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ENGINEERING EXHIBIT EE-1:

MINOR MODIFICATION OF CONSTRUCTION PERMIT
DIGITAL TELEVISION FLASH-CUT
APPLICATION

KM LPTV OF ATLANTA, L.L.C.
CLASS A DIGITAL TELEVISION STATION
WSKC-DC
FCC FACILITY NUMBER
35090

DIGITAL CHANNEL 22
ATLANTA, GEORGIA

JUNE, 2009

ENGINEERING EXHIBIT
IN SUPPORT OF
AN APPLICATION FOR AUTHORITY TO MAKE
CHANGES IN CLASS A TELEVISION BROADCAST STATION
WSKC-DC
ATLANTA, GEORGIA

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DECLARATION

I, Timothy Z. Sawyer, declare and that I have provided engineering services in the area of telecommunications since 1969. My qualifications are a matter of record with the Federal Communications Commission. I am a senior engineer with the firm of Mullaney Engineering, Inc., consulting radio telecommunications engineers with offices in Gaithersburg, Maryland.

The firm of Mullaney Engineering, Inc., has been retained by KM LPTV OF ATLANTA, L.L.C., to prepare the instant engineering exhibit in support of **an application for authority to make changes in CLASS A DIGITAL TELEVISION STATION WSKC-DC Atlanta, Georgia.** (FCC FACILITY ID NUMBER: 35090).

All facts contained herein are true of my own knowledge except those stated to be on information and belief, and as to those facts, I believe them to be true. I declare under the penalty of perjury that the foregoing is true and correct.



Timothy Z. Sawyer

Executed on the 30th day of June 2009

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DIGITAL CHANNEL 22
ATLANTA, GEORGIA

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NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement and the instant engineering exhibit of which it is part has been prepared on behalf of KM LPTV OF ATLANTA, L.L.C., (hereinafter "KM").

KM is the licensee of analog Class A Television Station WSKC-CA, Channel 22+, Atlanta, Georgia, AND holds a digital flash-cut application construction permit. The FCC facility identification number 35090

Engineering - Minor Modification of Construction Permit

By means of this application KM seeks to expand the requested digital "flash-cut" facility's coverage and change the authorized transmitter site.

The proposed digital "flash-cut" facilities will operate on digital Television Channel 22 with a maximum effective radiated power of 10-kilowatts and an antenna height above mean sea level of 404.37 meters using a directional antenna.

The proposed facilities will be built to comply with the *FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* and the instant proposal is categorically excluded from environmental processing pursuant to the provisions of Section 1.1306 of the Commission's Rules. A more detailed discussion of environmental factors is included under the heading Environmental Considerations below.

Information requested by exhibits in response to questions on Section III of FCC Form 301-CA is incorporated in the following paragraphs, figures and/or tables.

Processing of this application is requested under the rules currently in effect at the time of filing.

ENGINEERING DISCUSSION

PROPOSED FACILITIES

This application proposes digital operation on Television Channel 22, at a new transmitter site with a directional antenna pattern.

Figure 2 contains a horizontal radiation (relative field) pattern of the proposed directional horizontal radiation pattern. KM proposes to use a custom PSI UHF slot, rotated so that the main lobe of the directional antenna is at 90 degrees true. The antenna will employ 1.0-degrees of downward (negative) electrical beam tilt.

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 full-service Television Stations, LPTV Stations, or Television Translator Stations) or Class A Television Stations.

Using the procedures outlined in the FCC's OET-69 Bulletin, a **1-kilometer cell size resolution** and 2000 U.S. Census, the proposal complies with the current FCC policy, i.e., less than 0.5% new interference caused to other pertinent assignments except as authorized in 47 CFR 74.793(h) of the Commission's rules.

The Atlanta Georgia metro area is a mixed rural and high concentration urban area. The use of a population cell size of **1-kilometer in size** is appropriate in a mixed urban environment, as the use of a higher size would unfairly include adjacent urban populations that are not representative of the individual cell under study. The applicant requests that the Commission study this proposal with a population cell size of 1-kilometer and a profile spacing of 1-kilometer.

Each station of concern has been analyzed using the methods described in OET Bulletin No. 69, and the results indicate that no interference (unmasked) or interference above the Commission's established levels (% of baseline population) will occur.

The results of the OET Bulletin No. 69 styled study are contained with Figure 3. As noted above the OET study was conducted using a population cell size of 1-kilometer and a path profile spacing of 1-kilometer.

ENVIRONMENTAL CONSIDERATIONS

The applicant believes its proposal will not significantly affect the environment for the following reasons.

This is an existing communications site with no new construction of towers, support buildings or other environmental sensitive items required.

The site and this proposal are exempt from NHPA Section 106 review as no construction will occur that would trigger a review under NHPA Section 106.

The proposal does not meet any of the criteria specified in Section 1.1307 of the FCC Rules. More specifically, the proposed facilities are not known to fall within any of the categories enumerated in Sections 1.1307(a)(1)-(7) and will not involve the use of high intensity white lights. Furthermore, operation of the proposed facility will not involve the exposure of workers or the general public to levels of radio frequency electromagnetic fields exceeding guidelines adopted by the Federal Communications Commission. (The current FCC guidelines are based upon criteria contained in the National Council of Radiation Protection and Measurements (NCRP) Report No.86 (1986) and ANSI/IEEE C95.1-1992.)

Based upon a worst case downward relative field value of 0.3 for all angles 10-degrees and greater below the horizon and a maximum power of 10-kilowatts, and an antenna height of 80.7 meters above the ground. The power density level 2-meters above ground level is predicted to be 0.0015 mW/cm² or less. The computed power density is 0.086 percent of the Commission's guidelines for a controlled area and 0.432 percent of an uncontrolled area - as this level is far below the Commission's maximum limits, the facility is in compliance with the Commission's standards. The minimum distance directly below the antenna for a controlled area is 2.7 meters, as this distance is greater than 77 meters above ground, no exposure in excess of the Commission's guidelines can occur to workers on the ground.

The applicant will fully-cooperate and coordinate with all site users as required by the Commission's rules.

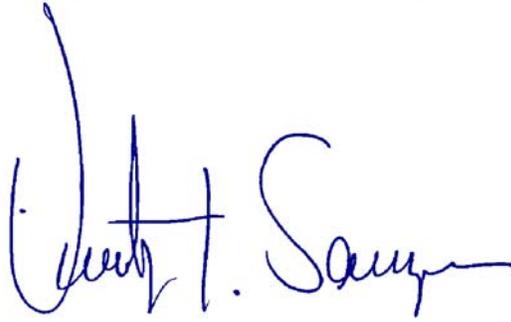
II SUMMARY:

The proposed digital "flash-cut" will operate on Digital Television Channel 22 with a maximum ERP 10-Kilowatts utilizing a DIRECTIONAL antenna system. The estimated digital transmitter power output (TPO) is 0.450 kilowatts.

Operation as proposed herein would not cause/increase any normally prohibited contour overlap using a terrain dependant - OET Bulletin No. 69 review, and would not have any significant impact on the environment. The proposed operation will not create any new prohibited interference.

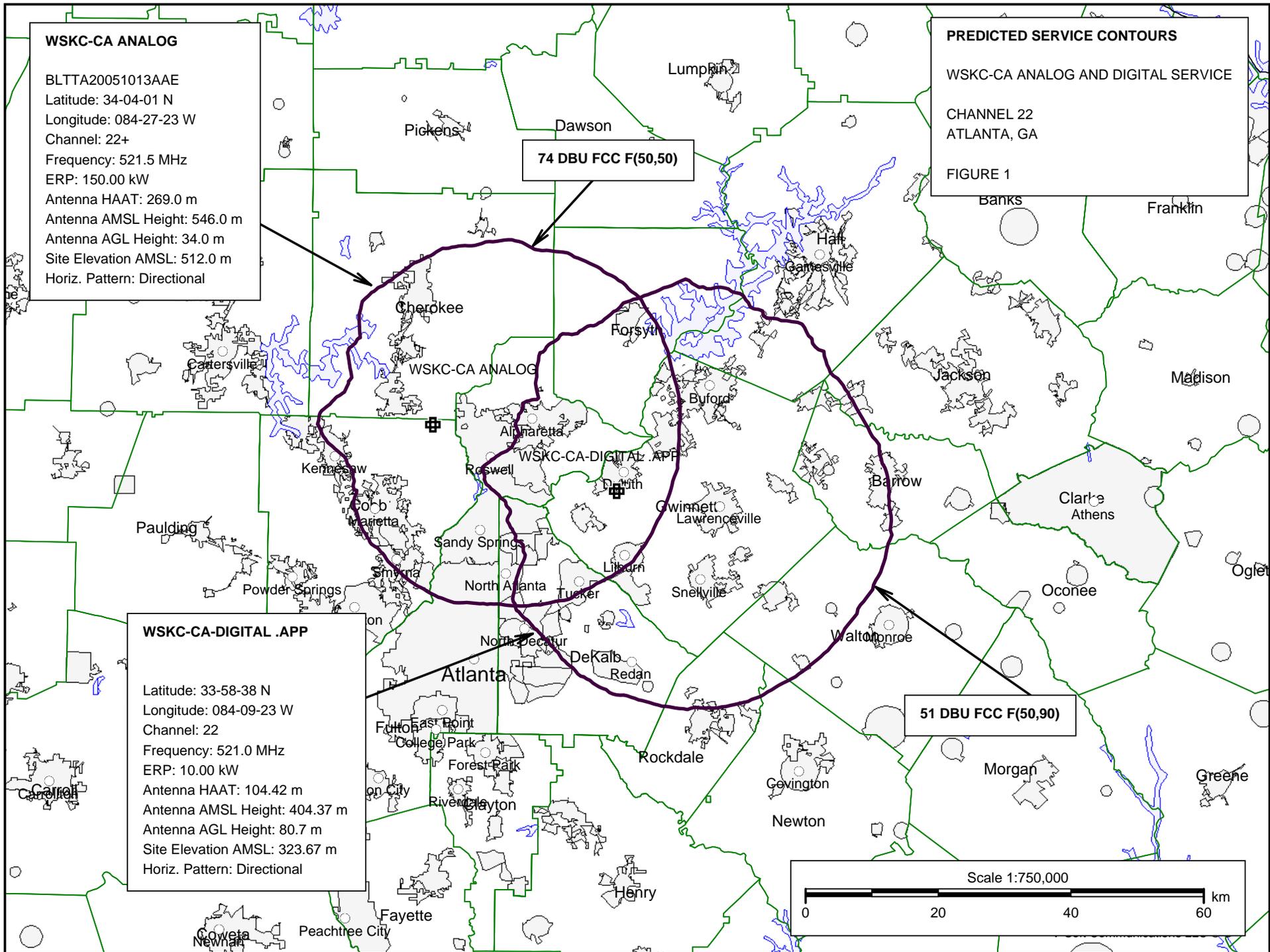
The proposed operation is fully in compliance with all other areas of the Commission's rules and applicable international agreements.

30 June 2009



Timothy Z. Sawyer

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WSKC-CA ANALOG

BLTTA20051013AAE
 Latitude: 34-04-01 N
 Longitude: 084-27-23 W
 Channel: 22+
 Frequency: 521.5 MHz
 ERP: 150.00 kW
 Antenna HAAT: 269.0 m
 Antenna AMSL Height: 546.0 m
 Antenna AGL Height: 34.0 m
 Site Elevation AMSL: 512.0 m
 Horiz. Pattern: Directional

PREDICTED SERVICE CONTOURS

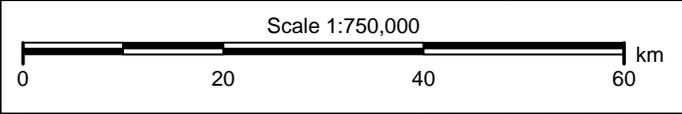
WSKC-CA ANALOG AND DIGITAL SERVICE
 CHANNEL 22
 ATLANTA, GA
 FIGURE 1

74 DBU FCC F(50,50)

51 DBU FCC F(50,90)

WSKC-CA-DIGITAL .APP

Latitude: 33-58-38 N
 Longitude: 084-09-23 W
 Channel: 22
 Frequency: 521.0 MHz
 ERP: 10.00 kW
 Antenna HAAT: 104.42 m
 Antenna AMSL Height: 404.37 m
 Antenna AGL Height: 80.7 m
 Site Elevation AMSL: 323.67 m
 Horiz. Pattern: Directional



PSI CUSTOM ANTENNA PATTERN FIGURE 2

Azimuth (deg)	Effective Field
0.0	0.323
10.0	0.375
20.0	0.438
30.0	0.520
40.0	0.617
50.0	0.721
60.0	0.822
70.0	0.912
80.0	0.976
90.0	1.000
100.0	0.976
110.0	0.912
120.0	0.822
130.0	0.721
140.0	0.617
150.0	0.520
160.0	0.438
170.0	0.375
180.0	0.323
190.0	0.276
200.0	0.237
210.0	0.205
220.0	0.172
230.0	0.130
240.0	0.099
250.0	0.103
260.0	0.099
270.0	0.103
280.0	0.133
290.0	0.103
300.0	0.099
310.0	0.130
320.0	0.130
330.0	0.205
340.0	0.237
350.0	0.276

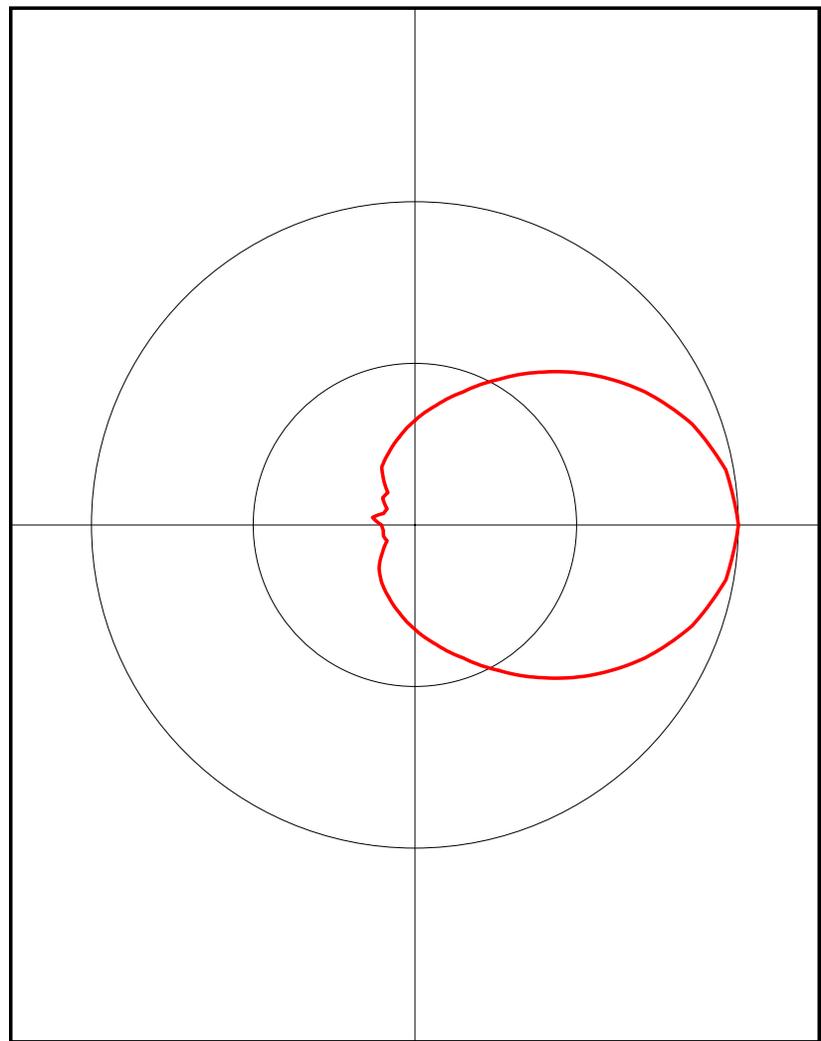


FIGURE 3 - OET BULLETIN NUMBER 69 INTERFERENCE STUDY SUMMARY

Outgoing Interference Population Report

WSKC-CA-D.C (22) Atlanta, GA -
 Broadcast Type: Digital Service: F [Stringent Emission Mask]
 Lat: 33-58-37.64 N Lng: 084-09-23.30 W ERP: 10.0 kW AMSL: 404.7 m
 TV Outgoing Interference Study
 Signal Resolution: 1.0 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 Default # of radials computed for contours: 360
 Contours calculated using 8 radial HAAT.
 LR Profile Spacing Increment: 1.0 km
 Masked interference points are being
 counted as interference.
 Using LPTV/translator D/U rules.
 Pop Centroid DB: 2000 US Census (SF1)
 Population Database: 2000 US Census (SF1)

 Stations Considered:

Call Letters	City	State	Dist	Bear
W23DN.A (23+)	Atlanta	GA	25.3	222.0
W23DN (23+)	Atlanta	GA	25.3	222.0
W23DN.A (26+)	Atlanta	GA	25.3	222.0
WGGD-LP.C (23-)	Gainesville	GA	26.7	50.7
WGGD-LP.A (23-)	Cleveland	GA	26.7	50.7
WPBA-D (21)	ATLANTA	GA	29.2	214.5
WPBA-D (21)	Atlanta	GA	29.3	214.4
WTBS-LP.C (26-)	Atlanta	GA	31.2	222.9
WTBS-LP (26-)	Atlanta	GA	32.3	221.7
WGGD-LP (23-)	Cleveland	GA	67.2	28.5
W22AC (22N)	Hartwell & Royston	GA	118.4	71.3
WCTD-LP (22-)	Ducktown	TN	120.8	347.0

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
W23DN.A (23+)	6.1	2,314	931,932	0	6,650	0.7 *
W23DN (23+)	6.1	2,314	931,932	0	6,650	0.7 *
W23DN.A (26+)	0.0	0	931,932	0	0	0.0
WGGD-LP.C (23-)	2.0	368	268,830	0	1,260	0.5
WGGD-LP.A (23-)	2.0	368	268,830	0	1,260	0.5
WPBA-D (21)	39.4	3,779	4,288,714	0	10,576	0.2
WPBA-D (21)	89.0	7,874	4,170,961	0	21,793	0.5
WTBS-LP.C (26-)	0.0	0	2,920,068	0	0	0.0
WTBS-LP (26-)	0.0	0	1,936,987	0	0	0.0
WGGD-LP (23-)	0.0	0	224,818	0	0	0.0
W22AC (22N)	0.0	0	13,566	0	0	0.0
WCTD-LP (22-)	0.0	0	70,456	0	0	0.0

 * Protection provided inn accordance with:

47 CFR §74.793 Digital Low Power TV And TV Translator Station Protection
Of Broadcast Stations.

74.793(h)"Protection to the authorized facilities of low power TV and TV translator stations and digital low power TV and TV translator stations shall be based on not causing predicted interference to the population within the service area defined and described in §§74.707(a) and 74.792, respectively, except that a digital low power TV or TV translator station must not cause a loss of service to 2.0 percent or more of the population predicted to receive service from the authorized low power TV, TV translator, digital low power TV or digital TV translator station."