



ENGINEERING STATEMENT
OF
BENJAMIN L. PIDEK, P.E.
IN SUPPORT OF
APPLICATION FOR MINOR MODIFICATION OF CONSTRUCTION PERMIT
SCRIPPS MEDIA, INC.
KMCI
LAWRENCE, KS

Background

Scripps Media, Inc. (Scripps) is the licensee of KMCI, licensed to serve Lawrence, KS, which is presently authorized to operate its maximized post-transition facility on Ch. 41 (BMPCDT-20080618ABG) with the following parameters:

Post-transition Facility (Ch. 41)

Coordinates: 38° 58' 42" N (NAD27)
94° 32' 01" W
ERP: 1000 kW (Omni)
HAAT: 323.7m

KMCI is sharing its top-mounted, omni-directional antenna for this facility with KSHB-DT, a facility licensed to Kansas City, MO which is owned by Scripps. During construction of the maximized facilities for both KMCI and KSHB, it was determined that the

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existing transmission line would not support both stations operating at their authorized ERP of 1000 kW. Scripps requested Special Temporary Authority to operate at an interim power level of 730 kW (rather than the authorized 1000 kW) while it considered potential solutions for the transmission line issue. After careful consideration of all available options, Scripps has determined that there is no economically feasible solution to remedy the transmission line deficiency; therefore, Scripps is seeking to modify the KMCI construction permit to specify its present ERP of 730 kW. Even at the lesser power that can be accommodated by the existing transmission line (ERP of 730 kW), the coverage of the KMCI facility would be significantly larger than its "Appendix B" coverage. Figure 1, attached hereto, is a coverage map depicting the noise-limited contour of the proposed KMCI facility vs. the noise-limited contour of the Appendix B facility.

Antenna System, Tower, and Operating Parameters

As specified in the instant application, Scripps proposes that KMCI continue using its omni-directional Dielectric TFU-30GTH/VP-R O6 DC digital antenna for the proposed "maximized" Ch. 41 facility which will be shared by co-owned station KSHB-DT on adjacent Ch. 42. The antenna is installed on a tower (ASR#1234587) that previously had an overall structure height of 624.5m AMSL (including appurtenances). The structure (after installation of the new digital antenna) now has an overall height of 621.1m AMSL (with appurtenances) which is 3.4m lower than the previous overall tower height (624.5m AMSL). The antenna has a center-of-radiation of 611.9m AMSL (with a calculated HAAT of 323.7m). Scripps has notified the FAA (ASN 2010-ACE-1856-OE) of the reduction in height of the existing structure. Scripps will amend the ASR accordingly after it receives confirmation from the FAA that the notice has been processed.

The proposed KMCI facility will incorporate both horizontal (730 kW) and vertical polarization (147 kW). The vertically polarized radiation component will not exceed the authorized horizontally polarized component in any azimuth.

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For comparison, the parameters of the Appendix B facility, authorized maximized facility and proposed facility are listed in the table below:

Parameters	Appendix B Facility	Authorized Maximized Facility	Proposed Facility
Coordinates (NAD27):	38° 58' 42" N 94° 32' 01" W	38° 58' 42" N 94° 32' 01" W	38° 58' 42" N 94° 32' 01" W
ERP (kW):	551 (DA)	1000 (omni)	730 (omni)
RCAMSL (m):	578.7	611.9	611.9
Population	1,978,000	2,169,697	2,141,651

Coverage

The entire principal community of Lawrence, KS is well within the predicted F(50,90) 48 dBu contour based on the proposed 730 kW ERP.

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; since the structure that the proposed facility antenna is mounted on is existing and registered, such conditions should not present issues requiring further consideration.

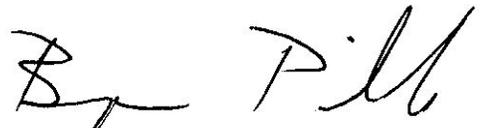
The additional ground level RFR contributed to the site by this proposal in public areas will be less than the calculated RFR for the KMCI maximized facility which has already been authorized by the Commission; therefore, the proposal does not need to be considered further.

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Scripps agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower base is enclosed by a locked security fence and appropriate signage warning of potential RFR hazards is posted.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



Benjamin L. Pidek, P.E.



John F. X. Browne, P.E.
July 28, 2010

John F.X. Browne & Associates P.C.

**Noise Limited Contour of Existing KMCI Appendix B Facility (Black) vs.
Noise Limited Contour of Proposed KMCI Proposed Facility (Red)**

KMCI App. B (Black)
Latitude: 38-58-42 N
Longitude: 094-32-01 W
ERP: 551.00 kW
Channel: 41
Frequency: 635.0 MHz
AMSL Height: 578.7 m

KMCI Proposed (Red)
Latitude: 38-58-42 N
Longitude: 094-32-01 W
ERP: 730.00 kW
Channel: 41
Frequency: 635.0 MHz
AMSL Height: 612.0 m

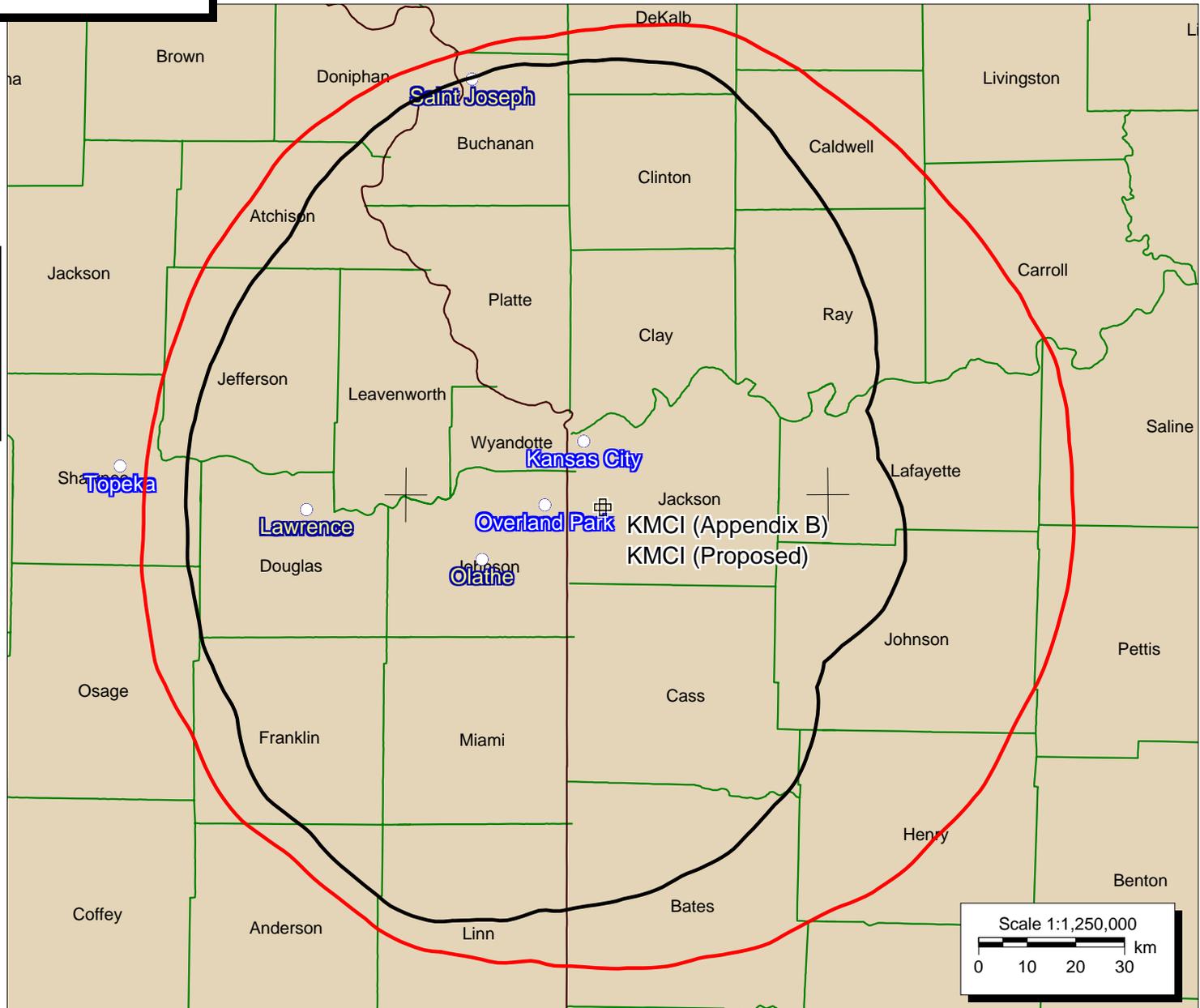


Figure 1
07/28/10