

## **ENGINEERING STATEMENT**

### **Request for Special Temporary Authorization** prepared for

**Mountain Licenses, L.P.**  
KAYU-DT Spokane, WA  
Facility ID 58684

*Mountain Licenses, L.P. ("MLLP")* is the licensee of television station KAYU-TV, analog Channel 28 and digital Channel 30, Spokane, WA. A construction permit (BPCDT-20080402AAX) authorizes KAYU-TV to operate its post-transition digital facility on Channel 28, its current analog channel. This channel was established in Appendix B of the Seventh Report and Order in MB Docket 87-278. This statement supports *MLLP's* request for Special Temporary Authority ("STA") to temporarily remain on its pre-transition digital channel beyond the transition date.

The instant STA request complies with the policy outlined in the Report and Order in the Third Periodic Review.<sup>1</sup> Under that policy, KAYU-DT could remain on its pre-transition digital Channel 30 for up to a year, provided that service to the current analog and digital population is not reduced, and provided that the digital Channel 30 operation would not add more than 0.5% interference to any other post-transition allotment or prevent other stations from making their transition.

KAYU-DT Channel 30 is licensed with an effective radiated power of 335 kW at 564 meters antenna height above average terrain, file number BLCDT-20050908ABO. *MLLP* proposes to temporarily continue operation beyond the transition date with the licensed parameters for KAYU-DT's Channel 30. No reduction in current digital service would result. The digital

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<sup>1</sup>*Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91, FCC 07-228, released December 31, 2007.

Channel 30 service population is 594,382 persons, according to OET Bulletin 69<sup>2</sup> analysis and 2000 Census data. The current analog Channel 28 service population is 553,035 persons.

A detailed interference study per OET Bulletin 69 shows that the STA request complies with the 0.5 percent limit of new interference caused to other stations' Appendix B facilities, as summarized below. No station would be prevented from making its transition.

**Post-Transition Interference Analysis Summary**

Appendix B							
Ch	Call Sign	State/City Facility ID	Power (kW) HAAT (m)	Dist (km) Bear (°T)	Baseline Population (2000 Census)	New Interference From Proposal	
						Population	Percent
--- no stations within culling distances ---							

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.  
May 27, 2008

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List of Attachments

-- none ---

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<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"). A standard cell size of 2 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.