

TECHNICAL EXHIBIT CONCERNING
CLASS A LICENSE APPLICATION FROM
STATION KUVN-CA
FACILITY ID 5319
FORT WORTH, TEXAS

This Technical Exhibit supports the Class A TV license application from low power television (LPTV) station KUVN-CA, on channel 47 at Fort Worth, Texas (Facility ID 5319). In particular, this statement addresses the interference issues raised in Part A, Section 1 on page 5 of FCC Form 302-CA. The Federal Communications Commission (FCC) Consolidated Database System (CDBS) has been the source of the technical information for the TV assignments employed in the interference studies conducted. As detailed below, a waiver of Section 73.6011 is requested with respect to KTAQ on channel 47 at Greenville, Texas.

According to the FCC's TV database, station KUVN-CA is authorized by outstanding construction permit (BPTTL-JG0601NX) to operate on channel 47 with a "zero" carrier frequency offset. A SWR directional antenna system will be employed (Antenna ID 24199). The visual effective radiated power (ERP) is 16.2 kilowatts (kW). The antenna center of radiation is located 361 meters above mean sea level (AMSL). The maximum antenna height above average terrain (HAAT) is 208 meters. The transmitter site coordinates are 32-45-01, 97-20-04. The facilities have been now been constructed in compliance with BPTTL-JG0601NX.

Interference studies have been performed using the methods outlined in the FCC rules. Where appropriate, interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid.

With respect to other full service and LPTV assignments operating on analog (NTSC) channels, a study was performed using the FCC's normal LPTV allocation method (i.e. separations & non-overlapping predicted contours). The study indicates that KUVN-CA's authorized channel 47 operation has no allocation or interference problems to other full service and LPTV analog operations with the exception of the licensed (BLCT-20000821ACP) operations of KDAF on channel 33 at Dallas, Texas and KTAQ on channel 47 at Greenville, Texas (BLCT-20020221AAD).

With respect to KDAF, based on consideration of terrain shielding and the provisions of the OET-69 Bulletin as permitted by FCC rules [See Section 74.705(e)], it is believed that KUVN-CA's channel 47 operation complies with the FCC's interference criteria toward KDAF. Specifically, calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid. The interference calculations indicate that the authorized KUVN-CA channel 47 operation is not predicted to cause any (0 persons) interference to KDAF's licensed operation. If necessary, a waiver of Sections 73.6011 and 74.705 is respectfully requested.

With respect to KTAQ, a waiver of the FCC's Class A interference criteria (Section 73.6011) is requested as detailed below.

With respect to digital television (DTV) assignments and allotments on channels 46, 47 and 48, interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid. The results of the OET Bulletin No. 69 interference analyses indicates that the authorized KUVN-CA channel 47 operation complies with the FCC's 0.5% "rounding allowance" (see paragraph 78 of MM Docket No. 00-10) to all known DTV assignments and allotments at this time. Therefore, it is believed that the proposal complies with the FCC's DTV interference standards.

The authorized KUVN-CA channel 47 operation does not cause interference to land mobile radio stations (LMRS) as specified in Section 73.6020 and 74.709 of the FCC rules.

Waiver of Section 73.6011

As noted above, the authorized KTAQ operation does not comply with the FCC's normal LPTV allocation method with respect to the licensed operation of KTAQ on channel 47 at Greenville, Texas. Furthermore, the authorized KTAQ operation also does not comply with the FCC's 0.5% interference threshold criteria to KTAQ based on the provisions of the OET-69 Bulletin. Therefore, a

waiver of Section 73.6011 is requested with respect to KTAQ. In support of the waiver request it is demonstrated there do not appear to be any Class A compliant "core band" channels available for use by KUVN-CA.

A search of the TV core band (channels 2-51) was conducted from the authorized KUVN-CA site. The results, tabulated on Figure 1, indicate that existing and/or authorized full-service NTSC, DTV, Class A and LPTV stations preclude the availability of an alternate channel for KUVN-CA in Fort Worth area.

Finally, KUVN-CA will endeavor to relocate to a Class A compliant core-band channel when spectrum becomes available.

If there are questions concerning this Technical Exhibit, please communicate with the office of the undersigned.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL 34237
(941) 329-6000
JEFF@DLR.COM

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Figure 1

**SUMMARY OF ALTERNATE CORE BAND CHANNEL SEARCH
FOR KUVN-CA, FORT WORTH, TX**

| Channel Studied | Station(s) Precluding Channel | Distance (km) |
|--------------------------|--------------------------------------|---------------|
| VHF Channels | | |
| 2 | KDTN, NTSC Ch. 2, Denton, TX | 39 |
| 3 | KDTN, NTSC Ch. 2, Denton, TX | 39 |
| | KDFW, NTSC Ch. 4, Dallas, TX | 38 |
| 4 | KDFW, NTSC Ch. 4, Dallas, TX | 38 |
| 5 | KXAS, NTSC Ch. 5, Fort Worth, TX | 39 |
| 6 | KXAS, NTSC Ch. 5, Fort Worth, TX | 39 |
| 7 | WFAA, NTSC Ch. 8, Dallas, TX | 38 |
| 8 | WFAA, NTSC Ch. 8, Dallas, TX | 38 |
| 9 | WFAA, DTV Ch. 9, Dallas, TX | 38 |
| 10 | WFAA, DTV Ch. 9, Dallas, TX | 38 |
| | KTVT, NTSC Ch. 11, Fort Worth, TX | 38 |
| 11 | KTVT, NTSC Ch. 11, Fort Worth, TX | 38 |
| 12 | KTVT, NTSC Ch. 11, Fort Worth, TX | 38 |
| | KERA, NTSC Ch. 13, Dallas, TX | 41 |
| 13 | KERA, NTSC Ch. 13, Dallas, TX | 41 |
| Core UHF Channels | | |
| 14 | KERA, DTV Ch. 14, Dallas, TX | 41 |
| 15 | LMRS, Ch. 16, Dallas/Fort Worth, TX | 51 |
| 16 | LMRS, Ch. 16, Dallas/Fort Worth, TX | 51 |
| 17 | LMRS, Ch. 16, Dallas/Fort Worth, TX | 51 |
| 18 | KTXA, DTV Ch. 18, Fort Worth, TX | 42 |
| 19 | KTVT, DTV Ch. 19, Fort Worth, TX | 41 |
| 20 | KTVT, DTV Ch. 19, Fort Worth, TX | 41 |
| | KTXA, NTSC Ch. 21, Fort Worth, TX | 39 |
| 21 | KTXA, NTSC Ch. 21, Fort Worth, TX | 39 |
| 22 | KTXA, NTSC Ch. 21, Fort Worth, TX | 39 |
| | KUVN, NTSC Ch. 23, Garland, TX | 39 |
| 23 | KUVN, NTSC Ch. 23, Garland, TX | 39 |
| 24 | KUVN, DTV Ch. 24, Garland, TX | 39 |
| 25 | K25FW, NTSC Ch. 25, Corsicana, TX | 39 |
| 26 | K26HF, NTSC Ch. 26, Britton, TX | 39 |
| 27 | KDFI, NTSC Ch. 27, Dallas, TX | 42 |
| 28 | KHPK-LP, NTSC Ch. 28, De Soto, TX | 39 |
| 29 | KMPX, NTSC Ch. 29, Decatur, TX | 41 |
| 30 | KMPX, DTV Ch. 30, Decatur, TX | 39 |
| 31 | K65BC, NTSC Ch. 31, De Soto, TX | 39 |
| 32 | KDAF, DTV Ch. 32, Dallas, TX | 42 |
| 33 | KDAF, NTSC Ch. 33, Dallas, TX | 42 |
| 34 | KJJM-LP, NTSC Ch. 34, Dallas, TX | 42 |
| 35 | KDFW, DTV Ch. 35, Dallas, TX | 38 |
| 36 | KDFI, DTV Ch. 36, Dallas, TX | 42 |
| 37 | Reserved for Radio Astronomy | -- |
| 38 | KVFW-LP, NTSC Ch. 38, Fort Worth, TX | 39 |
| 39 | KXTX, NTSC Ch. 39, Dallas, TX | 39 |
| 40 | KXTX, DTV Ch. 40, Dallas, TX | 39 |
| 41 | KXAS, DTV Ch. 41, Dallas, TX | 39 |
| 42 | KPXD, DTV Ch. 42, Arlington, TX | 38 |
| 43 | KDTN, DTV Ch. 43, Denton, TX | 42 |
| 44 | KLEG-LP, NTSC Ch. 44, Dallas, TX | 50 |
| 45 | KDTX, DTV Ch. 45, Dallas, TX | 39 |
| 46 | KTAQ, DTV Ch. 46, Greenville, TX | 42 |
| 47 | Currently Authorized Channel | -- |
| 48 | KSTR, DTV Ch. 48, Irving, TX | 42 |
| 49 | KSTR, NTSC Ch. 49, Irving, TX | 42 |
| 50 | KATA-LP, NTSC Ch. 50, Mesquite, TX | 42 |
| 51 | KFWD, DTV Ch. 51, Fort Worth, TX | 39 |