TECHNICAL EXHIBIT
AMENDMENT TO THE APPLICATION
FOR CONSTRUCTION PERMIT
STATION WXPX-DT (FACILITY ID 6601)
BRADENTON, FLORIDA

MARCH 28, 2001

CH 42 210 KW 476 M

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Technical Narrative

This Technical Exhibit supports an amendment to the application for construction permit for digital television (DTV) station WXPX-DT on channel 42 at Bradenton, Florida. Station WXPX-DT has an application pending to operate with a non-directional DTV effective radiated power (ERP) of 225 kW and an antenna HAAT of 476 meters (BPCDT-19990602KF).

Proposed Facilities

This amendment proposes ONLY to reduce ERP from the application on file. Changes are being made to FCC form 301, Section III-D, questions 9 (ERP), 12 (coverage map) and 13 (RFR analysis). Operation at the proposed site (coordinates: 27-49-10 N, 82-15-39 W) with a non-directional ERP of 210 kW and antenna HAAT of 476 meters is hereby proposed.

The proposed transmitter site is more than 1,500 kilometers from the closest point of the Canadian border. The site is more than 800 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Vero Beach, Florida, approximately 162 kilometers to the east. The closest point of the National Radio Quiet Zone (VA/WV) is more than 1,000 kilometers to the north. The closest point of the Table

Mountain Radio Quiet Zone (CO) is more than 2,500 kilometers to the northwest. The closest radio astronomy site operating on TV channel 37 is at Green Bank, West Virginia, more than 1,200 kilometers to the north. These separations are sufficient to not be a concern for coordination purposes.

Allocation Study

Interference calculations have been made using the procedures outlined in the FCC's OET-69 bulletin, using a **1 kilometer grid spacing**. The pending WXPX-DT application appears to cause excessive interference to the application for DTV station WRBW-DT. As shown in the table below, this proposal will reduce the interference caused to the WRBW-DT application.

Station	New Baseline	Proposed UNIQUE Interference
WRBW-DT(App), DTV-41, Orlando, FL	2,517,000	49,909 (2.0%)
WRBW-DT, DTV-41 allotment	2,060,000	4,072 (0.2%)

The interference calculation for the WRBW-DT application was determined using a revised baseline population (2,517,000 people) instead of the FCC's allotment baseline value of 2,060,000 people. The following stations were used for the re-calculated baseline figure for the WRBW-DT application:

WACX-DT, DTV-40 allotment, Leesburg, FL
WZVN-DT, DTV-41 allotment, Naples, FL
WXPX-DT, DTV-42 allotment, Bradenton, FL

The coverage map shown on Figure 3 depicts the WRBW-DT allotment and proposed WRBW-DT noise-limited service contours. From the map, it is apparent that the WRBW-DT application proposes a significant increase in coverage area and population. It does not appear reasonable to use the smaller WRBW DTV allotment baseline population to determine compliance with the FCC's interference standards to the much larger WRBW-DT

service area. If necessary, a waiver of the FCC rules with regards to the re-calculated baseline for station WRBW-DT is respectfully requested.

The proposed WXPX-DT operation does not cause excessive interference to any other analog or DTV assignments and therefore complies with the FCC's 2%/10% interference standard.

Class A Consideration

The FCC's CDBS and its list of low power television (LPTV) assignments eligible for Class A status has been reviewed for potential impact. Interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin. The proposed WXPX-DT operation does not cause calculated interference to any current or potential Class A station. If necessary, a waiver of the FCC rules is requested based on use of the FCC's OET-69 procedures to demonstrate no interference to LPTV assignments requesting Class A status.

Radiofrequency Electromagnetic Field Exposure

The proposed WXPX-DT 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 proposed DTV antenna is located 477 meters above ground level. The DTV ERP is 210 kW. A conservative relative field value of 0.1 was assumed for the antenna's downward radiation (see Figure 1B). The calculated power density at a point 2 meters (6.6 feet) above ground level is 0.0003 mW/cm^2. This is less than 0.1% of the FCC's recommended limit of 0.43 mW/cm^2 for channel 42 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this will be a multi-user site, an agreement will be in effect with the other stations to control access to the site. 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. The proposed WXPX-DT operation appears to be otherwise categorically excluded from environmental processing.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

Jonathan N. Edwards

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Sarasota, Florida 34237
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March 28, 2001

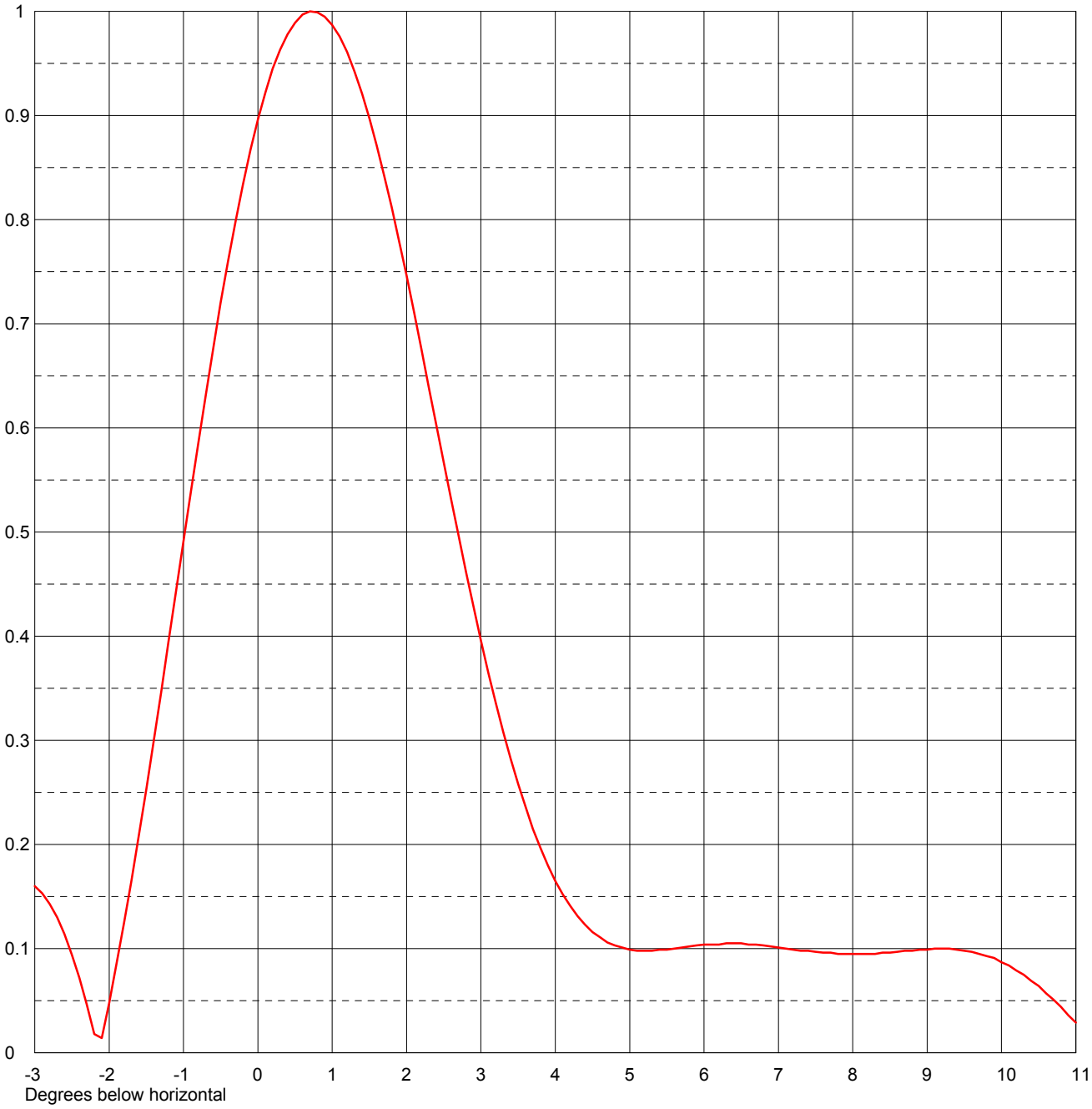
Exhibit No.
Figure 1A

Dielectric

Date	**27 Mar 2001**	
Call Letters	**WXPX-DT**	Channel
Location	**Bradenton, FL**	
Customer		
Antenna Type	**TFU-24GTH-R O4**	

ELEVATION PATTERN

RMS Gain at Main Lobe	**21.5 (13.32 dB)**	Beam Tilt	**0.75 Degrees**
RMS Gain at Horizontal	**17.3 (12.38 dB)**	Frequency	**MHz**
Calculated / Measured	**Calculated**	Drawing #	**24G215075**



Remarks:

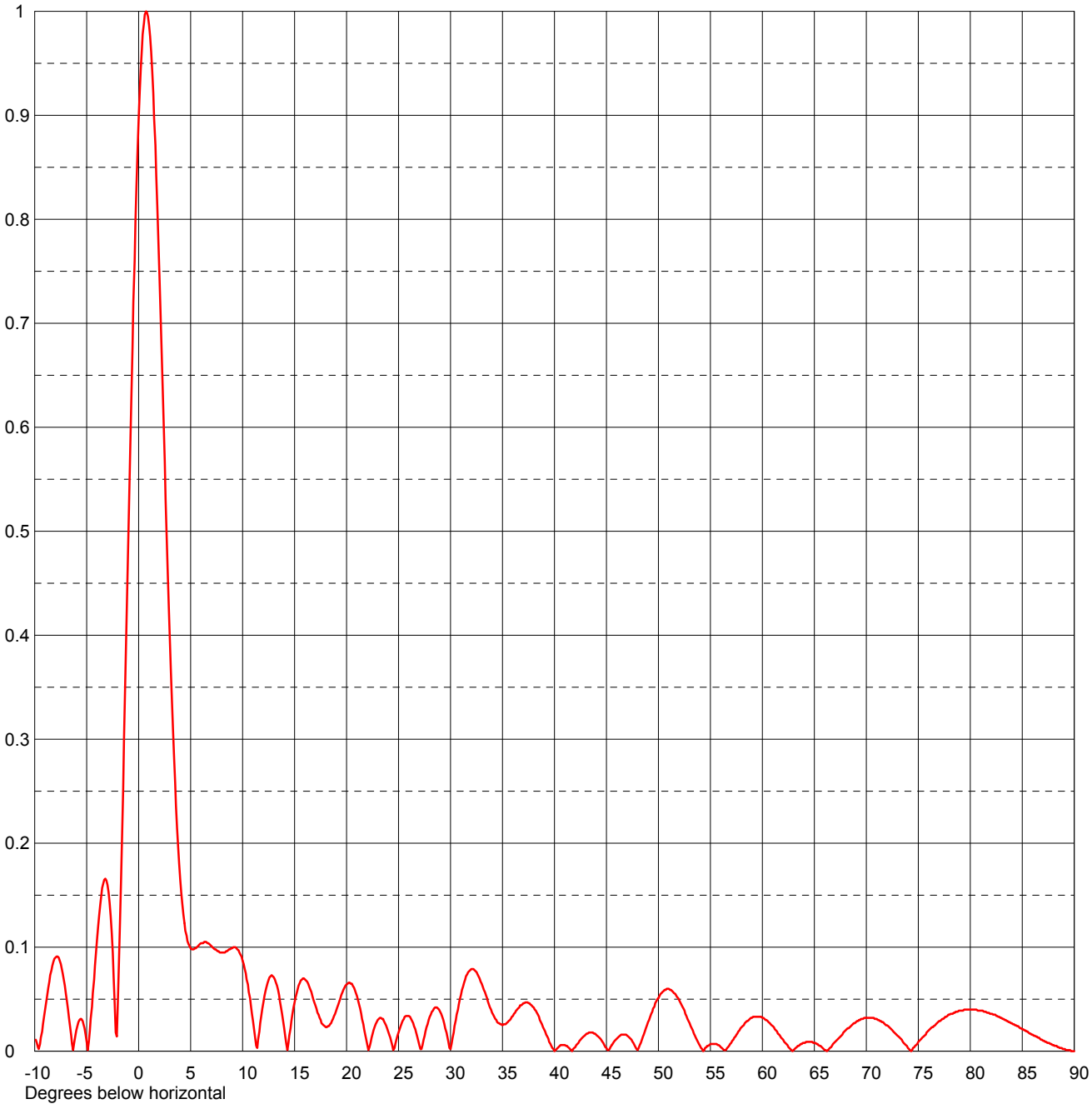
Exhibit No.
Figure 1B

Dielectric

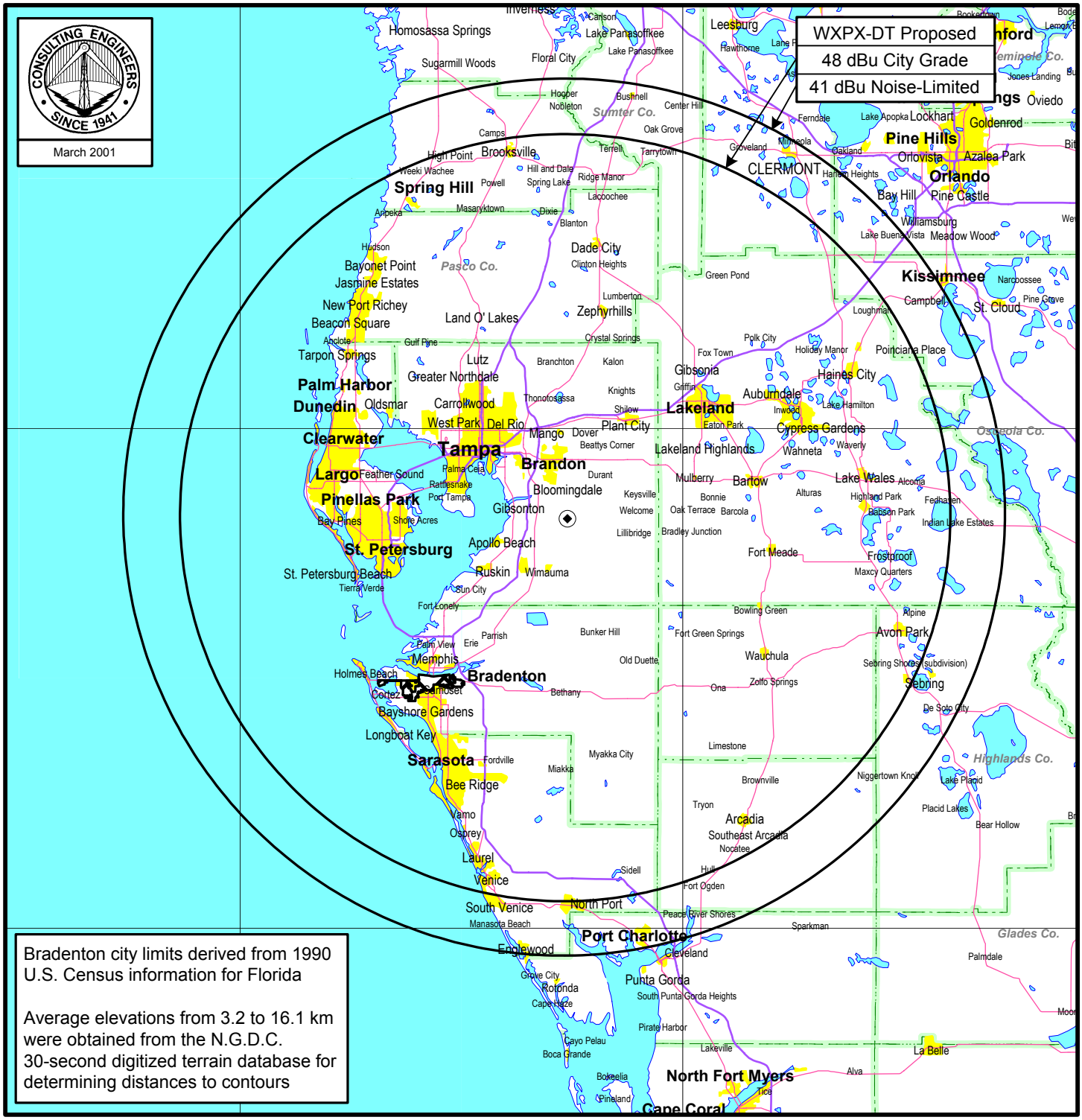
Date	**27 Mar 2001**	
Call Letters	**WXPX-DT**	Channel
Location	**Bradenton, FL**	
Customer		
Antenna Type	**TFU-24GTH-R O4**	

ELEVATION PATTERN

RMS Gain at Main Lobe	**21.5 (13.32 dB)**	Beam Tilt	**0.75 Degrees**
RMS Gain at Horizontal	**17.3 (12.38 dB)**	Frequency	**MHz**
Calculated / Measured	**Calculated**	Drawing #	**24G215075-90**



Remarks:



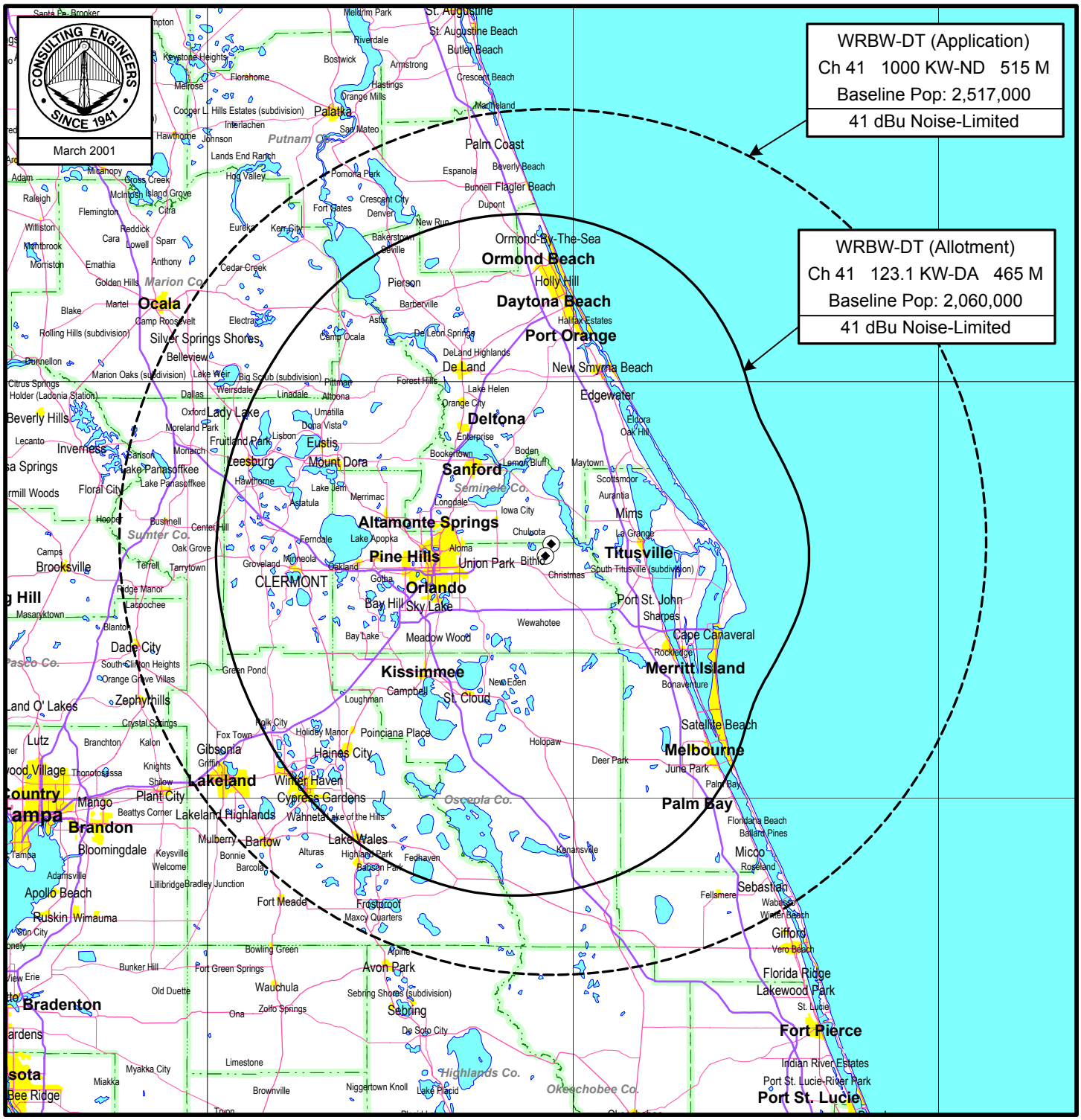
PREDICTED F(50,90) COVERAGE CONTOURS

STATION WXPX-DT

BRADENTON, FLORIDA

CH 42 210 KW 476 M

du Treil, Lundin & Rackley, Inc Sarasota, Florida



PREDICTED F(50,90) COVERAGE CONTOURS

STATION WRBW-DT

ORLANDO, FLORIDA

du Treil, Lundin & Rackley, Inc Sarasota, Florida

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Technical Specifications

Channel	42
Frequency	638-644 MHz
Proposed Site Coordinates (NAD 27)	27° 49' 10" North Latitude 82° 15' 39" West Longitude
Site Elevation above mean sea level	18.3 m
Average elevation above mean sea level of 8 equally spaced radials, 3-16 kilometers	19 m
Overall height of antenna structure	
Above ground	484.3 m
Above mean sea level	502.6 m
Height of antenna radiation center	
Above ground	477.0 m
Above mean sea level	495.3 m
Above average terrain	476 m
Transmitter rated power output (average)	20 kW
Waveguide/Transmission line	Dielectric 562176 (6")
Length	(1,650 ft) 503 m
Efficiency (2.05 dB loss)	62.4 %
	Dielectric 562173 (3")
Length	(67 ft) 21 m
Efficiency (0.18 dB loss)	96.0 %
Antenna	Dielectric TFU-24GTH O4
Polarization	Horizontal
Power Gain	21.5
Beam Tilt	0.75±

Proposed Operation

Transmitter output power (average)	17.5 kW
Transmission line loss	6.6 kW
Waveguide loss	0.4 kW
Antenna input power	10.5 kW
Maximum Effective Radiated Power	210 kW