

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION
CLASS A STATION KDCG-LP
FACILITY ID 349
OPELOUSAS, LOUISIANA
CH 22 1.7 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a flash-cut application for Class A station KDCG-LP at Opelousas, Louisiana (Facility ID: 349).

Specifically, this flash-cut application proposes to modify the KDCG-LP authorized digital operation by changing its directional antenna, reducing its maximizing directional effective radiated power (ERP), and slightly reducing its antenna radiation center height above mean sea level (RCAMSL). Class A station KDCG-LP proposes to employ its Scala SL-8 analog antenna and operate with a maximum directional ERP of 1.7 kilowatts and an RCAMSL of 81.2 meters. No other changes are proposed.

Figure 1 depicts the licensed 74 dBu contour and herein proposed digital 51 dBu contour for KDCG-CA. As shown, the proposed 51 dBu contour completely encompasses the licensed 74 dBu contour.

Antenna Structure Registration

The FCC Tower Registration Number for the existing 67 meter (220 foot) tower is 1212281.

Response to Paragraph 11 (Interference)

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, a distance terrain increment of 0.2 kilometer 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). In addition, the proposed facility complies with all the following

applicable rule Sections: Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, and 74.794(b).

Environmental Considerations

The KDCG-CA facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. As shown on Figure 2 (antenna vertical relative pattern), the maximum vertical relative field for depression angles towards the tower base (-60° to -90°) is less than 0.25. Therefore, using a vertical relative field value of 0.25, a maximum ERP of 1.7 kilowatts, and an antenna center of radiation height above ground level of 63 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0010 milliwatt per square centimeter (mW/cm^2), or 0.286 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.35 \text{ mW}/\text{cm}^2$ for TV channel 22). Therefore, the facility complies with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, a protocol will be in effect in the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.

¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been addressed by the tower owner.

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

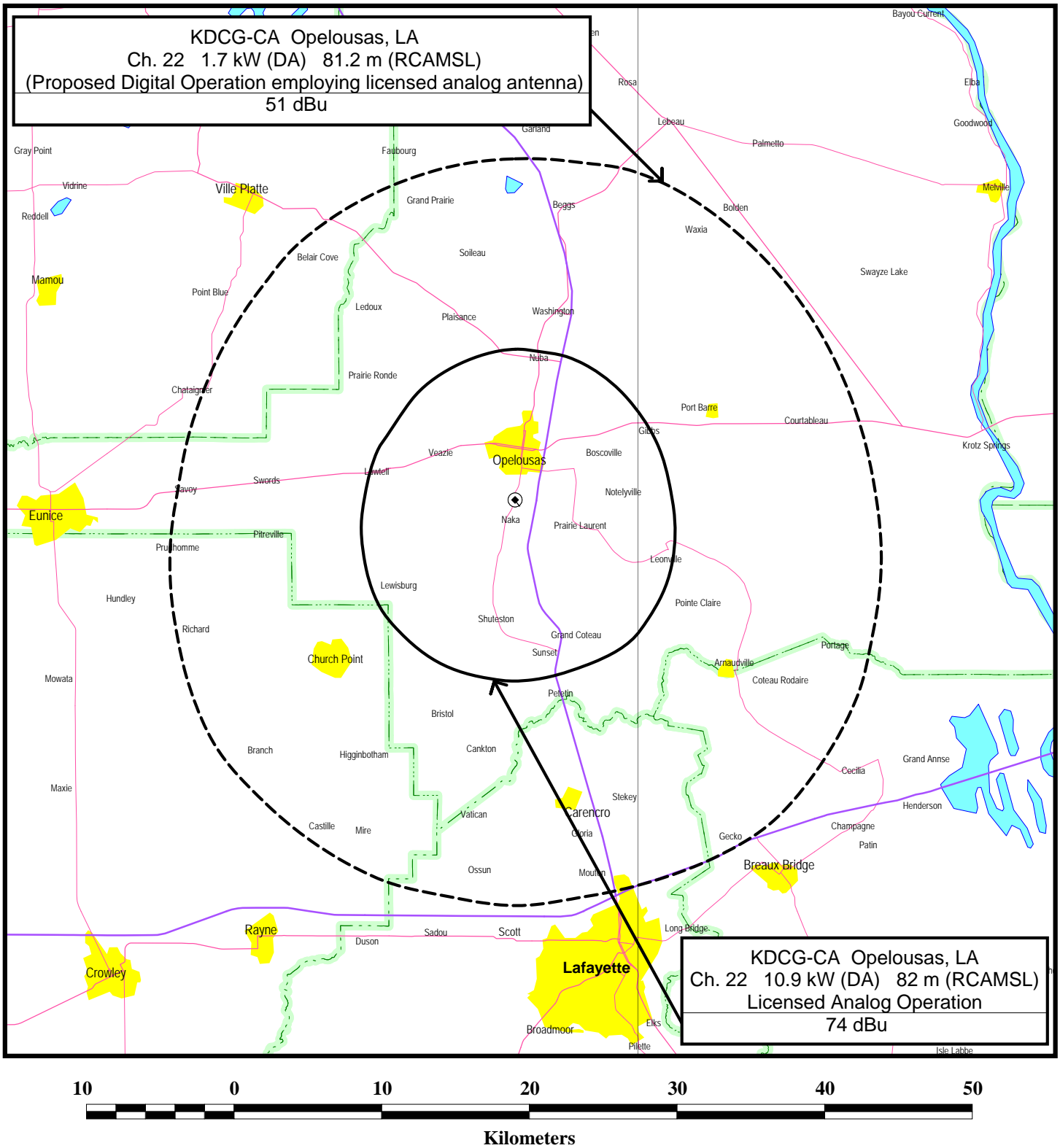
A handwritten signature in black ink that reads "Jerome J. Manarchuck". The signature is written in a cursive style with a large, stylized 'J' at the beginning.

Jerome J. Manarchuck

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March 16, 2009

Figure 1



FCC PREDICTED COVERAGE CONTOURS

DIGITAL CLASS A STATION KDCG-CA
 OPELOUSAS, LOUISIANA
 CH 22 1.7 KW (DA) 81.2 M (RCAMSL)

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 2

