

TECHNICAL SUMMARY
SECOND FILING WINDOW
APPLICATION FOR CONSTRUCTION PERMIT
TV STATION WXCW
NAPLES, FLORIDA
CHANNEL 32 1000 KW (DA) 393 m

1. The instant application is a second filing window application for WXCW on channel 32 at Naples, Florida. It is proposed to increase the ERP from 900 kW to 1000 kW. There will be no other changes. There will also be no change in the overall structure height of the existing tower (ASRN 1019724).

2. Section 73.622(f)(5) Compliance: It is proposed operate on channel 32 with a directional antenna maximum ERP of 1000 kW and an HAAT of 393 meters. These facilities exceed the nominal maximum facilities specified in Section 73.622(f)(8)(i). However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5). The largest station in the Fort-Myers/Naples, Florida market is WINK-TV on channel 31 (LMS File No. 0000025486) which is authorized to provide noise-limited 41 dBu, f(50,90) service to an area of 32,140 square kilometers whereas the proposed WXCW operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 26,450 square kilometers (see Figure 2 attached). Clarification of the largest station provision is provided in the Report and Order and Further Notice of Proposed Rule Making in MM Docket No. 00-39 at paragraphs 73-74.

3. 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.

4. 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 392 meters above ground level. The total DTV ERP is 1176 kW (1000 kW-horizontal, 176 kW-vertical). A conservative vertical plane relative field value of 0.1 is presumed for the antenna's downward radiation in both the horizontal and vertical planes of polarization (for angles below 60 degrees downward, see attached antenna data). The calculated power density at a

point 2 meters above ground level is 2.6 uW/cm^2 which is 0.7% of the FCC's recommended limit of 387.3 uW/cm^2 for channel 32 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.