

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of KSQA-DT LLC, permittee of digital television station KSQA-DT, Channel 12 in Topeka, Kansas, in support of its application for modification of Construction Permit BMPCDT-20110103AAE to operate from a new transmitter site.

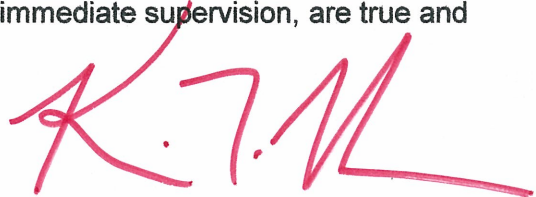
It is now proposed to mount the PSI omnidirectional antenna at the 78-meter level of an existing 85-meter structure in downtown Topeka. Since the antenna can be considered to be omnidirectional and has no beam tilt, no elevation or azimuth patterns accompany this application. Exhibit B is a map upon which the predicted service contours are plotted. As shown, the newly proposed 43 dBu contour completely encompasses the community of Topeka, the city of license. A Longley-Rice interference study is included as Exhibit C, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer. A power density calculation follows as Exhibit D.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the proposed KSQA-DT site. However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Because no change in the overall height or location of the existing building is proposed herein, the FAA has not been notified of this application. Further, the Commission has assigned Antenna Structure Registration Number 1031607 to this structure.

EXHIBIT A

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in red ink, appearing to read 'K.T. Fisher', with a stylized flourish at the end.

KEVIN T. FISHER

February 17, 2011

CONTOUR POPULATION

43 DBU : 311,939

36 DBU : 360,191

SMITHANDFISHER

36 DBU

43 DBU

**Proposed Site
Topeka**

Lawrence

Leavenworth

Emporia

Scale 1:800,000

0 10 20 30 km

**EXHIBIT B
PREDICTED SERVICE CONTOURS**

PROPOSED KSQA-DT

CHANNEL 12 - TOPEKA, KANSAS

[MODIFICATION OF BMPCDT-20110103AAE]

LONGLEY-RICE INTERFERENCE STUDY
PROPOSED KSQA-DT
CHANNEL 12 – TOPEKA, KANSAS
[MODIFICATION OF BMPCDT- 20110103AAE]

We conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. It is important to note that the software utilized a 2-square kilometer cell size, calculated signal strength at 1-kilometer increments along each radial studied, and employed the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than the proposed KSQA-DT facility) already is predicted to exist (also known as "masking"). The results of this study are provided in Exhibit C-2. It concludes that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

The Longley-Rice-based interference study also concludes that the proposed KSQA-DT facility proposed herein does not cause significant interference (0.5 percent) within the protected service contour of any potentially affected Class A low power television station.

Therefore, this proposal meets the FCC's *de minimis* interference standards for full-power DTV operations and Class A LPTV facilities.

EXHIBIT C-2

LONGLEY-RICE INTERFERENCE STUDY RESULTS

PROPOSED KSQA-DT
CHANNEL 12 – TOPEKA, KANSAS
[MODIFICATION OF BMPCDT-20110103AAE]

KSQA_DT_summary.txt
Summary Study

Percent allowed new interference: 0.500
Percent allowed new interference to non Class A LPTV: 2.000
Census data selected 2000
Data Base Selected
./data_files/pt_tvdb.sff
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 02-17-2011 Time: 09:58:40

Record Selected for Analysis

KSQA-DT USERRECORD-01 TOPEKA KS US
Channel 12 ERP 4.2 kw HAAT 65. m RCAMSL 00364 m
Latitude 039-02-56 Longitude 0095-40-32
Status APP Zone 2 Border Site number: 01
Dir Antenna Make usr Model USRPAT01 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

Site number	1			
Azimuth	ERP	HAAT	36.0 dBu F(50,90)	
(Deg)	(kw)	(m)	(km)	
0.0	4.200	67.2	60.1	
45.0	4.200	79.5	62.8	
90.0	4.200	89.3	64.9	
135.0	4.200	50.5	55.4	
180.0	4.200	47.2	54.2	
225.0	4.200	42.1	52.1	
270.0	4.200	62.2	58.9	
315.0	4.200	85.2	64.0	

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap
to Class A stations from site # 01

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KSQA-DT 12 TOPEKA KS USERRECORD01 Site # 01

KSQA_DT_summary.txt

and station

SHORT TO: KSQA 12 TOPEKA KS DTVPLN DTVP0364
39 -03-50 95 -45-49
Req. separation 273.6 Actual separation 7.8 Short 265.8 km

SHORT TO: KSCW-DR 12 WICHITA KS BPRM 20090624AET
038-03-38 0097-45-49
Req. separation 273.6 Actual separation 212.5 Short 61.1 km

SHORT TO: KSCW-DT 12 WICHITA KS BMPCDT 20090930AOP
038-03-37 0097-45-48
Req. separation 273.6 Actual separation 212.5 Short 61.1 km

SHORT TO: KUON-TV 12 LINCOLN NE BLEDT 20090406AIP
041-08-18 0096-27-20
Req. separation 273.6 Actual separation 241.3 Short 32.3 km

SHORT TO: WIBW-TV 13 TOPEKA KS BPCDT 20101028AAU
039-00-22 0096-02-57
Req. separation => 23.0 <= 110.0 Actual separation 32.7 Short 77.3(9.7) km

Checks to Site Number 01

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	Proposed Station Call	City/State	ARN
12	KSQA-DT	TOPEKA KS	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
11	KTWU	TOPEKA KS	7.8	LIC	BLEDT	20090917AAW
12	KSCW-DR	WICHITA KS	212.1	APP	BPRM	20090624AET
12	KSCW-DT	WICHITA KS	212.1	CP MOD	BMPCDT	20090930AOP
12	KRCG	JEFFERSON MO	312.3	LIC	BLCDT	20030709ABP
12	KUON-TV	LINCOLN NE	241.5	LIC	BLEDT	20090406AIP

[illegible]

NONE.

POWER DENSITY CALCULATION

PROPOSED KSQA-DT
CHANNEL 12 – TOPEKA, KANSAS
[MODIFICATION OF BMPCDT- 20110103AAE]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Topeka facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 4.2 kW, an antenna radiation center 77.7 meters above ground, and the specific elevation pattern for the proposed PSI antenna, maximum power density at a height of two meters above ground of 0.0022 mw/cm^2 is calculated to occur 61.3 meters from the base of the building. Since this value is only 1.1 percent of the 0.2 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 12 (204-210 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, assuming an antenna radiation center 7.6 meters above the roof of the building on which the antenna will be located, maximum power density two meters above roof level of 0.39 mw/cm^2 is calculated to exist 4.5 meters from the base of the tower atop the building. This value is only 39% of the 1.0 mw/cm^2 reference for controlled environments.

Lastly, the station owner will conduct a power density survey of the building's roof, once the station is constructed. In addition, power density measurements will be conducted

EXHIBIT D (continued)

for nearby buildings, if necessary. Based on the results of the power density survey, an appropriate RF safety protocol will be developed and the station owner will take whatever steps are necessary to identify and properly mark any RF hot spots and will reduce power or leave the air temporarily, if required, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.