

B. W. St. Clair

COMPREHENSIVE TECHNICAL EXHIBIT

**AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT
KHFD-LD, FCC ID 127785
FCC FILE NUMBER BPDTL-20090825ATC
EICB-TV EAST, LLC**

Amendment to Application for Minor Change to Licensed Facility. This application seeks to amend the above captioned application as follows:

1. Maximum Effective Radiated Power is revised to 5.0 kW (at III.9)
2. Transmitter Output Power is revised to 0.5 kW (at III.10)
3. "Full Service" mask filter is revised to "Stringent" mask filter (at III.12)
4. Authority and discussion of transmitter site move fully explained in this exhibit.

Interference Study. An OET 69 Longley-Rice study exhibit was performed for the within-captioned application. It was run on a Sun Blade computer running the official FCC Longley-Rice program as provided by Techware, Inc. The study yielded the information that the within application requires the use of a stringent mask filter to comply with with all appropriate sections of §74.793. Copy of the study applicable to the 30 day letter is appended.

Distance of move of transmitter site. The 30 day letter also raised the issue that "the proposed relocation exceeds 30 miles." In a follow up correspondence, the authority cited for this was a portion of §74.787(a)(4), which reads, in part, as follows:

"Displacement applications. A digital low power television or television translator station which is causing or receiving interference or is predicted to cause or receive interference to or from an authorized TV broadcast station, DTV station or allotment or other protected station or service, may at any time file a displacement relief application for change in channel, together with technical modifications that are necessary to avoid interference or continue serving the station's protected service area, provided the proposed transmitter site is not located more than 30 miles from the reference coordinates of the existing station's community of license. *See* §76.53 of this chapter. A displacement relief application shall be filed on FCC Form 346 and will be considered a minor change and will be placed on public notice for a period of not less than 30 days to permit the filing of petitions to deny. These applications will not be subject to the filing of competing applications.

..."

With respect to the cited rulepart, please take note of the fact that (a) the within application is not a displacement application and does not seek displacement relief and (b) even if it were a displacement application, both the location of the underlying license and the location of the proposed transmitter site are indeed within 30 miles of the reference coordinates (32° 47' 09" North, 96° 47' 37" West) of the city of Dallas, TX. as outlined in §76.53 and in Public Notice DA 09-1487.

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AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT

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The within application is an application for minor change and is clearly defined in §74.787(b)(1) and (2) as a minor change in which some portion of the service contour of the underlying license and the proposed change overlap one another. In this instance, the overlap is significant and the move is made to provide improved service to Dallas, TX, which is also the city of license of the facility as shown in BLDTL-20090724ADZ. Copy of a map showing the overlap is appended.

Accordingly, it is respectfully requested that the within amendment be accepted and the application granted.

J. R. McDonald
November 13, 2009

addenda:

Map, overlap of service contours of license and application
Longley-Rice interference study report

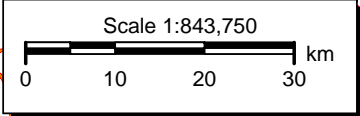
ADDENDUM TO COMPREHENSIVE TECHNICAL EXHIBIT
BPDTL-20090825ATC AS AMENDED

KHFD-LD-D.A
BPDTL20090825ATC
Latitude: 32-35-03 N
Longitude: 096-57-48 W
ERP: 5.00 kW
Channel: 51
Frequency: 695.0 MHz
AMSL Height: 499.3 m
Elevation: 249.3 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 1.5
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 90.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

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KHFD-LD as licensed
BLD TL-20090724ADZ

KHFD-LD application
BPDTL-20090825ATC



ADDENDUM, COMPREHENSIVE TECHNICAL EXHIBIT

AMENDMENT TO APPLICATION FOR MINOR CHANGE IN LICENSED FACILITY
SUBJECT APPLICATION: KHFD-LD, DALLAS TX, FACILITY ID 127785,
FCC FILE NUMBER BPDTL-20090825ATC, EICB-TV EAST, LLC

Census data selected: 2000

Post DTV Transition Database Selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-19-2009 Time: 16:20:18

Record Selected for Analysis

NEW51I USERRECORD-01 DALLAS TX US
Channel 51 ERP 5. kW HAAT 307. m RCAMSL 00499 m STRINGENT MASK
Latitude 032-35-03 Longitude 0096-57-48
Status APP Zone 1 Border
Dir Antenna Make CDB Model 00000000020059 Beam tilt N Ref Azimuth 314.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 0.5 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)	51.0 dBu F(50,90) (km)
0.0	4.295	325.5	50.0
45.0	4.967	297.3	49.3
90.0	1.009	298.1	40.7
135.0	0.000	297.5	7.2
180.0	0.000	269.8	7.1
225.0	0.001	309.4	7.8
270.0	1.175	325.3	42.8
315.0	4.947	331.3	51.1

Contour Overlap to Proposed Station

Station
KATA-CD 50 MESQUITE TX BLTTA20050218ACB

Station inside contour of Digital LPTV station
NEW51I 51 DALLAS TX USERRECORD01

Station
KATA-CD 50 MESQUITE TX BSTA20070226ABR

Station inside contour of Digital LPTV station
NEW51I 51 DALLAS TX USERRECORD01

Station
KATA-CD 50 MESQUITE TX BMPTTA20031125AHW

Station inside contour of Digital LPTV station
NEW51I 51 DALLAS TX 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	Call	City/State	ARN
51	NEW51I	DALLAS TX	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
44	KLEG-LP	DALLAS TX	26.4	LIC	BLTTL	-20000721ABQ
44	KLEG-LP	DALLAS TX	26.4	APP	BPTTA	-20080804AEJ
44	K59FJ	SHERMAN TX	123.0	APP	BPTTL	-20020726AAQ
47	KUVN-CA	FORT WORTH TX	39.3	LIC	BLTTA	-20030929ASK
50	NEW	DURANT OK	155.5	APP	BSFDTT	-20060630BCS
50	K50LF-D	DENISON TX	148.5	CP	BDCCDTL	-20081211AAB
50	KATA-CD	MESQUITE TX	0.8	LIC	BLDTA	-20090604ABX
50	KATA-CD	MESQUITE TX	0.8	LIC	BLTTA	-20050218ACB
50	KATA-CD	MESQUITE TX	0.8	APP	BSTA	-20070226ABR
50	KATA-CD	MESQUITE TX	0.9	APP	BMPTTA	-20031125AHW
50	K50IW	PARIS TX	175.1	CP	BNPTTL	-20000829ANB
51	K51FO	LEESVILLE LA	385.3	CP	BDISDTT	-20071221ACU
51	NEW	MONTGOMERY LA	397.1	APP	BNPTTL	-20000828AER
51	K51JW-D	SHREVEPORT LA	301.2	CP	BDCCDTL	-20061012ACW
51	K51CV	GOULD OK	356.0	LIC	BLTT	-19881215IE
51	K51EK	MCALESTER OK	289.8	LIC	BLTT	-19951212JB
51	KSBI	OKLAHOMA CITY OK	338.4	CP	BPCDT	-19991028AFH
51	KXAP-LD	TULSA OK	402.3	LIC	BLDTL	-20080707ABC
51	K51CK	ABILENE TX	261.4	LIC	BLTTL	-19900214JE
51	K51CK	ABILENE TX	261.3	CP	BDFCDTT	-20060313AAI
51	KBVO-CA	AUSTIN TX	263.2	LIC	BLTTA	-20020405ABE
51	KBVO-CA	AUSTIN TX	263.2	CP	BDFCDTA	-20060331ASH
51	NEW	COLLEGE STATION TX	221.6	APP	BNPDTL	-20090825AVK
51	KCEB	LONGVIEW TX	192.3	CP MOD	BMPCDT	-20081118AAA
51	KCEB-DR	LONGVIEW TX	192.3	APP	BPRM	-20080514AHH
51	KAXW-LP	MULLIN TX	133.0	CP	BDISDTL	-20081118ALE
51	KPKS-LP	SAN ANGELO TX	352.4	LIC	BLTTL	-20021115AAF
51	K51JF	SAN ANTONIO TX	379.0	LIC	BLTTL	-20060927AKS
51	K51JF	SAN ANTONIO TX	379.0	APP	BDFCDTL	-20081203AEK
51	KASX-LD	SWEETWATER TX	319.2	CP	BDCCDTL	-20061027AAZ
51	KAWF-LP	WICHITA FALLS TX	208.7	LIC	BLTTL	-20080605AAP
53	KZFW-LP	GREENVILLE TX	64.7	APP	BPTTL	-20040520AJJ

Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
50	KATA-CD	MESQUITE TX	BLDTA	-20090604ABX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
49	NEW	COLLEGE STATION TX	222.3	APP	BNPDTL	-20090825AVS
49	K49HT	COMMANCHE TX	104.7	APP	BDFCDTL	-20061030AAE
49	KJJM-LD	DALLAS & MESQUITE TX	0.0	APP	BDISDTL	-20090622ADP
50	K50KE-D	ALTUS OK	317.3	CP	BDCCDTT	-20061030ADW
50	NEW	DURANT OK	155.2	APP	BSFDTT	-20060630BCS
50	KOPX-TV	OKLAHOMA CITY OK	337.8	LIC	BLCDT	-20021108ABC
50	KOPX	OKLAHOMA CITY OK	337.8	PLN	DTVPLN	-DTVP1777
50	K17HK	BEAUMONT TX	384.3	APP	BDISDTL	-20090410AWA
50	KBTX-TV	BRYAN TX	243.0	CP MOD	BMPCDT	-20080611AAI
50	KBTX-TV	BRYAN TX	243.0	PLN	DTVPLN	-DTVP1783
50	K50LF-D	DENISON TX	148.1	CP	BDCCDTL	-20081211AAB
50	KNTA-LD	NEW BRAUNFELS TX	336.1	CP	BDCCDTL	-20061030ACH
51	NEW	COLLEGE STATION TX	222.3	APP	BNPDTL	-20090825AVK
51	KAXW-LP	MULLIN TX	133.4	CP	BDISDTL	-20081118ALE
51	NEW51I	DALLAS TX	0.8	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 7 KATA-CD
Before Analysis

Results for: 50A TX MESQUITE BLDTA 20090604ABX LIC
HAAT 1.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4040807	5450.9
not affected by terrain losses	4040807	5450.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	4	0.5
lost to ATV IX only	4	0.5
lost to all IX	4	0.5

Potential Interfering Stations Included in above Scenario 1

50A TX BRYAN	DTVPLN	DTVP1783	PLN
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After Analysis

Results for: 50A TX MESQUITE BLDTA 20090604ABX LIC
HAAT 1.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4040807	5450.9
not affected by terrain losses	4040807	5450.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	16398	22.7
lost to ATV IX only	16398	22.7
lost to all IX	16398	22.7

Potential Interfering Stations Included in above Scenario 1

50A TX BRYAN	DTVPLN	DTVP1783	PLN
51A TX DALLAS	USERRECORD01		APP

Percent new IX = 0.4057%

Worst case new IX 0.4057% Scenario 1

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