



**Technical Statement
Supporting STA Application
KSAT-TV San Antonio, TX
June 30, 2011**

In February 2011 KSAT-TV (KSAT) filed an application (BPCDT-20110224AAL) for a construction permit to increase its effective radiated power (ERP) to 65 kW and modify its antenna pattern. KSAT has recently been informed that its application cannot be granted until approval is received from the Mexican authorities. However, it was suggested by FCC staff that it is possible for the Commission to grant a Special Temporary Authority (STA) so long as it does not exceed parameters previously negotiated with Mexico.

Staff has indicated the a power of 45 kW with a non-directional antenna at the current KSAT site at a height above average terrain (HAAT) of 427 m and a center of radiation above mean sea level (RCAMSL) of 586 m was previously accepted by Mexico.

However, the antenna proposed in the construction permit is directional with a RCAMSL of 607 m. Therefore, a study was performed to determine the power level that would maintain the extent of the noise limited contour within that of the previously negotiated limits. That study indicates that at an ERP of 37 kW the noise limited contour would not exceed the currently negotiated limit. A plot comparing the two



contours is attached this statement. It is also noted that the facility proposed in this STA application will provide full city grade coverage over the city of license.

The STA is being requested because the current KSAT antenna is in very poor condition and needs to be replaced as soon as possible. Historically Mexico has been very slow to process such requests; therefore, due to the urgency to replace the KSAT antenna it seems appropriate to request the STA as an interim measure while awaiting Mexican approval for the full power increase.

The applicant is aware that Mexican approval of the power requested in the previous application (65 kW) is not guaranteed. However, there are no co-channel or adjacent channel Mexican stations contained in the list attached to the MEMORANDUM OF UNDERSTANDING BETWEEN THE FEDERAL COMMUNICATIONS COMMISSION OF THE UNITED STATES OF AMERICA AND THE SECRETARIA DE COMUNICACIONES Y TRANSPORTES OF THE UNITED MEXICAN STATES (MOU) that would be adversely affected by the proposed KSAT facility. Therefore, ultimate approval by Mexico is anticipated.



An RF exposure analysis indicates the radiation below the antenna for the power level being requested in this STA application (37 kW) will be well within acceptable limits. All other current (site is existing main antenna location) safeguards related to the site with regard to both workers and the general public will remain in place.

It is further noted that this application is identical to that proposed in the construction permit application (BPCDT-20110224AAL) with the exception of the reduced ERP. Therefore, it fully complies with the interference protection requirements toward other co-channel and adjacent channel stations.

The above was prepared by:

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