

TECHNICAL STATEMENT
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
TELEVISION STATION WTXL-DT
TALLAHASSEE, FLORIDA
CHANNEL 22 1000 KW 487 M

This Technical Statement was prepared on behalf of digital television broadcast station WTXL-DT, Tallahassee, Florida, in support of an application for modification of construction permit (See FCC File No. BPCDT-19991028ADJ). WTXL-DT is authorized for operation on Channel 22 with a non-directional effective radiated power (ERP) of 1000 kW and antenna height above average terrain (HAAT) of 497 m. The purpose of this application is to correct the geographic coordinates and elevation data to harmonize with the antenna structure registration information for the WTXL-DT antenna supporting structure. There are no changes other than the correction of the longitude by 4-seconds; correction of the site elevation; and correction of the antenna height, both above mean sea level and above average terrain.

The proposed facility will not result in any extension of the predicted 41 dBu noise-limited contour.* Therefore, the proposal meets the terms of the FCC Filing Freeze for television stations.†

* The modification will result in a slight reduction in the predicted 41 dBu noise-limited contour of approximately 0.25 km relative to the authorized predicted 41 dBu noise-limited contour.

† See August 2004 Filing Freeze PN, DA 04-2446 (MB rel. Aug. 3, 2004).

Tower Registration

The proposed antenna structure has been registered with the FCC. The FCC antenna structure registration number is 1031204. There will be no change in the overall height of the antenna structure as a result of the instant proposal.

Environmental Considerations

An evaluation was conducted for the proposed facility concerning compliance with Section 1.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy.[‡] Calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground[§] based on the following conservative assumptions, with the following results:

Call Sign	Channel	Total Average ERP (kW)	Relative Field Factor**	FCC Limit ^{††} (mW/cm ²)	Percentage of Limit
WTXL-DT	22	1000	0.10	0.347	0.4%

As indicated above, the total exposure to RF radiation at 2-m above ground level will not exceed 0.4% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF energy and it is

[‡] See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:

http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf

[§] The antenna radiation center height above ground is 488 m.

** This is a conservative estimate of the relative field factor in the downward direction.

†† for general population/uncontrolled environments

categorically excluded from environmental processing. The applicant, in coordination with other users of the transmission facility, shall reduce power or cease operation as necessary to protect persons having access to the WTXL-DT tower or antenna from radio frequency radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237-6019

September 17, 2004