

ENGINEERING EXHIBIT

Application to Modify Digital Television Station Construction Permit

prepared for

CBS Broadcasting Inc.

KCCW-TV Walker, MN

Facility ID 9640

Ch. 12 59 kW 286 m

CBS Broadcasting Inc. (“*CBS*”) is the licensee of television station KCCW-TV, Walker, MN. A Construction Permit (“CP”, BPCDT-20080527ABE) authorizes construction of the KCCW-TV post-transition digital facility on Channel 12, as established in Appendix B of the Seventh Report and Order in MB Docket 87-268. That CP authorizes operation with an effective radiated power (“ERP”) of 14.3 kW at 286 meters antenna height above average terrain (“HAAT”) with a nondirectional antenna. A “maximization” CP was subsequently granted (BMPCDT-20080619AAY) to authorize operation with the same antenna with an increased ERP of 85 kW.

KCCW-TV commenced post-transition digital operation pursuant to the 14.3 kW CP and a license application is pending to cover the construction (BLCDT-20090615AAC). The ERP was recently raised to 59 kW pursuant to Special Temporary Authority (“STA” BDSTA-20100203AAY). This ERP represents the maximum power achievable by the existing transmitter. *CBS* has determined that the additional transmitting equipment necessary to raise the power capacity beyond 59 kW ERP will not be acquired. Therefore, *CBS* herein proposes to modify the 85 kW CP to specify 59 kW for permanent operation.

The KCCW-TV nondirectional transmitting antenna is a horizontally polarized RCA model TW-18A-12P. The antenna is top-mounted on an antenna supporting structure having FCC Antenna Structure Registration (“ASR”) number 1024461. No change to the overall structure height and no tower work are required to carry out this proposal.

A map is supplied as **Figure 1**, which depicts the standard predicted coverage contours. This map includes the location of Walker, KCCW-TV's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 43 dBμ contour.

The proposed KCCW-TV facility's predicted service population provides a 117.2 percent match of the Appendix B facility, as detailed in the table below.

Population Summary		
Population Summary (2000 Census) OET Bulletin 69 method	Appendix B	Proposed
Within Noise Limited Contour	222,151	266,906
Not affected by terrain losses	217,725	262,282
Lost to all interference	3,265	11,015
Net DTV Service	214,460	251,267
Match of Appendix B	---	117.16%

The proposed KCCW-TV facility will employ the same technical parameters as currently authorized except that the 85 kW ERP is reduced to 59 kW. Thus, any resulting interference to other stations is reduced and detailed interference analysis to other television facilities is not believed to be required.¹

The nearest FCC monitoring station is 740 km distant at Grand Island, NE. This exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The site is not located within the areas requiring coordination with "quiet" zones specified in §73.1030(a) and (b). There are no AM stations within 3.2 kilometers of the site, based on information contained within the Commission's database. The site location is within the Canadian coordination zone (183 km to the Canada border), however no further international coordination should be necessary for the reduction in authorized power sought herein.

¹ The current KCCW-TV CP for 85 kW involved interference in excess of the FCC's 0.5% limit to KEYC-TV (Ch. 12 Mankato, MN) and KRII(DT) (Ch. 11 Chisolm, MN). Interference consent agreements were executed with the licensees of these stations in which KEYC-TV accepted 0.84% interference and KRII accepted 0.59% interference from KCCW-TV's 85 kW facility. With KCCW-TV's reduction to 59 kW as proposed herein, the interference to KEYC-TV is reduced to 0.57% and interference to KRII is reduced to less than the 0.5% limit based on OET Bulletin 69 analysis using default parameters.

Human Exposure to Radiofrequency Electromagnetic Field (Environmental)

The proposal will involve use of an existing transmitting antenna. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No tower construction or change in structure height is proposed. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. Based on OET-65 equation (10), and assuming 30% antenna relative field in downward elevations, the calculated power density attributable to the proposed facility at locations near the transmitter site at a height of two meters above ground level is $2.2 \mu\text{W}/\text{cm}^2$, which is 1.1 percent of the "uncontrolled / general public" maximum permissible exposure limit. This is below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic field exposure in excess of FCC guidelines.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.



Joseph M. Davis, P.E.
February 25, 2010

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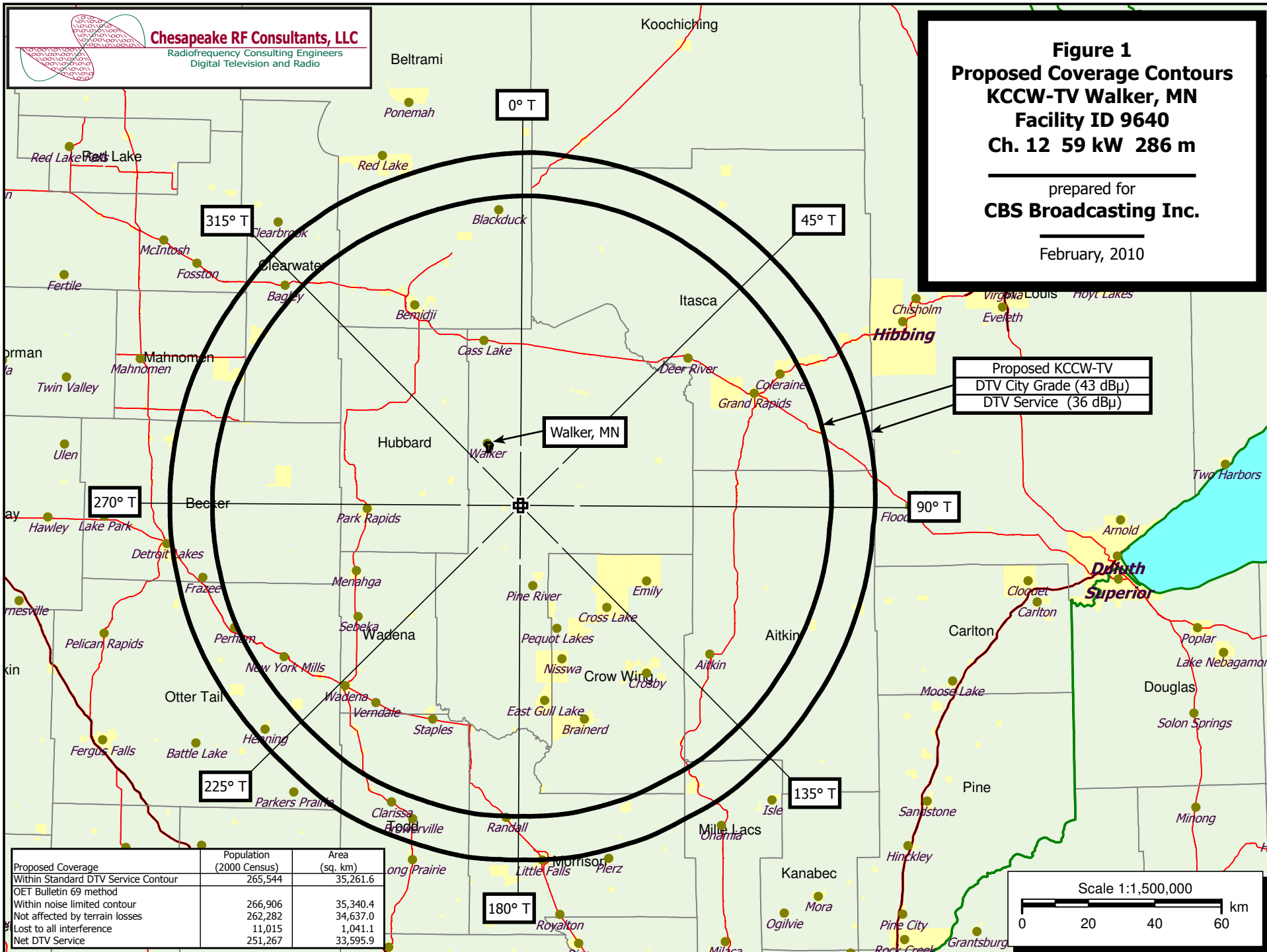
List of Attachments

Figure 1	Proposed Coverage Contours
Form 301	Saved Version of Engineering Sections from FCC Form at Time of Upload

This material was entered February 25, 2010 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's account number and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

Figure 1
Proposed Coverage Contours
KCCW-TV Walker, MN
Facility ID 9640
Ch. 12 59 kW 286 m

prepared for
CBS Broadcasting Inc.
February, 2010



Proposed Coverage	Population (2000 Census)	Area (sq. km)
Within Standard DTV Service Contour	265,544	35,261.6
OET Bulletin 69 method		
Within noise limited contour	266,906	35,340.4
Not affected by terrain losses	262,282	34,637.0
Lost to all interference	11,015	1,041.1
Net DTV Service	251,267	33,595.9

SECTION III-D - DTV Engineering	
Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p>Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p>Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION III-D - DTV Engineering	
TECHNICAL SPECIFICATIONS	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
TECH BOX	
1.	Channel Number: DTV 12 Analog TV, if any
2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 46 Minutes 56 Seconds 5 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 94 Minutes 27 Seconds 19 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1024461 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 423 meters
6.	Overall Tower Height Above Ground Level: 304.5 meters
7.	Height of Radiation Center Above Ground Level: 286.5 meters
8.	Height of Radiation Center Above Average Terrain : 286.4 meters
9.	Maximum Effective Radiated Power (average power): 59 kW

10.	Antenna Specifications:	
	a. Manufacturer RCA Model TW-18A-12P	
	b. Electrical Beam Tilt: degrees <input checked="" type="checkbox"/> Not Applicable	
	c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). [Exhibit 43]	
	d. Polarization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical	
	e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional)	
	[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]	
	If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. Exhibit required. [Exhibit 44]	
11.	Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if Certification Checklist Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 45]
12.	If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if Certification Checklist item 3 is answered "No.")	[Exhibit 46]
13.	Environmental Protection Act. Submit in an Exhibit the following: If Certification Checklist Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site. By checking "Yes" to Certification Checklist Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines. If Certification Checklist Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.	[Exhibit 47]
PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.		

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOSEPH M. DAVIS, P.E.	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 2/25/2010	
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City MANASSAS	State or Country (if foreign address) VA	Zip Code 20112 -
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