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*B. W. St. Clair*

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ENGINEERING STATEMENT IN SUPPORT OF LPTV MODIFICATION  
APPLICATION BMPTTL-20071105AFT, PENSACOLA, FL, WCTU-LP, FI 57865

Background

Application BMPTTL-20071105AFT (herein "Modification Application") seeks to change construction permit BPTTL-20030701CQU to an available supporting structure less than 1 km removed and to change the transmitting antenna to one which will fit on the available structure.

The previous licensee of WCTU-LP (formerly W69DH) filed a displacement application, BPTTL-20030701CQU, to change from channel 69 to channel 46 and move a distance of 35.4 km from the licensed location to avoid interference conflicts<sup>1</sup>.

In the intervening time since the displacement application was filed there have been major hurricanes in the area and a new standard for structural safety calculations has been issued<sup>2</sup>. A new owner has taken ownership of the tower and as a result of the new structural standard and the hurricane considerations made a determination that the tower is already overloaded and no additional antennas can be added. Thus the present application to change to a new supporting structure is necessary.

Discussion

It appears that the displacement application was granted based on the displacement relief provisions of §73.3572(a)(4)(ii) (herein "Relief Provision")

" . . . .a low power TV, TV translator or TV booster station authorized on a channel from channel 52 to 69 . . . . . may at any time file a displacement

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<sup>1</sup>This application stated in Exhibit 2 that the move was necessary to protect WPAN, channel 53, WJTC-DT, channel 45, WMFC-DT, channel 46. WCTV-DT, channel 46, and WPCT-TV, channel 46

<sup>2</sup>ANSI/TIA-222-G-2005

relief application for a change in output channel together with any technical modifications which are necessary to avoid interference . . . .”

and the need to protect the stations listed in Footnote 1.

There is no mention of contour overlap in the “Relief Provision” and the construction permit was granted apparently without this overlap. As may be seen in the attached Appendix 1 contour overlap does not exist.

The displacement application to channel 46 would have been equally grantable if it had specified the support structure and antenna described in the “Modification Application”.

### Conclusion

The construction permit will continue to be within the intent of the “Relief Provision” when is modified as requested by the “Modification Application”. On this basis it appears that the “Modification application” is grantable.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. W. St. Clair". The signature is fluid and cursive, with a small dot at the end.

B. W. St. Clair  
Engineering Consultant

December 31, 2007

