

## ENGINEERING EXHIBIT

### Digital Low Power Television Station Application for Minor Modification of Licensed Facility

prepared for

**Gray Television Licensee, LLC**  
WTGB-LD Jasper, FL  
Facility ID 186186  
Ch. 34 2.5 kW Directional

*Gray Television Licensee, LLC* (“*Gray*”) is the licensee of digital Low Power Television station WTGB-LD, Channel 34, Facility ID 186186, Jasper FL (file# 0000198529, granted September 7, 2022). *Gray* proposes herein a minor modification Construction Permit to specify relocation of WTGB-LD.

As proposed herein, WTGB-LD will relocate its existing side-mount antenna to the tower structure associated with FCC Antenna Structure Registration number 1056576, located 39.1 km (24.3 miles) from the licensed site. No change to the overall structure height is proposed.

The WTGB-LD antenna is a Dielectric model DLP-8B having horizontal polarization. The proposed effective radiated power is 2.5 kW directional, using a “full service” out of channel emission mask. A plot of the directional antenna’s azimuthal pattern is supplied in Figure 1. Figure 2 depicts the coverage contour of the proposed facility as well as that of the licensed facility, demonstrating compliance with §73.3572 for a minor change.

Interference study per OET Bulletin 69<sup>1</sup> shows that the proposal complies with the FCC’s interference protection requirements toward all digital television, television translator, LPTV, and Class A stations. The results, summarized in Table 1, show that any new interference does not

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<sup>1</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). This analysis employed the FCC’s current “TVStudy” software with the default application processing template settings, 1 km cell size, and 1.0 km terrain increment. Comparisons of various results of this computer program (run on a Mac processor) to the FCCs implementation of TVStudy show excellent correlation.

exceed the FCC's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations) to any facility.

### **Human Exposure to Radiofrequency Electromagnetic Field (Environmental)**

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the FCC's OET Bulletin Number 65. Based on OET-65 equation (10) and considering 25 percent antenna relative field in downward elevations (antenna elevation pattern data shows 25 percent relative field or less for angles 10-90 degrees below the horizontal), the calculated signal density near the tower at two meters above ground level attributable to the proposed facility is  $6.4 \mu\text{W}/\text{cm}^2$ , which is 1.6 percent of the general population/uncontrolled maximum permitted exposure limit. This is below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

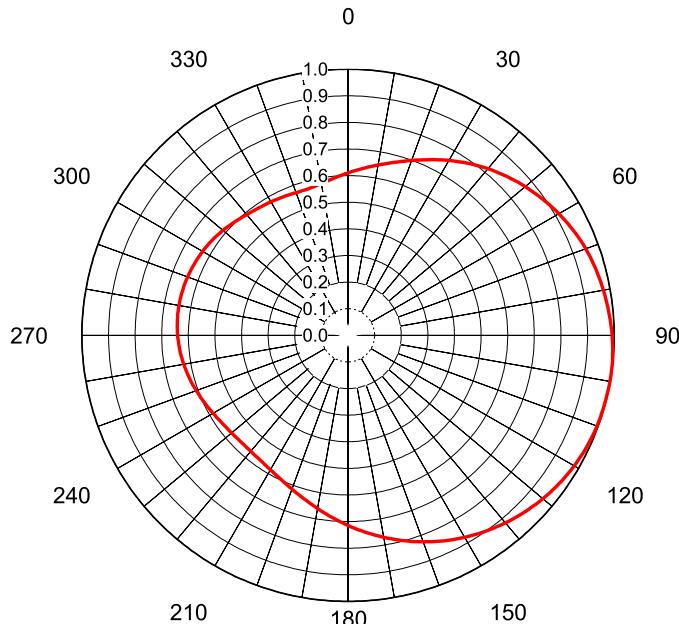
The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from RF electromagnetic field exposure in excess of FCC guidelines. This exhibit is limited to the evaluation of exposure to RF electromagnetic field. No increase in structure height is proposed.

#### *List of Attachments*

- Figure 1      Antenna Azimuthal Pattern
- Figure 2      Coverage Contour Comparison
- Table 1      TVStudy Analysis of Proposal
- Form 2100    Saved Version of Engineering Sections of FCC Form at Time of Upload

#### **Chesapeake RF Consultants, LLC**

Joseph M. Davis, P.E.      February 8, 2024  
207 Old Dominion Road      Yorktown, VA 23692      703-650-9600



## AZIMUTH PATTERN Horizontal Polarization

Proposal No. 20240208jmd  
 Date 8-Feb-24  
 Call Letters WTGB-LD  
 Channel 34  
 Frequency 593 MHz  
 Antenna Type DLP-8B  
 Gain 1.76 (2.45dB)  
 Calculated

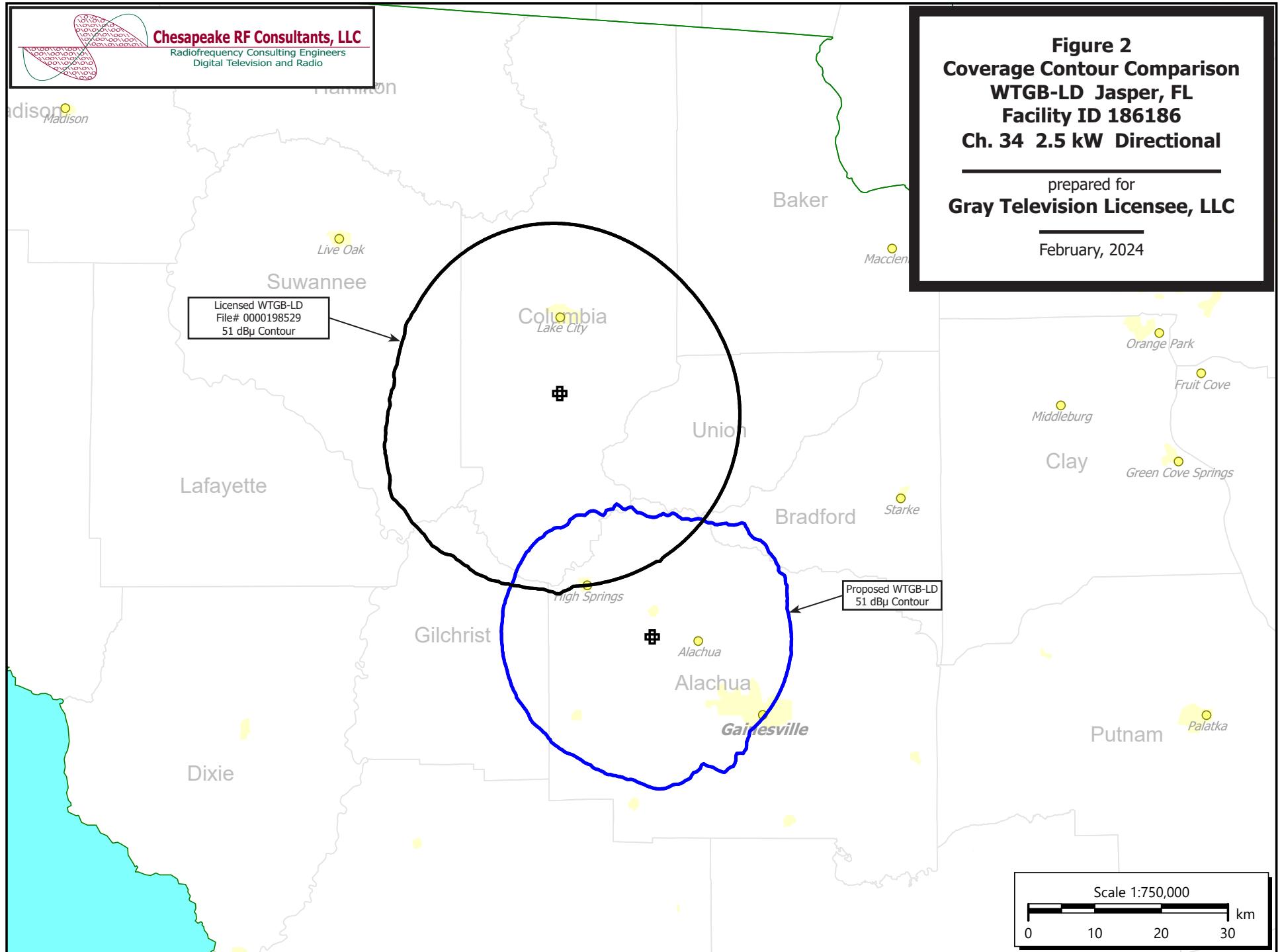
Pattern Number TLP-B-34 Hpol

Deg	Value																		
0	0.610	36	0.795	72	0.956	108	0.997	144	0.904	180	0.714	216	0.573	252	0.611	288	0.643	324	0.586
1	0.614	37	0.801	73	0.959	109	0.996	145	0.899	181	0.709	217	0.571	253	0.614	289	0.642	325	0.584
2	0.618	38	0.806	74	0.962	110	0.996	146	0.895	182	0.703	218	0.570	254	0.616	290	0.641	326	0.583
3	0.622	39	0.812	75	0.964	111	0.995	147	0.890	183	0.698	219	0.569	255	0.618	291	0.640	327	0.582
4	0.625	40	0.817	76	0.966	112	0.994	148	0.886	184	0.692	220	0.569	256	0.619	292	0.640	328	0.581
5	0.629	41	0.823	77	0.968	113	0.993	149	0.881	185	0.687	221	0.568	257	0.621	293	0.639	329	0.580
6	0.633	42	0.828	78	0.971	114	0.992	150	0.876	186	0.682	222	0.568	258	0.623	294	0.638	330	0.579
7	0.637	43	0.834	79	0.973	115	0.990	151	0.872	187	0.676	223	0.568	259	0.625	295	0.637	331	0.578
8	0.641	44	0.839	80	0.975	116	0.989	152	0.867	188	0.671	224	0.568	260	0.627	296	0.636	332	0.577
9	0.646	45	0.844	81	0.977	117	0.987	153	0.862	189	0.666	225	0.568	261	0.628	297	0.634	333	0.576
10	0.650	46	0.849	82	0.979	118	0.985	154	0.857	190	0.661	226	0.568	262	0.630	298	0.633	334	0.575
11	0.654	47	0.854	83	0.980	119	0.983	155	0.852	191	0.656	227	0.569	263	0.632	299	0.632	335	0.574
12	0.659	48	0.859	84	0.982	120	0.981	156	0.847	192	0.651	228	0.569	264	0.633	300	0.631	336	0.573
13	0.663	49	0.864	85	0.984	121	0.979	157	0.842	193	0.646	229	0.570	265	0.634	301	0.629	337	0.572
14	0.668	50	0.869	86	0.986	122	0.977	158	0.836	194	0.641	230	0.571	266	0.636	302	0.628	338	0.572
15	0.673	51	0.874	87	0.988	123	0.975	159	0.831	195	0.637	231	0.572	267	0.637	303	0.626	339	0.571
16	0.678	52	0.879	88	0.990	124	0.972	160	0.826	196	0.632	232	0.573	268	0.638	304	0.625	340	0.570
17	0.683	53	0.883	89	0.991	125	0.970	161	0.820	197	0.628	233	0.574	269	0.639	305	0.623	341	0.570
18	0.688	54	0.888	90	0.993	126	0.967	162	0.815	198	0.624	234	0.575	270	0.640	306	0.621	342	0.570
19	0.694	55	0.893	91	0.994	127	0.964	163	0.810	199	0.619	235	0.577	271	0.641	307	0.619	343	0.570
20	0.699	56	0.897	92	0.995	128	0.961	164	0.804	200	0.615	236	0.578	272	0.642	308	0.618	344	0.570
21	0.705	57	0.902	93	0.996	129	0.958	165	0.799	201	0.612	237	0.580	273	0.643	309	0.616	345	0.571
22	0.711	58	0.906	94	0.997	130	0.955	166	0.793	202	0.608	238	0.582	274	0.643	310	0.613	346	0.572
23	0.716	59	0.910	95	0.998	131	0.952	167	0.787	203	0.604	239	0.584	275	0.644	311	0.611	347	0.573
24	0.722	60	0.914	96	0.999	132	0.949	168	0.782	204	0.601	240	0.586	276	0.644	312	0.609	348	0.575
25	0.728	61	0.919	97	0.999	133	0.946	169	0.776	205	0.597	241	0.588	277	0.645	313	0.607	349	0.577
26	0.734	62	0.923	98	0.999	134	0.942	170	0.771	206	0.594	242	0.590	278	0.645	314	0.605	350	0.579
27	0.740	63	0.927	99	1.000	135	0.939	171	0.765	207	0.591	243	0.592	279	0.645	315	0.602	351	0.581
28	0.747	64	0.930	100	1.000	136	0.935	172	0.759	208	0.589	244	0.594	280	0.645	316	0.600	352	0.584
29	0.753	65	0.934	101	1.000	137	0.932	173	0.754	209	0.586	245	0.596	281	0.645	317	0.598	353	0.587
30	0.759	66	0.938	102	0.999	138	0.928	174	0.748	210	0.583	246	0.598	282	0.645	318	0.596	354	0.590
31	0.765	67	0.941	103	0.999	139	0.924	175	0.742	211	0.581	247	0.600	283	0.645	319	0.594	355	0.593
32	0.771	68	0.944	104	0.999	140	0.920	176	0.737	212	0.579	248	0.603	284	0.645	320	0.592	356	0.596
33	0.777	69	0.948	105	0.998	141	0.916	177	0.731	213	0.577	249	0.605	285	0.644	321	0.590	357	0.600
34	0.783	70	0.951	106	0.998	142	0.912	178	0.726	214	0.575	250	0.607	286	0.644	322	0.589	358	0.603
35	0.789	71	0.954	107	0.998	143	0.908	179	0.720	215	0.574	251	0.609	287	0.643	323	0.587	359	0.607

**Figure 1**  
**Antenna Azimuthal Pattern**  
**WTGB-LD Jasper, FL**  
**Facility ID 186186**  
**Ch. 34 2.5 kW Directional**  
 prepared for  
**Gray Television Licensee, LLC**

February, 2024





**Table 1 WTGB-LD TVStudy Analysis of Proposal**  
(page 1 of 2)



tvstudy v2.2.5 (4uoc83)  
Database: localhost, Study: WTGB-LD\_1056576, Model: Longley-Rice  
Start: 2024.02.08 13:22:18

Study created: 2024.02.08 13:22:17

Study build station data: LMS TV 2024-02-08

Proposal: WTGB-LD D34 LD LIC JASPER, FL  
File number: WTGB-LD\_1056576  
Facility ID: 186186  
Station data: User record  
Record ID: 272  
Country: U.S.

Build options:  
Protect pre-transition records not on baseline channel

Search options:  
Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WWRJ-LD	N27-	TX	LIC	JACKSONVILLE, FL	BLTTL20140115AAF	100.0 km
No	WXCK-LD	D33	LD	LIC	CHIEFLAND, FL	BLANK0000151345	43.7
No	WXCK-LD	N33	TX	LIC	CHIEFLAND, FL	BLTTL19960415IC	43.7
No	WUJF-LD	D33	LD	LIC	JACKSONVILLE, FL	BLANK0000164521	106.7
No	WTLV	D33	DT	APP	JACKSONVILLE, FL	BLANK0000235765	107.4
No	WOFL	D33	DT	LIC	ORLANDO, FL	BLANK0000216446	187.5
No	WNXG-LD	D33	LD	LIC	TALLAHASSEE, FL	BLANK0000129630	187.5
No	WGCT-LD	D33	LD	LIC	Tampa, FL	BLANK0000059159	213.4
No	WTSG-LD	D33	LD	LIC	Tifton, GA	BLANK0000202617	218.5
No	W33EV-D	D33	LD	LIC	VALDOSTA, GA	BLANK0000194524	146.3
No	W33EV-D	D33	LD	CP	VALDOSTA, GA	BLANK0000217792	160.4
No	WFTX-TV	D34	DT	LIC	CAPE CORAL, FL	BLANK0000117402	336.2
No	WBXJ-CD	D34	DC	LIC	JACKSONVILLE, ETC., FL	BLANK0000108581	106.7
No	WUCF-TV	D34	DT	LIC	ORLANDO, FL	BLANK0000150045	187.1
No	W34FF-D	D34-	LD	LIC	PANAMA CITY, FL	BLANK0000179306	313.7
No	W34FF-D	D34-	LD	CP	PANAMA CITY, FL	BLANK0000234035	290.5
No	WDNP-LD	D34	LD	LIC	ST. PETERSBURG, FL	BLANK0000123622	203.0
No	WDNP-LD	D34	LD	CP	ST. PETERSBURG, FL	BLANK0000222214	203.0
No	WHDT	D34	DT	LIC	STUART, FL	BLANK000085738	416.9
No	WXVK-LD	D34z	LD	LIC	Columbus, GA	BLANK0000115071	366.3
No	WXVK-LD	D34z	LD	CP	Columbus, GA	BLANK0000217326	407.6
No	WXVK-LD	D34z	LD	LIC	Columbus, GA	BLANK0000232628	407.6
No	WSST-TV	D34	DT	LIC	CORDELE, GA	BLANK0000064103	268.3
No	W34FX-D	D34	LD	LIC	MONTROSE, GA	BLANK0000194505	298.6
No	WGWG	D34	DT	LIC	CHARLESTON, SC	BLANK0000199719	441.0
No	W35DH-D	D35	LD	LIC	GREENVILLE, FL	BLANK0000178364	171.9
No	W35EC-D	D35	LD	LIC	LAKE CITY, FL	BLANK0000233644	58.1
No	WRCZ-LD	D35	LD	LIC	OCALA, FL	BLANK0000013902	106.7
No	WFTV	D35	DT	LIC	ORLANDO, FL	BLANK0000149068	192.4
No	WTAM-LD	D35	LD	LIC	TAMPA, FL	BLANK0000106115	216.5
No	WSCG	D35	DT	LIC	BAXLEY, GA	BLCDT20071120AJC	277.3
No	WBVJ-CD	D35+	DC	LIC	VALDOSTA, GA	BLANK0000004708	154.8
No	WBVJ-CD	D35+	DC	CP	VALDOSTA, GA	BLANK0000035757	154.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D34  
Mask: Full Service  
Latitude: 29 45 24.30 N (NAD83)  
Longitude: 82 29 46.00 W  
Height AMSL: 76.2 m  
HAAT: 0.0 m  
Peak ERP: 2.50 kW  
Antenna: Dielectric-DLP-8B (ID 1010939) 100.0 deg  
Elev Pattn: Generic

**Table 1 WTGB-LD TVStudy Analysis of Proposal**  
(page 2 of 2)



Elec Tilt: 1.00

50.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.930 kW	34.0 m	17.7 km
45.0	1.78	36.6	21.5
90.0	2.47	27.9	21.3
135.0	2.20	31.0	21.0
180.0	1.27	47.8	22.9
225.0	0.812	50.2	21.2
270.0	1.02	50.5	22.4
315.0	0.908	51.2	22.0

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 41 m

Distance to Canadian border: 1324.9 km

Distance to Mexican border: 1477.5 km

Conditions at FCC monitoring station: Vero Beach FL  
Bearing: 142.3 degrees Distance: 300.1 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 305.3 degrees Distance: 2359.7 km

Study cell size: 1.00 km

Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to proposal scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTGB-LD	D34	LD	LIC	JASPER, FL	WTGB-LD_1056576	
Undesireds:	WXCK-LD	D33	LD	LIC	CHIEFLAND, FL	BLANK0000151345	43.7 km
	W34FF-D	D34-	LD	LIC	PANAMA CITY, FL	BLANK0000179306	313.7
	WDNP-LD	D34	LD	LIC	ST. PETERSBURG, FL	BLANK0000123622	203.0
	Service area				Terrain-limited	IX-free	Percent IX
1433.2	214,752	1433.2	214,752	1433.2	214,752	0.00	0.00

**Channel and Facility Information**

Section	Question	Response
Facility ID	186186	
State	Florida	
City	JASPER	
LPD Channel	34	

Section	Question	Response
Antenna Location Data	Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?
		Yes
Coordinates (NAD83)	ASR Number	1056576
	Latitude	29° 45' 24.3" N+
	Longitude	082° 29' 46.0" W-
	Structure Type	GTOWER-Guyed Structure Used for Communication Purposes
	Overall Structure Height	98.1 meters
	Support Structure Height	91.4 meters
Antenna Data	Ground Elevation (AMSL)	45.7 meters
	Height of Radiation Center Above Ground Level	30.5 meters
	Height of Radiation Center Above Mean Sea Level	76.2 meters
	Effective Radiated Power	2.5 kW

Antenna Technical Data	Section	Question	Response
	Antenna Type	Antenna Type	Directional Custom
		Do you have an Antenna ID?	Yes
		Antenna ID	1010939
	Antenna Manufacturer and Model	Manufacturer:	Dielectric
		Model	DLP-8B
		Rotation	100 degrees
		Electrical Beam Tilt	1.0
		Mechanical Beam Tilt	Not Applicable
		toward azimuth	
		Polarization	Horizontal
	Elevation Radiation Pattern	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	No
		Uploaded file for elevation antenna (or radiation) pattern data	
		Out-of-Channel Emission Mask:	Full Service

#### Directional Antenna Relative Field Values (Pre-rotated Pattern)

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	1.000	90	0.661	180	0.645	270	0.650
10	0.996	100	0.615	190	0.641	280	0.699
20	0.981	110	0.583	200	0.631	290	0.759
30	0.955	120	0.569	210	0.613	300	0.817
40	0.920	130	0.571	220	0.592	310	0.869
50	0.876	140	0.586	230	0.579	320	0.914
60	0.826	150	0.607	240	0.570	330	0.951
70	0.771	160	0.627	250	0.579	340	0.975
80	0.714	170	0.640	260	0.610	350	0.993

#### Additional Azimuths

Degree	V <sub>A</sub>