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ENGINEERING EXHIBIT
APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
OHIO/OKLAHOMA HEARST-ARGYLE TELEVISION, INC.
STATION KOCO-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 7 47 KW (MAX-DA) 370 METERS

Ohio/Oklahoma Hearst-Argyle Television, Inc. (hereafter, Hearst-Argyle) is the permittee in BPCDT-20010904ABG for the construction of a new DTV facility for Station KOCO-DT, Oklahoma City, Oklahoma. The construction authorization is for operation on Channel 7 with maximum effective radiated power of 34 kW. A directional antenna is authorized and the specified antenna radiation center height above average terrain is 430 meters. This mode of operation has been allotted for KOCO-DT operation in Appendix B of the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making in MB Docket No. 87-268.

Currently, Station KOCO-DT is operating pursuant to Special Temporary Authorization (STA) BMDSTA-20030604ACT. The STA specifies operation for Station KOCO-DT on Channel 7 with maximum effective radiated power of 47 kW and antenna radiation center height above average terrain of 370 meters. The same tower as in the outstanding construction permit is employed to support the antenna for the STA operation. The tower Antenna Structure Registration Number (ASRN) is 1009951. The same directional radiation pattern as authorized in the construction permit is employed.

The STA facility's noise-limited, 36 dBu, F(50,90), contour is almost contiguous with the CP facility's noise-limited, 36 dBu, F(50,90), contour, as shown in the accompanying Figure 5. The population within the STA's noise-limited service area is 1,400,772 persons. The population within the CP's noise-limited contour is 1,411,803 persons. The STA noise-limited contour encompasses 99.2 % of the population that resides within the noise-limited contour for the CP facility.

In accordance with the policies set forth in the Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television in MB Docket No. 07-91, Hearst-Argyle, now, seeks to modify the outstanding construction permit to specify the facilities authorized in the STA. This application qualifies for expedited action as explained elsewhere.

The instant proposal is, effectively, a check-list proposal and new interference studies are not required. For the sakes of completeness and convenience, the radiation patterns for the Dielectric, type THV-6A7-R C170SP antenna that will be employed, are provided herein. Figure 1 is the horizontal plane pattern for the proposed modified CP operation. Figure 2 is a tabulation of relative field data for the pattern of Figure 1. The elevation pattern for the antenna is provided in Figure 3. The tabulation of relative field data for the pattern of Figure 3 is included as Figure 4.

Figure 5 is a map which shows the predicted principal city, 43 dBu, F(50,90), and noise-limited, 36 dBu, F(50,90), contours for both the CP authorized facility and the CP modification proposed herein. The map demonstrates that the 36 dBu, F(50,90) contour that is proposed for the modified CP operation does not extend beyond that authorized pursuant to the outstanding construction permit. Also, the principal community, Oklahoma City, will be encompassed by the proposed modified CP 43 dBu, F(50,90), contour, as is the case for the outstanding construction permit operation. Figure 6 provides the underlying supporting information for the contours for the proposed modified CP operation. The supporting data for the contours for the outstanding construction permit contours are provided in Figure 7.

As to environmental impact concerns, only the question relating to compliance with the FCC's adopted guidelines regarding radio-frequency radiation (rfr) to the public and to workers needs to be addressed for this existing broadcast use facility.

The tower that supports the proposed modified CP antenna, with the radiation center at a level of 366 meters above the ground, also, supports the Channel 5 (76 MHz) antenna for station KOCO-TV. This latter antenna is a Harris, 6-bay , so-called, Batwing. The antenna radiation center is 462 meters above ground level. The maximum peak visual effective radiated power is 100 kW. The maximum aural effective radiated power is 10 % of the peak visual effective radiated power.

Figure 8 is the vertical plane radiation pattern for a Harris, model TAB-6L, antenna that was extracted from an old catalog. The pattern of Figure 8 is for a beam tilt of 0.7° , whereas the KOCO-TV antenna has a beam tilt of 0.75° . The pattern of Figure 8 reasonably represents the radiation characteristic for the KOCO-TV antenna despite the small difference in the electrical beam tilt, and demonstrates that for depression angles that exceed 8.7° below the horizontal plane, the relative field does not exceed 26 % of the maximum that occurs at the $0.7(5)^\circ$ electrical beam tilt angle.

The relative field in the vertical plane for steep depression angles (8° - 90° below the horizontal plane) for the proposed modified CP antenna does not exceed 27% of the maximum radiation occurring in the vertical plane. (See Figure 3.)

A test calculation for the modified CP operation, using OET Bulletin 65, Edition 97-01, procedures, results in a prediction of an equivalent plane wave power density of 0.00086 mW/cm^2 , corresponding to 0.4 % of the maximum permissible exposure (MPE) of 0.2 mW/cm^2 at uncontrolled (public access) locations at a target that is located 2 meters above ground level at the tower base. This is the maximum exposure that could occur from the modified CP operation at any point within a radius of 2590 meters from

the tower base. The 2590 meter distance was determined as the earth impingement distance for a ray from the antenna center at a depression angle of 8° below the horizontal plane, assuming flat earth.

For distances beyond 2590 meters from the tower base, another test calculation, using the maximum radiation of 47.0 kW at a distance of 2590 meters, yields a contribution of 0.1 % of the MPE. This latter figure represents the greatest contribution that could result at any location beyond 2590 meters from the tower.

Similar test calculations were performed for the KOCO-TV facility. The KOCO-TV contribution to the MPE at the target at the tower base was determined to be 0.3 %. This contribution to the MPE is not exceeded anywhere within a radius of 3,746 meters from the tower base. Beyond 3,746 meters from the tower, the KOCO-TV contribution to the MPE is too small to warrant further consideration. The cumulative effect of the KOCO-TV and KOCO-DT modified CP operations is well below the MPE. The foregoing demonstrates that the KOCO-TV and KOCO-DT modified CP operations are in compliance with the FCC's adopted guidelines regarding rfr exposure to the public.

Insofar as controlled location worker protection to rfr overexposure is concerned, the following is germane. The KOCO-TV/KOCO-DT modified CP supporting tower is girded by a fence with a gate that is kept locked at all times. Entry within the fenced area is available only to authorized persons. Radiation hazard warning signs are posted on the fence (one on each fence side) to alert workers of the prospect for excessive radiation exposure. The fenced area qualifies as a controlled location work area. Procedures that currently are in place regarding power reduction, or the termination of excitation to an antenna, according to the work effort that is involved to avoid worker over exposure to rfr, will continue to be observed. In this manner, avoidance of overexposure of workers to rfr will continue to be achieved.

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Engineering Exhibit
Application for Modification of Construction Permit
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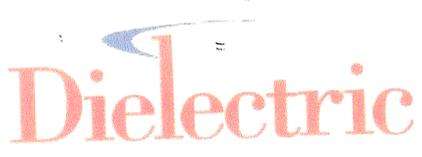
In determining the distances to contours for the KOCO-DT CP and proposed modified CP operations, use was made of the U.S.G.S. 30" terrain elevation database to determine the terrain elevation averages from 3.2 to 16.1 kilometers along specified radials.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 12, 2008.



Bernard R. Segal, P. E.

Maryland Registration # 25811



Proposal Number
Date **08 Aug 2001**
Call Letters **KOCO-DT** Channel **7**
Location **Oklahoma City, OK**
Customer
Antenna Type **THV-6A7-R C170SP**

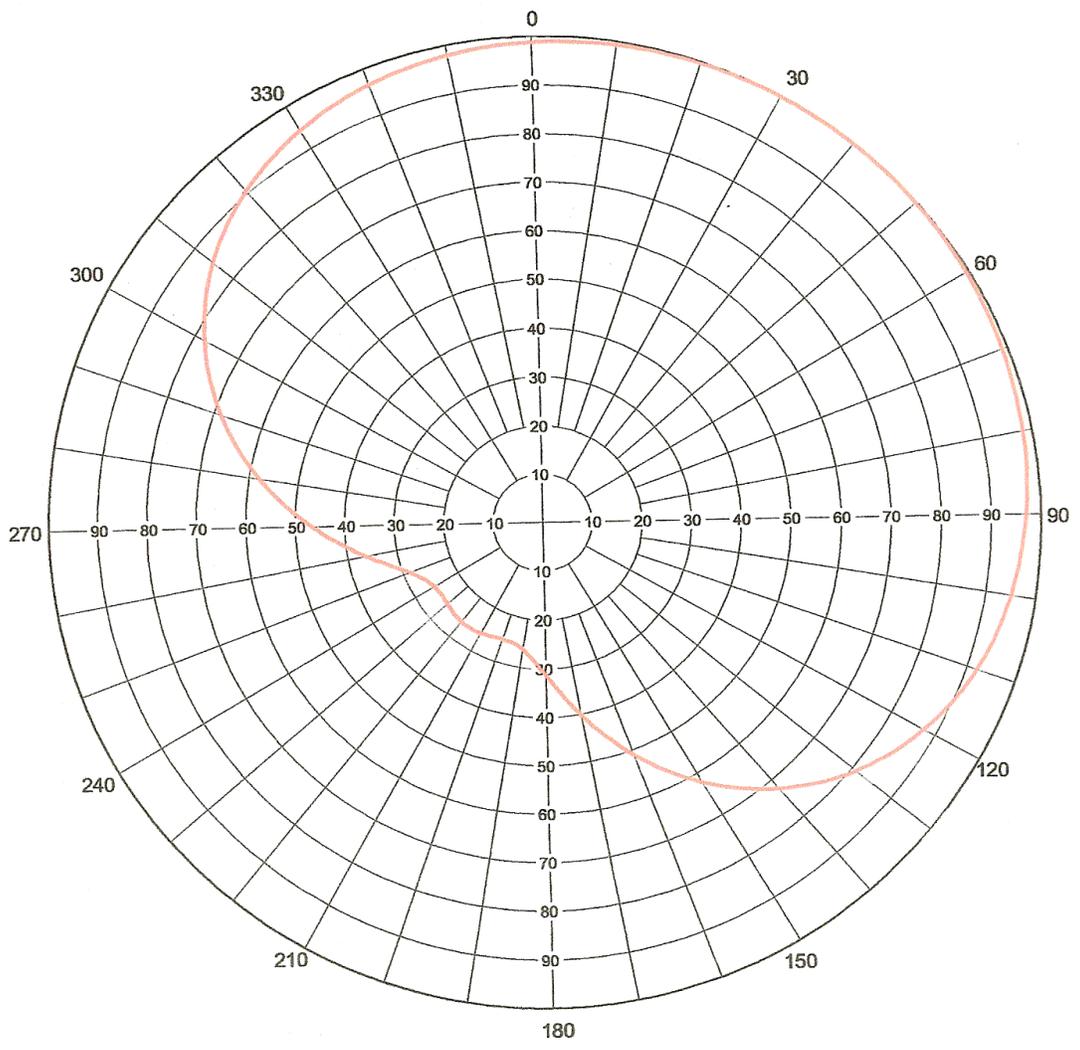
FIGURE 1

AZIMUTH PATTERN

RMS Gain at Main Lobe
Calculated / Measured

1.70 (2.30 dB)
Calculated

Frequency **177 MHz**
Drawing # **THV-C170SP-7**



Remarks:

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FIGURE 2

TABULATION OF AZIMUTH PATTERN DATA
KOCO-DT, OKLAHOMA CITY CITY, OKLAHOMA
CP MOD: CHANNEL 7 47.0 KW (MAX-DA) 370 METERS

Azimuth (Degrees T.)	Relative Field
0	0.988
10	0.993
20	0.997
30	1.000
37+	1.000
40	1.000
50	0.998
60	0.995
70	0.990
80	0.983
90	0.971
100	0.952
110	0.922
120	0.875
130	0.809
140	0.723
150	0.621
160	0.509
170	0.401
180	0.312
190	0.262
200-	0.252
210	0.259
217+	0.261
220	0.261
230	0.254
235-	0.252
240	0.254
250	0.287
260	0.362
270	0.465
280	0.577
290	0.684
300	0.777
310	0.851
320	0.905
330	0.942
340	0.965
350	0.979

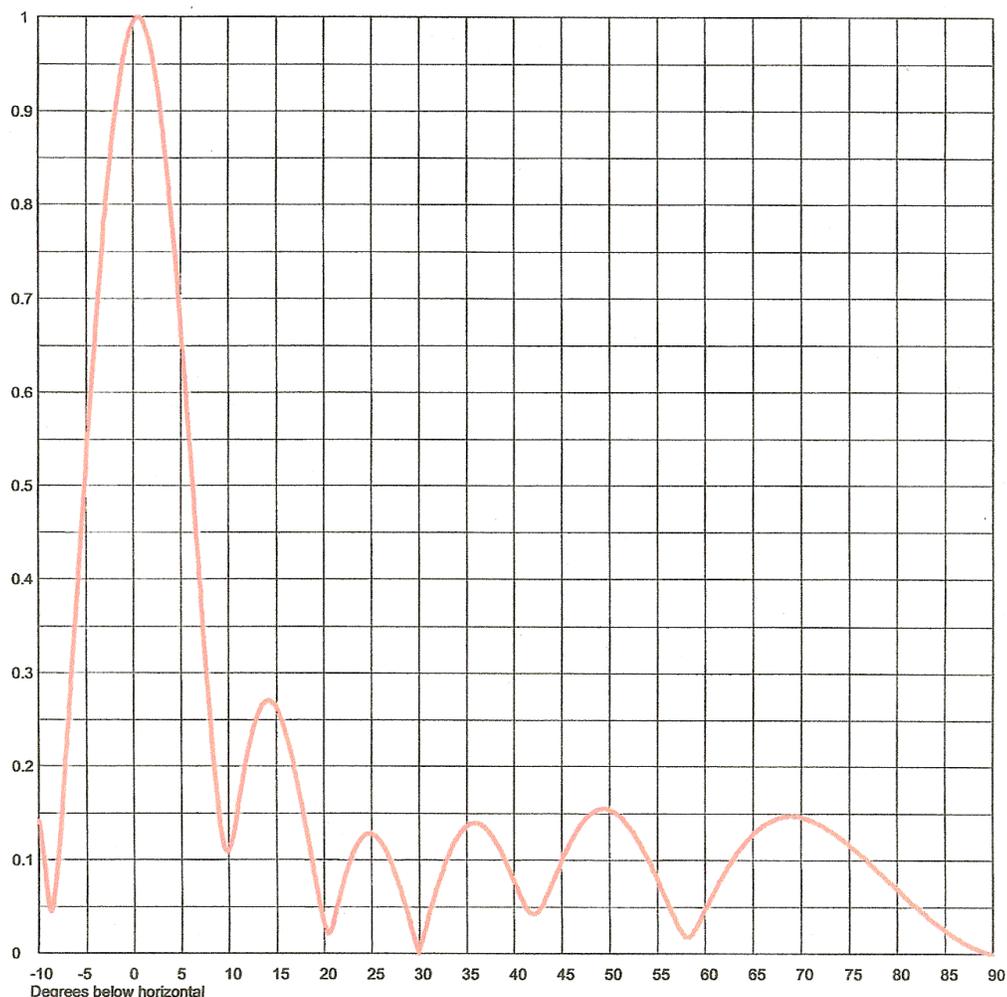
+ denotes a local maximum; - denotes a local minimum



Proposal Number **FIGURE 3**
Date **08 Aug 2001**
Call Letters **KOCO-DT** Channel **7**
Location **Oklahoma City, OK**
Customer
Antenna Type **THV-6A7-R C170SP**

ELEVATION PATTERN

RMS Gain at Main Lobe	6.0 (7.78 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	5.9 (7.71 dB)	Frequency	177.00 MHz
Calculated / Measured	Calculated	Drawing #	06V060050



Remarks:



Proposal Number **FIGURE 4**
 Date **08 Aug 2001**
 Call Letters **KOCO-DT** Channel **7**
 Location **Oklahoma City, OK**
 Customer
 Antenna Type **THV-6A7-R C170SP**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **06V060050**

Angle	Field										
-10.0	0.150	2.4	0.939	10.6	0.130	30.5	0.019	51.0	0.148	71.5	0.141
-9.5	0.106	2.6	0.926	10.8	0.142	31.0	0.037	51.5	0.144	72.0	0.138
-9.0	0.062	2.8	0.911	11.0	0.154	31.5	0.055	52.0	0.137	72.5	0.135
-8.5	0.048	3.0	0.895	11.5	0.184	32.0	0.072	52.5	0.130	73.0	0.132
-8.0	0.091	3.2	0.878	12.0	0.212	32.5	0.087	53.0	0.122	73.5	0.129
-7.5	0.153	3.4	0.859	12.5	0.235	33.0	0.101	53.5	0.113	74.0	0.125
-7.0	0.222	3.6	0.840	13.0	0.252	33.5	0.113	54.0	0.103	74.5	0.121
-6.5	0.294	3.8	0.820	13.5	0.264	34.0	0.122	54.5	0.093	75.0	0.117
-6.0	0.367	4.0	0.798	14.0	0.270	34.5	0.130	55.0	0.082	75.5	0.113
-5.5	0.441	4.2	0.776	14.5	0.270	35.0	0.136	55.5	0.070	76.0	0.108
-5.0	0.515	4.4	0.753	15.0	0.265	35.5	0.139	56.0	0.058	76.5	0.104
-4.5	0.587	4.6	0.729	15.5	0.254	36.0	0.140	56.5	0.047	77.0	0.099
-4.0	0.656	4.8	0.704	16.0	0.239	36.5	0.138	57.0	0.035	77.5	0.094
-3.5	0.721	5.0	0.678	16.5	0.220	37.0	0.135	57.5	0.025	78.0	0.089
-3.0	0.781	5.2	0.652	17.0	0.197	37.5	0.129	58.0	0.018	78.5	0.084
-2.8	0.804	5.4	0.626	17.5	0.172	38.0	0.122	58.5	0.019	79.0	0.079
-2.6	0.825	5.6	0.599	18.0	0.145	38.5	0.113	59.0	0.026	79.5	0.075
-2.4	0.846	5.8	0.571	18.5	0.117	39.0	0.102	59.5	0.035	80.0	0.070
-2.2	0.865	6.0	0.544	19.0	0.088	39.5	0.091	60.0	0.046	80.5	0.065
-2.0	0.883	6.2	0.516	19.5	0.060	40.0	0.079	60.5	0.056	81.0	0.060
-1.8	0.900	6.4	0.487	20.0	0.035	40.5	0.067	61.0	0.066	81.5	0.055
-1.6	0.916	6.6	0.459	20.5	0.021	41.0	0.056	61.5	0.076	82.0	0.051
-1.4	0.930	6.8	0.431	21.0	0.033	41.5	0.047	62.0	0.085	82.5	0.046
-1.2	0.944	7.0	0.403	21.5	0.053	42.0	0.043	62.5	0.094	83.0	0.042
-1.0	0.956	7.2	0.375	22.0	0.073	42.5	0.044	63.0	0.102	83.5	0.037
-0.8	0.966	7.4	0.347	22.5	0.090	43.0	0.051	63.5	0.109	84.0	0.033
-0.6	0.975	7.6	0.320	23.0	0.104	43.5	0.062	64.0	0.116	84.5	0.029
-0.4	0.983	7.8	0.293	23.5	0.115	44.0	0.074	64.5	0.122	85.0	0.025
-0.2	0.989	8.0	0.267	24.0	0.123	44.5	0.086	65.0	0.127	85.5	0.022
0.0	0.994	8.2	0.242	24.5	0.127	45.0	0.098	65.5	0.132	86.0	0.018
0.2	0.998	8.4	0.218	25.0	0.128	45.5	0.109	66.0	0.136	86.5	0.015
0.4	1.000	8.6	0.195	25.5	0.126	46.0	0.119	66.5	0.139	87.0	0.012
0.6	1.000	8.8	0.173	26.0	0.120	46.5	0.129	67.0	0.142	87.5	0.009
0.8	0.999	9.0	0.154	26.5	0.112	47.0	0.137	67.5	0.144	88.0	0.006
1.0	0.997	9.2	0.137	27.0	0.101	47.5	0.143	68.0	0.145	88.5	0.004
1.2	0.993	9.4	0.124	27.5	0.087	48.0	0.148	68.5	0.146	89.0	0.002
1.4	0.987	9.6	0.114	28.0	0.072	48.5	0.152	69.0	0.147	89.5	0.001
1.6	0.980	9.8	0.110	28.5	0.055	49.0	0.154	69.5	0.146	90.0	0.000
1.8	0.972	10.0	0.109	29.0	0.038	49.5	0.155	70.0	0.146		
2.0	0.963	10.2	0.113	29.5	0.019	50.0	0.154	70.5	0.144		
2.2	0.952	10.4	0.121	30.0	0.000	50.5	0.152	71.0	0.143		

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Figure 6

KOCO-DT, OKLAHOMA CITY, OKLAHOMA
CP MOD: CH. 7 47.0 KW (MAX-DA) 370 METERS

**Tabulation of Average Elevations, ERP's Employed, and
Distances to F(50,90) Contours**

Site Coordinates: 35° 33' 45" North Latitude
97° 29' 24" West Longitude

Antenna Radiation Center: 721 m AMSL

Azimuth (Deg. T.)	Radiation Center Above 3.2-16.1 km Terrain Avg. (meters)	ERP (kW)	Distance to	
			43 dBu Contour (km)	36 dBu Contour (km)
0	368	45.9	96.7	110.0
15	374	46.5	97.3	110.6
30	382	47.0	97.9	111.3
45	395	46.9	98.8	112.4
60	395	46.5	98.7	112.3
75	384	45.7	97.8	111.2
90	374	44.3	96.9	110.2
105	361	41.3	95.4	108.5
120	363	36.0	94.5	107.5
135	365	27.6	92.6	105.4
150	362	18.1	89.0	101.6
165	362	9.73	84.2	96.7
180	357	4.58	78.2	90.5
195	360	3.10	75.5	87.7
210	361	3.15	75.6	87.9
225	362	3.13	75.6	87.9
240	341	3.03	73.9	86.1
255	341	4.93	77.6	89.9
270	354	10.2	84.0	96.5
285	365	18.7	89.5	102.1
300	376	28.4	93.6	106.4
315	381	36.2	95.8	109.0
330	378	41.7	96.7	110.0
345	381	44.4	97.4	110.7
Average*	370			

* The average is for the eight standard radials.

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Figure 7

KOCO-DT, OKLAHOMA CITY, OKLAHOMA
CP: CH. 7 34.0 KW AVG. (MAX-DA) 430 METERS

Tabulation of Average Elevations, ERP's Employed, and
Distances to F(50,90) Contours

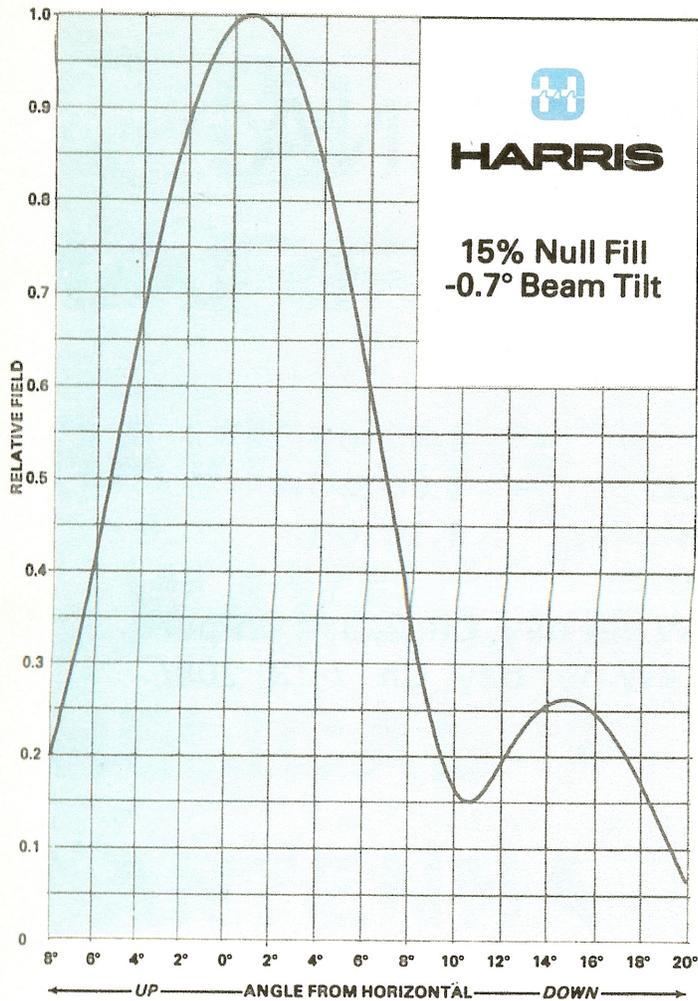
Site Coordinates: 35° 33' 45" North Latitude
97° 29' 24" West Longitude

Antenna Radiation Center: 781 m AMSL

Azimuth (Deg. T.)	Radiation Center Above 3.2-16.1 km Terrain Avg. (meters)	ERP (kW)	Distance to	
			43 dBu Contour (km)	36 dBu Contour (km)
0	428	33.2	98.0	112.2
15	434	33.7	98.5	112.9
30	442	34.0	99.1	113.6
45	455	33.9	100.1	114.9
60	455	33.7	99.9	114.7
75	444	33.1	99.0	113.6
90	424	32.1	98.1	112.4
105	421	29.9	96.8	110.6
120	423	26.0	95.8	109.5
135	425	20.0	93.9	107.3
150	422	13.1	90.5	103.3
165	422	7.04	85.8	98.1
180	417	3.31	79.6	92.0
195	420	2.25	76.7	89.3
210	421	2.28	76.8	89.4
225	422	2.26	76.8	89.4
240	401	2.19	75.3	87.9
255	401	3.57	79.1	91.6
270	414	7.35	85.6	98.0
285	425	13.5	90.9	103.8
300	436	20.5	94.7	108.5
315	441	26.2	96.9	111.2
330	438	30.2	97.9	112.2
345	441	32.1	98.5	113.0
Average*	430			

* The average is for the eight standard radials.

FIGURE 8



TAB-6L

ANTENNA ELEVATION PATTERN

OHIO/OKLAHOMA HEARST-ARGYLE TELEVISION, INC.
STATION KOCO-TV, OKLAHOMA CITY, OKLAHOMA
CH. 5 100 KW (MAX-DA) 464 METERS

Bernard R. Segal, P. E. Consulting Engineer

