

**EXHIBIT 43  
ENGINEERING STATEMENT RE;  
ENVIRONMENTAL CONSIDERATIONS  
WGSA-DT 650 KW 461 M AMSL CH. 35  
BAXLEY, GEORGIA**

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Prepared by  
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May, 2001

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**INTRODUCTION**

Television station WGSA-DT is applying to modify its permit in file BPCDT-19991101AIG for the purpose of relocating the DTV Channel 35 antenna to a new multi-user antenna tower to be built by Richland Towers near Savannah, Georgia. The proposal involves using a custom antenna stack with a top mounted Dielectric Model TUC-O5-16/80H-T for channel 35. The overall height of the antenna structure will not be increased above that already notified to the FAA, FCC and other agencies. The tower is registered with FCC registration Number 1223154.

Accordingly, notice of the proposed construction to the Federal Aviation Administration is not necessary since the overall height of the notified antenna structure will not change.

**ENVIRONMENTAL CONSIDERATIONS**

The application as amended remains categorically excluded from environmental processing by Section 1.1306 of the FCC Rules. It is excluded because the application does not involve a site location as described in Section 1.1307(a) and does not exceed the safety standards for human exposure to radio-frequency (RF) energy in Section 1.1307(b) as described below.

There are six other towers of similar height within three miles of the proposed tower to be used by WGSA-DT, an arrangement which constitutes an “antenna farm” area. Section 1.1306, Note No.3 contains a categorical exclusion from environmental processing for such locations.

Since the application is considered not to have a significant effect on the quality of the human environment under Section 1.1307(a) and (b), and is categorically excluded from such processing by Section 1.1306 of the Rules, environmental processing is not required.

The proposal to co-locate the WGSA-DT antenna and antennas of other TV and FM stations at the tower, will not subject workers or the general population to levels of radio frequency energy in excess of the *Radio frequency Radiation Exposure Limits* contained in Section 1.1310 of the FCC Rules. The WGSA-DT antenna will be located with its center at a height of approximately 455 meters above ground level. Channel 35 will have an average effective radiated power (ERP) of 650 kW. An evaluation of the effect of this antenna was conducted in accordance with the methodology outlined in *OET Bulletin 65, Version 97-01* and the results are believed to be in full compliance with the Commission's rules concerning RF exposure.

The EPA model for predicting ground-level power density contained in the Commission's bulletin was used to determine the “worst case” power density level at a point 2 meters above ground level. Based on the attached antenna elevation pattern for Channel 35, Figure 1, the maximum relative field directed downward, toward potentially occupied ground, does not exceed 5% of maximum field for any downward angle in excess of 65 degrees below the horizontal. This results in an estimated ground level power density of less than 1 microwatt per square centimeter. The FCC adopted maximum permitted RF exposure

for channel 35 is approximately 2000 microwatts per square centimeter and the resulting exposure is approximately 0.05% of the FCC guideline. Future additional broadcast users of the tower will contribute additional similarly small exposure. The future cumulative R.F. exposure at the tower site will be considered by the future licensed stations and Richland Towers, the structure owner.

Exposure in excess of the guideline is not possible at any ground-level location. WGSA-DT and the tower owner will adopt a work policy that is designed to avoid harmful exposure. Workers will be protected from excessive exposure to radio frequency fields in areas of close proximity to the radio frequency source in accordance with the methods recommended in *OET Bulletin No. 65, Version 97-01*. Preventive steps to avoid excessive exposure include the scheduling of work when the facility is shut down or operating at reduced power or by time averaging.

Respectfully submitted,  
Lohnes and Culver

By \_\_\_\_\_  
Robert D. Culver, P.E.  
Md. Reg. No. 19672

May, 2001

# EXHIBIT 43 - FIGURE 1

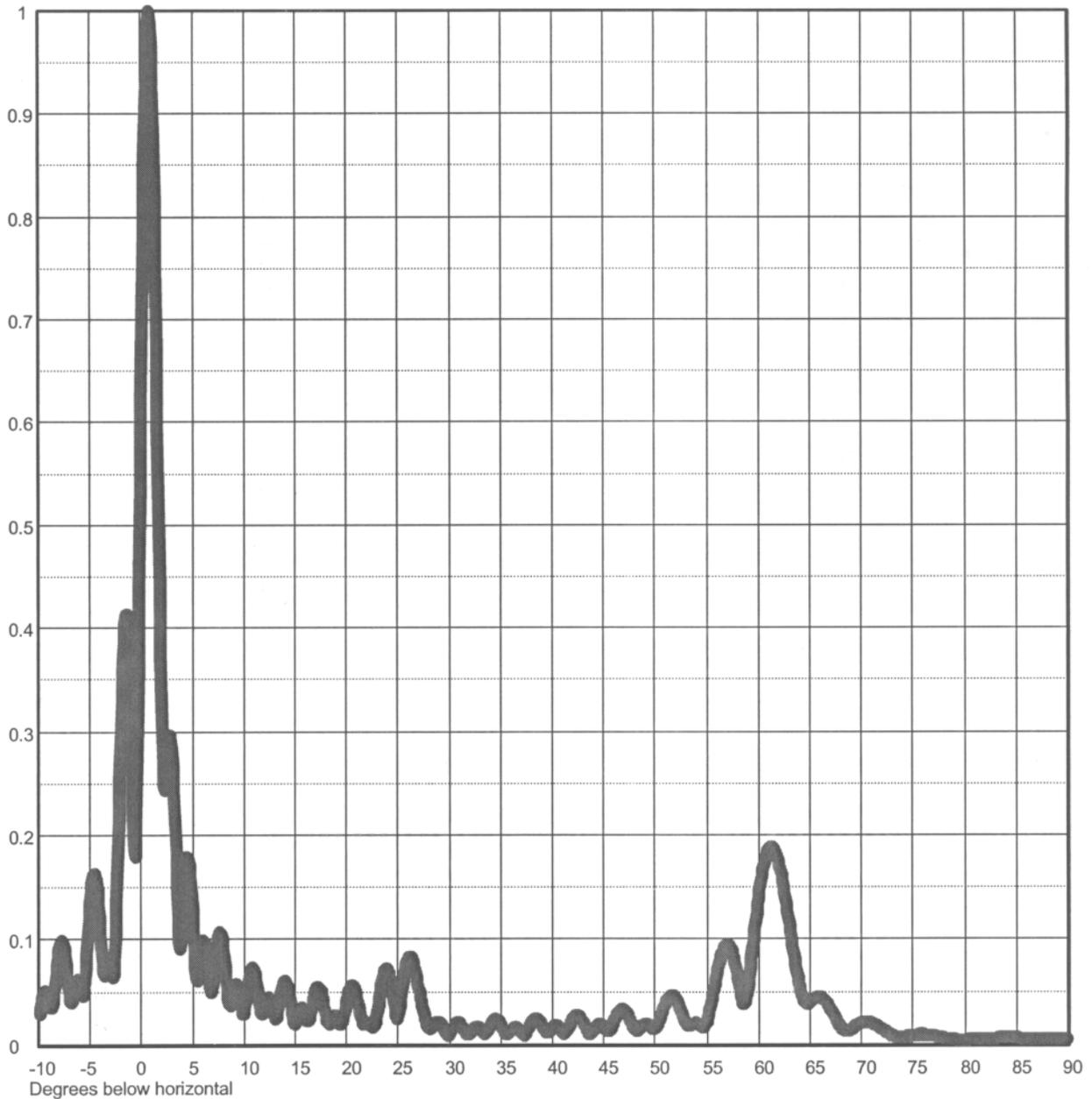
Exhibit No.



Date **16 May 2001**  
Call Letters **WGSA-DT** Channel **35**  
Location **Savannah, GA**  
Customer  
Antenna Type **TUC-O5-16/80H-T**

## ELEVATION PATTERN

RMS Gain at Main Lobe	<b>31.7 (15.01 dB)</b>	Beam Tilt	<b>0.75 Degrees</b>
RMS Gain at Horizontal	<b>12.3 (10.90 dB)</b>	Frequency	<b>605.00 MHz</b>
Calculated / Measured	<b>Calculated</b>	Drawing #	<b>16U317075-90</b>



Remarks: