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ENGINEERING AMENDMENT TO BPTVA-20070611ABC

ENGINEERING EXHIBIT EE-1:

KM LPTV OF CHICAGO-13, L.L.C.

CLASS A TELEVISION STATION WOCK-CA CHANNEL 13, CHICAGO, IL

APPLICATION FOR AUTHORITY TO MAKE CHANGES IN A CLASS A TELEVISION BROADCAST STATION

16 OCTOBER 2008

FCC FACILITY NUMBER
35092

ENGINEERING AMENDMENT AND
EXHIBIT

IN SUPPORT OF

AN APPLICATION FOR AUTHORITY TO MAKE

CHANGES IN A CLASS A TELEVISION BROADCAST STATION

CLASS A TELEVISION STATION WOCK-CA

CHICAGO, ILLINOIS

ENGINEERING AMENDMENT

TO

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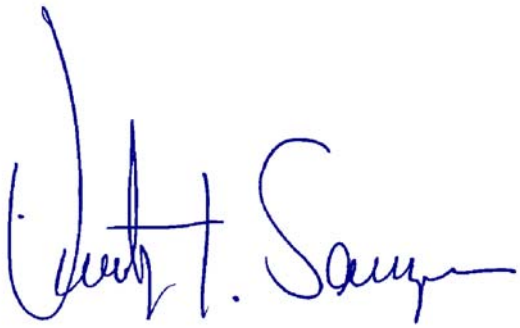
TABLE OF CONTENTS:

DECLARATION

I, Timothy Z. Sawyer, declare and that I have provided engineering services in the area of telecommunications since 1969. My qualifications are a matter of record with the Federal Communications Commission. I am a senior engineer with the firm of Mullaney Engineering, Inc., consulting radio telecommunications engineers with offices in Gaithersburg, Maryland.

The firm of Mullaney Engineering, Inc., has been retained by KM LPTV OF CHICAGO-13, L.L.C., to prepare the instant engineering exhibit AND amendment in support of ***an application for authority to make changes in a Class A Television Broadcast Station WOCK-CA Chicago, Illinois.*** (FCC FACILITY ID NUMBER: 35092).

All facts contained herein are true of my own knowledge except those stated to be on information and belief, and as to those facts, I believe them to be true. I declare under the penalty of perjury that the foregoing is true and correct.



Timothy Z. Sawyer

Executed on the 16th day of October 2008

ENGINEERING AMENDMENT
TO
BPTVA-20070611ABC

ENGINEERING EXHIBIT EE-1:

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16 OCTOBER 2008

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement (and engineering amendment) and the instant engineering exhibit of which it is part has been prepared on behalf of KM LPTV OF CHICAGO-13, L.L.C., (hereinafter "KM").

This engineering amendment incorporates all previously submitted engineering material with the following changes made herein:

1. This narrative statement and FCC Form 301-CA, Section III-Engineering (Analog) Tech Box Question Number 9, "Maximum ERP in any Horizontal and Vertical Angle" are modified as need to specify maximum effective radiated power (ERP) as 2.4 kilowatts.

2. Figure 3, Allocation Study OET Bulletin No. 69 Interference Study Summary is modified to show no increase in existing levels of interference to WREX-TV, Rockford, Il Channel 13 from this proposal will occur over that of the currently authorized WOCK-CA (licensed) facility.

By means of the instant application, KM proposes to make permissive minor changes to the directional antenna system utilized by station WOCK-CA and its location.

Specifically KM proposes to change the directional antenna from a 4-bay antenna to a 2-bay antenna. No change in the relative field of the horizontal plan pattern will occur. The pattern shape is identical to that currently authorized.

Only a sight change in the antenna location (and its elevation) atop the John Hancock Building in Chicago will occur.

Currently WOCK-CA operates on Television Channel 13 employing an effective radiated power (ERP) of 3.0 kilowatts toward the radio horizon. WOCK proposes to decrease the maximum power at the horizon to 2.4 kilowatts. The minor reduction in power is a result of the slight increase in antenna height.

By decreasing the ERP of the station slightly, there will be no gain area as a result of increasing the antenna height and no increase in predicted interference to existing or pending facilities.

The facilities will be built to comply with the *FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* and the instant proposal is categorically excluded from environmental processing pursuant to the provisions of Section 1.1306 of the Commission's Rules. A more detailed discussion of environmental factors is included under the heading Environmental Considerations below.

Information requested by exhibits in response to questions on Section III of FCC Form 301-CA is incorporated in the following paragraphs, figures, and tables.

Processing of this application is requested under the rules currently in effect at the time of filing.

II. ENGINEERING DISCUSSION:

A. Transmitter/Antenna Location:

KM proposes to relocate its directional antenna atop the John Hancock Building from the East Tower to the West tower. In order to accommodate the antenna on the West tower (FCC Tower Registration Number: 1009013) the overall vertical aperture of the antenna has been reduced from four bays to two bays.

The antenna will be side-mounted on the west tower of the John Hancock Building with a center of radiation at 1280 feet (390.1 meters) above ground level (AGL), 1873 feet (570.9 meters) above mean sea level (AMSL).

B. Coverage & Service Contours:

Figure 1, is a map showing the location of the present and proposed 74 dBu f(50,50) contours. As can be seen from this figure, the contours are identical.

C. Proposed Antenna:

As stated previously, the antenna consists of two bays (or levels), each bay consisting of two elements. One element is pointed at 220 degrees true and the other at 350 degrees true. Equal power division is employed to all elements.

The antenna is a custom composite antenna consisting of four horizontally polarized Scala CL-713 yagi antenna elements (two elements per bay/level). Information regarding the antenna is included in Figure 2. There are no changes in the horizontal radiation pattern of the antenna from that currently authorized. The maximum power at any angle (i.e. below or above the horizon will not exceed 2.4 -kilowatts.

C. <u>Allocation Study</u>:

Relocation of the WOCK-CA atop the John Hancock building will not result in an increase in interference to any full service analog or digital television stations, Class A television stations, TV translator stations or any existing DTV allotments or applications or result in an increase in service area outside of the current authorized service area.

The Commission's LP-1 computer program and the Longley Rice propagation method described in OET Bulletin No. 69 were used in this determination. The results of the OET styled study are contained within Figure 3.

Specifically predicated interference to WREX-DT, Channel 13 Rockford, IL digital television proposals were studied in detail using the method described in OET Bulletin No. 69, and the results as compared to the existing WOCH Channel 13 analog facility are presented in the following table:

PREDICTED INTERFERENCE LEVELS TO WREX-DT

(PERCENTAGE OF SERVICE POPULATION)

TO	WOCH-CA CH 13 ANALOG - LICENSED *	WOCH-CA CH 13 ANALOG -PROPOSED *
WREX-DT CH 13 ROCKFORD IL BMPCDT-20080619ADW	1.4%	1.4%
WREX-DT CH 13 ROCKFORD IL BPCDT-20080328AAM	1.0%	1.0%

* Percentage of base population of digital service contour predicted to receive interference from WOCH-CA Licensed or Proposed facility using 1990 US Census, cell size 1-km, profile spacing 1-km.

D. Environmental Considerations:

The applicant believes its proposal will not significantly affect the environment for the following reasons.

The proposal does not meet any of the criteria specified in Section 1.1307 of the FCC Rules. More specifically, the proposed facilities are not known to fall within any of the categories enumerated in Sections 1.1307(a)(1)-(7) and will not involve the use of high intensity white lights. Furthermore, operation of the proposed facility will not involve the exposure of workers or the general public to levels of radio frequency electromagnetic fields exceeding guidelines adopted by the Federal Communications Commission. (The current FCC guidelines are based upon criteria contained in the National Council of Radiation Protection and Measurements (NCRP) Report No.86 (1986) and ANSI/IEEE C95.1-1992.)

With regard to the last item, the WOCK-CA antenna is to be mounted on the west tower atop the John Hancock building in a very complex radiofrequency environment. The building roof is inaccessible to the general public.

Based upon a worst case downward relative field value of 0.5 for all angles 20 degrees or greater below the horizon and a maximum peak horizontal power of 2.4 - kilowatts, and an antenna height of 53 meters above the rooftop. The power density level 2 meters above the roof top is predicted to be 0.0045 mW/cm^2 or less. The computed power density is 0.45 percent of the Commission's guidelines for a controlled area and 2.25 percent of an uncontrolled area - no futher study from the proposal is required.

However, after commissioning of the proposed facility, power density measurements will be taken to determine the contribution of the WOCK-CA facility to the current radiation levels on the building roof. These measurements will be supplied to the Commission (if necessary) at the time of filing an application for station license.

The applicant will fully-cooperate and coordinate with all site users as required by the Commission's rules.

III. SUMMARY:

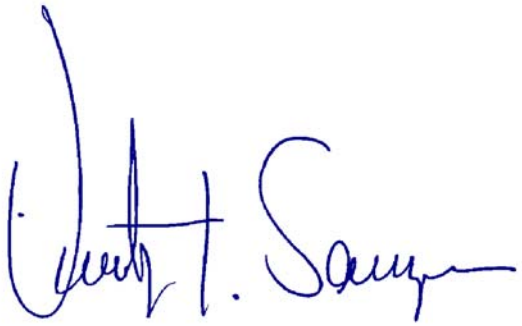
KM proposes to MODIFY the facilities of Class A Television Station WOCK-CA utilizing a DIRECTIONAL ANTENNA SYSTEM. The proposed station will operate on Television Channel 13.

Operation as proposed herein would not cause/increase any normally prohibited contour overlap, and would not have any significant impact on the environment.

The proposed operation will not create any new interference to other facilities or receive any new interference.

. The proposed operation is fully in compliance with all other areas of the Commission's rules and applicable international agreements.

16 October 2008



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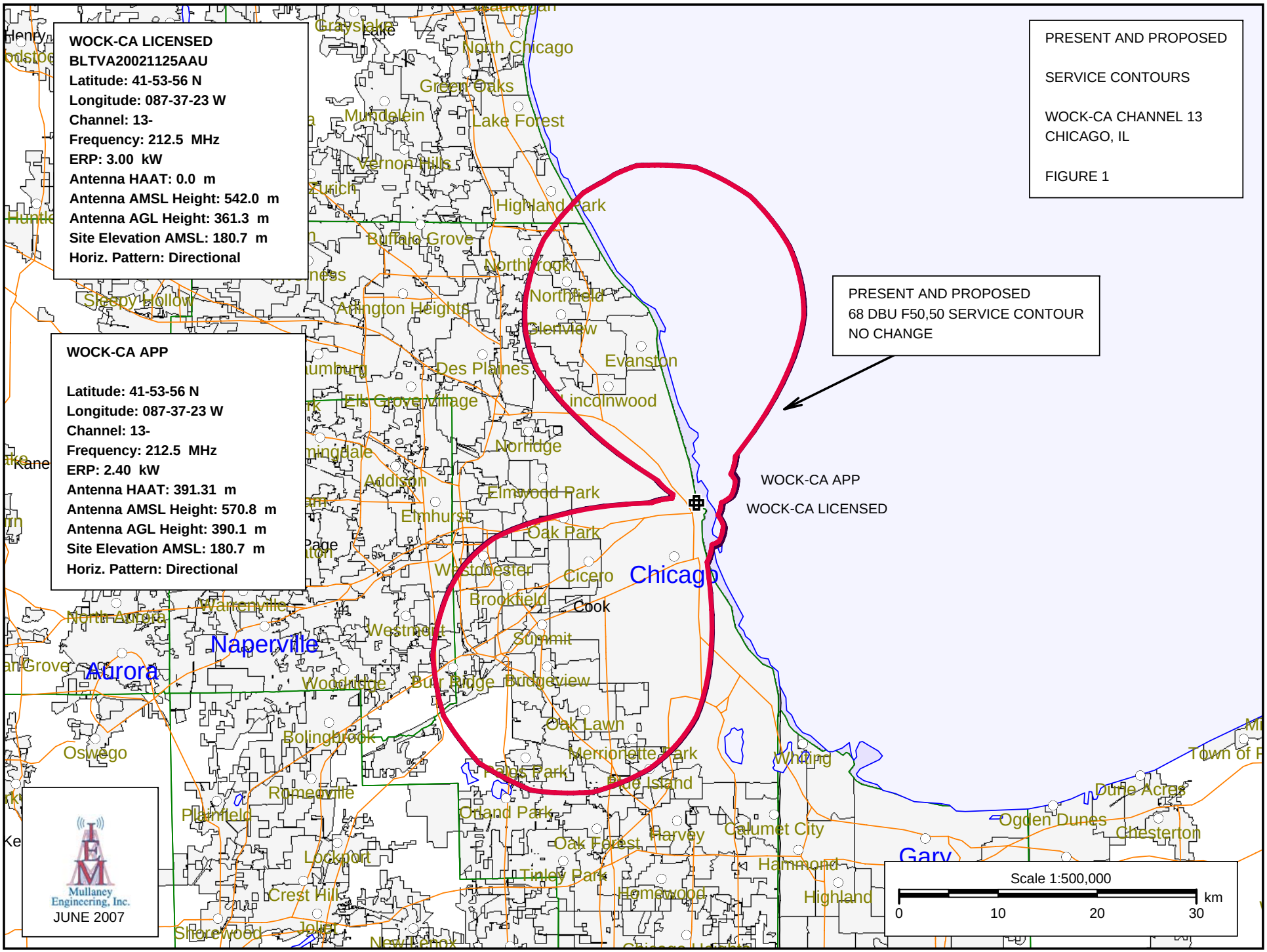
WOCK-CA LICENSED
BLTVA20021125AAU
Latitude: 41-53-56 N
Longitude: 087-37-23 W
Channel: 13-
Frequency: 212.5 MHz
ERP: 3.00 kW
Antenna HAAT: 0.0 m
Antenna AMSL Height: 542.0 m
Antenna AGL Height: 361.3 m
Site Elevation AMSL: 180.7 m
Horiz. Pattern: Directional
WOCK-CA APP
Latitude: 41-53-56 N
Longitude: 087-37-23 W
Channel: 13-
Frequency: 212.5 MHz
ERP: 2.40 kW
Antenna HAAT: 391.31 m
Antenna AMSL Height: 570.8 m
Antenna AGL Height: 390.1 m
Site Elevation AMSL: 180.7 m
Horiz. Pattern: Directional
PRESENT AND PROPOSED
SERVICE CONTOURS
WOCK-CA CHANNEL 13
CHICAGO, IL
FIGURE 1
PRESENT AND PROPOSED
68 DBU F50,50 SERVICE CONTOUR
NO CHANGE
WOCK-CA APP
WOCK-CA LICENSED
Chicago
Naperville
Aurora
Gary
Cook
Kane
Lake
Oswego
Scale 1:500,000
0
10
20
30
km
Mullaney Engineering, Inc.
JUNE 2007

Antenna Pattern SCA CL-713(COMPOSITE) FIGURE 2

Azimuth (deg)	Effective Field
0.0	0.955
10.0	0.822
20.0	0.622
30.0	0.379
40.0	0.059
50.0	0.040
60.0	0.040
70.0	0.035
80.0	0.030
90.0	0.020
100.0	0.020
110.0	0.020
120.0	0.020
130.0	0.030
140.0	0.035
150.0	0.040
160.0	0.040
170.0	0.059
180.0	0.379
190.0	0.622
200.0	0.822
210.0	0.955
220.0	1.000
230.0	0.946
240.0	0.807
250.0	0.602
255.0	0.490
260.0	0.359
265.0	0.173
270.0	0.040
280.0	0.020
290.0	0.020
300.0	0.040
305.0	0.173
310.0	0.359
315.0	0.490
320.0	0.602
330.0	0.807
340.0	0.946
350.0	1.000

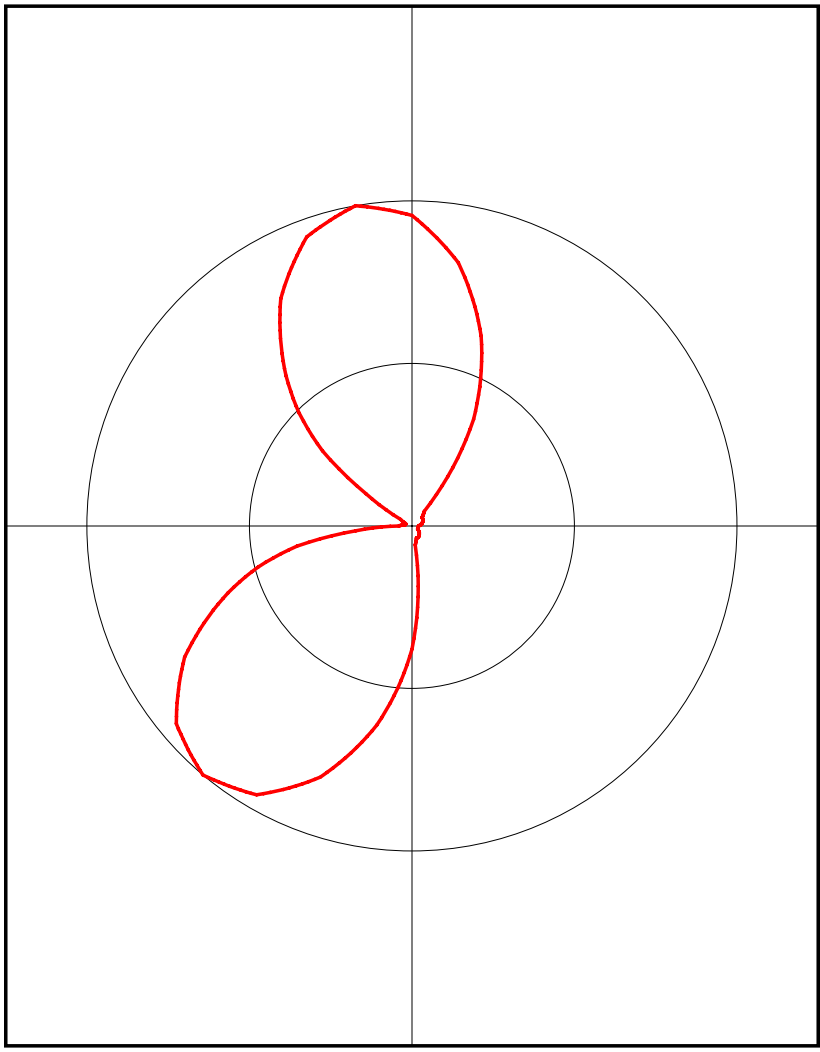

FIGURE 3 - WOCK-CA PROPOSED (OET BULLETIN NO. 69 STUDY SUMMARY)

Outgoing Interference Population Report

WOCK-CA.A (13-) Chicago, IL - BPTVA20070611ABC
Broadcast Type: NTSC Service: C
Lat: 41-53-56 N Lng: 087-37-23 W ERP: 2.4 kW AMSL: 570.8 m
TV Outgoing Interference Study
Signal Resolution: 1.0 km
Consider NTSC Taboo: Yes
KWX error points are considered to
     be interference free coverage.
Default # of radials computed for contours: 72
Contours calculated using 8 radial HAAT.
LR Profile Spacing Increment: 1.0 km
Masked interference points are being counted
     as interference free.
Using LPTV/translator D/U rules.
Pop Centroid DB: 1990 US Census

Primary Terrain: NED 3 Second US Terrain
Secondary Terrain: V-Soft 30 Second World Terrain

Population Database: 1990 US Census

Stations Considered:

Call Letters	City	State	Dist	Bear	
WBBM-TV-D.C (12)	Chicago	IL	2.5	205.0	
WISN-TV (12Z)	Milwaukee	WI	137.0	349.6	
WMLW-LD-D (13)	Milwaukee	WI	137.1	349.5	
WODN-LP (13+)	Portage	IN	47.1	130.2	
WREX-TV (13Z)	Rockford	IL	140.9	288.8	ANALOG
WREX-TV-D.A (13)	Rockford	IL	140.9	288.8	APP
WREX-TV-D.C (13)	Rockford	IL	140.9	288.8	CP

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%	
WBBM-TV-D.C (12)	0.0	0	8,654,380	0	0	0.0	
WISN-TV (12Z)	0.0	0	2,526,729	92	0	0.0	
WMLW-LD-D (13)	0.0	0	1,416,457	0	0	0.0	
WODN-LP (13+)	0.0	0	82,715	0	0	0.0	
WREX-TV (13Z)	226.9	2,936	1,558,613	86,597	7,595	0.5	ANALOG
WREX-TV-D.A (13)	296.7	8,459	1,626,570	90,517	22,610	1.4	APP
WREX-TV-D.C (13)	211.0	5,423	1,565,027	88,295	15,068	1.0	CP

FIGURE 3 - WOCK-CA LICENSED (OET BULLETIN NO. 69 STUDY SUMMARY)
Outgoing Interference Population Report

WOCK-CA (13-) Chicago, IL - BLTVA20021125AAU
Broadcast Type: NTSC Service: C
Lat: 41-53-56 N Lng: 087-37-23 W ERP: 3.0 kW AMSL: 542.0 m
TV Outgoing Interference Study
Signal Resolution: 1.0 km
Consider NTSC Taboo: Yes
KWX error points are considered to
     be interference free coverage.
Default # of radials computed for contours: 72
Contours calculated using 8 radial HAAT.
LR Profile Spacing Increment: 1.0 km
Masked interference points are being counted
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WREX-TV (13Z)	Rockford	IL	140.9	288.8	ANALOG
WREX-TV-D.A (13)	Rockford	IL	140.9	288.8	APP
WREX-TV-D.C (13)	Rockford	IL	140.9	288.8	CP

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