

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NEW YORK SPECTRUM HOLDING COMPANY, LLC ("NYSHC"), licensee of digital Low Power Television Station WTXI-LD, Channel 33 in Miami, Florida, in support of its channel-sharing amendment to its Channel 18 displacement Application for Construction Permit (LMS-0000053159). NYSHC entered into a channel-sharing agreement with KCRA License, LLC, licensee of W17DG-D and also applicant for displacement Channel 18 in Miami, in order to settle the mutual exclusivity between the two applications (MX Group 71). The facility proposed herein is identical to that authorized to W18EU-D/W17DG-D in LMS-0000053955.

It is proposed to mount a broadband directional antenna at the 260-meter level of an existing 317.3-meter communications tower. The proposed effective radiated power for the facility is 15.0 kW in the horizontal plane. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted. A detailed power density calculation is provided in Exhibit C.

Since no change in the overall height or location of the existing tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, the FCC issued Antenna Structure Registration Number 1018585 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits 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 and written in a cursive-like font.

February 20, 2019

KEVIN T. FISHER

CONTOUR POPULATION
2015 U.S. CENSUS DATA
3,100,453 (1,188,242 HH)

Smith and Fisher, LLC

PROPOSED CH. 18
51 DBU CONTOUR

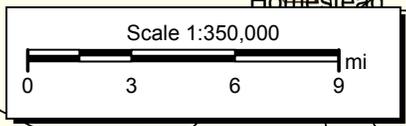
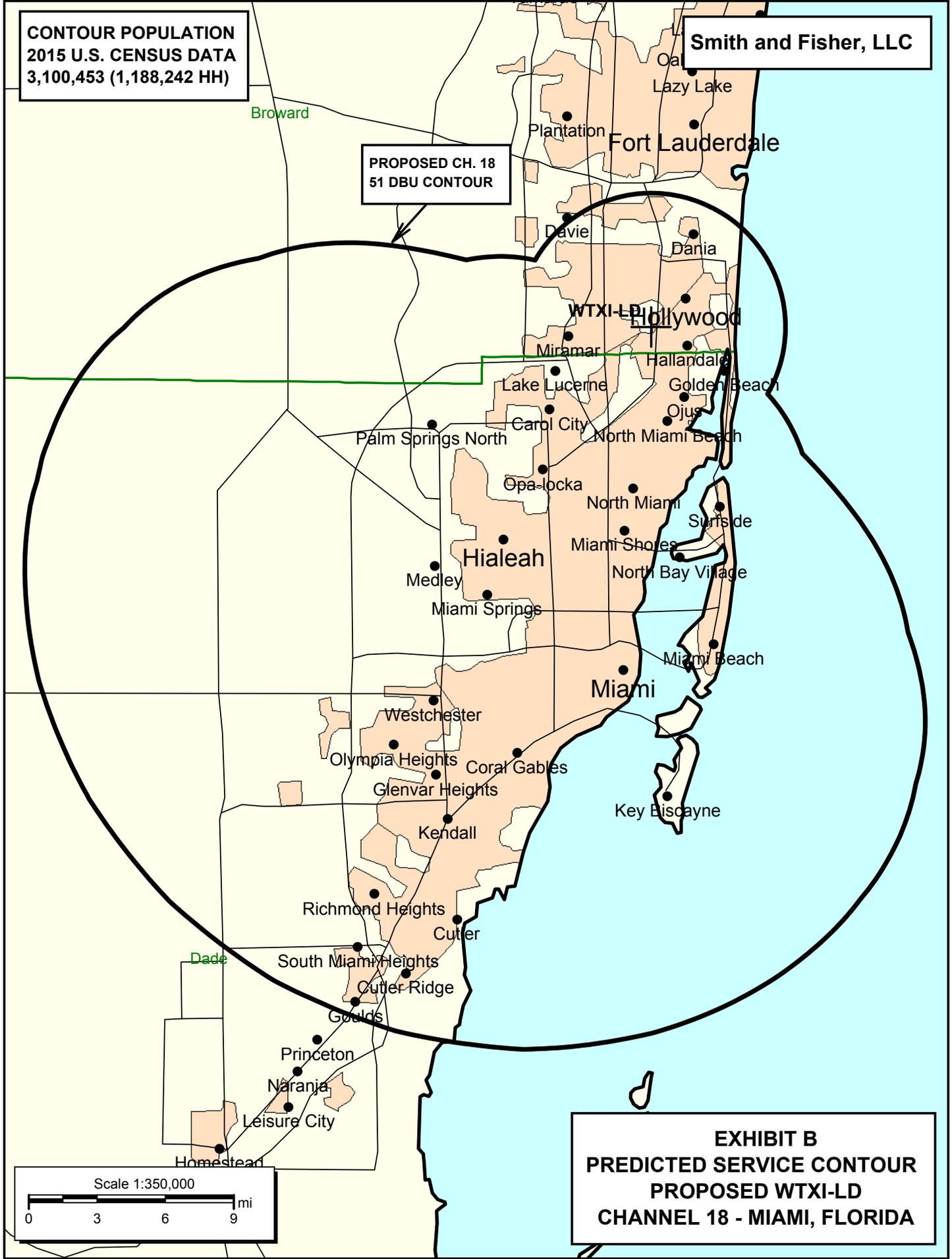


EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED WTXI-LD
CHANNEL 18 - MIAMI, FLORIDA

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 260 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 0.000075 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.