

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR LPTV K65BC

K65BC
FCC File No. BLTT-2167
Facility ID. No. 52923

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 K65BC (BLTT-2167, Facility ID. 52923).

Station K65BC is presently licensed to operate on NTSC Channel 65, and as such is located on an out of core channel. Accordingly, K65BC files this displacement relief application seeking to move to an in core channel, namely 31.

The proposed operational parameters for K65BC are as follows:

Frequency Offset:	MINUS OFFSET
Antenna radiation center height above ground level:	320 meters
Maximum effective radiated power:	5 KW
Antenna type and model #:	ANT ACB16CR
Antenna Orientation	355 Degrees
Transmitter Site	32-32-36 N 96-57-33 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 KDFI-TV, Channel 27, Dallas, TX, KDAF, Channel 33, Dallas, TX, KUVN, Channel 23, Garland, TX, KXTX, Channel 39, Dallas, TX, KCTF, Channel 34, Waco, TX, and KMPX, Channel 29, Decatur, TX; and DTV facilities KDAF, Channel 32, Dallas, TX and KMPX, Channel 30, Decatur, 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 interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Section 74.705 and Section 74.706, based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power and DTV stations.**

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
KDFI-TV, CH 27 DALLAS, TX FILE NO. BPCT-20000121AAQ CONSTRUCTION PERMIT	4,058,974	0 (0.0%)
KDFI-TV, CH 27 DALLAS, TX FILE NO. BPCT-20000207ACD LICENSE	4,037,064	0 (0.0%)
KDAF, CH33 DALLAS, TX FILE NO. BLCT-20000821ACP LICENSE	4,019,948	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BPCT-20010205AAX CONSTRUCTION PERMIT	4,118,574	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BLCT-19860926KU LICENSE	3,634,774	0 (0.0%)
KUVN, CH 23 GARLAND, TX FILE NO. BMPCT-20011210AAB CONSTRUCTION PERMIT MOD	4,067,153	0 (0.0%)
KXTX-TV, CH 39 DALLAS, TX FILE NO. BLCT-19970905KE LICENSE	4,070,917	0 (0.0%)
KXTX-TV, CH 39 DALLAS, TX FILE NO. BXPCT-20000410ABZ CONSTRUCTION PERMIT	3,890,726	0(0.0%)
KCTF, CH 34 WACO, TX FILE NO. BLET-19890531KE LICENSE	198,430	0 (0.0%)
KMPX, CH 29 DECATUR, TX FILE NO. BLCT-19930927KF LICENSE	3,719,664	0(0.0%)
NTSC NEW STATION APPLICATION, CH 34 FORT WORTH, TEXAS BPRM-20000717AEX	3,527,184	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause zero interference to existing NTSC facilities or construction permits.

DTV Facilities

An interference analysis was conducted using OET 69 Bulletin standards, as permitted by 73.703, with regard to the effect of the proposed station on the following DTV facilities:

Protected DTV Station	FCC Service Population	Proposed Interference Population
KDAF, CH 32 DALLAS, TX DTV ALLOTMENT	4,059,781	0 (0.0%)
KDAF, CH 32 DALLAS, TX FILE NO. BPCDT-19990225KF CONSTRUCTION PERMIT	4,196,373	0 (0.0%)
KMPX, CH 30 DECATUR, TX DTV ALLOTMENT	3,738,593	0 (0.0%)

As indicated in the above table, there will be no interference caused by the operation of the proposed station to any DTV facilities.

LPTV Facilities

The proposed facility complies with all LPTV and Class A protections as contained in section 74.707 without reliance upon OET 69 standards. However, please note that Class A facility KUVN-LP (Facility ID. 5319) continues to be shown in the FCC engineering database as being on Channel 31, despite the fact that KUVN-LP has moved to Channel 47 and filed a license to cover (BLTTA-20010706ABN) for its new facilities on Channel 47. As KUVN-LP has moved to channel 47, the facility proposed by this application will have no impact on KUVN-LP.

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 31 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 5 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0007 milliwatt per square centimeter

(MW/CM2), or .2% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.383 MW/CM2 for TV channel 31). 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.