

TECHNICAL SUMMARY
APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
LMS FILE NO. 0000051993
LPTV STATION WLZE-LD
FORT MYERS, FLORIDA
CHANNEL 27 15 KW (ND)

1. The instant minor change application is to relocate the authorized (CP, LMS File No. 51993) operation of LPTV station WLZE-LD on digital displacement channel 27 at Fort Myers, Florida and modify its facilities. Specifically, operation is proposed from an existing tower located 3.7 km east-northeast of the CP/licensed WLZE-LD site with a nondirectional antenna maximum effective radiated power (ERP) of 15 kW using a Dielectric model TLP-16A, horizontally polarized nondirectional antenna. The antenna radiation center height will be 331 m AMSL. There will be no change in the overall height of the existing structure (ASRN 1019724).

2. Figure 1 demonstrates that there is overlap of the licensed (Ch. 20), authorized (Ch. 27) and proposed 51 dBu, f(50,50) protected contours as required by Section 73.3572(a)(2)(ii) for minor change applications. Furthermore, as noted above, the site move will only be 3.7 km which comports with the 48 km limit.

3. Interference Compliance: As indicated in the attached *TVStudy* analysis summary, WLZE-LD's proposed channel 27 operation meets the FCC's interference protection requirements with respect to all protected facilities based on both the pre- and post-transition allocation environments. A cell size of 1.0 km and a profile resolution of 1.0 km points/km were utilized for the *TVStudy* analysis.

4. 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 322 meters above ground level. The total DTV ERP is 15 kW (horizontal polarization). A worst-case vertical plane relative field value of 1.0 is presumed for the antenna's downward radiation (-60° to -90° elevation). The calculated power density at a point 2 meters above ground level is 4.9 uW/cm^2 which is 1.3% of the FCC's recommended limit of 367.3 uW/cm^2 for channel 27

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.