

TECHNICAL SUMMARY
SECOND FILING WINDOW
APPLICATION FOR MODIFICATION OF CONSTRUCTION PERMIT
TV STATION WIFS
JANESVILLE, WISCONSIN
CHANNEL 21 170 KW (DA) 470 m

1. The instant application is a second filing window application for WIFS on channel 21 at Janesville, Wisconsin. It is proposed to change the transmitter site and modify facilities. There will be no change in the overall structure height of the existing tower (ASRN 1033919).

2. As demonstrated in the *TVStudy* analysis exhibit, the proposal complies with the FCC's interference protection requirements based on a cell size of 2.0 km and profile resolution of 1.0 points/km.

3. 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 426 meters above ground level. The total DTV ERP is 212.5 kW (170 kW-horizontal, 42.5 kW-vertical). A conservative vertical plane relative field value of 0.1 is presumed for the antenna's downward radiation (for angles below 60 degrees downward, see attached antenna data). The calculated power density at a point 2 meters above ground level is 0.4 uW/cm^2 which is 0.12% of the FCC's recommended limit of 343.3 uW/cm^2 for channel 21 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.