

MB 08-193

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FILED/ACCEPTED

AUG - 1 2008

Federal Communications Commission
Office of the Secretary

In the Matter of: }
 }
PAPPAS TELECASTING OF }
CENTRAL NEBRASKA, L.P. }
 }
To Amend the Post-Transition }
Digital Television Table of Allotment }
for Station KWNB, Hayes Center, NE }

MB Docket No.: _____

RM- _____

To: The Secretary
Attn: Chief, Video Division
Media Bureau

~~PLEASE STAMP~~
~~AND RETURN~~
~~TO~~
~~SECRETARY~~

PETITION FOR RULEMAKING

Pappas Telecasting of Central Nebraska, L.P. ("Petitioner"), by and through its attorneys, and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. § 73.623 (2007), hereby submits this Petition for Rulemaking to change the post-transition digital television ("DTV") channel allotment of Station KWNB-DT, Hayes Center, Nebraska (the "Station") to Channel 6, and to make related technical changes to the Station's technical parameters. This Petition is submitted pursuant to the Public Notice, dated May 30, 2008, lifting the freeze on the submission of DTV "maximization" applications and petitions for digital channel substitutions.¹

The Station's current analog facility is authorized to operate on NTSC Channel 6, and its current digital allotment is Channel 18.² As set forth in the Engineering Statement, attached hereto as Exhibit A, Petitioner has determined that the requested change in the post-transition DTV allotment of the Station to Channel 6 complies with the Commission's technical rules,

¹ *Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, DA 08-1213 (May 30, 2008).

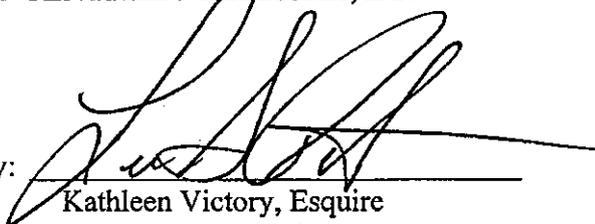
² *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order, Appendix B, 22 FCC Rcd 15,581 (2007) ("DTV Order"). The post-transition parameters for DTV facilities specified in Appendix B will be codified at 47 C.F.R. § 73.622(i). *Id.*, nt. 2.

would result in a more efficient use of the spectrum, as it will permit the Petitioner to further maximize the Station's facilities, and would permit the Petitioner to save financial resources in using a portion of its current analog antenna. Finally, the proposed facility complies with the Commission's processing guidelines established in the DTV Order regarding the permissible change in a post-transition DTV facility.

Therefore, Petitioner respectfully requests that the post-transition DTV Table of Allotments be amended for the Station to specify the technical parameters set forth herein. The requested changes comply with all applicable legal and technical requirements and would serve the public interest.

Respectfully submitted,

**PAPPAS TELECASTING
OF CENTRAL NEBRASKA, L.P.**

By: 

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Its Attorneys

August 1, 2008

KHANNA & GULL, Inc. - Consulting Engineers

**ENGINEERING STATEMENT
IN SUPPORT OF A PETITION FOR RULEMAKING
TO SUBSTITUTE TV CHANNEL 6 FOR CHANNEL 18
FOR THE PROPOSED DIGITAL TV OPERATION OF
KWNB-DT, HAYES CENTER, NEBRASKA
JULY 2008**

This engineering statement has been prepared on behalf of Pappas Telecasting of Central Nebraska, L.P., ("Pappas"), in support of a Rulemaking Petition ("RM") to substitute TV Channel 6 for the allotted TV Channel 18 for the digital television (DTV) operation of KWNB-TV, Hayes Center, Nebraska.

At present KWNB-TV, Facility ID Number 21162, is authorized to operate its analog TV facilities on Channel 6 (82-88 MHz) with 100 kW effective radiated power (ERP) and 221 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. The Commission has allotted TV Channel 18 (494-500 MHz) for the DTV operation of KWNB-DT with 1000 kW ERP and 216 meters HAAT. Pappas believes TV Channel 6 is superior to Channel 18 for the station's DTV coverage and is in the public interest as explained below in more detail. Therefore, Pappas is filing a Rule Making petition to substitute TV Channel 6 for Channel 18 in the DTV Table of Allotments, Section 73.622 of the Commission's rules. The allotted facilities are for an operation on DTV Channel 6 with 3 kW ERP, 221 meters HAAT and a non-directional TV antenna.

The following information provides pertinent data for the proposed KWNB-DT operation.

Name of the Licensee:	Pappas Telecasting of Central Nebraska, L.P.
Station Location:	NE-Hayes Center
Channel:	6
Hours of Operation:	Unlimited
Transmitter:	Type Accepted

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Antenna Type: GE, TY-60-F

Beam Tilt: None

Antenna Coordinates: North Latitude: 40 deg 37 min 32 sec
West Longitude: 101 deg 01 min 45 sec

Transmitter output power: As required to achieve authorized ERP

Maximum effective radiated power (Average): 3 kW
4.77 dBk

Elevation of site above mean sea level: 995.0 meters

Overall height of the tower above ground: 178.8 meters

Height of radiation center above ground (meters): 165 meters

Height of radiation center above mean sea level (meters): 1160 meters

Height of radiation center above average terrain (meters): 221 meters

Antenna Structure Registration No.: 1026527

Response to questions listed on the FCC Form 301, Section III-D-DTV

Engineering

Question 1. (a)

KWNB-TV is currently allotted a TV Channel 18 for its DTV operation. KWNB-TV is proposing to substitute TV Channel 6 for Channel 18 and is filing this Petition for Rule Making to allot DTV Channel 6 in the Table of Allotments, Section 73.622 of the Commission's rules.

Question 1. (d)

An interference study conducted (see attached Table I) according to the FCC OET Bulletin 69 indicates the proposed KWNB-DT operation would not cause any interference to other DTV stations exceeding the Commission's guidelines.

Question 1. (e)

The proposed DTV operation on Channel 6 would serve 76,687 people within the noise limited service area as compared to 76,000 predicted population defined in the new DTV Table in Appendix B for Channel 18. As such, the proposed DTV Channel 6 operation would serve 687 more people than listed in the new DTV Table in Appendix B for Channel 18.

Question 2.

The attached environmental statement demonstrates that there will not be any significant environmental impact from the proposed DTV operation in accordance with 47 C.F.R. Section 73.1307.

Question 3.

The attached map shows the proposed KWNB-DT 35 dBu contour will encompass the allotted principal community of Hayes Center, Nebraska (see Figure 1).

Question 4.

The proposed KWNB-DT facility complies with Section 73.1030 of the Commission's rules; therefore, notification to radio astronomy installations, radio receiving installations and FCC monitoring stations is not required.

Question 5.

KWNB-DT would be operating from the existing tower which is registered (ASR No. 1026527) by the Commission and no changes are proposed to require a change in the registration.

Reasons for the substitution of TV Channel 6 for Channel 18

As indicated earlier the proposed DTV Channel 6 is Hayes Center to the allotted DTV Channel 18 for the following reasons.

1. The proposed DTV operation on Channel 6 would replicate the coverage provided with Appendix B facilities on Channel 18 (see attached Figure 2). As a matter of fact the proposed Channel 6 operation would allow KWNB-DT to serve 687 more people than on Channel 18.
2. It would enable KWNB-TV to utilize part of the current analog TV Channel 6 equipment resulting in faster construction and implementation of its DTV operation

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Table I

TW Census data selected 2000
Post Transition Data Base Selected /space/software/cdbs/pt_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-16-2008 Time: 12:46:33

Record Selected for Analysis

KWNB-DT USERRECORD-01 HAYES CENTER NE US
Channel 06 ERP 3. kW HAAT 221. m RCAMSL 01160 m
Latitude 040-37-32 Longitude 0101-01-45
Status APP Zone 2 Border
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	28.0 dBu F(50,90) (km)
0.0	3.000	220.6	89.1
45.0	3.000	231.8	90.0
90.0	3.000	242.0	90.8
135.0	3.000	251.7	91.6
180.0	3.000	237.6	90.4
225.0	3.000	214.9	88.7
270.0	3.000	190.8	86.8
315.0	3.000	180.7	86.0

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KWNB-DT 06 HAYES CENTER NE USERRECORD01

and station

SHORT TO: KWNB-TV 06 HAYES CENTER NE BLCT 20000828AHT
040-37-32 0101-01-45
Req. separation 273.6 Actual separation 0.0 Short 273.6 km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

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Proposed facility OK toward Table Mountain
 Proposed facility is beyond the Canadian coordination distance
 Proposed facility is beyond the Mexican coordination distance
 Proposed station is OK toward AM broadcast stations

 Start of Interference Analysis

Channel	Proposed Station	ARN
06	Call City/State KWNB-DT HAYES CENTER NE	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
05	KHAS-TV	HASTINGS NE	223.1	CP	BPCDT	-20080417AAF
05	KHAS-TV	HASTINGS NE	223.1	PLN	DTVPLN	-DTVP0023
05	KHAS-TV	HASTINGS NE	223.1	APP	BPCDT	-20080603ABR
06	KBSD-TV	ENSIGN KS	336.9	PLN	DTVPLN	-DTVP0036
06	KBSD-TV	ENSIGN KS	336.9	CP MOD	BMPCDT	-20080313ABP

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	KHAS-TV	HASTINGS NE	BPCDT	-20080417AAF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
05	WOI-TV	AMES IA	419.5	PLN	DTVPLN	-DTVP0018
05	WOI-TV	AMES IA	418.9	APP	BPCDT	-20080620ABC
05	WOI-TV	AMES IA	418.9	CP	BPCDT	-20080415AAL
06	KWNB-DT	HAYES CENTER NE	223.1	APP	USERRECORD-01	

Proposed station is beyond the site to
 nearest cell evaluation distance

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	KHAS-TV	HASTINGS NE	DTVPLN	-DTVP0023

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
05	WOI-TV	AMES IA	419.5	PLN	DTVPLN	-DTVP0018
05	WOI-TV	AMES IA	418.9	APP	BPCDT	-20080620ABC
05	WOI-TV	AMES IA	418.9	CP	BPCDT	-20080415AAL
06	KWNB-DT	HAYES CENTER NE	223.1	APP	USERRECORD-01	

Proposed station is beyond the site to
 nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
05	KHAS-TV	HASTINGS NE	BPCDT -20080603ABR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
05	WOI-TV	AMES IA	419.5	PLN	DTVPLN -DTVP0018
05	WOI-TV	AMES IA	418.9	APP	BPCDT -20080620ABC
05	WOI-TV	AMES IA	418.9	CP	BPCDT -20080415AAL
06	KWNB-DT	HAYES CENTER NE	223.1	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
06	KBSD-TV	ENSIGN KS	DTVPLN -DTVP0036

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
06	KWNB-DT	HAYES CENTER NE	336.9	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
06	KBSD-TV	ENSIGN KS	BMPCDT -20080313ABP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
06	KWNB-DT	HAYES CENTER NE	336.9	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
06	KWNB-DT	HAYES CENTER NE	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
05	KHAS-TV	HASTINGS NE	223.1	CP	BPCDT -20080417AAF
05	KHAS-TV	HASTINGS NE	223.1	PLN	DTVPLN -DTVP0023
05	KHAS-TV	HASTINGS NE	223.1	APP	BPCDT -20080603ABR
06	KBSD-TV	ENSIGN KS	336.9	PLN	DTVPLN -DTVP0036
06	KBSD-TV	ENSIGN KS	336.9	CP MOD	BMPCDT -20080313ABP

Total scenarios = 2

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Result key: 1
 Scenario 1 Affected station 6
 Before Analysis

Results for: 5A NE HAYES CENTER USERRECORD01 APP
 HAAT 221.0 m, ATV ERP 3.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	77072	24985.9
not affected by terrain losses	76774	24758.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	87	135.9
lost to ATV IX only	87	135.9
lost to all IX	87	135.9

Potential Interfering Stations Included in above Scenario 1

6A KS ENSIGN DTVPLN DTVP0036 PLN

Result key: 2
 Scenario 2 Affected station 6
 Before Analysis

Results for: 6A NE HAYES CENTER USERRECORD01 APP
 HAAT 221.0 m, ATV ERP 3.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	77072	24985.9
not affected by terrain losses	76774	24758.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	87	135.9
lost to ATV IX only	87	135.9
lost to all IX	87	135.9

Potential Interfering Stations Included in above Scenario 2

6A KS ENSIGN BMPCDT 20080313AEP CP

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

ENVIRONMENTAL PROTECTION ACT

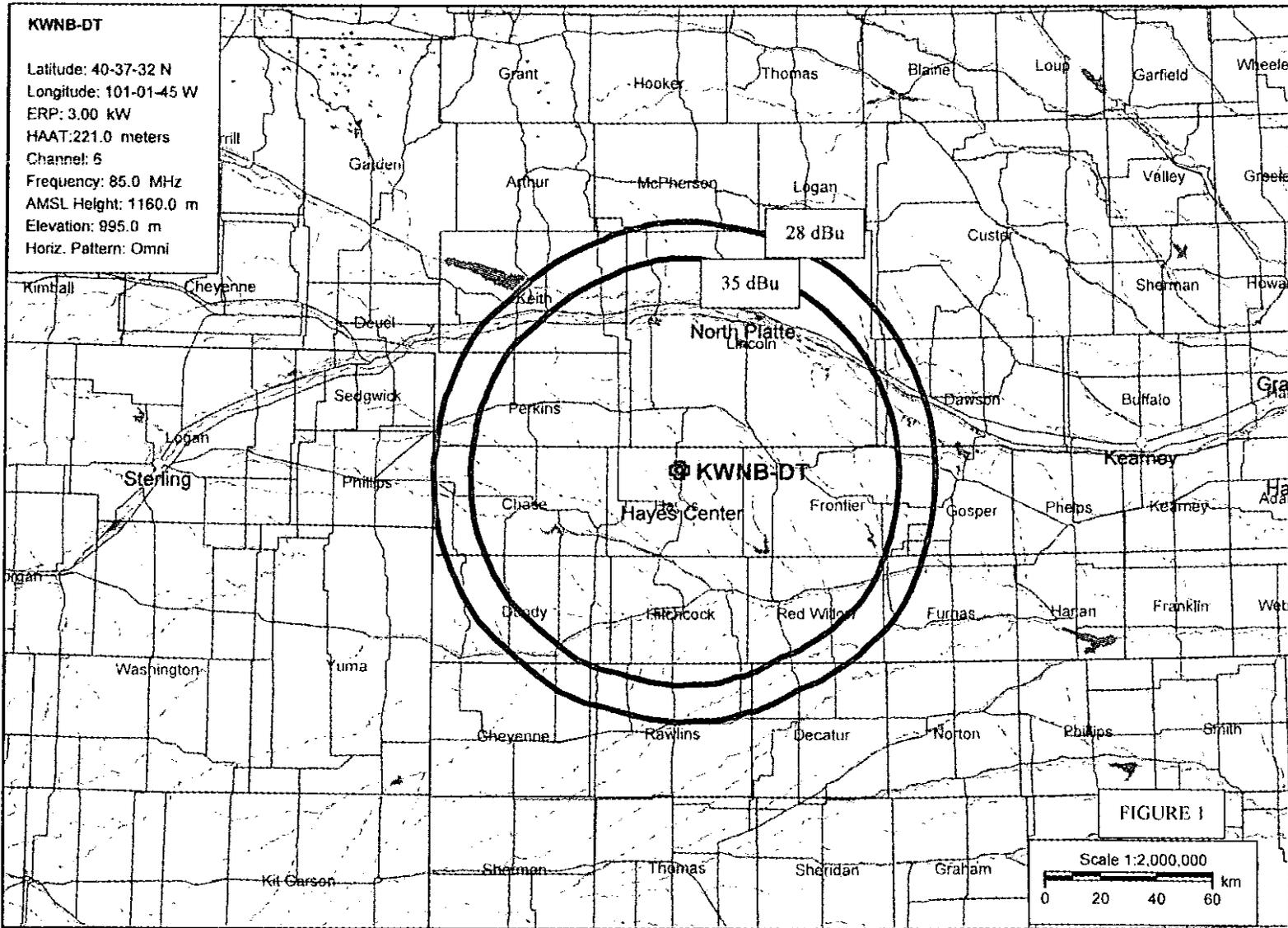
Since KWNB-DT will be using its currently licensed tower (ASR No. 1026527), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 3 kW and a radiation center of 165 meters above ground level, the proposed Channel 6 DTV operation would have less than 1 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.5 in the downward direction.

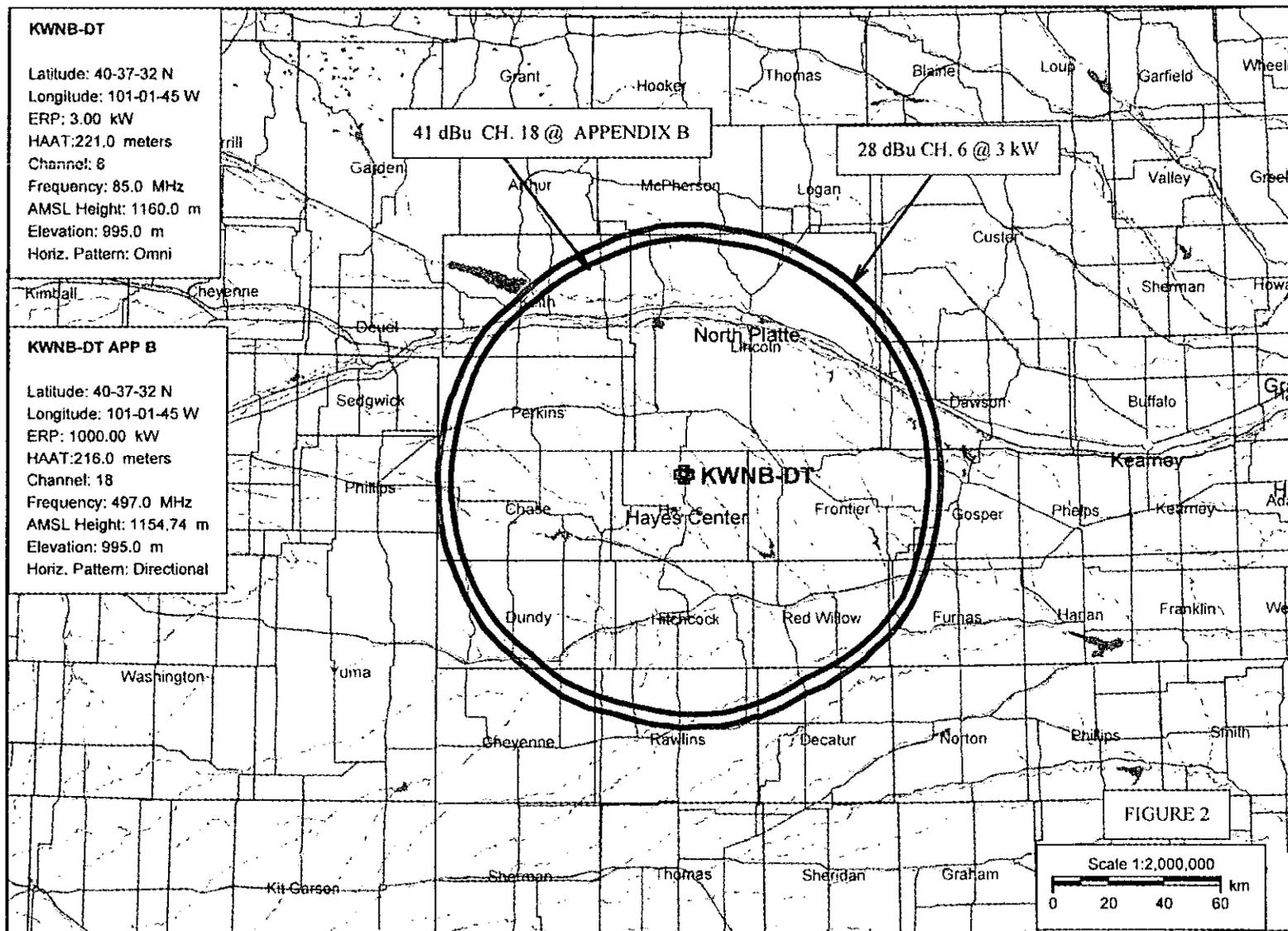
The Commission's guidelines for Channel 6 are $1,000 \mu\text{W}/\text{cm}^2$ for the occupational/controlled, and $200 \mu\text{W}/\text{cm}^2$ for the general population/uncontrolled environment.

The above analysis indicates that members of the public and personnel working around the KWNB-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, KWNB-DT will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.



COMPUTED CONTOURS FOR THE PROPOSED CH. 6 DTV OPERATION OF KWNB-DT, HAYES CENTER, NEBRASKA



COMPUTED CONTOURS FOR THE CURRENT APPENDIX B AND PROPOSED CH. 6 DTV OPERATION OF KWNB-DT, HAYES CENTER, NEBRASKA

application that are being revised.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1.	<p>Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
2.	<p>Parties to the Application.</p> <p>a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate rcw for each individual or entity. Attach additional pages if necessary.</p> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.</p> <p>(2) Citizenship.</p> <p>(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc.</p> <p>(4) Percentage of votes.</p> <p>(5) Percentage of total assets (equity plus debt).</p> <p>[Enter Parties/Owners Information]</p> <hr/> <p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 2]</p>
3.	<p>Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p>	<p><input type="checkbox"/> N/A [Exhibit 3]</p>
4.	<p>Multiple Ownership.</p> <p>a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?</p> <p>If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p> <p>b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.</p> <p>Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p>	<p><input type="radio"/> Yes <input type="radio"/> No [Exhibit 4]</p> <p><input type="radio"/> Yes <input type="radio"/> No [Exhibit 5]</p>

<p>All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p> <p>c. Applicant certifies that the proposed facility:</p> <ol style="list-style-type: none"> 1. does not present an issue under the Commission's policies relating to media interests of immediate family members; 2. complies with the Commission's policies relating to future ownership interests; and 3. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors. 		<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 6]</p>
5.	<p>Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <ol style="list-style-type: none"> a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised. 	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 7]</p>
6.	<p>Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 8]</p>
7.	<p>Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 9]</p>
8.	<p>Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
9.	<p>Local Public Notice. Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
10.	<p>Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p> <p>An exhibit is required unless this question is inapplicable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p> <p>[Exhibit 10]</p>
11.	<p>Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
12.	<p>Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p>
13.	<p>Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments. If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input type="radio"/> N/A</p>

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III-D - DTV Engineering	
Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p>Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p>Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input checked="" type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622 (i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION III-D - DTV Engineering	
TECHNICAL SPECIFICATIONS	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
TECH BOX	
1.	Channel Number: DTV 6 Analog TV, if any 6
2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 40 Minutes 37 Seconds 32 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 101 Minutes 1 Seconds 45 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1026527 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 995 meters
6.	Overall Tower Height Above Ground Level: 178.8 meters
7.	Height of Radiation Center Above Ground Level: 165 meters
8.	Height of Radiation Center Above Average Terrain : 221 meters
9.	Maximum Effective Radiated Power (average power): 3 kW
10.	Antenna Specifications: a. Manufacturer GE Model TY-60-F b. Electrical Beam Tilt: degrees <input checked="" type="checkbox"/> Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). [Exhibit 42] d. Polarization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]
10e. Directional Antenna Relative Field Values	

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees): No Rotation

Degrees	Value										
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	

Additional Azimuths

Relative Field Polar Plot

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 43]

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? Yes No [Exhibit 44]

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered "No.") [Exhibit 45]

13. **Environmental Protection Act. Submit in an Exhibit the following:** [Exhibit 46]

If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name S. K. KHANNA		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 8/1/2008	
Mailing Address KHANNA & GUILL, INC. 8405-A RICHMOND HIGHWAY			
City ALEXANDRIA	State or Country (if foreign address) VA	Zip Code 22309 -2425	
Telephone Number (include area code) 7037782550	E-Mail Address (if available) SID@KGICONSULTING.COM		

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 44

Description: ENGINEERING STATEMENT

Attachment 44

Description
EXHIBIT 44 - ENGINEERING STATEMENT

Exhibit 46

Description: REFERENCED EXHIBIT

SEE EXHIBIT 44

Attachment 46