

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NEW YORK SPECTRUM HOLDINGS COMPANY LLC, licensee of digital Low Power Television Station WTXI-LD, Channel 33 in Miami, Florida, in support of its displacement Application for Construction Permit to specify operation on Channel 18. No change in the WTXI-LD site location, effective radiated power, or antenna height is proposed herein.

This station is being displaced as a result of the spectrum auction and the assignment of repack Channel 33 to WJAN-CD in Miami, Florida. Operation of WJAN-CD on the same channel as WTXI-LD in the same market would result in an impermissible level of interference between both stations.

It is proposed to mount a broadband directional antenna at the 214-meter level of the existing 310.6-meter communications tower on which the present WTXI-LD antenna is located. The proposed effective radiated power for the facility is 15.0 kW in horizontal plane, which is the present power level of WTXI-LD. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted.

Included in a separate showing is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed both a cell size and increment spacing of 1.0 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed WTXI-LD facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities, except to the pre-repack facility of WPBT-DT, Channel 18 in Miami (BLEDT-20010712AGD). However, WPBT-DT has been allotted repack Channel 29 in Miami and the instant proposal protects that

EXHIBIT A

new facility. Since operation of WTXI-LD on proposed Channel 18 is contingent upon the move of WPBT-DT to its post-repack facility on Channel 29, the instant applicant has requested a waiver of the Commission's "contingent application Rule", which the FCC has said it will entertain during this LPTV displacement filing window.

A detailed power density calculation is provided in Exhibit C.

Since no change in the overall height or location of the existing WTXI-LD tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, the FCC issued Antenna Structure Registration Number 1224225 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large initial "K" and a long horizontal stroke at the end.

KEVIN T. FISHER

April 20, 2018

CONTOUR POPULATION
2015 U.S. CENSUS DATA
2,985,182 (1,150,438 HH)

Smith and Fisher, LLC

PROPOSED CH. 18
51 DBU CONTOUR

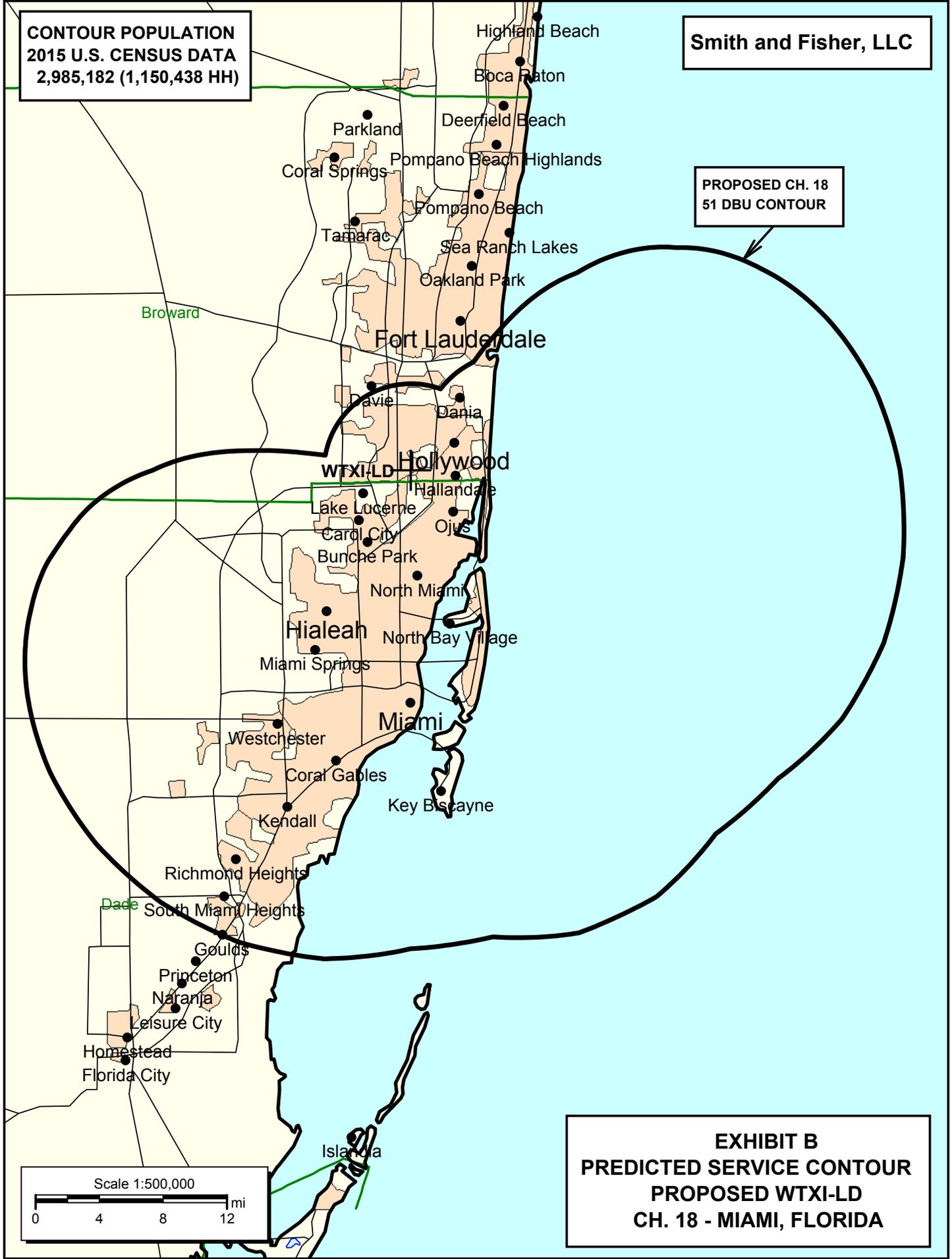


EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED WTXI-LD
CH. 18 - MIAMI, FLORIDA

POWER DENSITY CALCULATION

PROPOSED WTXI-LD
CHANNEL 18 – MIAMI, FLORIDA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Miami facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kW, an antenna radiation center 214 meters above ground, and assuming a vertical relative field value of 10 percent at the steeper elevation angles for the proposed MCI panel antenna, a maximum power density value two meters above ground of 0.00011 mW/cm² is calculated to occur near the base of the tower. Since this is significantly less than 0.1 percent of the 0.33 mW/cm² reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 18 (494-500 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.