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**Engineering Statement**

**W21CL FI 6042**

The within application is a flashcut at its present site for Digital operation using the same antenna and rotation as the underlying analog. The Proposed ERP is 12 kW Digital and the transmitter's emission mask is to be Stringent. Using those parameters, the application shows compliance with all applicable portions of 47 CFR 74.793. NIER is within the limits for this service. Tower is registered and no tower construction is planned as existing antenna and feedline will be used.

SPECIAL NOTE: There is on file a granted CP - BDFCDTL-20110808AAZ, the dismissal of which is requested by the applicant upon acceptance of the within application, intended to replace that one. This application is a flash cut of the analog facility upon the analog transmit site.

Respectfully submitted,

B. W. St. Clair  
Engineering Consultant  
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