ENGINEER STATEMENT FOR WOOT-LP

This engineering statement has been prepared on behalf of Tiger Eye Broadcasting Corporation (Tiger Eye), licensee of Class A low power television (LPTV) station WOOT-LP, Chattanooga, Tennessee and is in support of an application to modify its licensed Channel 6 operation.

At present WOOT-LP is licensed to operate on Channel 6 (+) (82-88 MHz) with 0.058 kW maximum effective radiated power (ERP) and 214 meters antenna radiation center above mean sea level (RCAMSL) using a directional TV antenna. WOOT-LP proposes to operation on Channel 6 (+) with 0.45 kW maximum ERP and 614 meters RCAMSL also using a directional antenna from a different antenna site.

Antenna Site

The proposed WOOT-LP antenna will be side-mounted at 42 meters (138 feet) above ground level on an existing tower, antenna structure registration No. 1052960. The geographic coordinates (NAD-27) of the proposed WOOT-LP site are as follows: N 35° 07' 45", W 85° 20' 02".

TV Allocation Situation

A TV allocation study indicates the proposed WOOT-LP operation would result in prohibited overlap of contours with the following TV stations:

1. WATE-TV, Channel 6, Knoxville, TN (Lic. & Applic.)
2. WBRC-TV, Channel 6, Birmingham, AL
3. NEW-Translator, Channel 6, Dalton, GA

Consequently, on behalf of station WOOT-LP, engineering interference studies have been conducted based on the FCC OET Bulletin 69 with respect to the aforementioned stations. The studies indicate that any additional predicted interference caused to the full

service TV stations would be less than 0.5% of the respective population listed in Appendix B of the Commission Sixth Report and Order in MM Docket 87-268 or within the protected contour (see Exhibit 6). Therefore, WOOT-LP requests a waiver of Sections 74.705 and 74.706 of the Commission's rules.

In addition, the FCC OET Bulletin 69 study indicates the proposed WOOT-LP operation would not cause predicted interference with respect to the proposed TV translator station.

The proposed operation of WOOT-LP would receive predicted interference from the licensed operations of analog TV station WBRC-TV and WATE-TV. Interference is also predicted to WOOT-LP from the authorized operation of WATE-TV. However, if the Commission's staff determines that additional predicted interference will be received by the proposed WOOT-LP operation from other such TV stations, WOOT-LP would either amend its proposal or accept interference to expedite grant of its proposal.

Environmental Statement

Since WOOT-LP would be side-mounting its TV antenna on an existing tower, environmental issues listed under Section 1.1307 (a) are not pertinent.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 0.45 kW and a radiation center of 42 meters above ground level, the proposed TV operation would have a maximum of 1 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower, conservatively assuming an antenna field factor of 0.5 in the downward direction. The Commission's guidelines for Channel 6 TV operation are 1,000 $\mu W/cm^2$ for the

occupational/controlled and 200 μW/cm^2 for the general population/uncontrolled environment.

Therefore, members of the public and personnel working around the proposed WOOT-LP, Channel 6 TV facility would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station WOOT-LP, in coordination with other stations, will establish procedure to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.