

TECHNICAL EXHIBIT
AMENDMENT TO
APPLICATION FOR DTV CONSTRUCTION PERMIT
TELEVISION STATION KADY-DT
OXNARD, CALIFORNIA

AUGUST 14, 2001

CH 24 85 KW (MAX-DA) 533 M

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Technical Narrative

This technical exhibit supports an application to amend the pending KADY-DT application for construction permit. KADY-DT has pending an application for a maximum average effective radiated power of 90 kilowatts employing a Dielectric TLP-80 directional antenna.¹ The Commission recently notified KADY-DT that the proposed facility causes prohibited interference to KVCR-TV at San Bernardino, California. Therefore, the purpose of this instant amendment is to modify the proposed KADY-DT facility to not cause prohibited interference to KVCR-TV. This amendment seeks to decrease the effective radiated power from 90 kilowatts to 85 kilowatts, change the directional antenna reference azimuth to 350° from 0°, True, and **request 1 kilometer OET-69 grid spacing processing.**

¹ See FCC File Number: BPCDT-19991028AEN.

Transmitter Location

There is no change in transmitter site location. The tower location is uniquely described by the following geographic coordinates (NAD 27):

34° 19' 49" North Latitude
119° 01' 24" West Longitude

A sketch of the proposed antenna and existing supporting structure is included as Figure 1. Figure 5 is a coverage map showing the City Grade and Noise-Limited contours.

Directional Transmitting Antenna

A Dielectric TLP-80 directional transmitting antenna with a "peanut" pattern is proposed. The horizontal and vertical plane information is provided in Figures 2 and 3.

Allocation Study

The proposed KADY-DT facility meets the requirements of Section 73.623 of the FCC Rules concerning predicted interference to NTSC and DTV allotments and assignments. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules; OET Bulletin No. 69; and published FCC guidelines for preparation of such interference analyses. The Longley-Rice interference analyses were conducted using the software developed by du Treil, Lundin & Rackley, Inc. based on the FCC published software routines.² Stations selected for

² The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in

analysis were determined pursuant to the distance requirements outlined in the FCC DTV Processing Guidelines Public Notice. The results of the interference analyses for the proposed KADY-DT facility are summarized herein at Figure 4. As indicated therein, the proposed facility will meet the *de minimis* criterion outlined in the FCC Rules and published guidelines with respect to all considered stations.³

Radiofrequency Electromagnetic Field Exposure

The proposed facility has been evaluated in terms of potential radiofrequency electromagnetic field exposure at ground level in accordance with OET Bulletin No. 65, Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields. The power density at the base of the tower was calculated using the appropriate procedure contained in Section 2, Supplement A, *Additional Information for Radio and Television Broadcast Stations*, of the Bulletin.

For the calculation, a maximum average effective radiated power of 85 kilowatts and a radiation center of 98 meters (320 Feet) above ground level were employed. A "conservative" vertical downward radiation value of 0.3 was assumed. It can be calculated that the power density at ground level resulting from this facility would not exceed 0.017 mW/cm². This is less than five percent of the

the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed.

³ Interference analysis results reflect the net change in interference to a given station considering the interference predicted to occur from all other stations (i.e. "masking") including the existing KADY-DT. This properly reflects the net interference change for determining compliance with the FCC 0.5% *de minimis* standard.

maximum Commission guideline value in an uncontrolled environment for a Channel 24 television station.

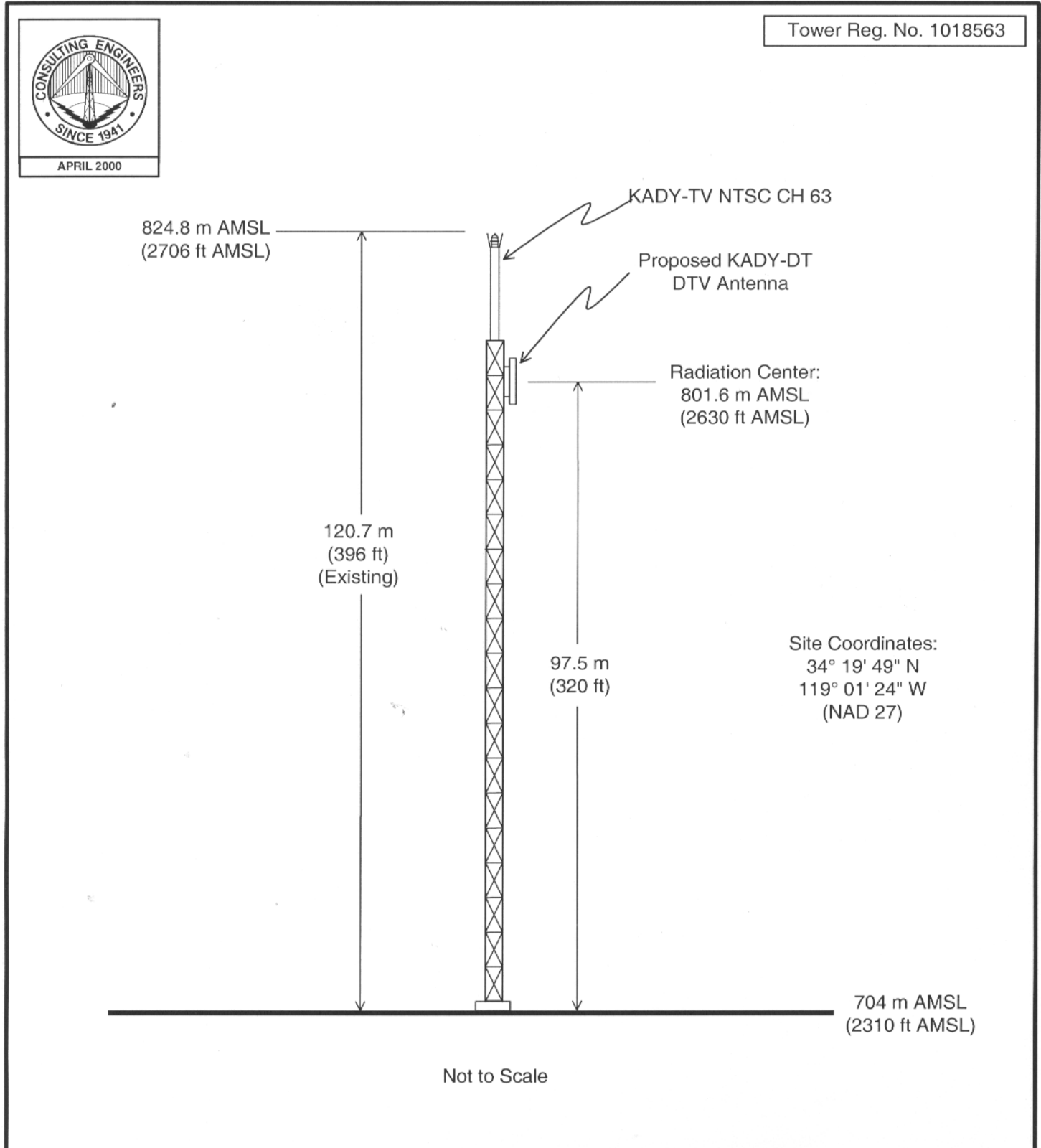
When it becomes necessary for workers to ascend the tower, appropriate measures, such as reduction or shut down of power if necessary, shall be taken to ensure that the human exposure to radiofrequency electromagnetic fields will not exceed the FCC guidelines.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

August 14, 2001

Figure 1



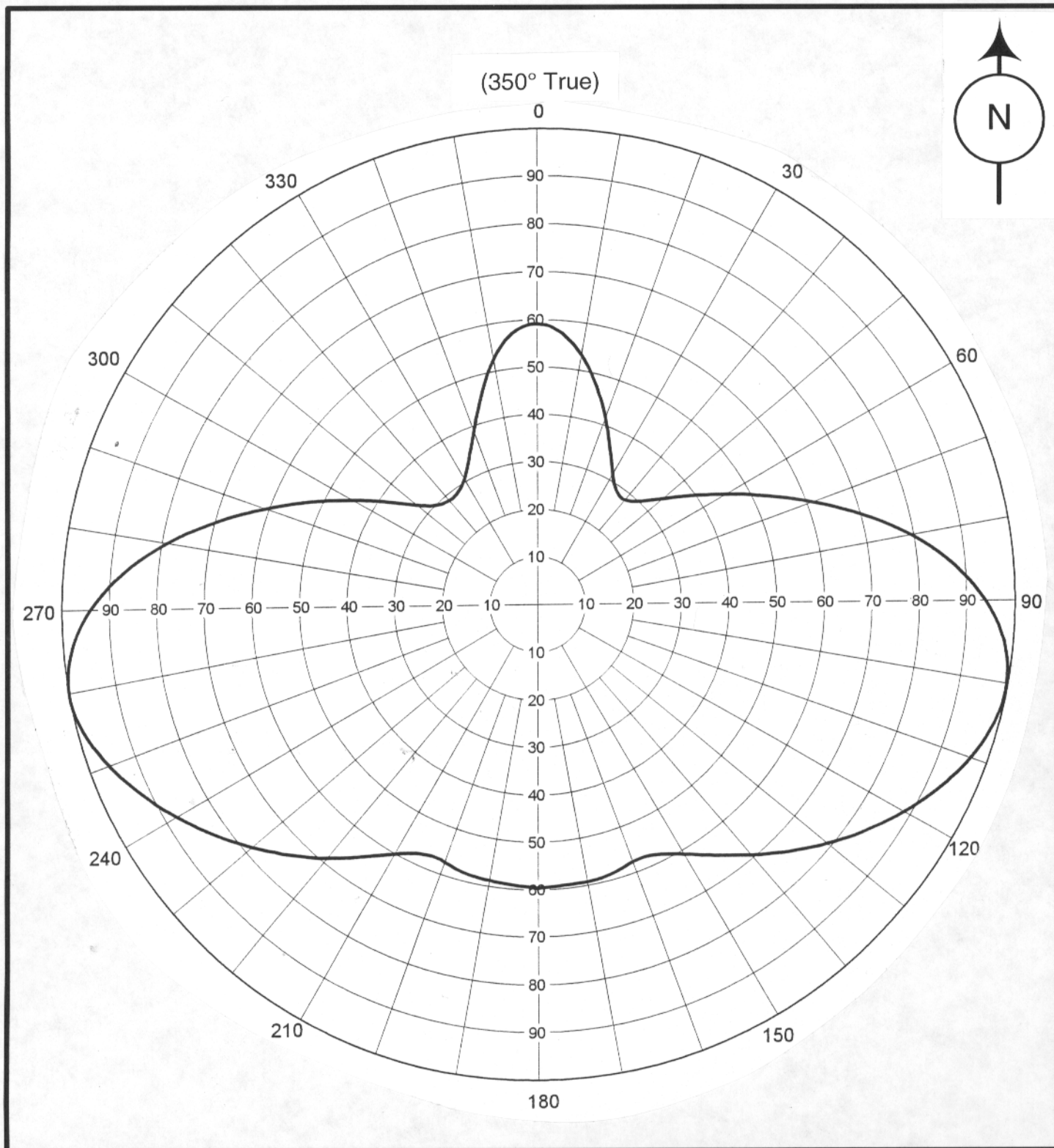
PROPOSED ANTENNA AND SUPPORTING STRUCTURE

TELEVISION STATION KADY-DT

OXNARD, CALIFORNIA

CH 24 85 KW (MAX-DA) 533 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



HORIZONTAL PLANE ANTENNA PATTERN

TELEVISION STATION KADY-DT
OXNARD, CALIFORNIA

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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

★

Angle	Field
0	0.591
10	0.532
20	0.415
30	0.314
40	0.284
50	0.341
60	0.455
70	0.612
80	0.794
90	0.939
100	0.998
110	0.965
120	0.885
130	0.791
140	0.693
150	0.610
160	0.578
170	0.592
180	0.596
190	0.588
200	0.574
210	0.601
220	0.689
230	0.784
240	0.876
250	0.958
260	1.000
270	0.939
280	0.790
290	0.607
300	0.447
310	0.329
320	0.288
330	0.307
340	0.389
350	0.525

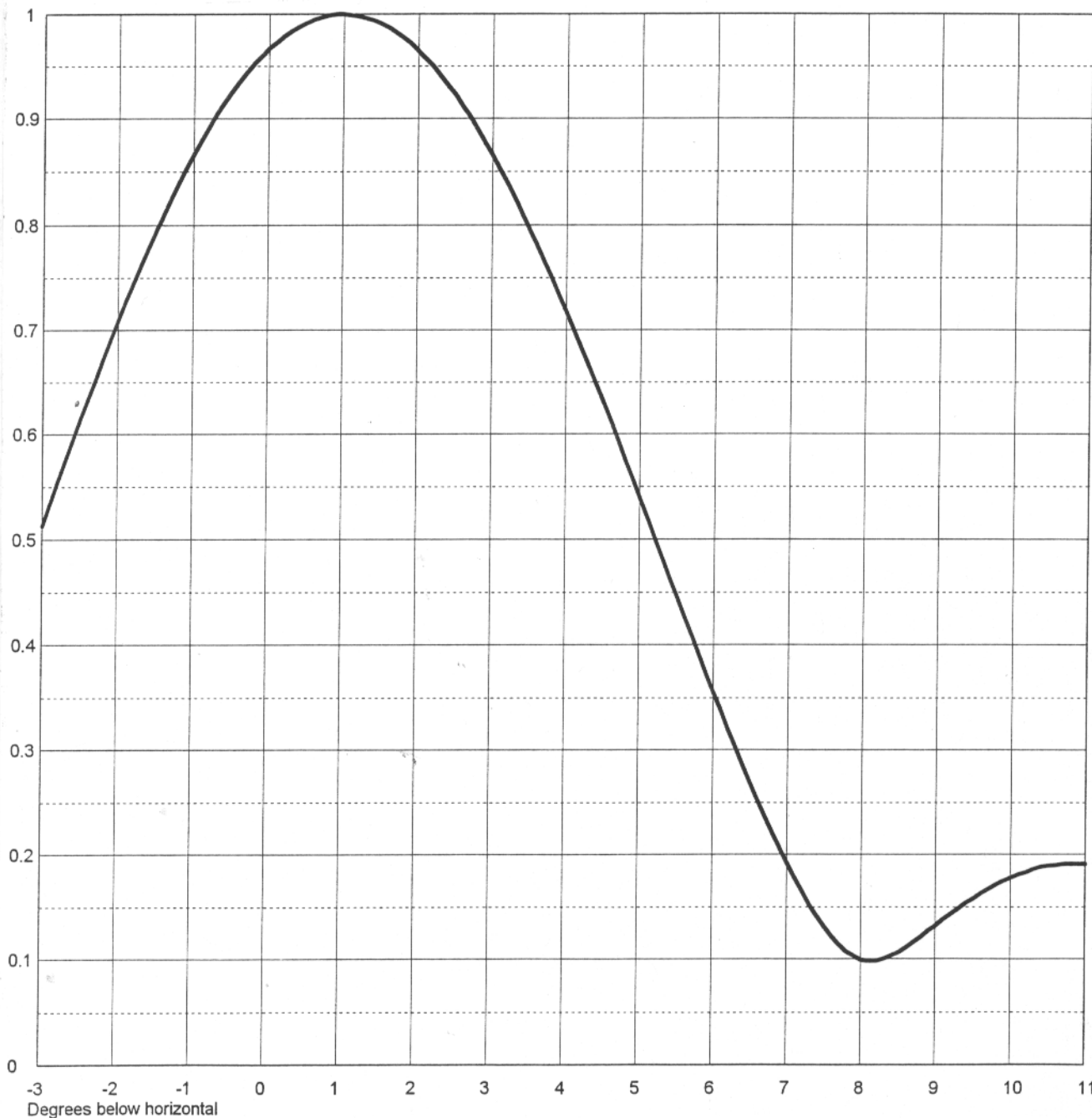
★
Referenced to 350° True

HORIZONTAL PLANE ANTENNA TABULATION

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OXNARD, CALIFORNIA

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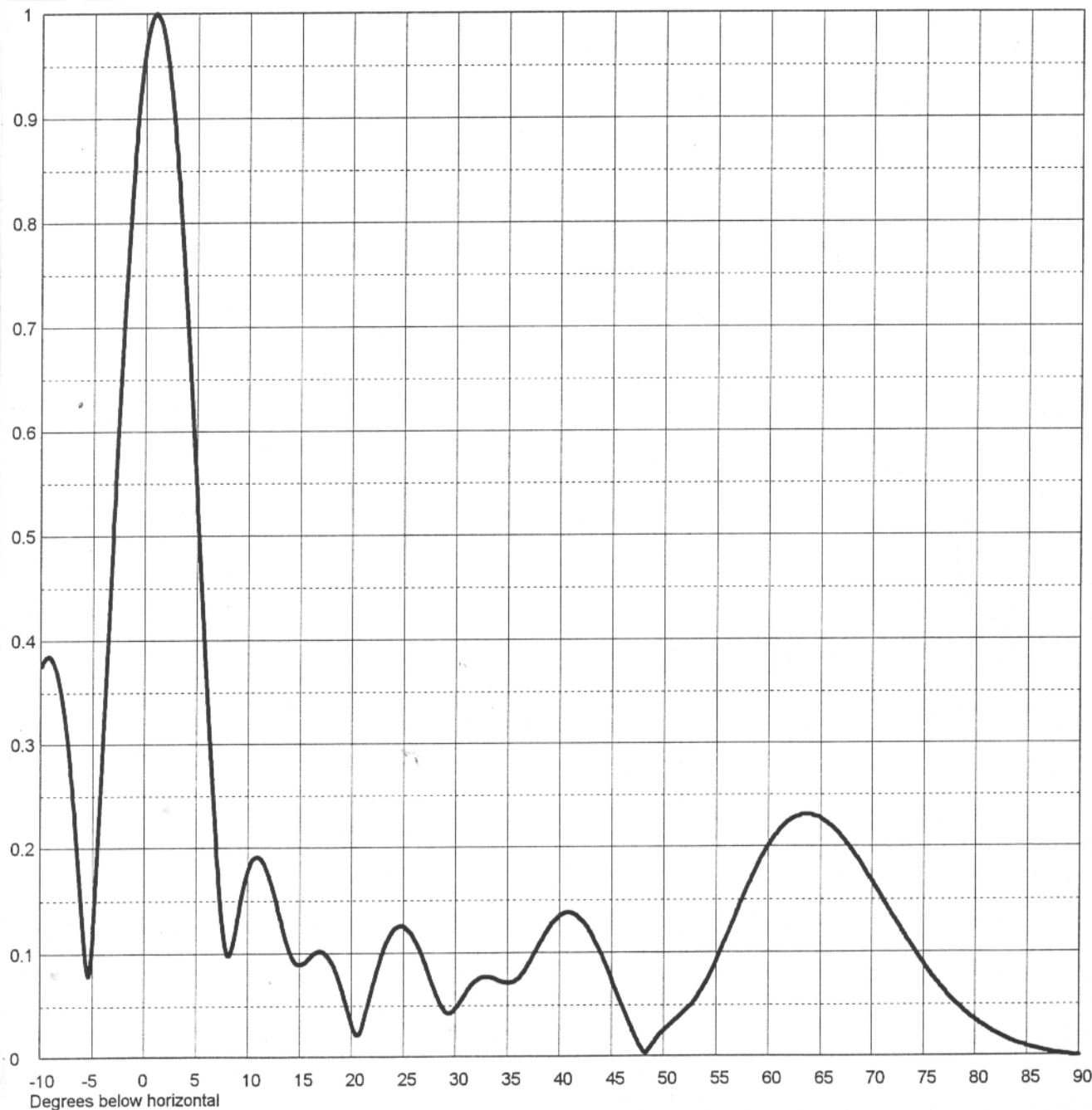


VERTICAL PLANE ANTENNA PATTERN

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Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.374	2.4	0.931	10.6	0.190	30.5	0.054	51.0	0.035	71.5	0.143
-9.5	0.384	2.6	0.911	10.8	0.191	31.0	0.062	51.5	0.039	72.0	0.135
-9.0	0.383	2.8	0.889	11.0	0.191	31.5	0.069	52.0	0.044	72.5	0.127
-8.5	0.371	3.0	0.865	11.5	0.186	32.0	0.074	52.5	0.049	73.0	0.119
-8.0	0.346	3.2	0.839	12.0	0.174	32.5	0.077	53.0	0.055	73.5	0.111
-7.5	0.308	3.4	0.811	12.5	0.157	33.0	0.077	53.5	0.063	74.0	0.104
-7.0	0.258	3.6	0.781	13.0	0.137	33.5	0.077	54.0	0.071	74.5	0.096
-6.5	0.197	3.8	0.750	13.5	0.118	34.0	0.075	54.5	0.081	75.0	0.089
-6.0	0.130	4.0	0.717	14.0	0.102	34.5	0.073	55.0	0.092	75.5	0.082
-5.5	0.081	4.2	0.683	14.5	0.092	35.0	0.072	55.5	0.103	76.0	0.076
-5.0	0.114	4.4	0.648	15.0	0.089	35.5	0.072	56.0	0.115	76.5	0.070
-4.5	0.201	4.6	0.613	15.5	0.091	36.0	0.075	56.5	0.127	77.0	0.064
-4.0	0.303	4.8	0.576	16.0	0.096	36.5	0.081	57.0	0.139	77.5	0.058
-3.5	0.408	5.0	0.539	16.5	0.100	37.0	0.089	57.5	0.150	78.0	0.053
-3.0	0.513	5.2	0.502	17.0	0.102	37.5	0.098	58.0	0.162	78.5	0.048
-2.8	0.555	5.4	0.465	17.5	0.099	38.0	0.107	58.5	0.173	79.0	0.043
-2.6	0.595	5.6	0.428	18.0	0.093	38.5	0.116	59.0	0.183	79.5	0.039
-2.4	0.634	5.8	0.392	18.5	0.082	39.0	0.124	59.5	0.192	80.0	0.035
-2.2	0.672	6.0	0.355	19.0	0.067	39.5	0.130	60.0	0.201	80.5	0.031
-2.0	0.709	6.2	0.320	19.5	0.050	40.0	0.135	60.5	0.208	81.0	0.028
-1.8	0.744	6.4	0.286	20.0	0.032	40.5	0.138	61.0	0.215	81.5	0.025
-1.6	0.778	6.6	0.253	20.5	0.021	41.0	0.138	61.5	0.220	82.0	0.022
-1.4	0.809	6.8	0.221	21.0	0.029	41.5	0.136	62.0	0.224	82.5	0.019
-1.2	0.839	7.0	0.192	21.5	0.047	42.0	0.132	62.5	0.227	83.0	0.017
-1.0	0.866	7.2	0.165	22.0	0.067	42.5	0.126	63.0	0.229	83.5	0.014
-0.8	0.891	7.4	0.141	22.5	0.085	43.0	0.119	63.5	0.230	84.0	0.012
-0.6	0.914	7.6	0.122	23.0	0.100	43.5	0.109	64.0	0.230	84.5	0.011
-0.4	0.934	7.8	0.107	23.5	0.112	44.0	0.099	64.5	0.229	85.0	0.009
-0.2	0.952	8.0	0.099	24.0	0.121	44.5	0.087	65.0	0.227	85.5	0.007
0.0	0.967	8.2	0.098	24.5	0.125	45.0	0.075	65.5	0.223	86.0	0.006
0.2	0.979	8.4	0.103	25.0	0.125	45.5	0.062	66.0	0.220	86.5	0.005
0.4	0.988	8.6	0.111	25.5	0.121	46.0	0.050	66.5	0.215	87.0	0.004
0.6	0.995	8.8	0.121	26.0	0.114	46.5	0.037	67.0	0.209	87.5	0.003
0.8	0.999	9.0	0.132	26.5	0.104	47.0	0.025	67.5	0.203	88.0	0.002
1.0	1.000	9.2	0.143	27.0	0.092	47.5	0.015	68.0	0.197	88.5	0.001
1.2	0.998	9.4	0.154	27.5	0.078	48.0	0.005	68.5	0.190	89.0	0.001
1.4	0.994	9.6	0.163	28.0	0.064	48.5	0.006	69.0	0.183	89.5	0.000
1.6	0.987	9.8	0.171	28.5	0.052	49.0	0.013	69.5	0.175	90.0	0.000
1.8	0.977	10.0	0.178	29.0	0.044	49.5	0.020	70.0	0.167		
2.0	0.964	10.2	0.183	29.5	0.042	50.0	0.025	70.5	0.159		
2.2	0.949	10.4	0.188	30.0	0.047	50.5	0.030	71.0	0.151		

VERTICAL PLANE ANTENNA TABULATION

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Summary of DTV Allocation Analysis

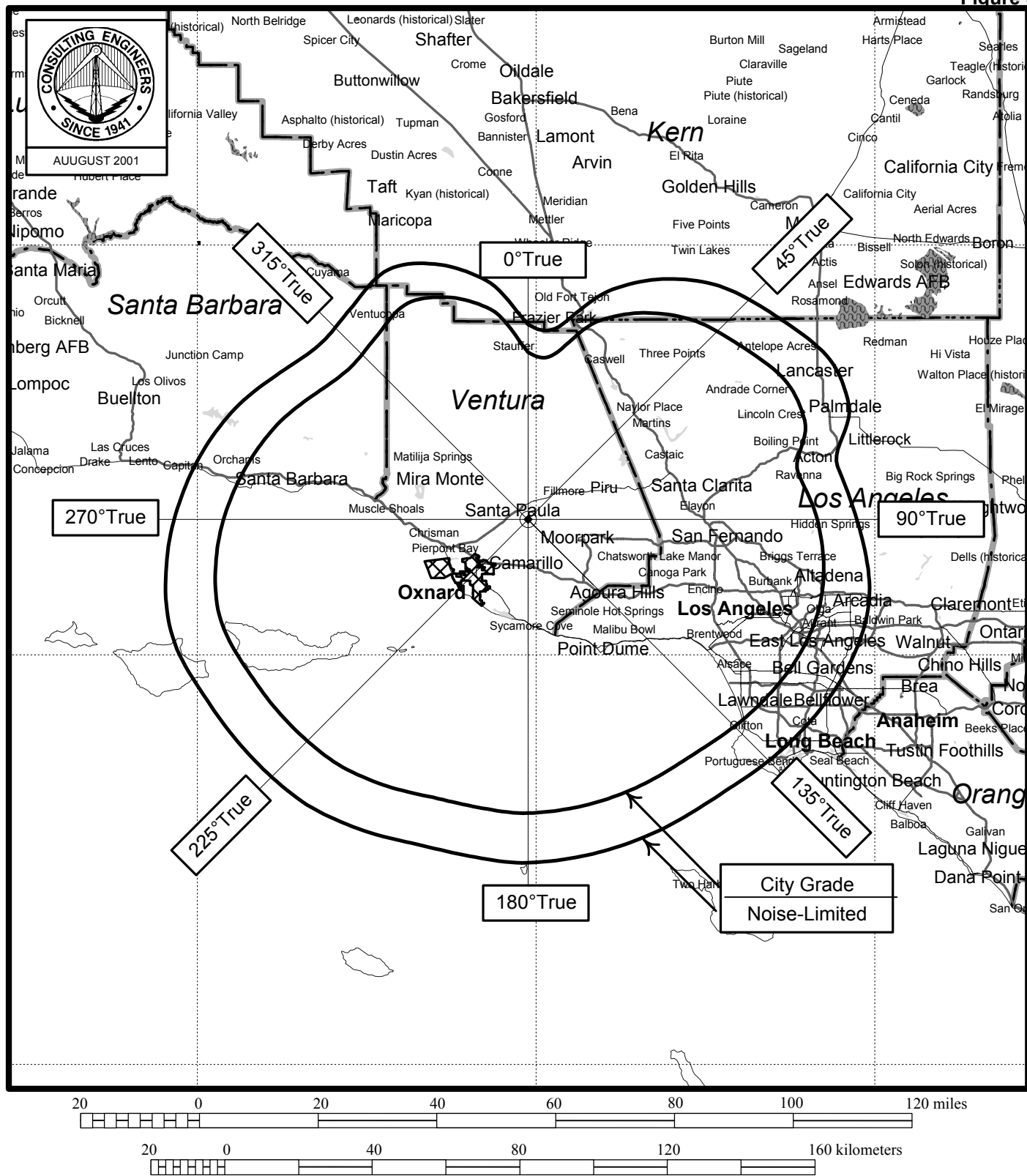
Facility	Channel	Baseline Service Population (1990)	Permissible IX(%)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
KGET(TV) Bakersfield, CA <i>BLCT-19790529KF</i>	17	No Interference Predicted			
KWHY-TV Los Angeles, CA <i>BLCT-19940317KM</i>	22	No Interference Predicted			
KERO-TV Bakersfield, CA <i>BMLCT-305</i>	23	No Interference Predicted			
KTBN-DT Santa Ana, CA <i>BPCDT-19991101AHZ</i>	23	Checklist Like Application. No Interference Calculation Required.			
KTBN-DT Santa Ana, CA <i>Allotment</i>	23	12,468,000	2.0	9,809	0.08

Figure 4
Sheet 2 of 2

Facility	Channel	Baseline Service Population (1990)	Permissible IX(%)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
KVMD-DT Twentynine Palms, CA <i>BPCDT-19991101AIP</i>	23	No Interference Predicted			
KSEE (TV) Fresno, CA <i>BLCT-2300</i>	24	No Interference Predicted			
KVCR-TV San Bernardino, CA <i>BLET-19831021KG</i>	24	10,755,797	0.1	266	<0.01
KVVU-DT Henderson, NV <i>BPCDT-19991027ADC</i>	24	No Interference Predicted			
KVVU-DT Henderson, NV <i>Allotment</i>	24	No Interference Predicted			
KGET-DT Bakersfield, CA <i>Allotment</i>	25	No Interference Predicted			
KGET-DT Bakersfield, CA <i>BPCDT-19991101AGB</i>	25	No Interference Predicted			
KCET (TV) Los Angeles, CA <i>BLET-19820607LE</i>	28	13,982,571	2.0	115	<0.01

Note: One-square kilometer resolution is employed for the OET-69 analysis.

Figure 5



FCC PREDICTED COVERAGE CONTOURS

TELEVISION STATION KADY-DT
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du Treil, Lundin & Rackley, Inc., Sarasota, Florida