

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
TV TRANSLATOR STATION K12OG (FACILITY ID 32321)
TAOS, NEW MEXICO
CH 12 0.028 KW

Technical Narrative

This Technical Exhibit supports a flash-cut application for TV translator station K12OG. Station K12OG is licensed (BLTTV-19900712IK) to operate on analog channel 12 with a Scala HDCA-10-12 directional maximum (visual) effective radiated power (ERP) of 0.14 kW and an antenna height above mean sea level (RCAMSL) of 2563 meters.

Proposed Facilities

This application proposes digital operation on the current channel 12 (204-210 MHz) from an alternate site location, and employing the currently licensed Scala HDCA-10-12 directional antenna (ID 20790). The maximum ERP will be 0.028 kW. The antenna radiation center height above mean sea level will be at 2283 meters. The proposed site is described by the following coordinates,
N 36° 23' 51", W 105° 32' 34".

Figure 1 is a map showing the licensed 68 dBu (analog) and proposed 48 dBu (digital) coverage contours. As shown on the map, the licensed analog contour overlaps a portion of the proposed digital contour. Thus, the proposal is consider a minor change.

Response to Paragraph 5 – Antenna Structure Registration Number

Station K12OG proposes to utilize its existing Scala HDCA-10-12 directional antenna and side-mount it at the 27 meter level on an existing 37 meter tower. The antenna will be oriented with the major lobe at 310° true. Notification to the FAA is not required as the overall height of the structure does not exceed 200 feet and there are no airports within 8 kilometers of the proposed site. Figure 2 shows the results of the FCC's TOWAIR Program.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The K12OG facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provides assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation contained in the Bulletin. Based on a worst case vertical relative field value of 1.0, a maximum ERP of 0.028 kilowatts, and an antenna center of radiation height above ground level of 27 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0007 milliwatt per

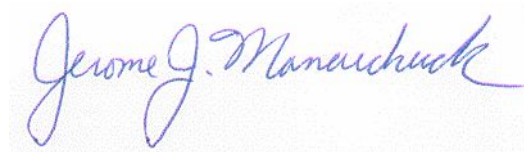
¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second*

square centimeter (mW/cm^2), or 0.35 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.2 \text{ mW}/\text{cm}^2$ for TV channel 12). Therefore, the facility complies with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect to control access to the site. In the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

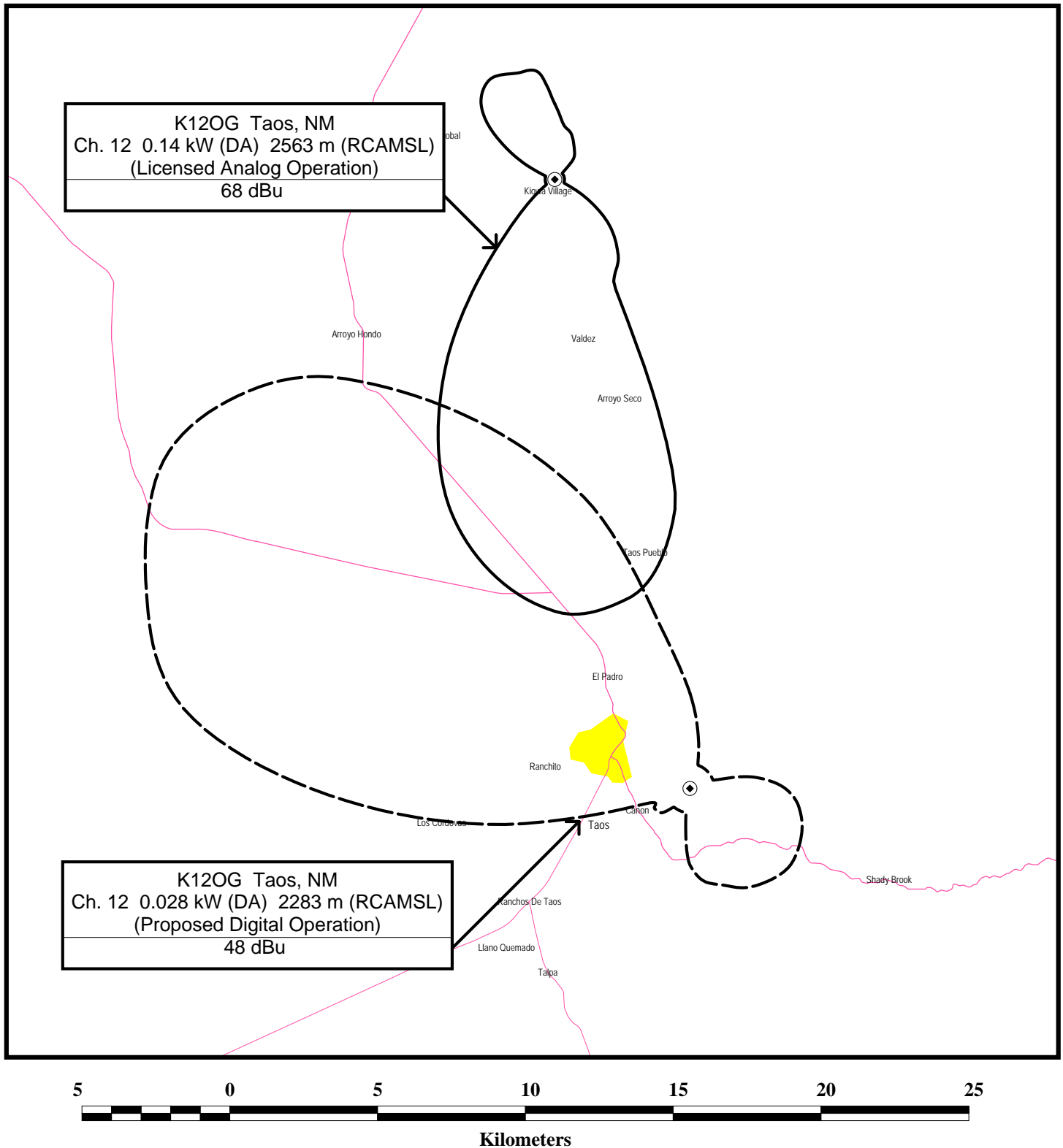


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

TV TRANSLATOR STATION K12OG
TAOS, NEW MEXICO
CH 12 0.028 KW (DA) 2283 M

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

TOWAIR Determination Results

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates

Latitude	36-23-51.0 north
Longitude	105-32-36.0 west

Measurements (Meters)

Overall Structure Height (AGL)	37
Support Structure Height (AGL)	36
Site Elevation (AMSL)	2256

Structure Type

TOWER - Free standing or Guyed Structure used for Communications Purposes

[Tower Construction Notification](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Note: Notification does NOT replace [Section 106 Consultation](#).

CLOSE WINDOW