

TECHNICAL EXHIBIT
DISPLACEMENT APPLICATION FOR
LPTV STATION K06CU (FACILITY ID 35307)
GRANTS, NEW MEXICO
CH 36 0.1 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a displacement application for LPTV station K06CU. Station K06CU is operating on analog channel 6 with a directional antenna maximum (visual) effective radiated power (ERP) of 0.005 kilowatts and an antenna height above mean sea level (RCAMSL) of 2199 meters (See FCC File Number: BLTTV-525). It is proposed to “displace” K06CU from channel 6 to channel 36. The proposed operation specifies to remain at the licensed site.

The licensed channel 6 operation is displaced by FM educational station KIDS, which is located only 0.28 kilometers away. Due to the proximity of KIDS it is believed that K06CU is eligible for displacement relief.

Summary of Proposed Facilities

Below is a tabulation of the proposed facility:

Channel:	36
Geographic Coordinates:	35° 07' 09" North Latitude 107° 54' 02" West Longitude
Antenna Structure Registration:	1216858
Overall Tower Height:	22.9 meters (75 feet)
Ground Elevation:	2158 meters
Radiation Center:	2172 meters AMSL

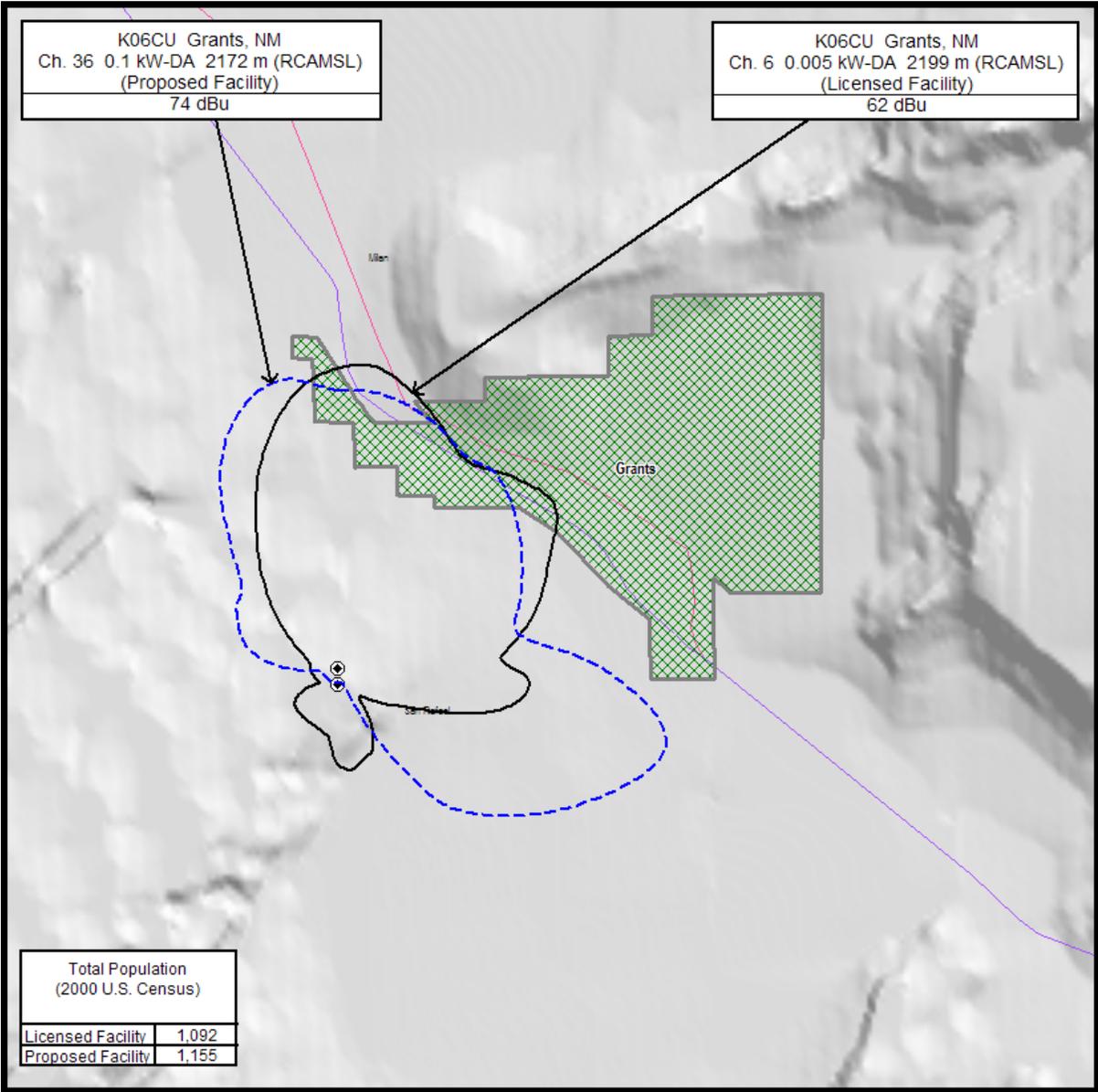
	14 meters (46 feet) AGL
Antenna Type:	Scala 4DR-4-2HW
Antenna Major Lobe Orientation:	30°True
Transmitter Power Output:	0.03 kilowatts
Transmission Line:	LDF6-50 (1-1/4" Foam – 80 feet)
Maximum Effective Radiated Power:	0.1 kilowatts

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.

Below is a map depicting K06CU's licensed and proposed analog protected contours.



Radiofrequency Electromagnetic Field Exposure

The proposed 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 13.7 meters above ground level. The proposed ERP of 0.1 kW is assumed. A conservative relative field value of 0.5 was assumed for the Scala antenna's

downward radiation. The calculated power density at ground level is 0.0031 mW/cm². This is less than 5% of the FCC's recommended limit of 0.4 mW/cm² for channel 36 for an "uncontrolled" environment.

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 to control access to the site. 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure.

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October 29, 2008

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OET-69 Interference Analysis

Census data selected: 1990

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-29-2008 Time: 10:29:22

Record Selected for Analysis

K06CU USERRECORD-01 GRANTS, ETC. NM US
Channel 36 ERP 0.1 kW HAAT 172. m RCAMSL 02172 m
Latitude 035-07-09 Longitude 0107-54-02
Status APP Zone 2 Border Offset
Dir Antenna Make CDB Model 00000000020741 Beam tilt N Ref Azimuth 30.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.061	171.7	5.2
45.0	0.079	93.7	4.2
90.0	0.095	123.3	5.0
135.0	0.000	161.5	1.0
180.0	0.000	105.9	0.5
225.0	0.000	33.0	0.5
270.0	0.000	33.0	1.5
315.0	0.076	39.4	2.7

Contour Overlap Evaluation from LPTV Station to Full Service TV & DTV

Station inside contour of station
KNME-TV 35 ALBUQUERQUE NM BLEDT 20030218BNH

Contour Overlap Evaluation from LPTV to Full Service TV & DTV Complete

Contour Overlap Evaluation from LPTV Station to LPTV Stations

No Spacing violations or contour overlap from LPTV station

Contour Overlap Evaluation from LPTV to LPTV Stations Complete

Contour Overlap to Proposed Station

Station
KTVS-LP 36 ALBUQUERQUE NM BLTTL20031014AIL causes

Contour overlap to station
K06CU 36 GRANTS, ETC. NM USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

- Proposed facility OK to FCC Monitoring Stations
- Proposed facility OK toward West Virginia quiet zone
- Proposed facility OK toward Table Mountain
- Proposed facility is beyond the Canadian coordination distance
- Proposed facility is beyond the Mexican coordination distance
- Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
36	K06CU	GRANTS, ETC. NM	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
35	KNME-TV	ALBUQUERQUE NM	132.2	LIC	BLEDT -20030218BNH

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Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application Ref. No.
35	KNME-TV	ALBUQUERQUE NM	BLEDT -20030218BNH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
36	K06CU	GRANTS, ETC. NM	132.2	APP	USERRECORD-01

Proposal causes no interference

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
36	K06CU	GRANTS, ETC. NM	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	KWBQ	SANTA FE NM	132.3	LIC	BLCDDT	-20030429ABG
29	KWBQ	SANTA FE NM	132.2	CP MOD	BMPCDDT	-20010323AAU
35	KNME-DR	ALBUQUERQUE NM	132.3	LIC	BPRM	-20001208ADU
35	KNME-TV	ALBUQUERQUE NM	132.2	LIC	BLEDT	-20030218BNH
36	K52GA	IGNACIO CO	232.5	CP	BDISDTT	-20060331AWO
36	KKNJ-LP	ALAMOGORDO NM	315.0	APP	BDFCDDT	-20060331AJK
36	KTVS-LP	ALBUQUERQUE NM	132.2	CP	BDFCDDL	-20080618ABU
36	KTVS-LP	ALBUQUERQUE NM	132.2	LIC	BLTTL	-20031014AIL
50	KASY-TV	ALBUQUERQUE NM	132.2	LIC	BLCT	-20011102ABA
51	KYNM-LD	ALBUQUERQUE NM	132.3	CP	BDCCDDL	-20061030AMZ
51	KASY-DT	ALBUQUERQUE NM	132.3	PLN	DTVPLN	-DTVP1487

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 2 K06CU
Before Analysis

Results for: 36N NM GRANTS, ETC.	USERRECORD01	APP
	POPULATION	AREA (sq km)
within Noise Limited Contour	859	38.9
not affected by terrain losses	859	37.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

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