ENGINEERING STATEMENT

This exhibit supports this application to modify FCC File Number 0000024416, a construction permit for W28ES-D, Facility ID 130477, licensed to the Applicant herein.

The proposed facility was studied using TVStudy v2.2.3 using the following parameters:

- Study Cell Size of 0.5 km
- Profile Point Spacing of 0.10 km.

The Applicant proposed to modify the ERP from 0.29 kW to 0.48 kW. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility.

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

Digital TV and Class A Station Protection and Interference Acceptance

The proposed facility causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., "*de minimis*") based on TVStudy v2.2.3. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Low Power TV and TV Translator Station Protection

Based on TVStudy v2.2.3 with the Build Option to Protect LPTVs, the proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Environment Effect

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.