

Glenn P Edwards

Chief Engineer, Circle City Broadcasting

1950 N Meridian

Indianapolis Indiana 46202

November 21, 2019

This letter is to exhibit that the requested minor modification to BLCDT-20110207ACU has no significant environmental impact as defined in FCC rule 1.1307. The request is to move to a tower closer to the Indianapolis population center which lost UHF over the air service for WISH TV programming after WALV moved to channel 17 as part of the national repack. The proposed tower is an existing TV broadcast tower. The site is not an Indian religious site, nor located in a flood plain area, nor a designated wilderness area, not a designated wildlife preserve. The change does not change lighting on the tower, nor disturb the land or surface features.

The requested change will not create any RF exposure hazard. Using OET-65 guidelines and taking into account the total ERP from the antenna, the UHF field factor radiated to ground level and the distance to the height of an average person (2 meters), The accepted formula was constructed using the channel 26 construction permit data as follows:

$P = 15 \text{ kw}$

$R = 188 \text{ meters}$

$F = .1 \text{ for UHF antennas}$

S, the power density in watts per square meter was calculated and returned the value of:

$0.14 \mu\text{watts/cm}^2$

$363 \mu\text{watts/cm}^2$ is the general population exposure limit for the channel 26 broadcast facility.

This is 0.04% of the exposure limit and not a significant contributor to the RF exposure environment. The licensee will coordinate with other users on the tower and tower workers to reduce power or cease operation as necessary to protect persons accessing the tower.

Sincerely,

 11/21/19
Glenn P Edwards