



**ENGINEERING STATEMENT**  
**OF**  
**JOHN F.X. BROWNE, P.E.**  
**IN SUPPORT OF APPLICATION**  
**FOR**  
**MINOR MODIFICATION OF A CONSTRUCTION PERMIT**  
**KOAM-DT**  
**PITTSBURG, KS**

**Background**

Saga Quad States Communications, LLC (Saga) is the licensee of television station KOAM, Ch7, (BLCT-2279, Facility ID. 58552) at Pittsburg, KS. Saga also holds a construction permit for KOAM-DT, Ch13, ( BMPCDT-20011206AAF, Facility ID. 5822) at Pittsburg, KS. Because of space constraints on its tower, Saga now proposes to increase the ERP of this facility from 4.2 kW to 6 kW and lower the antenna height so that the antenna will fit in an available aperture on the tower. This modification complies with the Commission's "freeze order" because the coverage area of the 36dBu (F50,90) contour will not increase in any direction. A map depicting this is attached as Figure 1.

**Site and Tower**

The tower and location remain the same as specified for the licensed facility. The tower is registered (ASRN 1032005). Since the antenna would be side mounted on the tower in such a manner so as not to increase the overall height of the structure, the FAA would not need to be notified nor would the ASR need to be changed. The center of radiation would be



at 302.4m AGL (573.6m AMSL, 302.4m HAAT) which is 37.6m lower than the presently authorized antenna height at this location.

### **Antenna and Power**

The proposed antenna is an Antenna Concepts Inc. ACS4E omni-directional radiator. The antenna would be placed at a height resulting in an HAAT of 302.4m (573.6m AMSL). With the proposed ERP of 6 kW, the predicted F(50,90) 43 dBu contour would completely encompass the city of Pittsburg, KS.

### **Interference**

Since there would be no increase in any direction of the 36dBu F(50,90) contour the interference issues would remain the same as those considered for the underlying construction permit that is being modified. The proposal meets the FCC's de minimis criteria.

### **Environmental/RFR**

This construction does not involve any of the conditions that require preparation of an Environmental Assessment as specified in 47 CFR Section 1.1311.

The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be  $0.000022 \text{ mW/cm}^2$ , which is much less than 1% of the MPE for public exposure ( $0.2 \text{ mW/cm}^2$ ) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

Saga 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 also be encouraged to wear personal RFR



monitors when on the structure. A locked security fence will enclose the tower base and appropriate signage warning of RFR hazards will be in place.

### **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.



John F.X. Browne, P.E.

January 6, 2005