

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
LPTV STATION WCPX-LP (FACILITY ID 53397)
COLUMBUS, OHIO
CH 48 15 KW-ND

Technical Narrative

This Technical Exhibit supports a flash-cut digital television (DTV) application for low power television (LPTV) station WCPX-LP at Columbus, Ohio (Facility ID 53397). Station WCPX-LP is licensed (BLTTL-20001221AAX) to operate on analog channel 48(0) with a directional antenna (DA) system. The maximum visual effective radiated power (ERP) is 40 kilowatts (kW). The antenna radiation center height above mean sea level (RCAMSL) is 400 meters. The FCC antenna structure registration number is 1054358 and the site coordinates are 40-09-33, 82-55-23 (NAD-27).

Proposed Facilities

This application proposes digital operation on the current channel (48), at the same antenna height and at the current transmitter site (slight correction to coordinates to match tower registration). A Dielectric model TLP-12A non-directional (ND) antenna system will be used. The proposed DTV ERP is 15 kW and antenna RCAMSL remains 400 meters AMSL.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer grid, and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

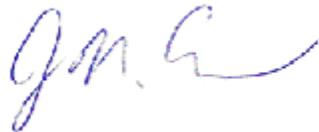
The WCPX-LP site is 170 kilometers from the closest point of the US-Canada border. Figure 2 is a map showing the predicted co-channel analog (NTSC) and DTV interfering contours for the proposed WCPX-LP operation. The predicted 30.2 dBu F(50,10) contour is for interference to co-channel Canadian analog allotments. The predicted 12.4 dBu F(50,10) contour is for interference to co-channel Canadian DTV allotments. As shown, the predicted interfering contours do not overlap Canadian allotments in Canada.

Radiofrequency Electromagnetic Field Exposure

The proposed WCPX-LP facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 119.3 meters above ground level. The proposed maximum ERP is 15 kW. Based on a downward relative field of 0.2, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 1% of the FCC's recommended limit of 0.45 mW/cm^2 for channel 48 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

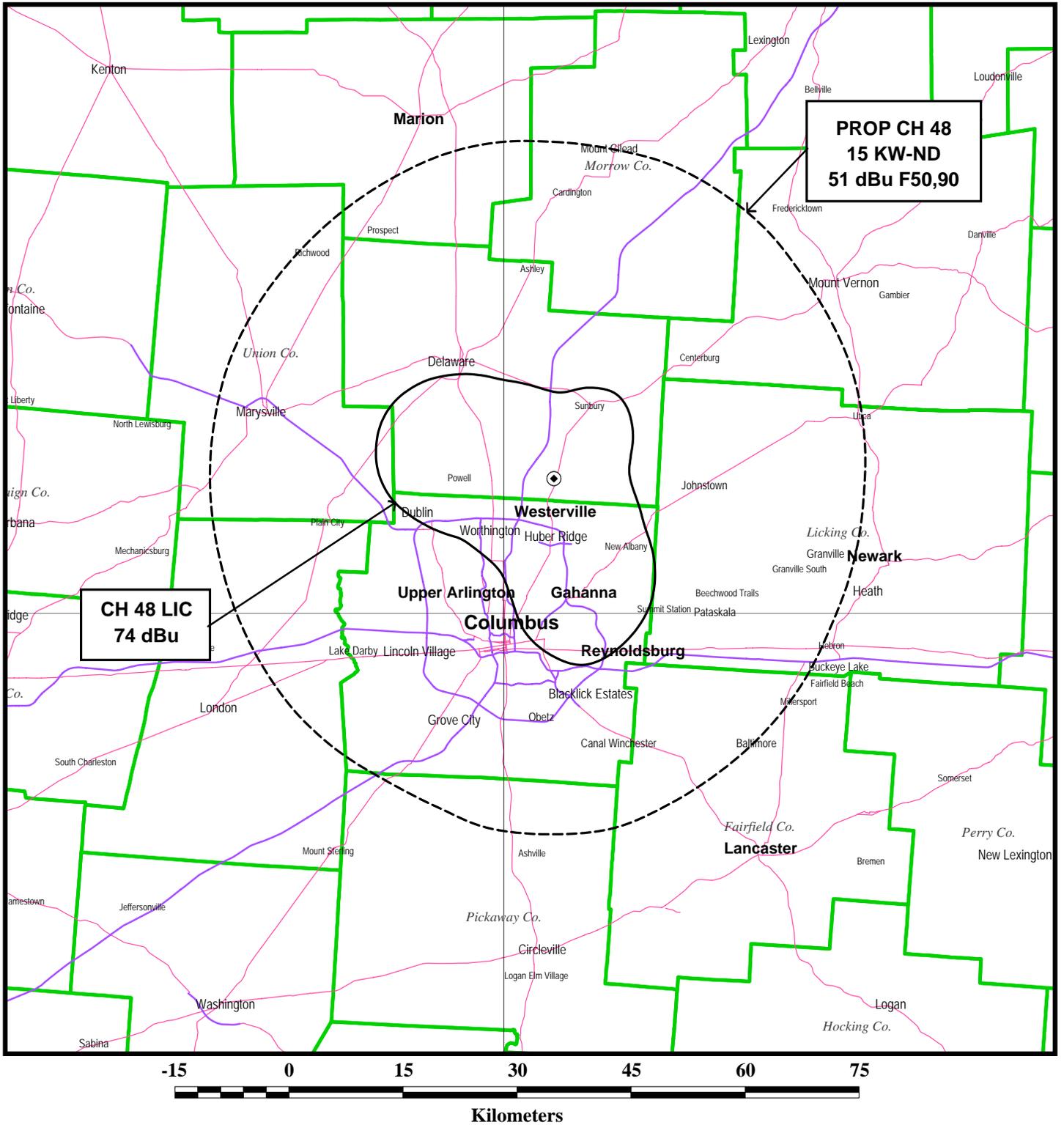


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Figure 1

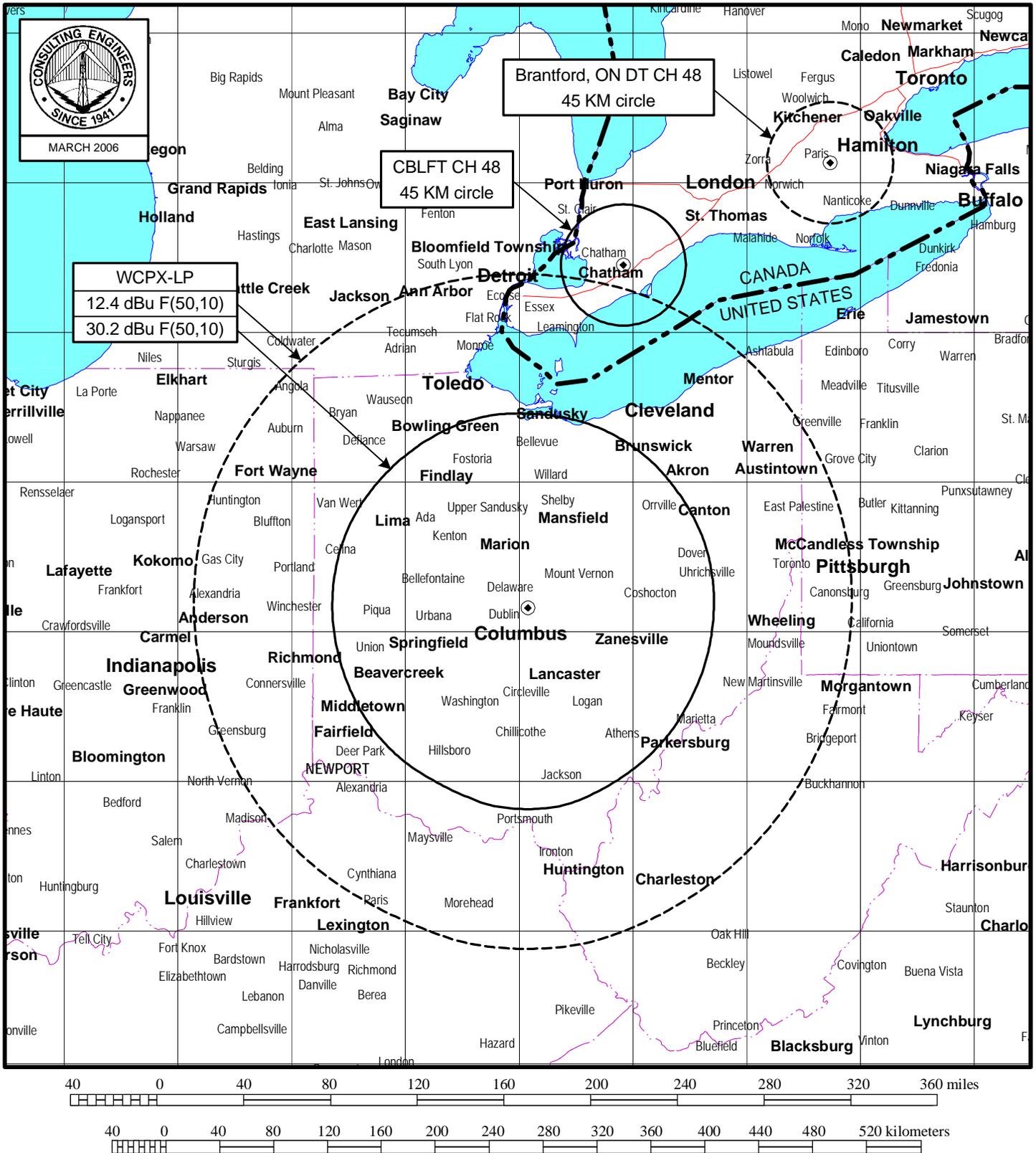


PREDICTED COVERAGE CONTOURS

**STATION WCPX-LP
COLUMBUS, OHIO**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



PREDICTED CANADA INTERFERING CONTOUR MAP

STATION WCPX-LP
COLUMBUS, OHIO
CH 48 15 KW

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