

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of TCT OF MICHIGAN, INC., licensee of Class A LPTV station WDWO-CA, Channel 18 in Detroit, Michigan, in support of this Application for Construction Permit to specify digital operation on Channel 18 from the licensed WDWO-CA site, as a "flashcut" proposal.

It is proposed to mount a standard ERI omnidirectional antenna at the 88-meter level of the existing 106-meter communications tower on which the present WDWO-CA antenna is mounted. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 51 dBu contour encompasses a significant portion of the Grade A contour that obtains from the licensed WDWO-CA facility. An interference study is provided in Exhibit C, and a power density calculation follows as Exhibit D.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1004893 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.


KYLE T. FISHER

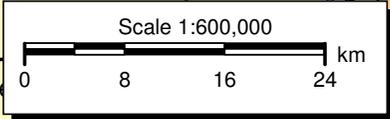
March 24, 2010



CONTOUR POPULATION
51 dBu : 3,922,270
41 dBu : 4,376,563



EXHIBIT B



LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED WDWO-CD
CHANNEL 18 – DETROIT, MICHIGAN

We conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 0.1 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed WDWO-CD) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-2. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed WDWO-CD facility complies with the requirements of Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027 and 74.794(b) of the Commission's Rules.

INTERFERENCE SUMMARY
PROPOSED WDWO-CD
CHANNEL 18 – DETROIT, MICHIGAN

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
WDCP-DT BPEDT-20000217ABB	CP	University Center, MI	18	797,153	315	<0.1

POWER DENSITY CALCULATION
PROPOSED WDWO-CD
CHANNEL 18 – DETROIT, MICHIGAN

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Detroit facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15 kw, an antenna radiation center 88 meters above ground, and the vertical pattern of the ERI antenna, maximum power density two meters above ground of 0.0035 mw/cm^2 is calculated to occur 28 meters from the base of the tower. Since this is only 1.1 percent of the 0.33 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 18 (494-500 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.