

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
DIGITAL CLASS A STATION KFOL-CA
FACILITY ID 24978
HOUMA, LOUISIANA
CH 30 15 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application to modify the authorized digital construction permit (BMPDTA-20080804AEE) of Class A station KFOL-CA on channel 30 at Houma, Louisiana (Facility ID: 24978).

This application proposes to modify the KFOL-CA authorized operation by relocating to an alternate transmitter site, operating with a different directional antenna, increasing the maximum directional effective radiated power (ERP), and increasing the antenna radiation center height above mean sea level (RCAMSL).

Specifically, it is proposed to operate on digital channel 30 employing an SWR SWEDL160I-30-DT directional antenna having a main lobe orientation of 240 degrees true. The maximum directional effective radiated power will be 15 kW and the antenna radiation center height above mean sea level will be 123.4 meters.

Figure 1 depicts the licensed 74 dBu analog contour and the proposed digital 51 dBu contour for KFOL-CA. As indicated, the proposed 51 dBu contour completely encompasses the licensed 74 dBu contour, therefore this application is considered a minor change application in compliance with Section 73.3572 of the FCC rules.

Antenna Structure Registration

It is proposed to operate on an existing 139 meter (456 foot) structure. The FCC Tower Registration Number for the existing tower is 1022617.

Response to Paragraph 13 (Interference)

A post-transition interference study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending digital TV, analog and digital LPTV/translators, and analog and digital Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a post-transition interference analysis was conducted employing a 1 kilometer cell size resolution, a distance terrain increment of 1 kilometer and 2000 U.S. Census. Results of the analysis indicate that the proposal will not cause prohibited interference to any pertinent allotment or stations. In addition, the proposed facility complies with all the following applicable rule Sections: Sections 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, and 74.794(b).

Environmental Considerations

The KFOL-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. Based on a conservative vertical relative field value of 0.4 for depression angles towards the tower base (-60° to -90°), a maximum ERP of 15 kilowatts, and an antenna center of radiation height above ground level of 122.5 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0055 milliwatt per square centimeter (mW/cm²), or 1.46 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.379 mW/cm² for TV

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.

channel 30). 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, 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 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.

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 as part of the registration process.

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

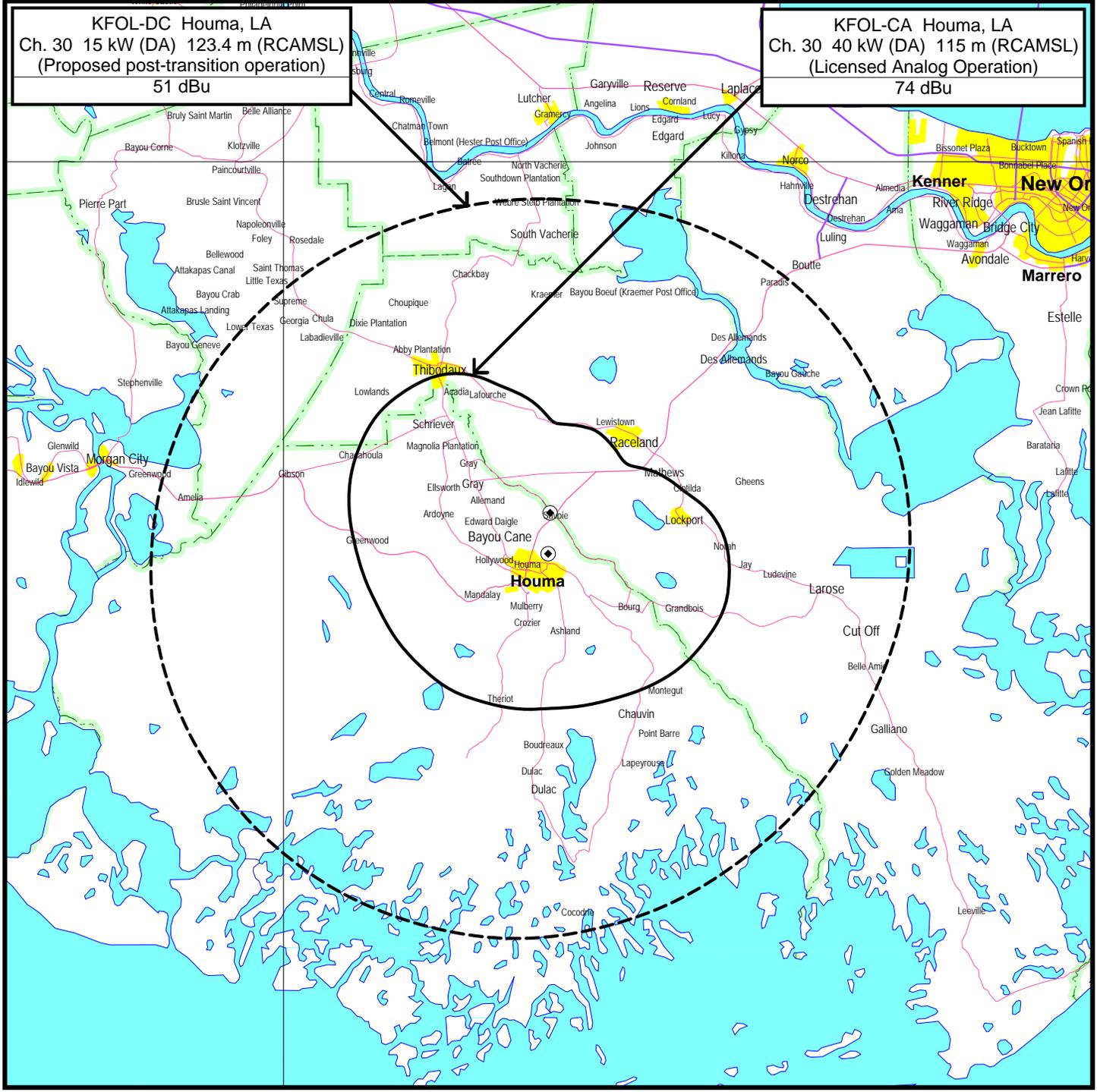


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

**CLASS A STATION KFOL-CA
HOUMA, LOUISIANA**

CH 30 15 KW (DA) 123.4 M (RCAMSL)

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