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GEORGE PETRUTSAS
LEONARD R. RAISH
JAMES P. RILEY
MARVIN ROSENBERG
LONNA M. THOMPSON
KATHLEEN VICTORY*
HOWARD M. WEISS
*NOT ADMITTED IN VIRGINIA

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OF COUNSEL
EDWARD A. CAINE

TELECOMMUNICATIONS CONSULTANT
HON. ROBERT E. LEE

WRITER'S NUMBER
(703) 812- 0420

May 13, 1993

RECEIVED
MAY 13 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
Room 222, 1919 M Street, N.W.
Stop Code 1170
Washington, D.C. 20554

Re: MM Docket No. 93-93
File No. BPET-900904KE

Dear Ms. Searcy:

There is transmitted herewith, in triplicate, an engineering amendment specifying a change in site filed by Valley Public Television, Inc., by its attorneys, in connection with its above-noted application and the completed "Document Index Terms" form required in docketed proceedings. A Petition for Leave to Amend is being filed simultaneously herewith.

If additional information is necessary, please communicate with this office.

Very truly yours,

Vincent J. Curtis, Jr.
Counsel for
Valley Public Television, Inc.

VJC/mac
Enclosures
cc: The Honorable Arthur I. Steinberg (with enclosure)(by hand)
Norman Goldstein, Esquire (with enclosure)(by hand)
Barbara A. Kreisman, Esquire (with enclosure)(by hand)
Thomas Schattenfield, Esquire (with enclosure)

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List A B C D E

ORIGINAL

AMENDMENT

The application of Valley Public Television, Inc. for a construction permit for a new noncommercial educational television station on Channel *39, Bakersfield, California (File No. BPET-900904KF) is hereby amended by adding the attached engineering amendment. The remaining representations in the

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

6203 Leesburg Pike
Falls Church, Virginia 22041

ORIGINAL

ENGINEERING REPORT

ENGINEERING EXHIBIT

ON BEHALF OF

VALLEY PUBLIC TELEVISION, INC.

TO AMEND THE PENDING

APPLICATION (BPET-900904KE)

FOR A NEW NONCOMMERCIAL TV STATION

TO SERVE

BAKERSFIELD, CALIFORNIA

Channel	: 39
ERP	: 370 kW (Max. DA)
HAAT	: 391 meters

May 6, 1993

Section V-C - TV BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY
File No. _____
ASB Referral Date _____
Referred by _____

Name of Applicant: Valley Public Television, Inc.

Call letters *(if issued)*: N/A

Purpose of Application *(check appropriate box)*:

X Amendment to Pending Application

- [ ] Construct a new (main) facility
- [ ] Modify existing construction permit for main facility
- [ ] Modify licensed main facility
- [ ] Install a new auxiliary antenna
- [ ] Modify existing construction permit for auxiliary antenna
- [ ] Modify licensed auxiliary antenna

If purpose is to modify, indicate nature of change(s) by checking appropriate box(es), and specify the file number(s) of the authorization(s) affected:

- [X] Antenna supporting-structure height
- [X] Antenna height above average terrain
- [X] Antenna location
- [ ] Main Studio location
- [X] Effective radiated power
- [ ] Frequency
- [X] Antenna system
- [ ] Other *(Summarize briefly)*

File Number(s) BPET-900904KE

1. Allocation:

Channel No.	Offset *(check one)*	Principal community to be served: City	County	State	Zone *(check one)*
39	[ ] Plus [X] Minus [ ] Zero	Bakersfield	Kern	CA	[ ] I [X] II [ ] III

2. Exact location of antenna:

(a) Specify address, town or city, county and state. If no address, specify distance and bearing to the nearest landmark.

Mt. Adelaine, 17 Kilometers Northeast of Bakersfield (Kern), CA

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude and West Longitude will be presumed.

Latitude	°	'	"	Longitude	°	'	"
	35	25	47		118	44	56

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? [X] Yes [ ] No

If Yes, give call letter(s) or file number(s) or both. Business Band

If proposal involves a change in height of an existing structure, specify existing height above ground level, including antenna, all other appurtenances, and lighting, if any. N/A

10. Antenna:

(a) Manufacturer Antenna Concepts (b) Model No. ACS16C

(c) Is a directional antenna proposed? [X] Yes [ ] No

If Yes, specify major lobe azimuth(s) 270 degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No. 2

(d) Is electrical beam tilt proposed? [X] Yes [ ] No

If Yes, specify 1.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No. 3

(e) Is mechanical beam tilt proposed? [ ] Yes [X] No

If Yes, specify _____ degrees mechanical beam tilt toward azimuth _____ degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. Exhibit No.

(f) The proposed antenna is: *(check only one box)*

[X] horizontally polarized [ ] circularly polarized [ ] elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)? [X] Yes [ ] No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service. Exhibit No.

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)? [ ] Yes [X] No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125. Exhibit No. *

13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610? [X] Yes [ ] No

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waiver(s). Exhibit No.

14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast *(except citizens band or amateur)* radio stations or any established commercial or government receiving stations? [X] Yes [ ] No

If Yes, attach as an Exhibit a description of the expected, undesired effects of operations and remedial steps to be pursued, if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference *(including that caused by intermodulation)* to facilities in existence or authorized prior to grant of this application. *(See 47 C.F.R. Sections 73.685(d) and (g).)* Exhibit No. 7

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers. Exhibit No. 4

* On file in BPET-900904KE; No Change

16. Attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* which shows clearly, legibly and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. 5

(a) The proposed transmitter location, and the radials along which profile graphs have been prepared;
(b) The City Grade, Grade A and Grade B predicted contours; and
(c) The legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population *(latest census)* within the predicted Grade B contour.

Area 9,350 sq. km. Population 450,205

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. N/A

(a) The proposed auxiliary Grade B contour; and
(b) The Grade B contour of the licensed main facility for which the applied-for facility will be the auxiliary.

(Main facility license file number _____)

19. Terrain and Coverage Data *(To be calculated in accordance with 47 C.F.R. Section 73.684.)*

Source of terrain data: *(check only one box below)*

[X] Linearly interpolated 30-second database (Source: NGDC; TPG-0050)

[ ] 7.5 minute topographic map

[ ] Other *(briefly summarize)*

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A Contour (kilometers)	To the Grade B Contour (kilometers)
* 260	800	52.7	63.5	84.4
0	251	17.9	25.2	38.8
45	-44#	6.6	9.2	16.6
90	-212#	7.5	10.5	19.4
135	265	19.9	27.4	41.3
180	686	27.9	37.2	53.8
[illegible]	769	44.7	55.0	73.7

20. Environmental Statement *(See 47 C.F.R. Section 1.1301 et seq.)*

Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact? ☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311. Exhibit No.

If No, explain briefly why not.
See Exhibit 6

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name *(Typed or Printed)*	Relationship to Applicant *(e.g., Consulting Engineer)*
William A. Hamman	Consulting Engineer
Signature	Address *(Include ZIP Code)* Moffet, Larson & Johnson 5302 Leesburg Pike, Suite 800 Skyline Two Falls Church VA 22041
Date May 6, 1993	Telephone No. *(Include Area Code)* (703) 824-5660

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

5203 Leesburg Pike
Falls Church, Virginia 22041

ENGINEERING REPORT

Valley Public Television, Inc.
Bakersfield, California

ENGINEERING STATEMENT

This Engineering Amendment was prepared on behalf of Valley Public Television, Inc. (Valley).

Valley has a pending application (BPET-900904KE) before the FCC for a new noncommercial television station to serve Bakersfield, California area on Channel 39.

The purpose of this Engineering Exhibit is as follows:

1. Move to a new location that meets the require spacings.
2. Change the antenna system.
3. Increase the ERP and decrease the HAAT.

The exhibits referred to on Section V-C are attached as follows:

Exhibit 1	: Antenna Sketch
Exhibit 2-A - 2-C	: Horizontal Directional Antenna Data
Exhibit 3-A - 3-B	: Vertical Directional Antenna Data
Exhibit 4	: Site Map
Exhibit 5	: Proposed Coverage Map
Exhibit 6-A - 6-B	: Environment Statement
Exhibit 7	: Other facilities
Table 1	: Channel study of Channel 39

Moffet, Larson, & Johnson, Inc.

TABLE 1
Date: 5/93

Study Name : BAKERSFIELD, CA
Channel : 39
Coordinates : N 35 25 47.0 W 118 44 56.0
Separations : TV Zone 2 - Full Service

Call	City & State	Stat	File - number		Chan	ERP	HAAT	Zn	Latitude	Longitude	Bear	Dist	Req'd	Clear	Notes
												--- kilometers ---			
KSEE	FRESNO CA	LIC	BLCT 2300		24z	1600	2350	2	36 44 45.0	119 16 53.0	342.1	153.71	119.9	33.81	
KSEE	FRESNO CA	APP	BPCT 4879		24z	3715	2350	2	36 44 45.0	119 16 53.0	342.1	153.71	119.9	33.81	
D92-246	RIDGECREST CA	PDEL	RM 8091	*	25z			2	35 37 22.0	117 40 29.0	77.2	99.76	95.7	4.06	CLOSE
D92-246	RIDGECREST CA	PADD	RM 8091	*	25z			1	35 38 58.0	117 33 24.0	76.9	110.83	95.7	15.13	CLOSE c
	RIDGECREST CA	ALC		*	25z			2	35 37 22.0	117 40 29.0	77.2	99.76	95.7	4.06	CLOSE c
D85-172	LOS ANGELES CA	PADD			32z			1	34 3 15.0	118 14 28.0	163.0	159.52	95.7	63.82	Comment
	SANTA BARBARA CA	DEL			38z			2	34 25 18.0	119 41 48.0	217.9	141.44	87.7	53.74	Comment
NEW	SANTA BARBARA CA	APPM	BPCT 840606KJ!		38z	2511	3016	2	34 31 32.0	119 57 28.0	228.0	149.15	87.7	61.45	Comment
NEW	SANTA BARBARA CA	APPD	BPCT 840723KJ		38z	2630	2915	2	34 31 32.0	119 57 28.0	228.0	149.15	87.7	61.45	Comment
NEW	SANTA BARBARA CA	APPD	BPCT 840720KG		38z	2690	2878	2	34 31 31.0	119 57 29.0	228.0	149.19	87.7	61.49	Comment
NEW	SANTA BARBARA CA	APP	BPCT 840723KO!		38z	5000	1252	2	34 28 15.0	119 40 33.0	218.7	135.96	87.7	48.26	Comment
NEW	SANTA BARBARA CA	APP	BPCT 840606KE!		38z	21.8	-409	2	34 25 26.0	119 42 13.0	218.2	141.64	87.7	53.94	Comment
	SANTA BARBARA CA	ALC			38z			2	34 25 18.0	119 41 48.0	217.9	141.44	87.7	53.74	
NEW	BAKERSFIELD CA	APP	BPET 900904KF!	*	39-	162	3596	1	35 27 14.0	118 35 37.0	79.1	14.35	248.6	-234.25	SHORT c
NEW	BAKERSFIELD CA	APP	BPET 881012KE!	*	39-	310	1332	2	35 26 17.0	118 44 23.0	41.9	1.24	280.8	-279.56	SHORT c
	BAKERSFIELD CA	ALC		*	39-			2	35 22 31.0	119 1 16.0	256.3	25.46	280.8	-255.34	SHORT
KNSD	SAN DIEGO CA	LIC	BMLCT 810911KH		39z	5000	1890	2	32 41 48.0	116 56 5.8	150.7	346.33	280.8	65.53	
KNSD	SAN DIEGO CA	CP	BPCT 920818KE		39z	2500	1894	2	32 41 48.0	116 56 5.8	150.7	346.33	280.8	65.53	
KBLR	PARADISE NV	LIC	BLCT 890427KI		39-	1330	1204	2	36 0 31.0	115 0 22.0	78.1	344.70	280.8	63.90	

NOTE: NOT DRAWN TO SCALE

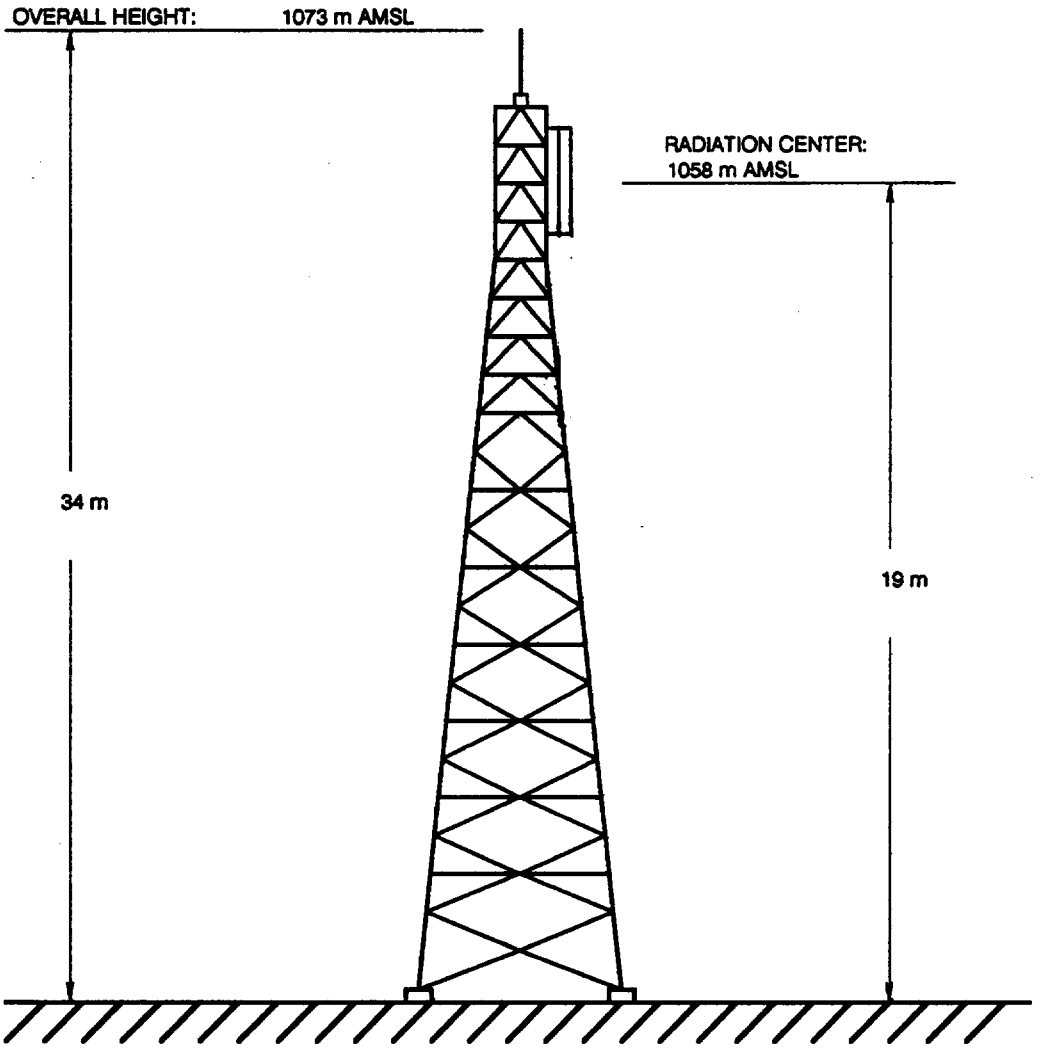
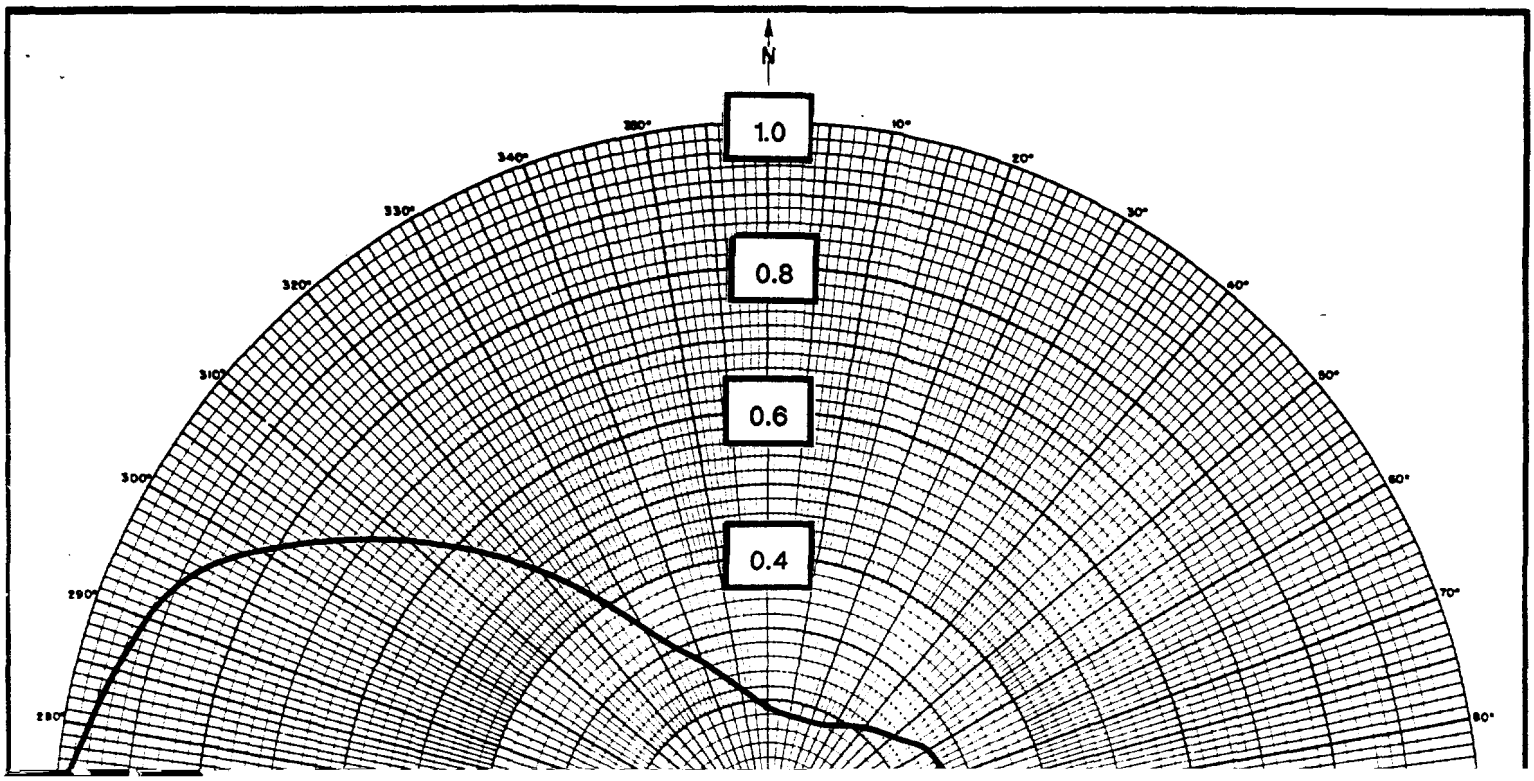


EXHIBIT NO. 1

NEW TV — BAKERSFIELD, CA

VERTICAL PLAN SKETCH OF PROPOSED ANTENNA AND SUPPORT STRUCTURE

MAY 1993 — MOFFET, LARSON & JOHNSON, INC.


N
1.0
0.8
0.6
0.4
350°
10°
340°
20°
330°
30°
320°
40°
310°
50°
300°
60°
290°
70°
280°
80°

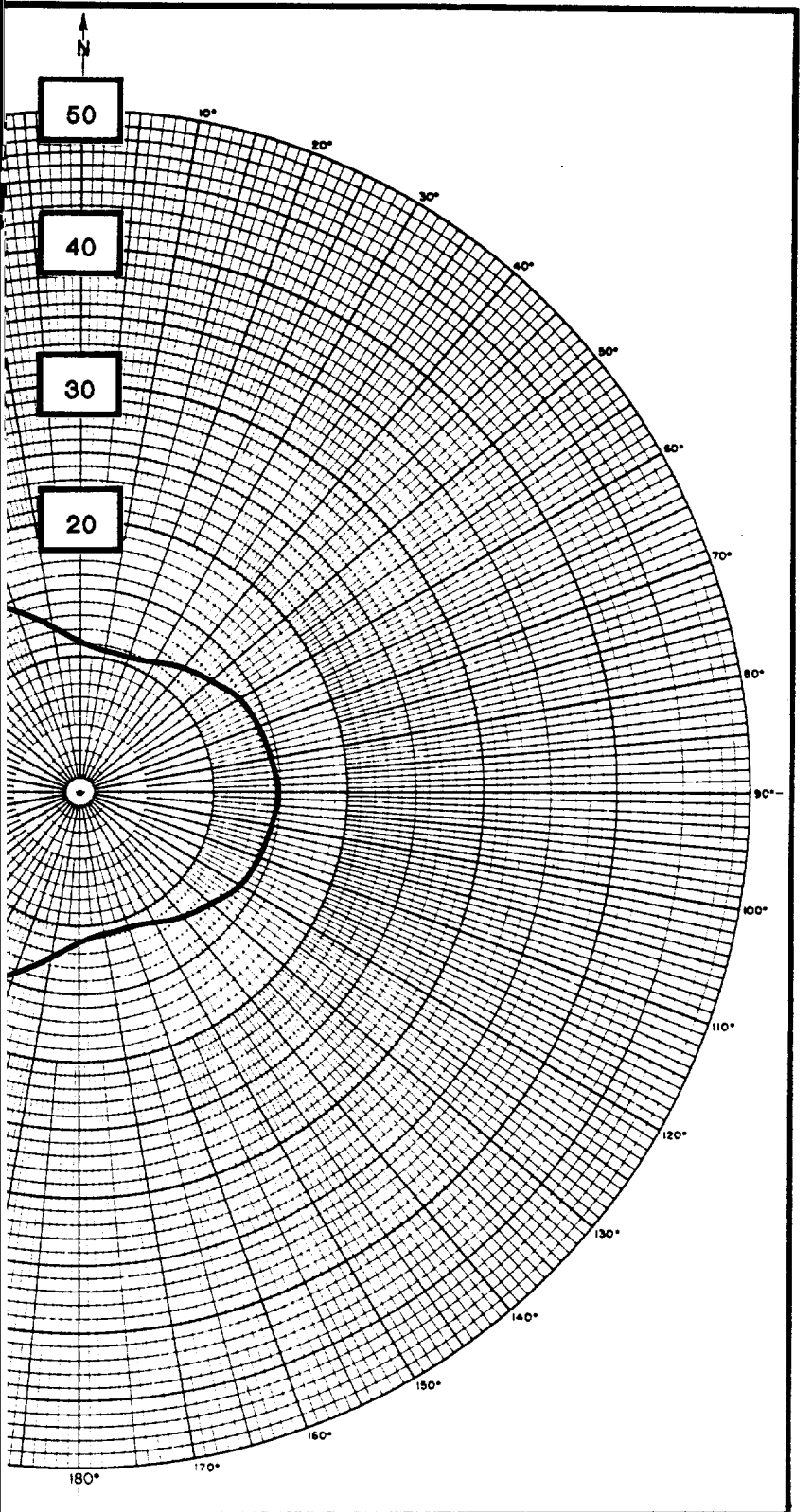


EXHIBIT 2-B

BAKERSFIELD, CALIFORNIA

HORIZONTAL PATTERN-dBk

MOFFET, LARSON & JOHNSON, INC.

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

5203 Leesburg Pike
Falls Church, Virginia 22041

ENGINEERING REPORT

Valley Public Television, Inc.
Bakersfield, California

EXHIBIT 2-C

ANTENNA CONCEPTS, INC.

ELEVATION PATTERN DATE 5/5/93 BEAM TILT -1.5
ACS16C ANTENNA GAIN : 79 NULL FILL 0 %

ELEVATION	FIELD	.1 .2 .3 .4 .5 .6 .7 .8 .9 1.0
+6.00	0.037	*
+4.00	0.220	*
+2.00	0.039	*
+0.00	0.777	*
-2.00	1.000	*
-4.00	0.376	*
-6.00	0.193	*
-8.00	0.104	*
-10.00	0.128	*
-12.00	0.033	*
-14.00	0.099	*
-16.00	0.004	*
-18.00	0.077	*
-20.00	0.011	*
-22.00	0.065	*
-24.00	0.014	*
-26.00	0.056	*
-28.00	0.013	*
-30.00	0.052	*
-32.00	0.007	*
-34.00	0.050	*
-36.00	0.006	*
-38.00	0.046	*
-40.00	0.022	*
-42.00	0.036	*
-44.00	0.042	*
-46.00	0.008	*
-48.00	0.046	*
-50.00	0.026	*
-52.00	0.027	*
-54.00	0.055	*
-56.00	0.035	*
-58.00	0.016	*
-60.00	0.048	*
-62.00	0.044	*
-64.00	0.008	*
-66.00	0.044	*
-68.00	0.080	*
-70.00	0.094	*
-72.00	0.086	*
-74.00	0.069	*
-76.00	0.060	*
-78.00	0.067	*
-80.00	0.080	*
-82.00	0.091	*
-84.00	0.096	*
-86.00	0.096	*
-88.00	0.092	*
-90.00	0.084	*

Record of input data: ACS16C WITH 16 BAYS.
GAIN 79 BT/NF -1.5 DEG. & 0 PERCENT.

EXHIBIT 3-A

VERTICLE ANTENNA PATTERN IN dBk

ANTENNA CONCEPTS, INC.

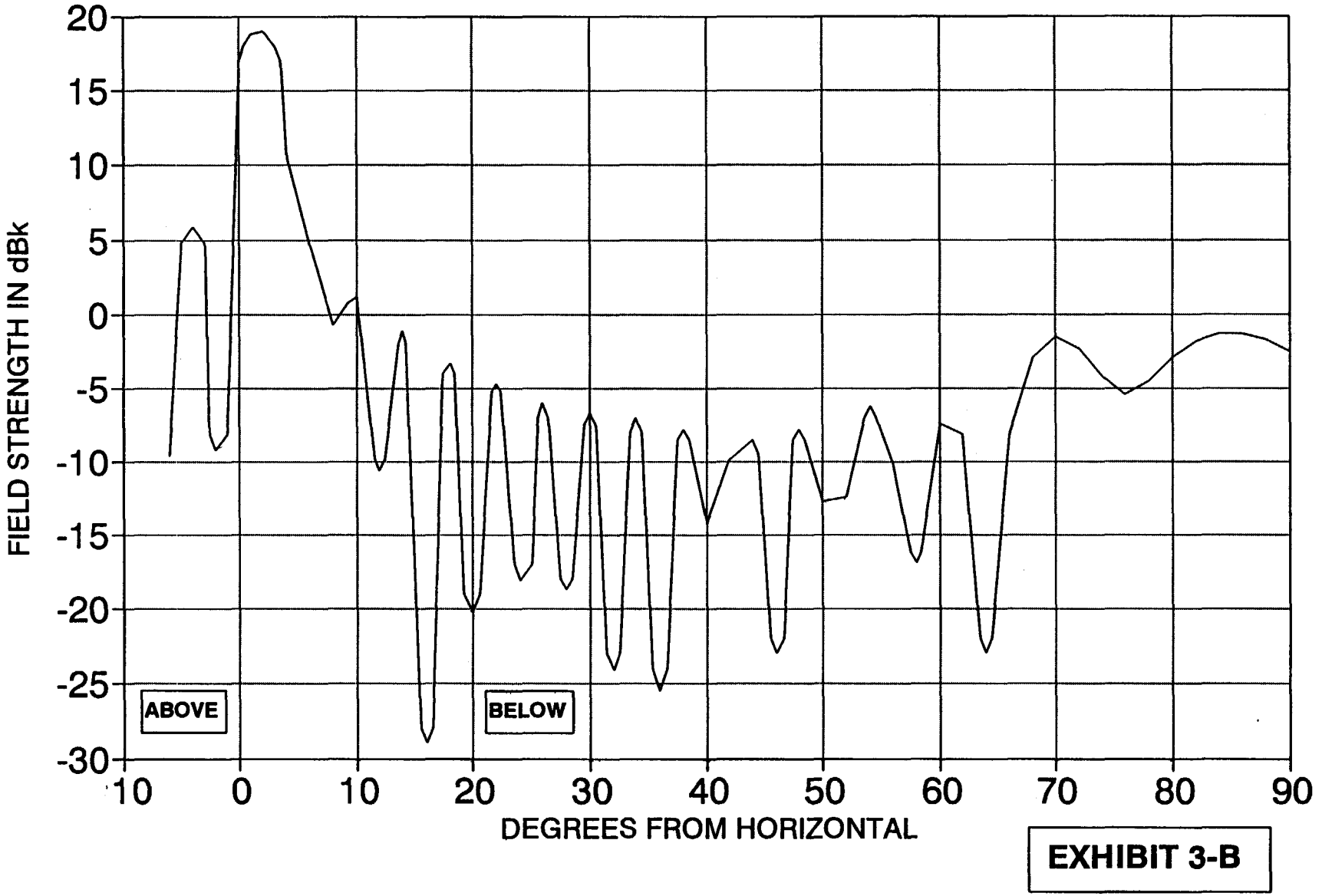
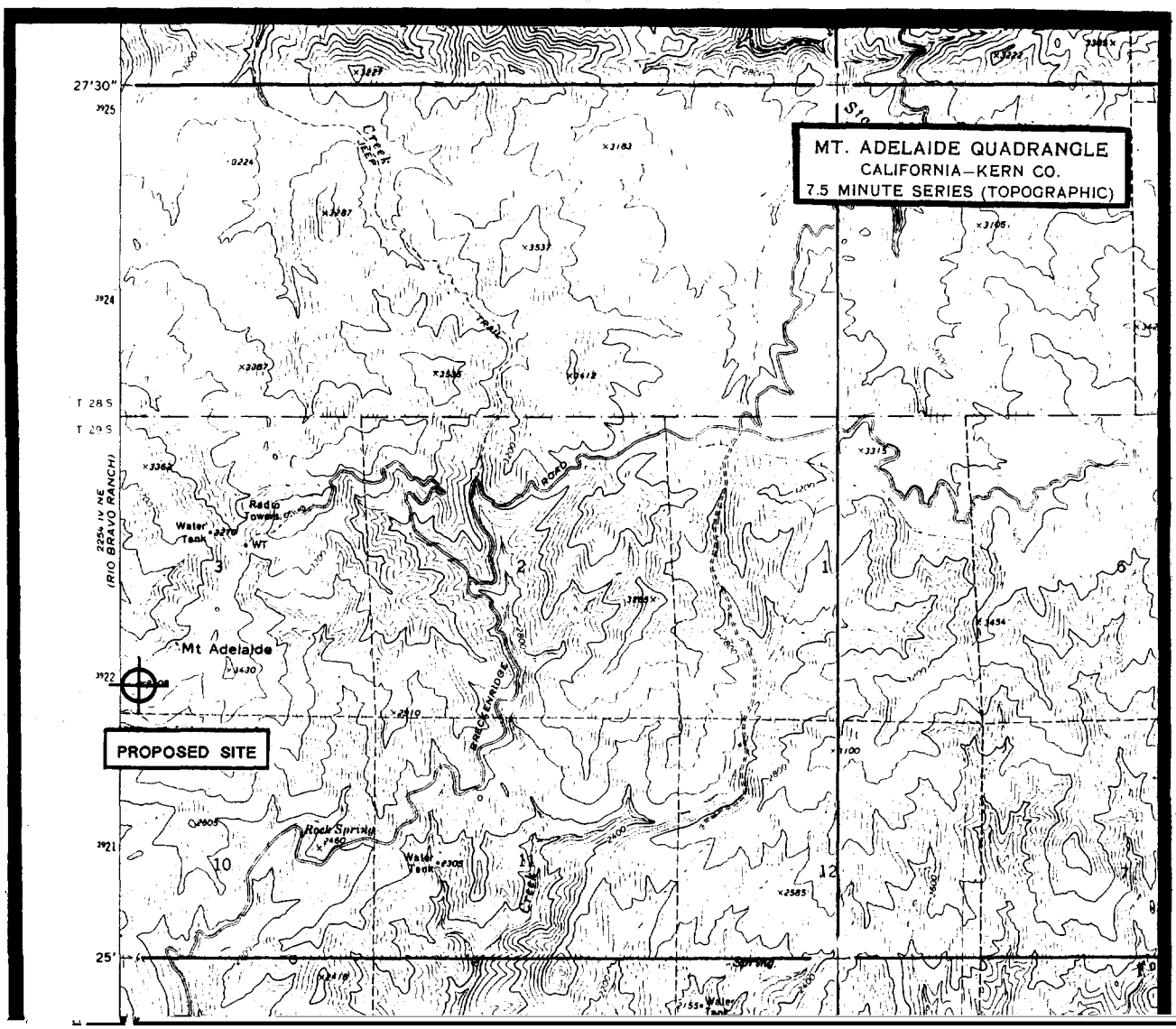
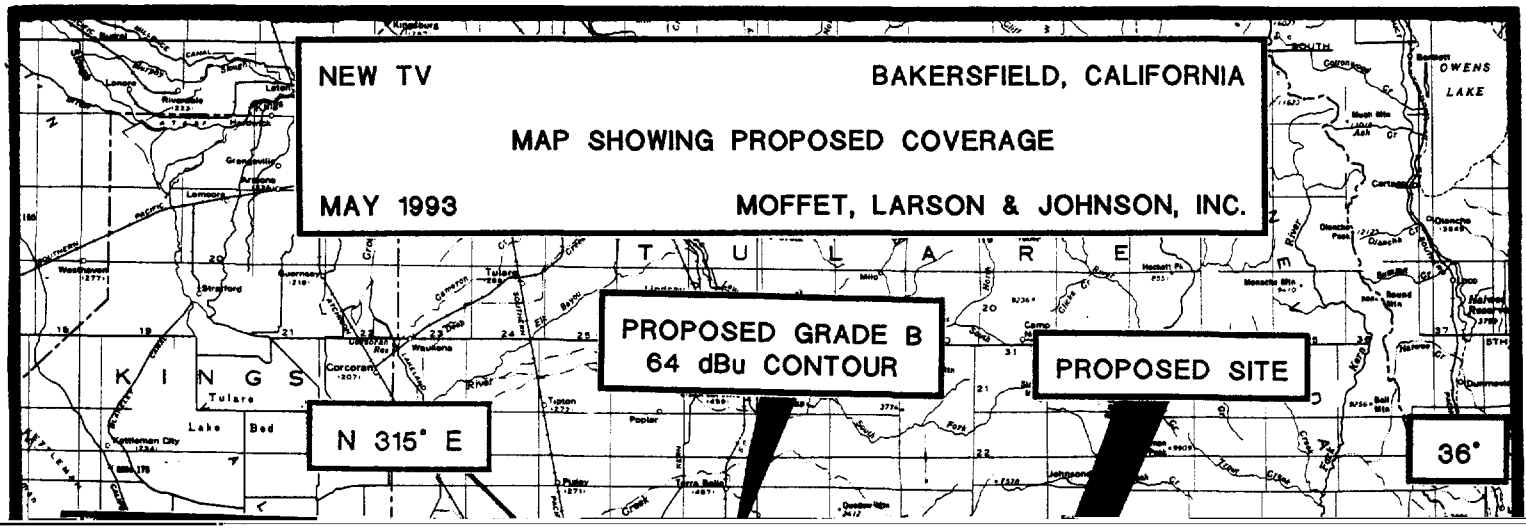


EXHIBIT 3-B


MT. ADELAIDE QUADRANGLE
CALIFORNIA—KERN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
PROPOSED SITE
Mt Adelaide
Radio Towers
Water Tank
WT
Rock Spring
Water Tank
Spring
Water Tank
ROAD
TRAIL
CREEK
T 28 S
T 29 S
27'30"
25'
3925
3924
3922
3921
225± IV NE
(RIO BRAVO RANCH)


NEW TV
BAKERSFIELD, CALIFORNIA
MAP SHOWING PROPOSED COVERAGE
MAY 1993
MOFFET, LARSON & JOHNSON, INC.
PROPOSED GRADE B
64 dBu CONTOUR
PROPOSED SITE
N 315° E
36°
K I N G S
T U L A R E
Lake Bed
OWENS LAKE

Valley Public Television, Inc.
Bakersfield, California

EXHIBIT 6-A

FURTHER RESPONSE TO PART 20 OF FCC FORM 340

This proposal is categorically excluded from the environmental processing since it does not involve a site location specified under Section 1.1307(a)(1)-(8) of the Commission's Rules.

Exhibit 6-B tabulates the calculation of the percent of allow power density from the proposed antenna at distances from the tower base to 100 meters on a bearing of 270 degree true, the bearing of maximum radiation, and at an elevation of 2 meters above ground level. As shown in Exhibit 6-B, the power density at ground level will be less than that allowed. Therefore, the electromagnetic radiation from this proposed operation will be below the standards set in the Human Exposure Guide (ANSI C95.1, 1982) in locations accessible to the public.

The antenna input power will be reduced or shut off as necessary when authorized persons climb the tower to ensure that these persons are not subject to electromagnetic radiation that exceed the ANSI limit.

A fence will be constructed to prevent access to the tower and appropriate warning signs will be place on the tower.

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

5203 Leesburg Pike
Falls Church, Virginia 22041

Valley Public Television, Inc.
Bakersfield, California

EXHIBIT 6-B

CALCULATION OF PERCENT OF ALLOWED POWER DENSITY

Antenna # 1 - TV Broadcast

ID : BAKERSFIELD, CA

Frequency : 620.0 Mhz Rad Cent : 19.0 meters AG

Power

Hori Vis : 370.000 kW Hori Vis : 370.000 kW

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

5203 Leesburg Pike
Falls Church, Virginia 22041

Valley Public Television, Inc.
Bakersfield, California

EXHIBIT 7

FURTHER RESPONSE TO PART 14 OF FCC FORM 340

There are no FM or TV stations within 60 meters of the proposed antenna. However, there are business band antennas located within 60 meters of the proposed antenna. It is not expected that the proposed TV operation will cause any adverse affect to the business band facilities. However, if any adverse affects should occur, the applicant will alleviate the problem.

MLJ **MOFFET, LARSON & JOHNSON, INC.**
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place — ENGINEERING REPORT — 5203 Leesburg Pike

MLJ MOFFET, LARSON & JOHNSON, INC.
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place
Suite 800

5203 Leesburg Pike
Falls Church, Virginia 22041

ENGINEERING REPORT

Valley Public Television, Inc.
Bakersfield, California

AFFIDAVIT

COUNTY OF FAIRFAX)
) SS:
COMMONWEALTH OF VIRGINIA)

WALLACE E. JOHNSON, being duly sworn upon oath deposes and says:

That his qualifications are a matter of record with the Federal Communications Commission;

That he is a registered professional engineer in the Commonwealth of Virginia and the District of Columbia and is the Vice Chairman of the firm of Moffet, Larson & Johnson, Inc.;

That this firm has been retained by Valley Public Television, Inc. to prepare this engineering statement;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

Wallace E. Johnson

COMMONWEALTH OF VIRGINIA
WALLACE E. JOHNSON
No. 13521
PROFESSIONAL ENGINEER

Subscribed and sworn to before me this 6th day of May, 1993.

Notary Public

NOTARY PUBLIC
SUSAN V. TOTH
COMMONWEALTH OF VIRGINIA

My Comm. Exps.
July 31, 1996