

ENGINEERING STATEMENT

This engineering statement this application to modify the construction permit of W05DG-D, Facility ID 127813, FCC File Number 0000054812, which is a digital displacement construction permit for W22EW-D, licensed to the Applicant herein.

Proposed Facility

Applicant proposes to modify: (i) antenna height to 13.2 meters, (ii) ERP to 0.57 kW, (iii) antenna orientation to 285°, and to use the following Longley-Rice analysis settings:

- Study cell size: 1.00 km
- Profile point spacing: 0.50 km

And the results are as follow:

- Distance to Canadian border: 378.9 km
- Distance to Mexican border: 2657.6 km
- Conditions at FCC monitoring station: Laurel MD
Bearing: 231.3 degrees Distance: 283.4 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:
Bearing: 278.7 degrees Distance: 2606.0 km

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

Waiver Request

To the degree that it is deemed necessary, the Applicant requests to waive the contingent application rule 47 C.F.R Section 73.3517 to allow the grant of this application which is necessary for the station to continue to serve its current viewers.

In addition, in order to comply with Section 73.3700(g)(2), the Applicant agrees to a condition that the proposed facility will not commence operation until any other potentially mutually interfering repacked full power or Class A stations have left their channels pursuant to the relevant phase assignment.

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 assignments and allotments (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 Assessment Not Required

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. The applicant also certifies that it, in coordination with other users of each transmitter site, will reduce power or cease operation as necessary to protect persons having access to each site, transmitter or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.