

TECHNICAL EXHIBIT  
AMENDMENT TO  
DIGITAL FLASH-CUT APPLICATION FOR  
CLASS A STATION KHPM-CA (FACILITY ID 35921)  
SAN MARCOS, TEXAS  
CH 40 0.037 KW-ND

Technical Narrative

This Technical Exhibit supports an amendment to a flash-cut application for Class A station KHPM-CA. Station KHPM-CA is licensed (BLTTA-200605125ADT) to operate on analog channel 40 with a nondirectional antenna maximum (visual) effective radiated power (ERP) of 8 kW and an antenna height above mean sea level (RCAMSL) of 244 meters.

Freeze Compliance

This application can be accepted for filing as it does not request a change which is consider “frozen” by FCC’s Public Notice (DA 04-2446) released August 3, 2004, *Freeze on the filing of Certain TV and DTV Requests for Allotment or Service Area Changes*. Specifically, the proposed 51 dBu contour will not result in an extension of the currently licensed 74 dBu contour (see below).

Proposed Facilities

This application proposes digital operation on the current channel (40), at the currently licensed KHPM-CA transmitter site (ARN 1244880) and with the same antenna. The transmitter site coordinates remain (NAD27): 29-53-26 N, 97-56-54 W. A Bogner

B8UO nondirectional antenna, with a maximum ERP of 0.037 kW and antenna RCAMSL of 244 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, the 51 dBu contour does not extend beyond the licensed 74 dBu contour.

### Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

### Radiofrequency Electromagnetic Field Exposure

The proposed KHPM-CA facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 12 meters above ground level. The proposed maximum ERP is 0.037 kW. Based on a worst-case vertical relative field of 1.0, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed

3.0% of the FCC's recommended limit of  $0.42 \text{ mW/cm}^2$  for channel 40 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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.

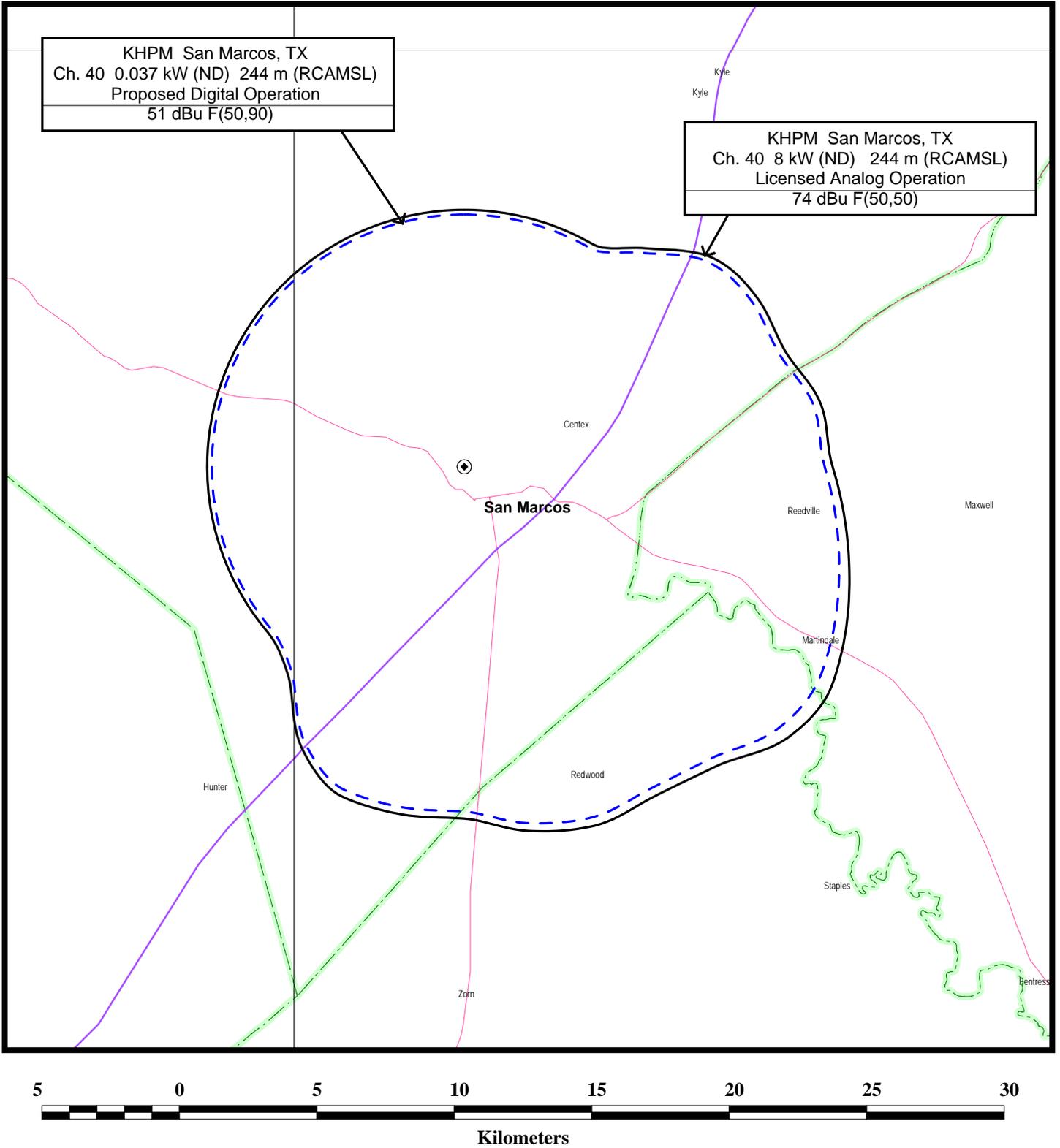
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.



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August 3, 2006



### FCC PREDICTED COVERAGE CONTOURS

CLASS A STATION KHPM  
SAN MARCOS, TEXAS  
CH 40 0.037 KW (ND) 244 M (RCAMSL)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida