**ENGINEERING STATEMENT**

This engineering statement supports this minor modification application to modify FCC File No. 0000053862, a construction permit for WHCT-LD on Channel 35 in Hartford, New Haven, CT, licensed to the Applicant herein.

The Applicant proposes the following changes:

* Lower the RCAGL of the antenna at the request of the tower owner and structural analysis result.
* Modify the antenna model and polarization.

The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of its existing licensed facility. The proposed facility was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 2.0 km

Profile point spacing: 0.05 km

It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

**Phase 4 Request**

 The Applicant hereby requests the proposed facility of WHCT-LD to be placed in Phase 4 of the transition schedule to eliminate interference to WVIT and WRDM-CD who are channel sharing on channel 35 and have been reassigned to channel 31 in Phase 4. The Applicant will commence operation of the proposed facility of WHCT-LD on channel 35 simultaneously with WVIT’s transition in Phase 4.

**Digital TV and Class A Station Protection**

 The proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., “*de minimis*”) based on TVStudy v2.2.5. 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**

 The proposed facility causes less than 2.0% interference to surrounding low power licenses and construction permits (i.e., “*de minimis*”) based on TVStudy v2.2.5. 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.