated power of 300 kilowatts (H+V) and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0741 milliwatt per square centimeter (mW/cm²), or 14.2 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.52 mW/cm² for TV channel 66). 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.

¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

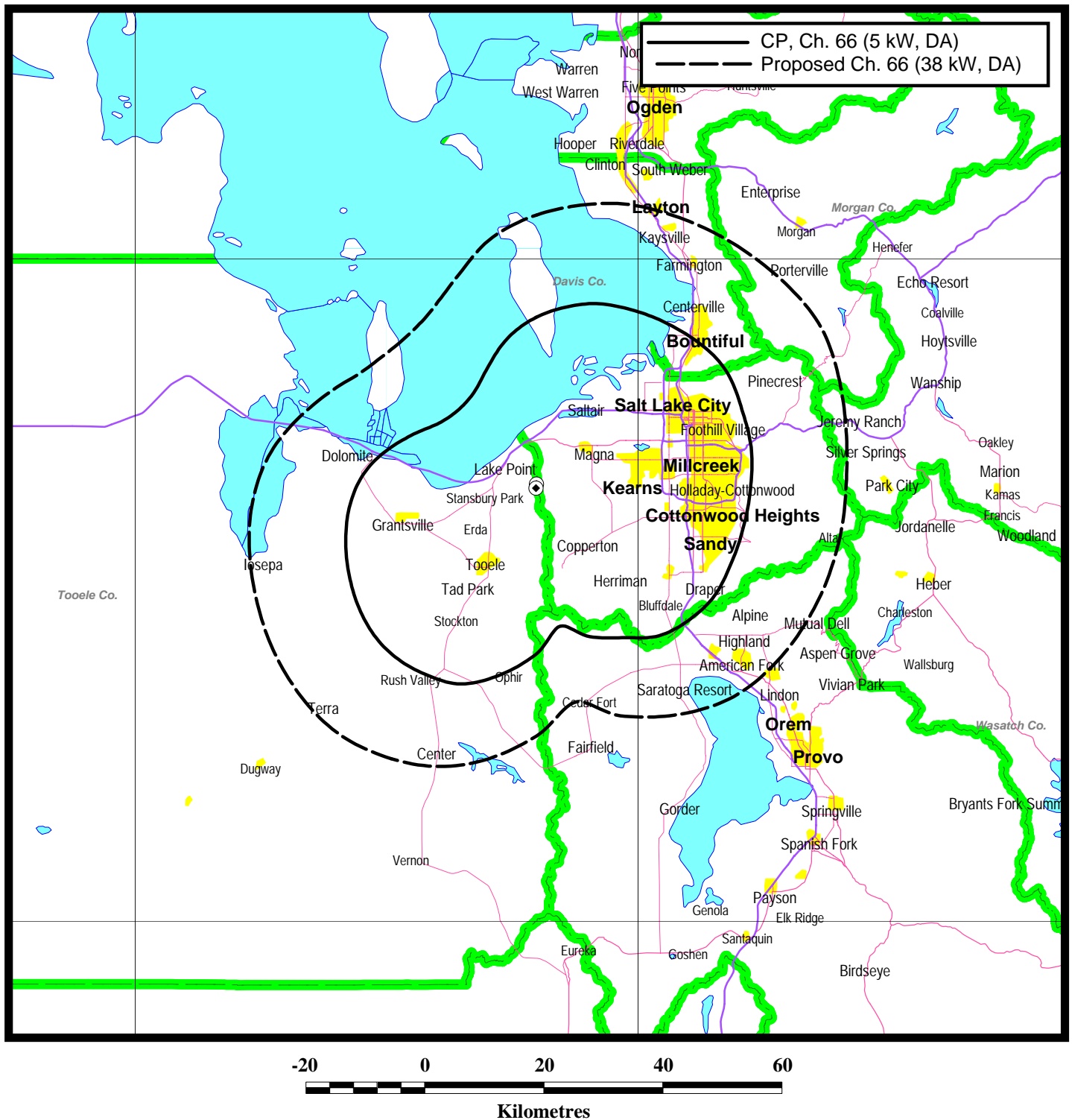
In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.

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Figure 1



PREDICTED 74 DBU CONTOURS

STATION K66FN
SALT LAKE CITY, UTAH
CH 66 38 KW (MAX-DA)

OET-69 LPTV INTERFERENCE CAUSED STUDY

CELL SIZE : 2.00
Using offset in determining thresholds
Per 6th Report & Order and FCC OET-69 Bulletin

K66EH 39-21-15 112-20-30 66(N) 3.090 kw 2012 m DA 50.0 % 76.1 dBu
DELTA OAK CITY, ETCUT
LIC BLTT19921109IL

0.62	0.51	0.29	0.16	0.12	0.10	0.08	0.06	0.06	0.06	0.06	0.08
0.09	0.11	0.10	0.10	0.09	0.08	0.07	0.08	0.08	0.09	0.10	0.13
0.22	0.49	0.82	1.00	0.81	0.42	0.18	0.12	0.11	0.16	0.31	0.51

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	277.4795	3946
not affected by terrain losses	277.4795	3946

K66FN 40-39-35 112-12-02 66(-) 38.000 kw 2795 m DA 10.0 % 76.1
SALT LAKE CITY UT

1.00	1.00	0.98	0.96	0.93	0.96	0.99	1.00	0.98	0.92	0.85	0.76
0.68	0.61	0.51	0.40	0.30	0.25	0.24	0.25	0.30	0.40	0.51	0.61
0.68	0.76	0.85	0.92	0.98	1.00	0.99	0.96	0.93	0.96	0.98	1.00

Ref Az: 136.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

Interference	Area	Pop
	0	0

K66AA 39-45-22 110-59-26 66(N) 2.060 kw 2989 m DA 50.0 % 76.1 dBu
DUCHESNE ETC. UT
LIC BLTT925

1.00	0.76	0.09	0.05	0.04	0.04	0.04	0.04	0.04	0.04	0.11	0.40
0.65	0.69	0.54	0.16	0.06	0.06	0.06	0.05	0.05	0.05	0.05	0.06
0.06	0.06	0.05	0.05	0.04	0.04	0.04	0.04	0.04	0.06	0.14	0.78

Ref Az: 12.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	232.0111	4005
not affected by terrain losses	192.0092	2153

K66FN 40-39-35 112-12-02 66(-) 38.000 kw 2795 m DA 10.0 % 76.1
SALT LAKE CITY UT

1.00	1.00	0.98	0.96	0.93	0.96	0.99	1.00	0.98	0.92	0.85	0.76
0.68	0.61	0.51	0.40	0.30	0.25	0.24	0.25	0.30	0.40	0.51	0.61
0.68	0.76	0.85	0.92	0.98	1.00	0.99	0.96	0.93	0.96	0.98	1.00

Ref Az: 136.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

Interference **Area** **Pop**
 4.00 0(0.0)

K66FC **41-39-54** **111-05-55** **66(N)** **0.932 kw** **2406** **m DA** **50.0 % 76.1 dBu**

RURAL RANDOLPH **UT**

LIC **BLTT19960216JD**

1.00	0.80	0.40	0.15	0.09	0.06	0.05	0.05	0.05	0.05	0.05	0.05	0.05
0.05	0.05	0.04	0.03	0.03	0.03	0.03	0.03	0.03	0.04	0.04	0.04	0.04
0.04	0.04	0.05	0.05	0.05	0.05	0.05	0.06	0.09	0.18	0.46	0.81	

Ref Az: 350.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	92.53202	82
not affected by terrain losses	88.50889	69

K66FN **40-39-35** **112-12-02** **66(-)** **38.000 kw** **2795** **m DA** **10.0 % 76.1**

SALT LAKE CITY **UT**

1.00	1.00	0.98	0.96	0.93	0.96	0.99	1.00	0.98	0.92	0.85	0.76	
0.68	0.61	0.51	0.40	0.30	0.25	0.24	0.25	0.30	0.40	0.51	0.61	
0.68	0.76	0.85	0.92	0.98	1.00	0.99	0.96	0.93	0.96	0.98	1.00	

Ref Az: 136.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

Interference **Area** **Pop**
 0 0

K66BK **38-52-37** **111-52-30** **66(N)** **0.413 kw** **2016** **m DA** **50.0 % 76.1 dBu**

SALINA & REDMOND **UT**

LIC **BLTT19800414IN**

1.00	0.80	0.40	0.15	0.09	0.07	0.06	0.06	0.06	0.06	0.07	0.07	
0.08	0.08	0.06	0.03	0.03	0.03	0.03	0.03	0.04	0.04	0.07	0.07	
0.08	0.08	0.06	0.06	0.06	0.06	0.06	0.06	0.09	0.18	0.46	0.81	

(5.0 0.95)(355.0 0.95)

Ref Az: 355.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	48.01489	1023
not affected by terrain losses	48.01489	1023

K66FN **40-39-35** **112-12-02** **66(-)** **38.000 kw** **2795** **m DA** **10.0 % 76.1**

SALT LAKE CITY **UT**

1.00	1.00	0.98	0.96	0.93	0.96	0.99	1.00	0.98	0.92	0.85	0.76	
0.68	0.61	0.51	0.40	0.30	0.25	0.24	0.25	0.30	0.40	0.51	0.61	
0.68	0.76	0.85	0.92	0.98	1.00	0.99	0.96	0.93	0.96	0.98	1.00	

Ref Az: 136.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

Interference	Area	Pop
	0	0

Summary of Calculations

Facility	Channel	Type	Baseline	Permissible	IX	%Base
K66EH, DELTA OAK CITY,	66	TV	3946	0.5	0	0.00
K66AA, DUCHESNE ETC.,	66	TV	4005	0.5	0	0.00
K66FC, RURAL RANDOLPH,	66	TV	82	0.5	0	0.00
K66BK, SALINA & REDMOND	66	TV	1023	0.5	0	0.00