

TECHNICAL EXHIBIT
DISPLACEMENT RELIEF APPLICATION
LPTV STATION W61AG
FACILITY ID 73327
POTTSVILLE, PENNSYLVANIA
CH 28 0.1 KW

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a displacement application for LPTV station W61AG at Pottsville, Pennsylvania (Facility ID: 73327). Station W61AG is licensed for operation on channel 61 at Pottsville, Pennsylvania with a directional antenna maximum effective radiated power (ERP) of 1.88 kilowatts and an antenna radiation center height above mean sea level (RCMSL) of 424 meters. Since W61AG operates on a channel that is out of the core (Chs. 2-51) it is therefore eligible for displacement.

Purpose of Application

This application is being filed to displace W61AG from channel 61 to channel 28, to change its antenna system, frequency offset, and to decrease the station's ERP from 1.88 kilowatts to 0.1 kilowatt. No other changes are proposed, including no change in community of license (Pottsville). As detailed below, this application is considered a "minor change" in facilities pursuant to Section 73.3572.

Proposed Operation

W61AG proposes to operate at its currently licensed site described by the following coordinates, N40° 40' 33", W76° 11' 54" and to operate on channel 28 (554-560 MHz) with a "minus" carrier frequency offset employing a non-directional Scala SL-8 antenna. The maximum ERP will be 0.1 kilowatts at any horizontal or vertical angle. The antenna radiation center height above mean sea level will remain at 424 meters.

Minor Change Application

Figure 1 depicts the licensed and herein proposed 74 dBu contours for W61AG. As indicated, the proposed 74 dBu contour is completely encompassed by the licensed 74 dBu

contour. Therefore, the proposed modification is considered a "minor change" in facilities pursuant to Section 73.3572.

Response to Paragraph 6 - Antenna Structure Registration Number

Station W61AG proposes to side-mount a non-directional antenna at the 28-meter level on an existing 30 meter tower. As indicated by Figure 2, the existing tower does not require tower registration based on the FCC's TOWAIR program.

Response to Paragraph 13 - TV Broadcast Analog Protection

A study has been conducted using the provisions of Section 74.705 which indicates that the proposed W61AG operation will not create prohibited interference to other existing, authorized or proposed TV broadcast analog (NTSC) full-power stations. Interference calculations for the proposed W61AG operation are summarized below.

Protected TV Station	Service Population	Proposed Interference Population
WBRE-TV, NTSC Ch. 28 Wilkes-Barre, PA LIC (BLCT-19891005KF)	2,283,489	10,847 (0.478%)

Response to Paragraph 13 - DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed W61AG operation on channel 28 complies with the FCC's 0.5% interference threshold criteria to all allotted, proposed or actual DTV operating facilities on channels 27, 28 & 29.¹ Interference calculations for the proposed W61AG operation are summarized below.

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. A Sun based processor computer system was employed.

Protected DTV Station	Service Population	Proposed Interference Population
WNEC, DTV Ch. 28 New York, NY Authorized CP (BPCDT-19981102KI)	--	0 (0.00%)

Response to Paragraph 13 - LPTV/TV Translator, Class A Station Protection

A study has been conducted using the provisions of Sections 74.707 and 74.708 which indicates that the W61AG proposal will not create prohibited interference to other existing, authorized or proposed LPTV, TV Translator and Class A stations.

The proposed W61AG site is located 332 kilometers from the nearest point of the U.S./Canada border. There are no Canadian TV and DTV allotments on pertinent channels that require consideration. In addition, the proposed 19 dBu F(50,10) interfering contour does not extend into Canada (see Figure 3). Therefore, it is believed coordination of the proposed W61AG operation with Canada is not required.

The closest point of the Mexican border is more than 2355 kilometers to the southwest. The closest FCC monitoring station is at Laurel, Maryland, approximately 176 kilometers to the south. The closest point of the National Radio Quiet Zone (VA/WV) is more than 250 kilometers to the southwest. The Table Mountain Radio Quiet Zone (CO) is more than 2464 kilometers to the west. The closest radio astronomy site using channel 37 is at Green Bank, West Virginia, approximately 400 to the southwest. These separations are sufficient to not be a coordination concern.

Land Mobile Protection

It is believed, the proposed facility will not adversely affect any land mobile operations.

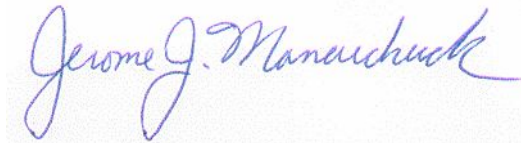
Environmental Considerations

The proposed W61AG television facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". The calculated power density at the base of the tower was calculated using the appropriate equation of the Bulletin.

Presuming a worst case vertical relative field value of 1.0, a maximum visual ERP of 0.1 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0025 milliwatts per square centimeter (mW/cm^2), or 0.67% percent of the Commission's recommended limit of $0.37 \text{ mW}/\text{cm}^2$ for TV channel 28 applicable to general population/uncontrolled exposure areas. Therefore, it is believed the proposed facility complies with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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 technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner.

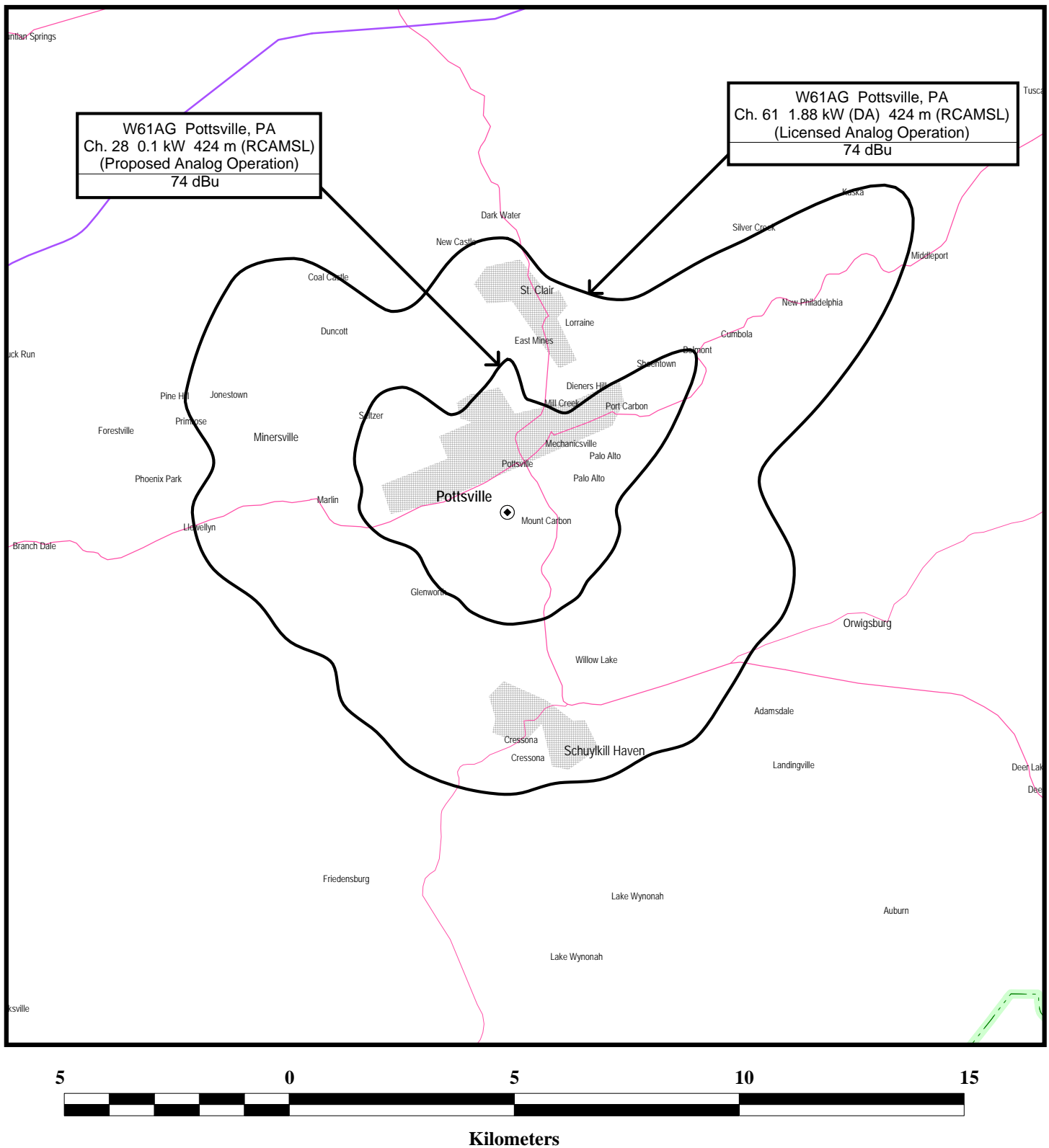


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Figure 1



FCC PREDICTED COVERAGE CONTOURS

LPTV STATION W61AG
CH 28 0.1 KW 424 M (RCAMSL)
POTTSVILLE, PENNSYLVANIA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

TOWAIR Determination Results

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates

Latitude	40-40-33.0 north
Longitude	076-11-53.0 west

Measurements (Meters)

Overall Structure Height (AGL)	30
Support Structure Height (AGL)	29
Site Elevation (AMSL)	396

Structure Type

TOWER - Free standing or Guyed Structure used for Communications Purposes

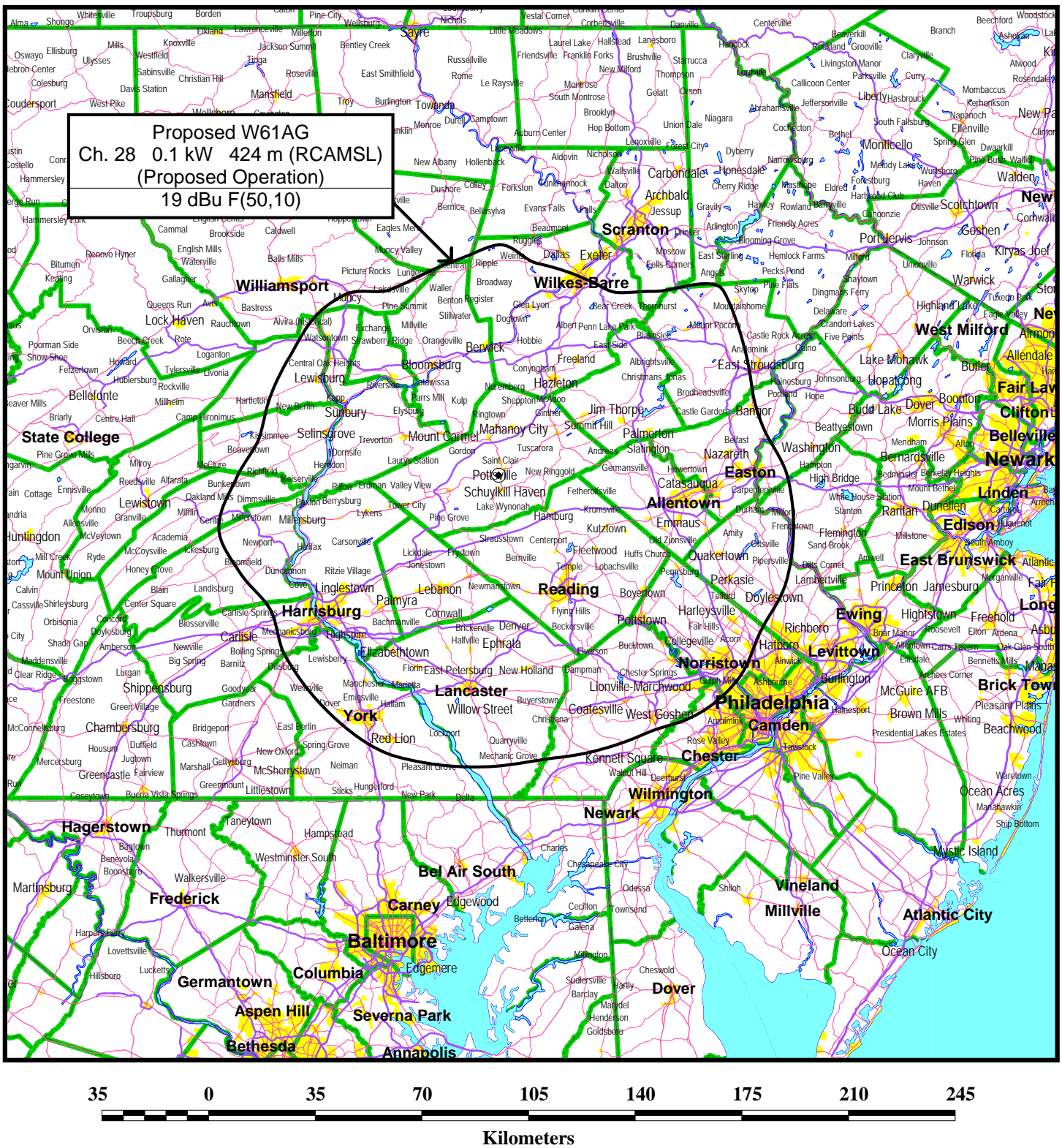
[Tower Construction Notification](#)

Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Note: Notification does NOT replace [Section 106 Consultation](#).

CLOSE WINDOW

Figure 3



PREDICTED 19 dBU CONTOUR

PROPOSED W61AG
POTTSVILLE, PENNSYLVANIA
CH 28 0.1 KW 424 M (RCAMSL)

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