

TECHNICAL SUMMARY
SECOND FILING WINDOW
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
TV STATION WINK-DT
FORT MYERS, FLORIDA
CHANNEL 31 793 KW (DA) 416 m

1. The instant application is a second filing window application for WINK-DT on channel 31 at Fort Myers, Florida. It is proposed to increase the ERP from 700 kW to 793 kW. There will be no other changes. There will also be no change in the overall structure height of the existing tower (ASRN 1019724).

2. As demonstrated in the *TVStudy* analysis exhibit, the proposal complies with the FCC's interference protection requirements based on a cell size of 2.0 km and profile resolution of 1.0 points/km.

3. RFR Compliance: The proposed facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna will be located 415 meters above ground level. The total DTV ERP is 1031 kW (793 kW-horizontal, 238 kW-vertical). A conservative vertical plane relative field value of 0.1 is presumed for the antenna's downward radiation in both the horizontal and vertical planes of polarization (for angles below 60 degrees downward, see attached antenna data). The calculated power density at a point 2 meters above ground level is 2.0 uW/cm² which is 0.53% of the FCC's recommended limit of 383.3 uW/cm² for channel 31 for an uncontrolled environment. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the transmitting site is restricted and appropriately marked with RFR warning signs. Also, as this is a multi-user site, a formal RFR protection protocol is in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to RFR exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.