

# ENGINEERING EXHIBIT

## Application for Digital Low Power Television Construction Permit

prepared for

### Polnet Communications, Ltd.

W29DJ Sheboygan, WI

Facility ID 67976

Ch. 30 (Digital) 15 kW

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FCC Form 346, Section III – Engineering Data (Digital)

#### Exhibit 11

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#### Exhibit 12

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*This material supplies a "hard copy" of the engineering portions of this application as entered September 11, 2009 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*



	47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030.	See Explanation in [Exhibit 11]
14.	<p><b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an <b>Exhibit is required.</b></p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 12]</p>
15.	<p><b>Channels 52-59.</b> If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:</p> <p><input type="checkbox"/> The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.</p>	
16.	<p><b>Channels 60-69.</b> If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreements(s) with 700 MHz public safety regional planning committee(s) and state administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.</p>	
<p><b>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</b></p>		

**SECTION III PREPARER'S CERTIFICATION**

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name ROBERT J. CLINTON		Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature		Date 9/11/2009	
Mailing Address CAVELL, MERTZ & ASSOCIATES, INC. 7839 ASHTON AVENUE			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20109 - 2883
Telephone Number (include area code) 7033929090		E-Mail Address (if available) BCLINTON@CAVELLMERTZ.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**Exhibits**

**Exhibit 10**

**Description:** EXHIBIT 10 - STRUCTURE REGISTRATION

PLEASE SEE EXHIBIT 11 - STATEMENT A FOR STRUCTURE REGISTRATION DISCUSSION.

**Attachment 10**

**Exhibit 11**

**Description:** EXHIBIT 11 - STATEMENT A

EXHIBIT 11 - STATEMENT A - ALLOCATION CONSIDERATIONS

**Attachment 11**

Description
<a href="#">EXHIBIT 11 - STATEMENT A</a>

**Exhibit 12**

**Description:** EXHIBIT 12 - ENVIRONMENTAL

EXHIBIT 12 - ENVIRONMENTAL CONSIDERATIONS (WITH TABLE OF CONTENTS AND COPY OF FORM 346, SECTION III)

**Attachment 12**

Description
<a href="#">EXHIBIT 12 - ENVIRONMENTAL</a>

Exhibit 12 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Polnet Communications, Ltd.**  
W29DJ Sheboygan, WI  
Facility ID 67976  
Ch. 30 (Digital) 15 kW

**Introduction**

The instant proposal is not believed to have a significant environmental impact as defined under §1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

*Polnet Communications, Ltd.*, herein proposes to modify the Construction Permit ("CP") for digital television translator station W29DJ, Channel 29, Sheboygan, Wisconsin, Facility ID 67976 (BDFCDTL-20080408ABL) to Channel 30 at the currently authorized transmitting site. A different transmitting antenna will be employed, to be located on the same existing antenna structure that is specified in the current CP.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

**Human Exposure to Radiofrequency Electromagnetic Field**

The proposed operation was evaluated for human exposure to radiofrequency electromagnetic field using the procedures outlined in the Commission's OET Bulletin 65 ("OET-65"). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

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The W29DJ Channel 30 antenna center of radiation will be 255.6 meters above ground level. An effective radiated power of 15 kilowatts, horizontally polarized, will be employed utilizing a Dielectric model TLP-24M directional antenna. A “worst-case” relative field value of 1.000 is assumed for purposes of the calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 30 (center frequency 569 MHz) is 379.3  $\mu\text{W}/\text{cm}^2$ .

OET-65’s formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

- S = power density in microwatts/cm<sup>2</sup>
- ERP = total (average) ERP in Watts
- F = relative field factor
- D = distance in meters

Using this formula and the above assumptions, the proposed facility would contribute a power density of 7.8  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure, or 2.1 percent of the general population/uncontrolled limit. At ground level locations away from the base of the building, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna. If the actual vertical plane (elevation) pattern of the antenna were considered, the calculation would be even lower.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

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**Safety of Tower Workers and the General Public**

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower or in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

**Conclusion**

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.