ENGINEERING STATEMENT
RE REQUEST TO CONSTRUCT POST-TRANSITION
AUXILIARY DTV STATION
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 9 19.4 KW ERP 418.1 METERS HAAT

OCTOBER 2008

COHEN, DIPPELL AND EVERIST, P. C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D. C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Ross J. Heide, being duly sworn upon his oath, deposes and states that:

He is a graduate of the Massachusetts Institute of Technology in Operations Research and Management Science, a Registered Professional Engineer in the District of Columbia, and employed by Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Ross J. Heide
District of Columbia
Professional Engineer
Registration No. PE900748

Subscribed and sworn to before me this 23rd day of October, 2008.

Notary Public

My Commission Expires: 2/28/2013

Introduction

This engineering statement has been prepared on behalf of Griffin OKC Licensing, L.L.C., ("KWTV") licensee of TV station KWTV(TV), Oklahoma City, Oklahoma, as part of its request to construct a post-transition DTV auxiliary station. Station KWTV-DT has been allotted its current analog Channel 9 (186-192 MHz) for its permanent, post-transition digital TV operation and been authorized to construct a facility (BPCDT-20080317AFP) with 40 kW non-directional effective radiated power ("ERP") and 465 meters height above average terrain ("HAAT").[1] KWTV-DT proposes to construct DTV Channel 9 auxiliary station on the authorized tower with 19.4 kW non-directional ERP at 418.1 meters HAAT. This new auxilary antenna will be side-mounted on the existing tower and will also be used as the auxiliary antenna for KETA-DT, Channel 13, Oklahoma City, Oklahoma.

Antenna Site

There is no change in the proposed antenna site. The proposed DTV Channel 9 auxiliary antenna will be side-mounted on the tower (Exhibit E-1) with its center of radiation ("C/R") at 419.5 meters above ground level. The KWTV antenna site is located at 7401 North Kelley Avenue, Oklahoma City, Oklahoma. The KWTV antenna structure registration number is 1010943.

[1] "In the Matter of Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television", MB Docket No. 07-91, Report & Order (FCC 07-228), Released December 31, 2007.

The geographic coordinates of the existing tower are as follows:

North Latitude: 35° 32’ 58”

West Longitude: 97° 29’ 49”

NAD-27

The following data shows the pertinent information concerning the proposed auxiliary operation.

Power Data

Transmitter Power Output (“TPO”)	3.7 kW	5.71 dBk
Transmission Line Efficiency/Loss	83.4%	-0.79 dB
Input Power to Auxiliary Antenna	3.1 kW	4.92 dBk
Auxiliary Antenna Power Gain	6.2	7.96 dB
Auxiliary Effective Radiated Power	19.4 kW	12.88 dBk

Antenna Data

Antenna: Dielectric, TF-6HS-H DC (or equivalent) with 0.70 degrees electrical beamtilt. The vertical plane pattern and other exhibits required by Section 73.625(c) are included herein as Exhibit E-2.

Transmission Line: 335.3 meters (1100 ft) of Dielectric, Type EIA/DCA, 6-1/8” coaxial, 50 ohm line (or equivalent)

Elevation Data

Vertical dimension for Channel 9 auxiliary antenna	11.4 meters 37.3 feet
Elevation of the site above mean sea level:	353.6 meters 1160.1 feet
Elevation of the top of existing supporting structure above ground including appurtenances	480.5 meters 1576.4 feet

Elevation of the top of supporting structure above mean sea level including appurtenances	834.1 meters 2736.5 feet
Height of Ch.9 auxiliary antenna radiation center meters above ground	419.5 meters 1376.3 feet
Height of Ch.9 auxiliary antenna radiation center above mean sea level	773.1 meters 2536.4 feet
Height of Ch.9 auxiliary antenna radiation center above average terrain	418.1 meters 1371.7 feet

Effective Radiated Power

The ERP authorized for the main DTV Channel 9 operation is 40 kW at 465 meters HAAT. Station KWTV-DT is proposing to operate its DTV Channel 9 auxiliary facility with an ERP of 19.4 kW non-directional at 418.1 meters HAAT. This power and height will ensure that the auxiliary operation does not extend the predicted 36 dBu F(50,90) noise-limited contour in any direction beyond that authorized in the CP. The attached map (Exhibit E-3) shows the computed F(50,90) 36 dBu contours predicted according to Section 73.625(b) of the Commission's rules based on the DTV facilities authorized in the current CP and the facilities of 19.4 kW ERP proposed for the auxiliary operation.

Principal Community Coverage

The Commission requires DTV stations to place a stronger signal over the principal community. The proposed auxiliary operation of Station KWTV Channel 9 places a predicted 43 dBu contour over the community of license as shown in Exhibit E-3.

Topographic Data

The average elevation data of the eight cardinal radials from 3.2 to 16.1 kilometers, are based on the NGDC 3-second computerized terrain database.

Contour Data

Utilizing the formula in Section 73.625(b)(2) for the effective heights shown on the attached tabulation, the depression angle A_h, for each azimuth has been calculated. The maximum radiation value has been used to calculate ERP where the vertical radiation pattern at these angles is greater than 90% of the maximum.

Table I provides the distances along the eight cardinal radials to the predicted F(50,90) 36 dBu and 43 dBu contours, the average elevations, and the effective antenna heights. The distances along each radial to the limits of F(50,90) 36 dBu and 43 dBu contours were determined as specified in Section 73.625(b) by reference to the propagation data for Channels 7-13, as published by the Commission in Figures 10 and 10a, Section 73.699 of its rules.

Population Coverage

The population coverage of the proposed auxiliary operation relative to the operation authorized in the CP is shown in the following table.

Longley-Rice Predicted Service

	FCC Defined[2]		Total Longley-Rice[3]	
	Population	Area (sq. km)	Population	Area (sq. km)
40 kW CP	1,506,600	42,200	1,570,700	50,390
19.4 kW Auxiliary	419,500	34,850	1,502,200	44,020
19.4 kW Auxiliary as % of CP	94.2%	85.0%	95.6%	87.4%

As with its operation authorized in the CP, KWTV DTV Channel 9 auxiliary at reduced power will remain in compliance with radio frequency field ("RFF") safety guidelines, FAA requirements, and environmental statutes. The total percentage of RFF levels was calculated by combining the percentage contribution of each station.

The total "worst-case" post-transition RFF contribution of all stations two meters above the ground near the base of the KWTV-DT tower is no more than 1.0% of the FCC guidelines for an uncontrolled environment and no more than 0.2% of the FCC guidelines for a controlled environment.

Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

[2]OET Bulletin 69 service area.
[3]OET Bulletin 69 method, except not limited to inside the noise-limited contour of §73.625.

Environmental Assessment

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the licensee indicates:

(a)(1)	The existing tower is not located in an officially designated wilderness area.
(a)(2)	The existing tower is not located in an officially designated wildlife preserve.
(a)(3)	The proposed facilities will not affect any listed threatened or endangered species or habitats.
(a)(3)(ii)	The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
(a)(4)	The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
(a)(5)	The existing tower is not located near any known Indian religious sites.
(a)(6)	The existing tower is not located in a flood plain.
(a)(7)	Addition of DTV auxiliary facilities to an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
(a)(8)	It is not proposed to equip the tower with high intensity white lights unless required by the FAA.
(b)	Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.

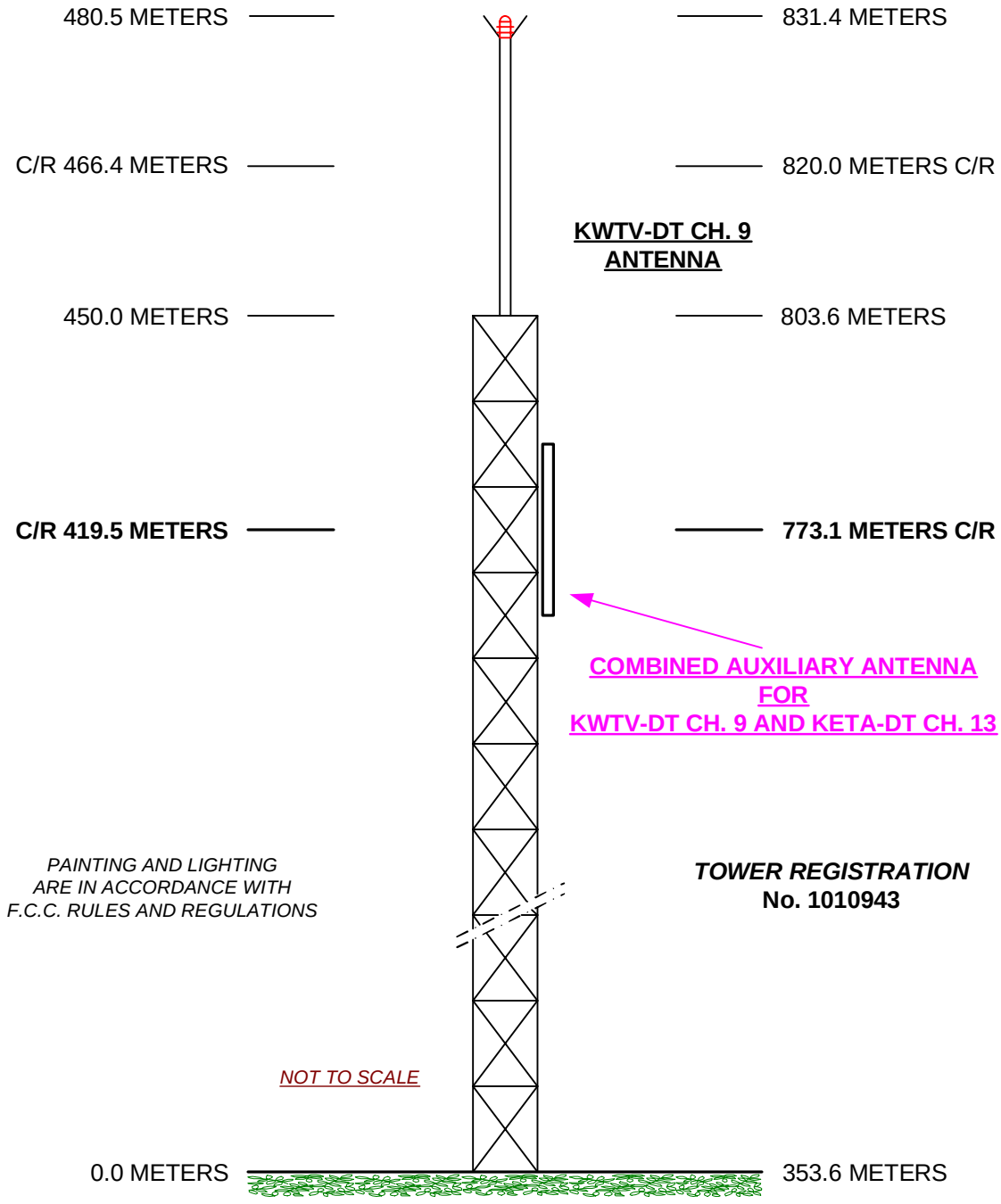


EXHIBIT E-1
VERTICAL SKETCH
FOR THE PROPOSED AUXILIARY OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
OCTOBER 2008

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED AUXILIARY DTV OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 9 19.4 KW 418.1 METERS HAAT
OCTOBER 2008

Radial Bearing N°E, T	Average* Elevation 3.2 to 16.1 km meters	Effective Height meters	Depression Angle	ERP At Radio Horizon kW	Distance to Contour F(50,90) 43 dBu City Grade km	36 dBu Noise-Limited km
0	349.6	423.5	0.570	19.4	93.5	106.9
45	323.2	449.9	0.588	19.4	95.1	109.2
90	353.5	419.6	0.567	19.4	93.3	106.6
135	360.1	413.0	0.563	19.4	93.0	106.1
180	368.3	404.8	0.557	19.4	92.5	105.5
225	362.8	410.3	0.561	19.4	92.8	105.9
270	375.4	397.7	0.552	19.4	92.0	104.9
315	347.3	425.8	0.572	19.4	93.7	107.1

*Based on data from FCC 3-second data base

DTV Channel 9 (186-192 MHz)
Average Elevation 3.2 to16.1 km 355 meters AMSL
Center of Radiation 773.1 meters AMSL
Antenna Height Above Average Terrain 418.1 meters
Effective Radiated Power 19.4 kW (12.88 dBk) Max.

North Latitude: 35° 32’ 58”
West Longitude: 97° 29’ 49”

(NAD-27)

COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2

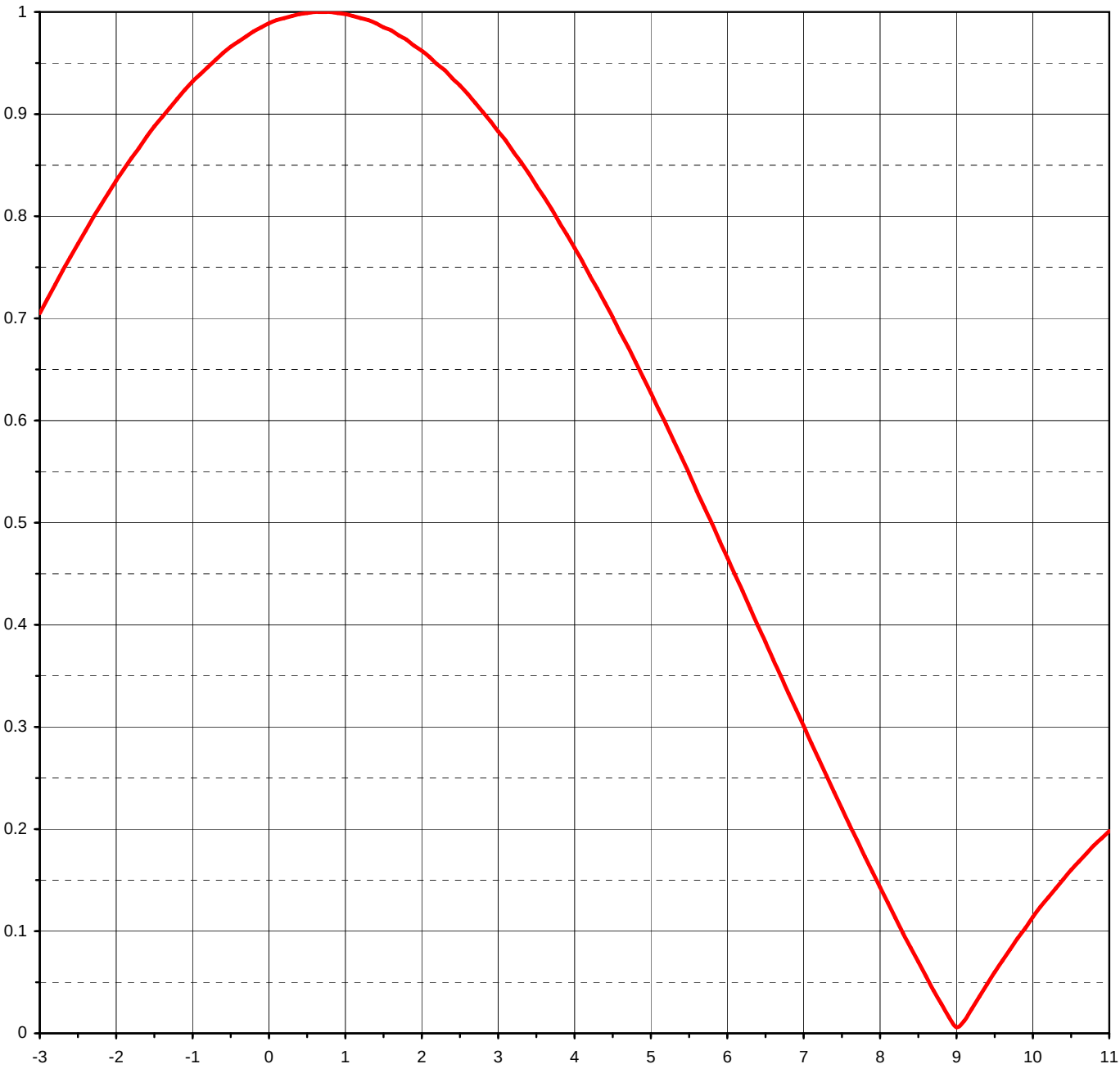
ANTENNA MANUFACTURER DATA

KWTV-DT, OKLAHOMA CITY, OKLAHOMA

Proposal Number	**C-02437**		
Date	**17-Mar-08**		
Call Letters	**KWTV-DT**	Channel	**9**
Location	**Oklahoma City, OK**		
Customer			
Antenna Type	**TF-6HS-H DC**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**6.25**	**(7.96 dB)**	Beam Tilt	**0.70 deg**
RMS Gain at Horizontal	**6.10**	**(7.85 dB)**	Frequency	**189.00 MHz**
Calculated / Measured	**Calculated**		Drawing #	**06S062070**

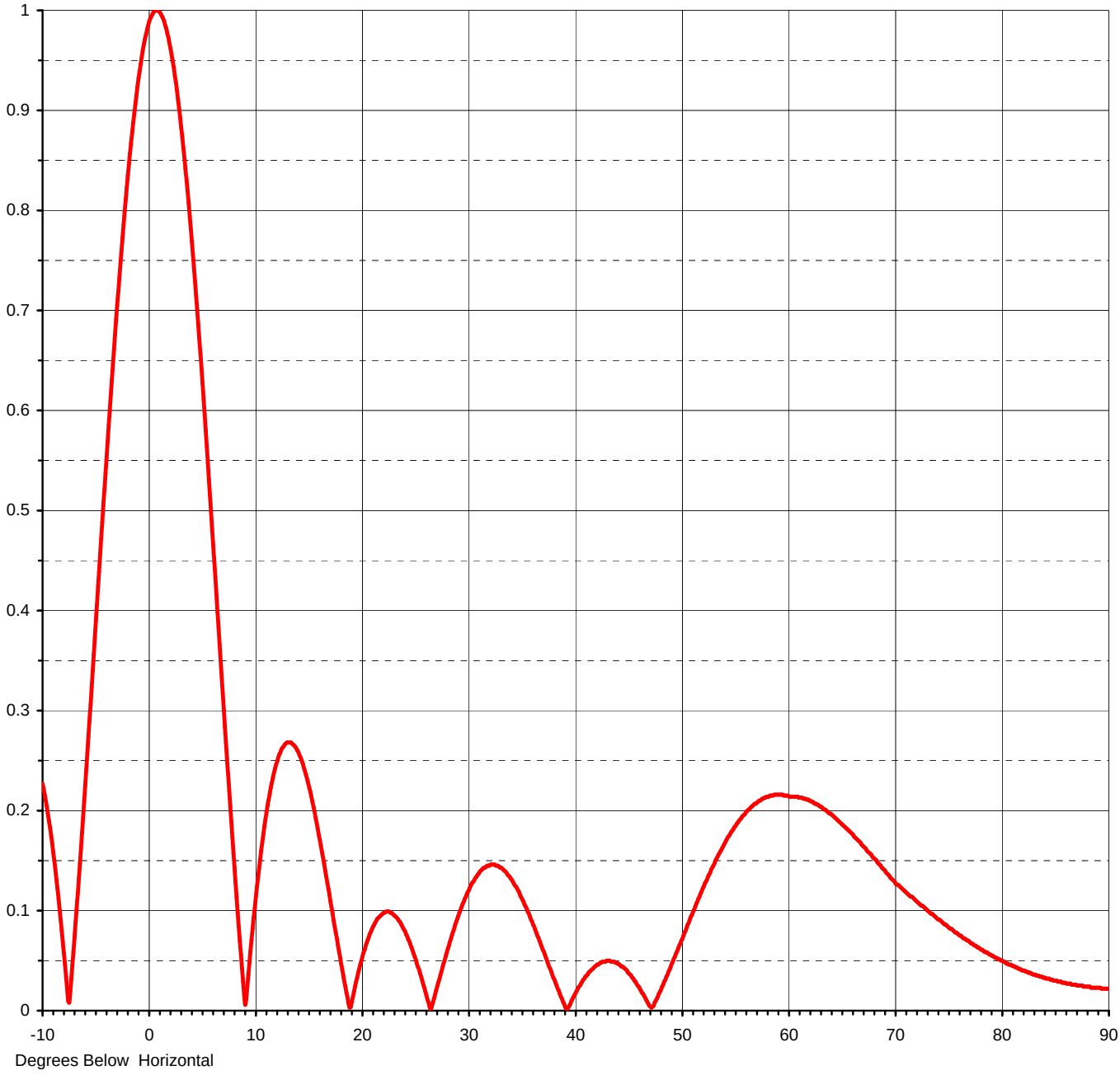


Dielectric

Proposal Number	**C-02437**		
Date	**17-Mar-08**		
Call Letters	**KWTV-DT**	Channel	**9**
Location	**Oklahoma City, OK**		
Customer			
Antenna Type	**TF-6HS-H DC**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**6.25**	**(7.96 dB)**	Beam Tilt	**0.70 deg**
RMS Gain at Horizontal	**6.10**	**(7.85 dB)**	Frequency	**189.00 MHz**
Calculated / Measured	**Calculated**		Drawing #	**06S062070-90**



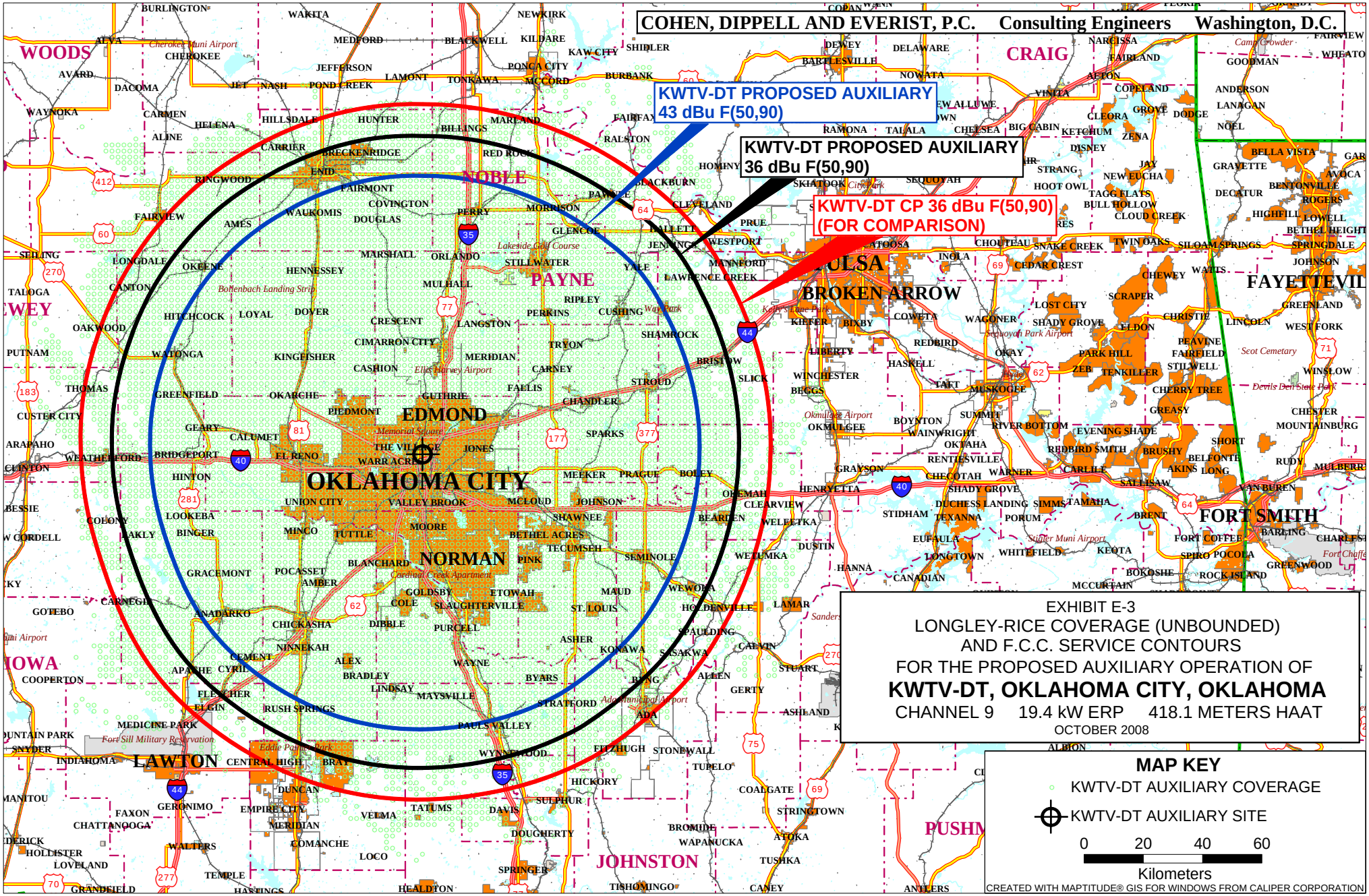
Dielectric

Proposal Number	**C-02437**
Date	**17-Mar-08**
Call Letters	**KWTV-DT** Channel **9**
Location	**Oklahoma City, OK**
Customer	
Antenna Type	**TF-6HS-H DC**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **06S062070-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.227	2.4	0.935	10.6	0.160	30.5	0.129	51.0	0.096	71.5	0.114
-9.5	0.197	2.6	0.920	10.8	0.176	31.0	0.137	51.5	0.109	72.0	0.109
-9.0	0.158	2.8	0.902	11.0	0.191	31.5	0.143	52.0	0.122	72.5	0.105
-8.5	0.112	3.0	0.883	11.5	0.223	32.0	0.145	52.5	0.134	73.0	0.100
-8.0	0.057	3.2	0.863	12.0	0.246	32.5	0.146	53.0	0.145	73.5	0.096
-7.5	0.008	3.4	0.842	12.5	0.261	33.0	0.143	53.5	0.156	74.0	0.091
-7.0	0.073	3.6	0.819	13.0	0.268	33.5	0.139	54.0	0.166	74.5	0.087
-6.5	0.147	3.8	0.794	13.5	0.267	34.0	0.132	54.5	0.175	75.0	0.083
-6.0	0.225	4.0	0.769	14.0	0.260	34.5	0.124	55.0	0.184	75.5	0.079
-5.5	0.306	4.2	0.742	14.5	0.247	35.0	0.113	55.5	0.191	76.0	0.075
-5.0	0.390	4.4	0.715	15.0	0.228	35.5	0.102	56.0	0.197	76.5	0.072
-4.5	0.472	4.6	0.686	15.5	0.204	36.0	0.089	56.5	0.203	77.0	0.068
-4.0	0.553	4.8	0.657	16.0	0.176	36.5	0.075	57.0	0.207	77.5	0.065
-3.5	0.631	5.0	0.627	16.5	0.147	37.0	0.061	57.5	0.211	78.0	0.061
-3.0	0.705	5.2	0.596	17.0	0.116	37.5	0.047	58.0	0.214	78.5	0.058
-2.8	0.733	5.4	0.564	17.5	0.084	38.0	0.033	58.5	0.215	79.0	0.055
-2.6	0.760	5.6	0.531	18.0	0.053	38.5	0.020	59.0	0.216	79.5	0.052
-2.4	0.786	5.8	0.499	18.5	0.024	39.0	0.007	59.5	0.216	80.0	0.050
-2.2	0.811	6.0	0.466	19.0	0.004	39.5	0.005	60.0	0.215	80.5	0.047
-2.0	0.835	6.2	0.433	19.5	0.029	40.0	0.016	60.5	0.214	81.0	0.045
-1.8	0.857	6.4	0.399	20.0	0.050	40.5	0.025	61.0	0.213	81.5	0.042
-1.6	0.878	6.6	0.366	20.5	0.068	41.0	0.034	61.5	0.212	82.0	0.040
-1.4	0.897	6.8	0.333	21.0	0.082	41.5	0.040	62.0	0.210	82.5	0.038
-1.2	0.915	7.0	0.301	21.5	0.092	42.0	0.045	62.5	0.207	83.0	0.036
-1.0	0.932	7.2	0.268	22.0	0.097	42.5	0.048	63.0	0.204	83.5	0.034
-0.8	0.946	7.4	0.236	22.5	0.099	43.0	0.050	63.5	0.201	84.0	0.033
-0.6	0.960	7.6	0.204	23.0	0.096	43.5	0.049	64.0	0.197	84.5	0.031
-0.4	0.971	7.8	0.173	23.5	0.090	44.0	0.047	64.5	0.191	85.0	0.030
-0.2	0.981	8.0	0.143	24.0	0.081	44.5	0.044	65.0	0.186	85.5	0.029
0.0	0.989	8.2	0.113	24.5	0.069	45.0	0.038	65.5	0.181	86.0	0.027
0.2	0.994	8.4	0.084	25.0	0.054	45.5	0.032	66.0	0.176	86.5	0.026
0.4	0.998	8.6	0.056	25.5	0.037	46.0	0.024	66.5	0.170	87.0	0.025
0.6	1.000	8.8	0.029	26.0	0.019	46.5	0.015	67.0	0.164	87.5	0.025
0.8	1.000	9.0	0.006	26.5	0.001	47.0	0.005	67.5	0.158	88.0	0.024
1.0	0.998	9.2	0.024	27.0	0.020	47.5	0.008	68.0	0.152	88.5	0.023
1.2	0.994	9.4	0.048	27.5	0.039	48.0	0.019	68.5	0.146	89.0	0.023
1.4	0.989	9.6	0.071	28.0	0.058	48.5	0.031	69.0	0.140	89.5	0.022
1.6	0.982	9.8	0.082	28.5	0.076	49.0	0.044	69.5	0.133	90.0	0.022
1.8	0.973	10.0	0.103	29.0	0.092	49.5	0.057	70.0	0.127		
2.0	0.962	10.2	0.124	29.5	0.107	50.0	0.070	70.5	0.123		
2.2	0.949	10.4	0.142	30.0	0.119	50.5	0.083	71.0	0.118		


COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.
KWTV-DT PROPOSED AUXILIARY
43 dBu F(50,90)
KWTV-DT PROPOSED AUXILIARY
36 dBu F(50,90)
KWTV-DT CP 36 dBu F(50,90)
(FOR COMPARISON)
EXHIBIT E-3
LONGLEY-RICE COVERAGE (UNBOUNDED)
AND F.C.C. SERVICE CONTOURS
FOR THE PROPOSED AUXILIARY OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 9 19.4 kW ERP 418.1 METERS HAAT
OCTOBER 2008
MAP KEY
KWTV-DT AUXILIARY COVERAGE
KWTV-DT AUXILIARY SITE
0 20 40 60
Kilometers
CREATED WITH MAPTITUDE® GIS FOR WINDOWS FROM CALIPER CORPORATION
OKLAHOMA CITY
EDMOND
NORMAN
LAWTON
TULSA
BROKEN ARROW
FORT SMITH
FAYETTEVIL
CRAIG
NOBLE
PAYNE
JOHNSTON
PUSHM
WOODS
IOWA

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.

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 pen-nit application to modify 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.

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.

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. [X] Yes [ ] 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. [ ] Yes [ ] 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. [ ] Yes [ ] 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"). [X] Yes [ ] No [ ] 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. [X] Yes [ ] No [ ] N/A

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RIF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1. 1307. [X] Yes [ ] No

   Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. [X] Yes [ ] 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. [X] Yes [ ] No

5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration 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. [X] Yes [ ] 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 9 Analog TV, if any ____

2. Zone: ☐ I ☒ II ☐ III

3. Antenna Location Coordinates: (NAD 27)

35 ° 32 ' 58 " ☒ N ☐ S Latitude
97 ° 29 ' 49 " ☐ E ☒ W Longitude

4. Antenna Structure Registration Number: 1010943

☐ Not applicable ☐ FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 353.6 meters

6. Overall Tower Height Above Ground Level: 480.5 meters

7. Height of Radiation Center Above Ground Level: 419.5 meters

8. Height of Radiation Center Above Average Terrain: 418.1 meters

9. Maximum Effective Radiated Power (average power): 19.4 kW

10. Antenna Specifications:

a. Manufacturer: Dielectric | Model: TF-6HS-H DC

b. Electrical Beam Tilt: 0.7 degrees ☐ Not Applicable

c. Mechanical Beam Tilt: ____ degrees toward azimuth ____ degrees True ☒ Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No. E-2

d. Polorization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: [X] Not applicable (Nondirectional)

Rotation: _____ ° [ ] No rotation

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

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.** Exhibit No.

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? [X] Yes [ ] No

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

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 No.

13. **Environmental Protection Act. Submit in an Exhibit** the following: Exhibit No.

a. 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 radio frequency 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.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

13. **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 I'M 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.

☐ Yes ☐ No ☐ N/A

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 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	Relationship to Applicant (e.g., Consulting Engineer)	
Ross J. Heide	Consulting Engineer	
Signature	Date October 24, 2008	
Mailing Address Cohen, Dippell and Everist, P.C, 1300 L Street, NW Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

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