



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN
APPLICATION FOR MODIFICATION OF
A DTV CONSTRUCTION PERMIT
BPCDT-20080317AGS
WLFL-DT - RALEIGH, NORTH CAROLINA
DTV - CH. 27 - 725 kW - 610 m HAAT**

Prepared for: WLFL Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WLFL Licensee, LLC, licensee of WLFL(TV), channel 22, Raleigh, North Carolina, and permittee of WLFL-DT, on post-transition channel 27, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application for modification of its post-transition construction permit BPCDT-20080317AGS. The permittee proposes to construct its post-transition DTV facility according to its current post-transition authorization with one exception. It is herein proposed to increase WLFL-DT's effective radiated power (ERP) from the currently authorized 568 kW to 725 kW. No other changes are proposed.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 2 contains the predicted DTV Noise Limited (41 dBu) contour and the predicted principal community (48 dBu) contour. The 48 dBu contour entirely encompasses the principal community of license, Raleigh, North Carolina.

DTV Allocation Considerations

A study was performed utilizing the Commission's application processing software to determine compliance with the post-transition limitations contained in §73.616 of the Commission's rules. Results indicate that the instant proposal to increase WLFL-DT's ERP from 568 kW to 725 kW is predicted to cause no unacceptable level (0.5%) of new interference to the populations served by any DTV station, expansion construction permit or allotment.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, the interference contour overlap analysis which is provided by TV_Process was considered, based on the proposed WLFL-DT facility, to establish compliance with the protection requirements contained therein. The

study results indicate that no prohibited contour overlap exists with any Class A LPTV stations.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WLFL-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, $(\text{frequency}/1500)$. The MPE level for "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm^2) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, $(\text{frequency}/300)$. The predicted emissions of WLFL-DT must be considered, along with the predicted emissions from other proposed stations at the site, and within 315 meters of the site. For WLFL-DT, which will operate on DTV Channel 27 (548-554 MHz), the MPE is 0.367 milliwatts per centimeter squared (mW/cm^2) in an "uncontrolled" environment and 1.835 mW/cm^2 in a "controlled" environment. The proposed WLFL-DT facility will operate with a maximum ERP of 725 kW using a horizontally polarized transmitting antenna at a centerline height of 580 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WLFL-DT facility is predicted to produce a power density at two meters above ground level of 0.00652 mW/cm^2 , which is 1.78% of the FCC guideline value for "uncontrolled" environments, and 0.356% of the FCC guideline value for "controlled" environments (see Appendix A). The total percentage of the ANSI value including all stations at the proposed site is only 9.11% of the limit for "uncontrolled" environments, and 1.82% of the limit for "controlled" environments.

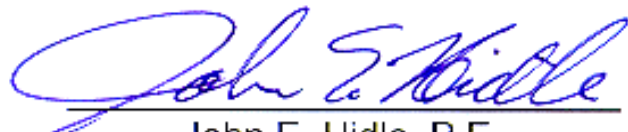
OCCUPATIONAL SAFETY

The permittee for WLFL-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the proposed WLFL-DT antenna. The applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel.

SUMMARY

It is submitted that the instant application for modification of construction permit for WLFL-DT seeking to increase the effective radiated power from 568 kW to 725 kW, as described herein complies with the Rules, Regulations and Policies of the Federal Communications Commission. This statement, FCC Form 301, Section III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: June 18, 2008

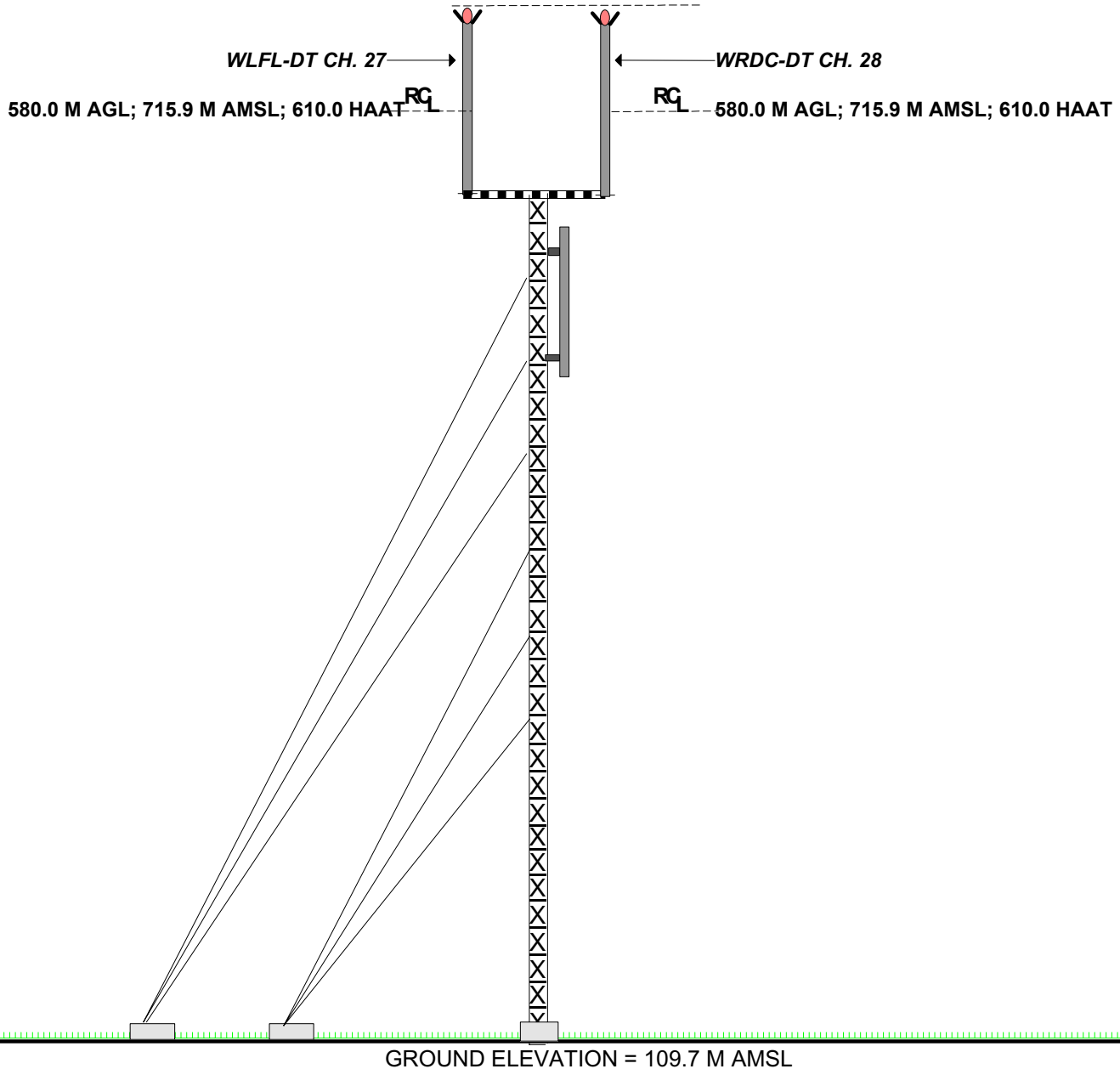

John E. Hidle, P.E.



35° 40' 28" NL
078° 31' 40" WL

EXHIBIT 1

OVERALL HEIGHT
178.3 M AGL; 369.7 M AMSL



VERTICAL PLAN ANTENNA SKETCH

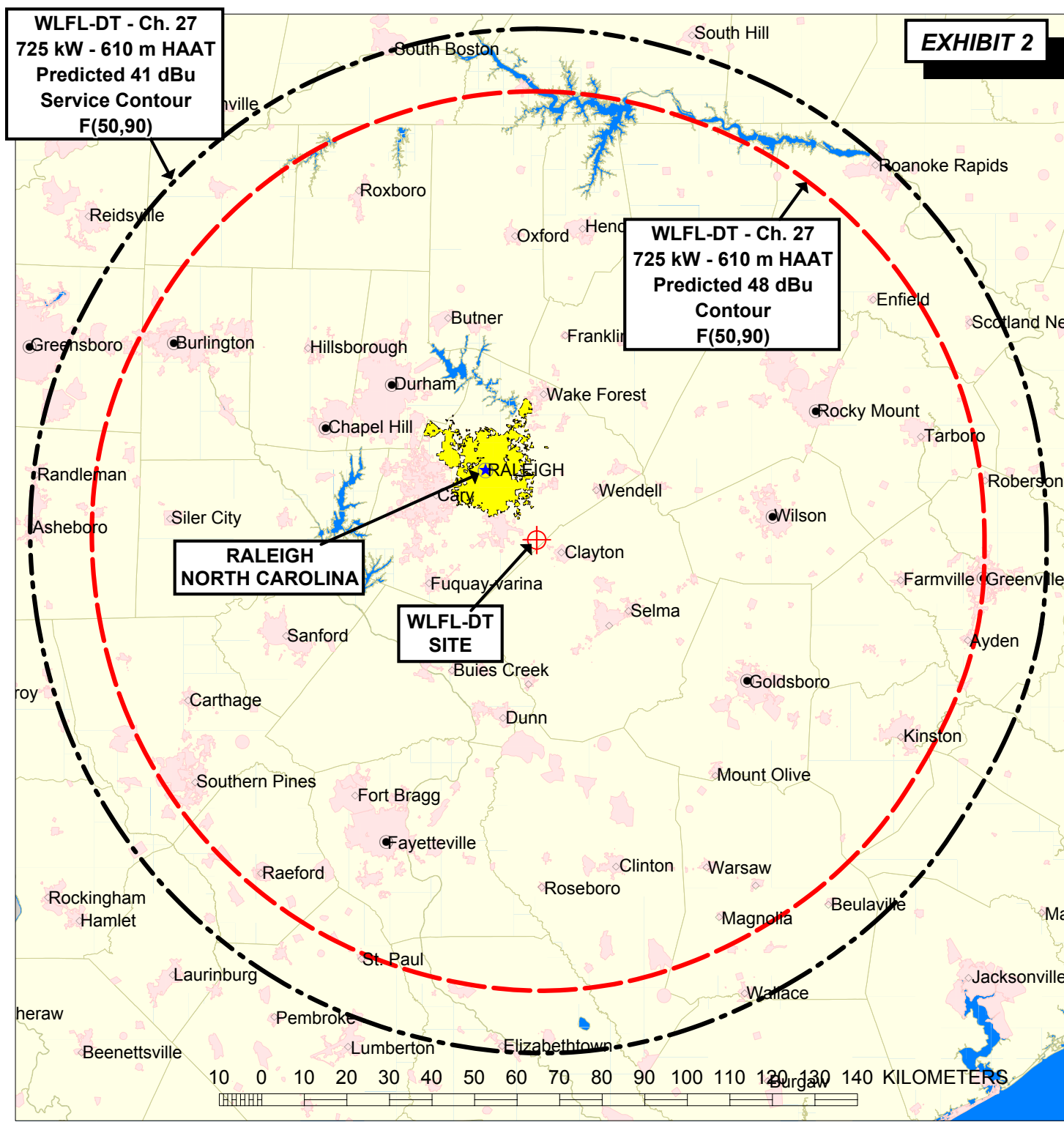
WLFL-DT RALEIGH, NORTH CAROLINA

CH. 27, 725 kW - 610.0 m HAAT

JUNE, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



PREDICTED COVERAGE CONTOURS
WLFL-DT, RALEIGH, NORTH CAROLINA
PROPOSED COVERAGE CONTOURS

PREDICTED 48 dBu F(50,90)
CH. 27 - 725 kW PRINCIPAL COMMUNITY
DTV SERVICE CONTOUR

PREDICTED 41 dBu F(50,90)
CH. 27 - 725 kW NOISE LIMITED CONTOUR
NON-DIRECTIONAL ANTENNA

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WLFL-DT, RALEIGH, NORTH CAROLINA
CHANNEL 27, 725 kW ERP, 610.0 m HAAT
JUNE, 2008

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WLFL-DT	DT	27	551	H	578	725.000	0.300	0.00652	0.367	1.78%
WRDC-DT	DT	28	557	H	578	725.000	0.300	0.00652	0.371	1.76%
WACN-LP	TV	34	593	H	298	49.160	0.300	0.00083	0.395	0.21%
WRAZ-DT	DT	49	683	H	581.9	1000.000	0.300	0.00888	0.455	1.95%
WRAL-DT	DT	48	677	H	597	916.000	0.300	0.00773	0.451	1.71%
WNCN-DT	DT	17	491	H	596	525.000	0.300	0.00444	0.327	1.36%
W64CN	TV	64	773	H	150	27.000	0.300	0.00180	0.515	0.35%
TOTAL PERCENTAGE OF ANSI VALUE=										9.11%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights*

so that the predicted power densities consider the 2 meter human height allowance.

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.

CARL T. JONES
CORPORATION