ENGINEERING STATEMENT
DIGITAL DISPLACEMENT APPLICATION
FOR TV TRANSLATOR STATION
ON BEHALF OF
KSBY COMMUNICATIONS, INC.
K59CD, SANTA BARBARA, CALIFORNIA
CHANNEL 10 0.1 KW ERP 654 METERS RCAMSL

DECEMBER 2006

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Ryan Felmlee, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University, has successfully completed the Engineer-In-Training examination ("EIT") in the State of Virginia, and is a staff engineer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Ryan Felmlee
District of Columbia

Subscribed and sworn to before me this 15th day of December, 2006.

CAROLYN L. LYONS NOTARY PUBLIC DISTRICT OF COLUMBIA

Notary Public

My Commission Expires: 2/28/2008

This engineering statement has been prepared on behalf of KSBY Communications, Inc., licensee of television translator station K59CD, Santa Barbara, California. K59CD is licensed to operate its analog facilities on out-of-core channel 59 with a directional ERP of 1.18 kW. Accordingly, this statement supports the licensee's request for digital displacement by converting to digital operation on in-core channel 10 with a nondirectional effective radiated power ("ERP") of 0.1 kW at a radiation center above mean sea level ("RCAMSL") of 654 meters.

There is no change in transmitter site. The NAD-27 geographic coordinates of the existing site are as follows:

North Latitude: 34° 27' 55"

West Longitude: 119° 40' 38"

The existing tower is less than 20 feet and TOWAIR indicates that registration is not required.

Elevation Data

Elevation of site above mean sea level	649.7 meters (2131.6 feet)
Center of radiation of antenna above ground level	4.3 meters (14 feet)
Center of radiation of antenna above mean sea level	654 meters (2145.7 feet)
Overall tower height above ground level	5.2 meters (17 feet)

Equipment Data

Transmitter:	Type Accepted
Antenna:	Kathrein Scala TVO-4 or equivalent
Transmission Line:	Andrew, Type LDF5-50A, 7/8", 12.2 meters (40 feet) with 96% efficiency

Power Data

Transmitter:	0.052 kW	-12.8 dBk
Transmission Line Loss:	96.0%	0.2 dB
Input Into Antenna:	0.05 kW	-13 dBk
Antenna Gain:	2	3.0 dB
ERP:	0.1 kW	-10 dBk

As indicated above, the transmitter with typical power output of 0.052 kW will deliver 0.05 kW to the input of the antenna. The antenna, having a maximum gain of 3 dB will produce an ERP of 0.1 kW. A coverage map providing the protected contour of the proposed channel 10 facility is included as Exhibit E-1 of this report.

The K59CD antenna system will be side-mounted on the existing pole at 4.3 meters above ground. The overall structure height above ground level remains unchanged at 5.2 meters.

Allocation

An allocation study, performed in accordance with Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710 of the FCC Rules indicates that the proposed Channel 10 operation will not cause objectionable interference to any authorized or proposed full-service, analog, or

digital operation or authorized LPTV / TV translator stations. In accordance with Section 74.703 of the FCC Rules, a Longley-Rice analysis demonstrates that the proposed channel 10 digital operation of K59CD will not cause new interference to any authorized facility. The results of the Longley-Rice analysis are included as Exhibit E-2. Accordingly, K59CD demonstrates with interference compliance with respect to Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710 of the FCC Rules through use of Longley-Rice methodology as provided in OET Bulletin 69.

FCC Rule, Section 1.1307

The K59CD transmitting facilities are located at the Gibralter Peak Communications site, which is a multi-user communications site consisting of TV, FM and multiple land mobile facilities. Public access to the site is restricted by a perimeter fence and secured by a locked gate. Signs are posted indicating that potential RF hazards may exist. The Gibralter Peak Communications site is a remote area, surrounded by steep, rugged terrain and not likely to be accessed by the public, and therefore considered a controlled environment.

The K59CD digital transmitting facilities will utilize a Kathrein Scala TVO-4 antenna. The antenna will be mounted on a pipe with a center of radiation at approximately 4.3 meters (14 feet) above ground. The K59CD facilities are in compliance with the County of Santa Barbara Inland Zoning Ordinance, Article III of Chapter 35, Section 35.292h, Commercial Telecommunication Facilities, which imposes height limits on commercial telecommunication facilities and requires such structures to blend in with the natural or man-made environment in

such a manner as to not be substantially visible from public viewing areas. There are numerous authorized FM, LPTV and TV translator facilities at the collocated multiuser site

Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on or near the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

Environmental Assessment

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the licensee indicates:

(a)(1)	The existing tower is not located in an officially designated wilderness area.
(a)(2)	The existing tower is not located in an officially designated wildlife preserve.
(a)(3)	The proposed facilities will not affect any listed threatened or endangered species or habitats.
(a)(3)(ii)	The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
(a)(4)	The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects

significant in American history, architecture, archaeology, engineering, or culture.

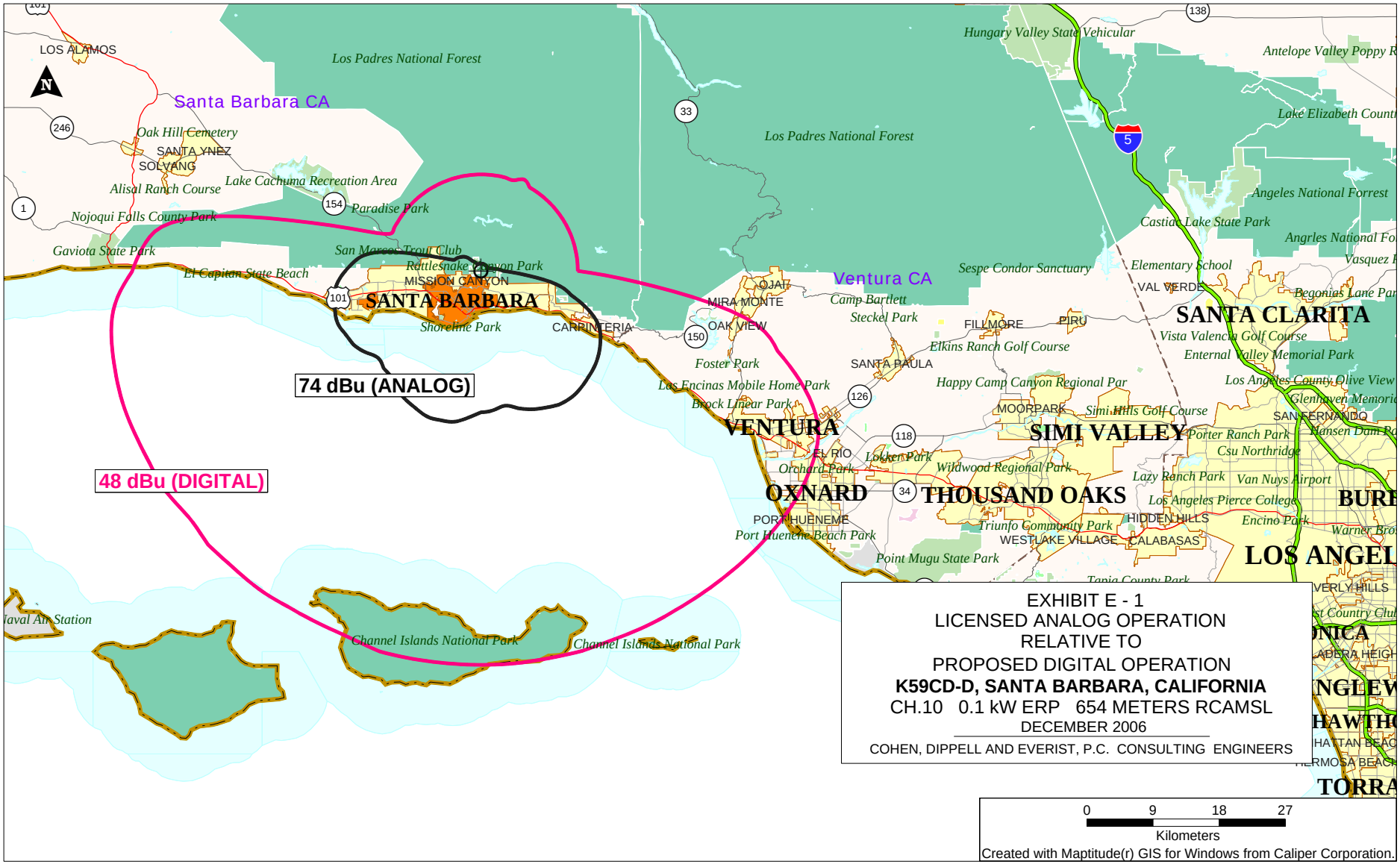
(a)(5) The existing tower is not located near any known Indian religious sites.

(a)(6) The existing tower is not located in a flood plain.

(a)(7) The installation of the DTV facilities on an existing tower will not involve a significant change in surface features of the ground in the vicinity of the tower.

(a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.

(b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.


74 dBu (ANALOG)
48 dBu (DIGITAL)
Santa Barbara CA
Ventura CA
SANTA BARBARA
VENTURA
OXNARD
THOUSAND OAKS
SIMI VALLEY
SANTA CLARITA
LOS ANGEL
TORRA
Los Padres National Forest
Channel Islands National Park
EXHIBIT E - 1
LICENSED ANALOG OPERATION
RELATIVE TO
PROPOSED DIGITAL OPERATION
K59CD-D, SANTA BARBARA, CALIFORNIA
CH.10 0.1 kW ERP 654 METERS RCAMSL
DECEMBER 2006
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS
0 9 18 27
Kilometers
Created with Maptitude(r) GIS for Windows from Caliper Corporation.

COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2
LONGLEY-RICE ANALYSIS
FOR THE PROPOSED DIGITAL OPERATION OF
K59CD, SANTA BARBARA, CA
CH 10 0.1 KW ERP 654 METERS RC/AMSL
DECEMBER 2006

Station	City	State	Channel	Distance km	Status	FCC File No.	Interference
K09KG	BULLHEAD CITY	AZ	9	474.6	LIC	BLTTV-3790	Beyond Distance
K09HL	BAKER	CA	9	358.6	LIC	BLTTV-3752	Beyond Distance
KCAL-TV	LOS ANGELES	CA	9	150.1	LIC	BLCT-19911107KP	0.00%
K09UF	MORRO BAY	CA	9	133.6	CP	BPTVA-20031203ABN	No Interference
K09UF	MORRO BAY	CA	9	139.4	LIC	BLTVL-19870306IE	No Interference
K09UF	MORRO BAY	CA	9	139.4	APP	BDFCDVA-20061030ADV	No Interference
K09VI	SPRINGVILLE	CA	9	204.2	LIC	BLTTV-19910301JR	Beyond Distance
KERO-TV	BAKERSFIELD	CA	10	147.7	LIC	BMLCDT-20030429AAS	No Interference
K10GC	LAKE ISABELLA	CA	10	177.5	LIC	BLTTV-4490	No Interference
K10OG	LOMPOC	CA	10	76.6	LIC	BLTVL-19981007JB	No Interference
K10IX	NEWBERRY SPRINGS	CA	10	277.1	LIC	BLTTV-5095	No Interference
K10OU	PALM SPRINGS	CA	10	287.7	CP	BNPTVL-20000830AXA	No Interference
KSBW	SALINAS	CA	10	303.3	LIC	BLCDT-20030221ABJ	No Interference
KGTV	SAN DIEGO	CA	10	288.4	LIC	BLCT-20011004AAZ	No Interference
DDK10IK	YOSEMITE VILLAGE	CA	10	362.9	LIC	BLTTV-19911107JJ	Beyond Distance
KKEY-LP	BAKERSFIELD	CA	11	137.8	LIC	BLTVL-20031016ABY	No Interference
KTTV	LOS ANGELES	CA	11	150.5	LIC	BLCT-2252	0.00%
NEW	SAN LUIS OBISPO	CA	11	96.4	APP	BDCCDVL-20061019ABJ	No Interference
K11FU	SPRINGVILLE	CA	11	204.4	LIC	BLTTV-4209	Beyond Distance

Section III - Engineering (Digital)

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: 10

2. Translator Input Channel No. 15

3. Station proposed to be rebroadcast:

Call Sign	City	State	Channel
KSBY	SAN LOUIS OBISPO	CA	15

4. Antenna Location Coordinates: (NAD 27)

34 ° 27 ' 55 " [X] N [ ] S Latitude

119 ° 40 ' 38 " [ ] E [X] W Longitude

5. Antenna Structure Registration Number: _____

[X] Not applicable See Explanation in Exhibit No. E [ ] FAA Notification Filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: 649.7 meters

7. Overall Tower Height Above Ground Level: 5.2 meters

8. Height of Radiation Center Above Ground Level: 4.3 meters

9. Maximum Effective Radiated Power (ERP): 0.1 kW

10. Transmitter Output Power: 0.052 kW

11. a. Transmitting Antenna: [X] Nondirectional [ ] Directional ("Off-the-Shelf") [ ] Directional composite

Manufacturer	Model
SCA	TVO-4

b. Electrical Beam Tilt: _____ degrees [X] Not applicable

c. Directional Antenna Relative Field Values:

Rotation: _____ ° ☐ No rotation ☒ N/A (Nondirectional)

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

12. **Out-of-Channel Emission Mask:** Simple ☐ Stringent ☒

CERTIFICATION

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030.

☐ Yes ☒ No See Explanation in Exhibit No. E

14. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.,* the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance. An **Exhibit is required.**

☒ Yes ☐ No See Explanation in Exhibit No. E

Exhibit No.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

15. **Channels 52-59.** If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:

☐ The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.

☐ Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licensees of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

16. **Channels 60-69.** If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:

☐ Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licensees of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees,

☐ Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreement(s) with 700 MHz public safety regional planning committee(s) and state frequency administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.

☐ Pursuant to Section 74.786(e), an applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Ryan M. Felmlee		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer
Signature		Date 12/15/2006
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).