



**Kessler and Gehman Associates**  
Consultants • Broadcast • Wireless

**REQUEST FOR  
SPECIAL  
TEMPORARY  
AUTHORITY FOR  
A TV  
TRANSLATOR  
CHANNEL  
DISPLACEMENT  
W45AA-D**

Columbia, MS

**Prepared For:**

Mississippi Authority for  
Educational Television  
3825 Ridgewood Road  
Jackson, MS 39211

**Prepared By:**

Ryan Wilhour  
Consulting Engineering  
Kessler and Gehman Associates  
507 NW 60<sup>th</sup> Street, Suite D  
Gainesville, FL 32607-2055  
352-332-3157 Extension 3  
[ryan@kesslerandgehman.com](mailto:ryan@kesslerandgehman.com)  
[www.kesslerandgehman.com](http://www.kesslerandgehman.com)

**Prepared On:**

June 14, 2018

**TABLE OF CONTENTS**

1.0 BACKGROUND AND STA REQUEST ..... 2  
2.0 RF EXPOSURE ANALYSIS ..... 3  
3.0 CERTIFICATION..... 4  
Appendix A – T-Mobile Certified Letter..... 5  
Appendix B – TVStudy v2.2.3 IX Analysis Summary ..... 11  
Appendix C – RF Exposure Analysis..... 13

## **1.0 BACKGROUND AND STA REQUEST**

This engineering statement was prepared on behalf of Mississippi Authority for Educational Television (“MAET”), licensee of digital TV translator station W45AA-D located to serve Columbia, MS. On March 16, 2018 a 120-day advance notification letter<sup>1</sup> was issued to MAET which informs that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area (“PEA”) # 79 by November 30, 2018 and W45AA-D is likely to cause harmful interference to its operations. As such, the licensed W45AA-D facility must cease operation on or before November 30, 2018.

MAET filed a channel 29 displacement application<sup>2</sup> during the April 10, 2018 through June 1, 2018 post-incentive auction translator channel displacement window. Appendix B demonstrates that the pending application is not mutually exclusive with any pre or post transition full service stations, existing translators, or proposed translator applications filed during the window. The facility is predicted to experience up to 8.34% inbound interference which is permissible. As demonstrated, the pending application is technically grantable.

The purpose of the instant STA is to request operation of W45AA using the technical parameters filed in FCC File No.: 0000053265. It is believed that there is a chance the Commission may not issue MAET a construction permit grant before the T-Mobile November 30, 2018 cutoff date which would force W45AA-D to go dark. It is respectfully requested to either immediately grant a construction permit to FCC File No.: 0000053265 making the requested STA moot, or grant the instant STA to allow W45AA to continue providing service to viewers with minimal disruption. Either path will best serve the public interest by allowing W45AA-D to stay on-the-air in lieu of going dark for an unspecified amount of time.

---

<sup>1</sup> Refer to Appendix A

<sup>2</sup> FCC File No.: 0000053265

## 2.0 RF EXPOSURE ANALYSIS

A theoretical analysis has been conducted of the human exposure to radio frequency radiation (“RFR”) using the calculation methodology described in OET Bulletin 65, Edition 97-01. The RFR analysis is conducted pursuant to the following methodology:

Terrain<sup>3</sup> extraction is compiled from the proposed tower site to radial lengths of 0.25 miles in 0.001 mile increments for 360 radials. The power density is calculated for each terrain point at 6 feet above ground level using the elevation and azimuth pattern of the proposed broadcast antenna. The power density calculations are conducted using the lower edge of the proposed channel frequency. To account for ground reflections, a coefficient of 1.6 was included in the calculation.

The resulting cylindrical polar analysis is then summarized into a coordinate plane graph using the following methodology:

Starting from the origin the maximum calculated RFR value is determined among the 360 degree radials for each 0.001 mile increment, the value is then converted into a percentage of the maximum allowable general population or uncontrolled exposure and plotted as a function of perpendicular distance from the tower.

The resulting RFR study illustrated in Appendix C demonstrates that the peak exposure is 0.9% of the most restrictive permissible exposure threshold. Pursuant to OET Bulletin 65 concerning multiple-user transmitter sites only those licensees whose transmitters produce power density levels greater than 5.0% of the exposure limit are considered significant contributors to RFR. Since the proposed operation is within 5% of the most permissible exposure at any location

---

<sup>3</sup> Terrain extraction is based upon a 3 arc second point spacing terrain database.

2 meters above the ground, it is not considered a significant contributor to RFR exposure. Thus, contributions to exposure from other RF sources in the vicinity of the proposed facility were not taken into account. The instant application is compliant with the FCC limits for human exposure to RF radiation and thus is excluded from further environmental processing.

A chain link fence shall encompass the proposed support structure. The applicant will cooperate with any other users of the tower by reducing the power to the antenna or if necessary completely cutting it off in order to protect maintenance workers on the tower.

### **3.0 CERTIFICATION**

I, Ryan Wilhour, am an engineering associate of Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and have been working in the field of radio and television broadcast consulting since 1996. The foregoing statement and the report regarding the engineering work are true and correct to the best of my knowledge.

Ryan Wilhour



Consulting Engineer  
June 14, 2018

## Appendix A – T-Mobile Certified Letter



**VIA CERTIFIED MAIL & EMAIL**

3/16/2018

MISSISSIPPI AUTHORITY FOR EDUCATIONAL TELEVISION  
3825 Ridgewood Rd  
Jackson, MS 39211-6453

RE: Notification of Intent to Begin 600MHz Operations

Dear W45AA-D Licensee/ Facility ID: 43205:

T-Mobile USA, Inc. ("T-Mobile") is notifying you that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area ("PEA") # 79 by 11/30/2018 and your station is likely to cause harmful interference to T-Mobile's operations.

To determine if your station(s) is likely to cause interference, an interference analysis has been performed, as specified by the Federal Communications Commissions' ("FCC") Inter-service Interference procedures<sup>77</sup>, using publicly available information in the FCC's Licensing and Management System ("LMS") for your facility. This analysis predicts field strength at T-Mobile's base station and user equipment locations in the PEA # 79 market from your facility. The FCC has set the thresholds at which the predicted field strength from low power TV and translator stations creates a sufficient interference risk to wireless facilities. T-Mobile has determined that your facility exceeds those thresholds and is an interference risk to its wireless operations.

T-Mobile will commence its operations in the PEA # 79 market on 11/30/2018. This letter provides the 120 days' advance notification required by FCC regulations, 47 CFR §73.3700(g)(4). The FCC regulations also require you to cease operations or eliminate the potential for harmful interference to T-Mobile's wireless facilities in the PEA # 79 market.

The FCC will work with you to attempt find a new television channel outside of the new 600 MHz mobile band that will not interfere with T-Mobile's network. You should review the FCC's Tools Available to LPTV/Translator Station Public Notice (enclosed) released on June 14, 2017 and contact Hossein Hashemzadeh, Melvin Collins, or Barbara Kreisman at the FCC for more information about the options available in your area.<sup>78</sup>

Please email [SpectrumClearing@T-Mobile.com](mailto:SpectrumClearing@T-Mobile.com) once you have determined when you will eliminate the interference. If you would like additional information regarding our findings or if it might be possible to coordinate our operations, please submit a request to Dan Wilson, Sr. Manager, Spectrum Engineering, at [SpectrumClearing@T-Mobile.com](mailto:SpectrumClearing@T-Mobile.com).

Sincerely,  
/s/ Mark Bishop  
Sr. Manager, Spectrum Engineering, T-Mobile USA, Inc.

---

<sup>77</sup> See 30 FCC Red 12049, 12071, para. 49 (2015)

<sup>78</sup> See <https://www.fcc.gov/document/iatf-mb-set-forth-tools-available-lptvtranslator-stations>

T-Mobile USA, Inc. 3617 131<sup>st</sup> Ave SE, Bellevue, Washington 98006



601 Pennsylvania Ave. NW  
North Building, Suite 800  
Washington, DC 20004

July 17, 2017

**Written Ex Parte Communication**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re:** *The Incentive Auction Task Force and Media Bureau Announce Procedures For Low Power Television, Television Translator and Replacement Translator Stations During the Post-Incentive Auction Transition, MB Docket No. 16-306; GN Docket No. 12-268*

Dear Ms. Dortch:

I am writing to inform you of a voluntary commitment that T-Mobile USA, Inc.<sup>1</sup> (“T-Mobile”) is making to compensate certain low power television stations that operate on a secondary basis and are unable to obtain a permanent channel in time to accommodate T-Mobile’s rapid deployment of broadband service in the 600 MHz band. As detailed more fully below, T-Mobile is offering to pay the reasonable costs associated for such stations to move from a temporary channel to a permanent channel. While these stations are required to vacate the 600 MHz band when the broadband provider is ready to initiate service, T-Mobile recognizes that some of these stations may need to move twice, and T-Mobile is willing to go beyond what is required and compensate these stations for the additional move. T-Mobile’s voluntary commitment will significantly ease the burden on these stations and help ensure that their service to the public is not disrupted.

T-Mobile is moving quickly to realize the benefits of the incentive auction that Congress and the FCC envisioned by deploying competitive broadband services throughout the country, particularly in rural America. Broadband stimulates economic growth, creates jobs, and enhances global competitiveness while revamping fields as diverse as education, energy production and agriculture. Indeed, after the 600 MHz auction closed with nearly \$20 billion in winning bids, a bipartisan group of House Energy and Commerce Committee leaders declared the auction a “success” that had “revolutionized the way that our nation makes spectrum

---

<sup>1</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly traded company.

allocation decisions.”<sup>2</sup> Representatives Greg Walden, Frank Pallone, Jr., Marsha Blackburn and Mike Doyle added that they expected all stakeholders to continue to “work together to free up our airwaves and usher in the future of wireless broadband.”<sup>3</sup>

T-Mobile began laying the foundation for accelerated broadband deployment well over a year ago by investing in the people and equipment necessary to clear the 600 MHz band within the 39 months adopted by the FCC to allow deployment of wireless advanced broadband services throughout the country. T-Mobile has spent considerable time and money to better understand broadcasters’ needs and to accelerate broadcasters’ post-auction transition to new facilities.<sup>4</sup> Our efforts include investing in broadcast equipment manufacturing capacity and installation resources and providing relocation assistance to public television stations.<sup>5</sup> To further accelerate the rapid deployment of wireless broadband throughout America, T-Mobile today announces that it will assist in paying the duplicative costs that low-power television and TV translator licensees might reasonably incur as a result of T-Mobile’s rapid 600 MHz broadband deployment.

T-Mobile expects to have at least ten megahertz of 600 MHz spectrum clear and ready for deployment across an area covering more than one million square miles by the end of 2017.<sup>6</sup> T-Mobile’s rapid rollout of its newly won 600 MHz licenses will include hundreds of thousands of square miles of rural and remote portions of the country whose residents the traditional wireless carriers have all too often overlooked and underserved. Most of the spectrum T-Mobile will use to support its massive investment in broadband infrastructure is unencumbered and will support immediate broadband deployment. But in some areas, legacy low-power television and TV translator stations operate on a secondary, non-interference basis.<sup>7</sup>

---

<sup>2</sup> Press Release, Energy and Commerce Committee, Bipartisan Committee Leaders Comment on Incentive Auction (Feb. 15, 2017), <http://bit.ly/2lkHrsT>.

<sup>3</sup> *Id.*

<sup>4</sup> See *On Time and On Budget: Completing the 600 MHz Incentive Auction Repacking Process Within the FCC’s 39-Month Relocation Deadline and the Budget Established by Congress*, Report, T-Mobile, BTTI, Hammett & Edison (filed as an attachment to the Ex Parte Notice of T-Mobile to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, AU Docket No. 14-252 (filed Feb. 17, 2016)), <http://bit.ly/2nAvVeJ>; *On Time and On Budget: A Response to Digital Tech Consulting, Inc.’s March 2016 Presentation on the State of Broadcaster Relocation Resources*, Report, T-Mobile, BTTI, Hammett & Edison (filed as an attachment to the Ex Parte Notice of T-Mobile to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, AU Docket No. 14-252 (filed May 11, 2016)), <http://bit.ly/2uP191Q>.

<sup>5</sup> See Press Release, PBS, Public Television Joins Forces With T-Mobile to Preserve Access to Public Television for Millions in Rural America (June 29, 2017), <http://to.pbs.org/2tteX4V>; Press Release, Electronics Research, Inc., ERI to accelerate completion of TV channel repack post FCC’s Broadcast Incentive Auction (2016), <http://bit.ly/2vamDpD>; *ERI and T-Mobile Deal for Crews and Facilities Puts 39-month Repack Deadline Closer to Being Met*, WIRELESS ESTIMATOR (April 21, 2016), <http://bit.ly/2suBJED>.

<sup>6</sup> See, e.g., *T-Mobile Is Kicking Off 600 MHz Testing This Summer*, WIRELESS WEEK, <http://bit.ly/2s9j0RU> (June 15, 2017).

<sup>7</sup> Low-power television and television translator stations operating in the 600 MHz band are collectively referred to here as “secondary stations” or “second ary licensees.”

These secondary stations enjoy fewer protections than full-power and Class A licensees. Secondary licensees were ineligible to participate in the incentive auction, ineligible for relocation funds and not entitled to protection against harmful interference under the FCC's rules.<sup>8</sup> As a result, secondary stations must terminate operations in the 600 MHz after receiving notice from the new licensees in the band.<sup>9</sup> Consistent with these notice provisions, T-Mobile has already notified some secondary 600 MHz LPTV and television translator licensees of T-Mobile's deployment plans and the secondary licensees' obligation to avoid causing interference to T-Mobile's mobile broadband operations.<sup>10</sup>

T-Mobile recognizes the valuable services that these secondary licensees can provide to the public, and the FCC has adopted numerous measures to support legacy secondary operations, including a process by which secondary licensees displaced by 600 MHz broadband deployments can seek new licenses in the remaining broadcast spectrum below the 600 MHz band.<sup>11</sup> Under the FCC's rules, displaced secondary stations will have an opportunity to file applications to access another channel in the repacked TV band or to enter channel-sharing arrangements during a so-called Special Displacement Window the Media Bureau will open no sooner than November 13, 2017.<sup>12</sup>

In some areas, however, the Special Displacement Window for secondary licensees could occur after T-Mobile's planned 600 MHz wireless broadband deployment. The potential for T-Mobile's broadband deployment to outpace the anticipated timing of the FCC's displacement window could require some secondary licensees to relocate to temporary channels that differ from the permanent alternative channels the secondary operators may receive following the assignment of frequencies available during the Special Displacement Window. As a result, some secondary operators could face two sets of relocation expenses – one set of relocation expenses prior to the opening of the Special Displacement Window and a second set of relocation

---

<sup>8</sup> See *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567 ¶¶ 236-241 (2014), <http://bit.ly/1DL0pdy> (“*Incentive Auction Order*”), *aff'd*, *Nat'l Assoc. of Broadcasters v. FCC*, 789 F.3d 165 (D.C. Cir. 2015).

<sup>9</sup> See *id.* ¶ 668.

<sup>10</sup> See Letter from Michael A. Lewis, DLA Piper, LLP (US) to Marlene H. Dortch, Docket Nos. 16-306, 12-268 (June 1, 2017), available at <http://bit.ly/2sFf0qd>.

<sup>11</sup> See *Incentive Auction Order* ¶ 657.

<sup>12</sup> The FCC has said it intends to announce an opportunity for secondary licensees to apply for new channels after the primary full power and Class A television licensees have had an opportunity to apply for their preferred channel locations. See *Incentive Auction Task Force and Media Bureau Announce Procedures for the Post-Incentive Auction Broadcast Transition*, Public Notice, 32 FCC Rcd 858 ¶ 15 (MB 2017); *Incentive Auction Order* ¶¶ 552-553. To allow sufficient time for primary licensees to select their preferred locations, the so-called Special Displacement Window for LPTV licensees cannot occur until “approximately seven to eight months after release of the Closing and Channel Reassignment Public Notice on April 13, 2017,” or sometime between November and December of 2017. See *The Incentive Auction Task Force and Media Bureau Announce Procedures for Low Power Television, Television Translator and Replacement Translator Stations During the Post-Incentive Auction Transition*, Public Notice, 32 FCC Rcd 3860 ¶ 15 (MB 2017), <http://bit.ly/2sUWKgS>.

expenses after processing requests for alternative channels received during the Special Displacement Window.

This type of double-payment risk, while fully consistent with the Spectrum Act of 2012, has generated concern among some secondary licensees.<sup>13</sup> T-Mobile has heard those concerns and wants to address them because even though the Spectrum Act of 2012 requires secondary licensees to pay their own relocation costs, T-Mobile appreciates that its rapid deployment may create an additional burden on these secondary operators if they need to relocate more than once.

T-Mobile therefore will reimburse eligible secondary licensees<sup>14</sup> for the costs that they reasonably incur to comply with the permanent channel assignment they may receive under the Special Displacement Window to the extent those channel assignments differ from the channel assignment these licensees may build following displacement from the 600 MHz band due to T-Mobile's rapid broadband deployment.<sup>15</sup>

---

<sup>13</sup> See Reply Comments of Free Access & Broadcast Telemedia, LLC, GN Docket No. 12-268, MB Docket No. 16-306 (filed Nov. 15, 2016), <http://fcc.us/2u9UPoQ> (“[The Commission] failed to size the additional cost imposed on LPTV businesses of having to move two or more times without reimbursement that other licensees are given”); Comments of National Translator Association, GN Docket No. 12-268, MB Docket No. 16-306 (filed Oct. 31, 2016), <http://bit.ly/2t5Hbhm>; see also Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §§ 6402 (codified at 47 U.S.C. § 309(j)(8)(G)), 6403 (codified at 47 U.S.C. § 1452), 126 Stat. 156 (2012).

<sup>14</sup> Only translator and LPTV licensees that must terminate existing operations due to T-Mobile's 600 MHz band deployments that occur prior to the Special Displacement Window are eligible to participate in the reimbursement program administered by T-Mobile (Supplemental Reimbursement Program). T-Mobile will not reimburse second-move expenses for secondary licensees that are not operational or are not validly licensed at the time they receive notice of T-Mobile's intent to deploy, nor will T-Mobile reimburse second-move expenses for secondary licensees that discontinue operations on their own initiative or due to a third-party's 600 MHz band deployment. The Supplemental Reimbursement Program is intended to allow eligible secondary licensees to purchase and install facilities that are comparable to those in operation at the time of receiving notice of T-Mobile's intent to deploy; therefore, the Supplemental Reimbursement Program excludes costs that may be necessary to resolve mutual exclusivity among licensees as well as other ancillary or consequential expenses that might be associated with relocation. This reimbursement provision is also based on the current clearing process and timeline and may not be available if the timeline or process is significantly altered or delayed.

<sup>15</sup> For full-power and Class A television licensees, for example, the Spectrum Act of 2012 requires that the FCC “reimburse costs reasonably incurred by” reassigned to new channels and the FCC has established numerous guidelines on what types of costs are, in fact, “reasonably incurred.” See 47 U.S.C. § 1452(b)(4)(A)(i) (directing the FCC to pay from the relocation fund costs “reasonably incurred” by certain eligible broadcast television licensees); see also *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Declaratory Ruling, 31 FCC Rcd 4246 (MB 2016), <http://bit.ly/2tFSVcy> (“*Reimbursement Declaratory Ruling*”); *Incentive Auction Task Force and Media Bureau Finalize Catalog of Reimbursement Expenses*, Public Notice, 32 FCC Rcd 1199 (MB 2017), <http://bit.ly/2tFxbgX>. In administering the Supplemental Reimbursement Program, T-Mobile will generally follow the procedures and reimbursement guidelines established by the FCC. For example, the FCC has developed a Catalog of Eligible Expenses, which identifies the kinds and amounts of expenses that will be reimbursed to full-power and Class A television licensees, who are required to relocate to a new channel. See *Catalog of Potential Expenses and Estimated Costs*, FCC (2017 Update), <http://bit.ly/2sWyFGn>. T-Mobile will use the Catalog of Eligible Expenses as a general guide for cost reimbursement of eligible secondary stations. In addition, the FCC has held that “[a]ll claimed expenses are subject to review by the Media Bureau

July 17, 2017  
Page 5

T-Mobile's voluntary commitment to reimburse secondary 600 MHz licensees for the reasonable cost of any second move that would be required due to T-Mobile's rapid broadband deployment will ensure that no secondary licensee in the 600 MHz band has to pay twice to relocate operations following the 600 MHz incentive auction. T-Mobile's voluntarily commitment will help minimize the overall effect on secondary stations in the band while continuing to permit rapid deployment of broadband service throughout the nation.

Secondary licensees eligible for T-Mobile's Supplemental Reimbursement Program will have received notice of T-Mobile's intent to deploy in their area; they should contact the representative listed in their notice letter for additional information about this program. Should the Commission have questions concerning this letter or T-Mobile's voluntary commitment to secondary licensees in the 600 MHz band, please feel free to contact me.

Sincerely,

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy  
T-MOBILE USA, INC.  
(202) 654-5900

---

to ensure that each expense is reasonable." *Incentive Auction Order* ¶ 622. When reimbursing LPTV licensees for the cost of duplicative relocation expenses, T-Mobile will likewise reserve the right to ensure the reasonableness of each expense in the context of the planned relocation, including reviewing the costs associated with both the first and second moves to ensure that costs are attributed in a reasonable way. Once an LPTV operator submits a valid request for reimbursement, T-Mobile will reimburse the claim within a reasonable amount of time of receiving it, consistent with the duration of time necessary for the reimbursement of final expenses for full-power and Class A television licensees. Finally, the Commission's reimbursement program includes a sunset date: no expenses will be reimbursed after the close of the three-year relocation period. *See Reimbursement Declaratory Ruling* ¶ 2. In reimbursing LPTV and TV translator operators for the duplicative relocation expenses of eligible secondary licensees, T-Mobile will follow a similar policy: all reimbursement claims will have had to have been submitted and processed during the three-year relocation period.

## Appendix B – TVStudy v2.2.3 IX Analysis Summary

Study created: 2018.06.14 07:58:25

Study build station data: LMS TV 2018-06-12

Proposal: W45AA-D D29 LD APP \*P COLUMBIA, MS  
 File number: BLANK0000053265  
 Facility ID: 43205  
 Station data: LMS TV 2018-06-12  
 Record ID: 25076ff362bbf2a10162f84235ee71e4  
 Country: U.S.

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

Search options:  
 Non-U.S. records included  
 Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KATC	D28	DT	LIC	LAFAYETTE, LA	BLCDT20071109AAV	257.0 km
No	KNLD-LD	D28	LD	LIC	NEW ORLEANS, LA	BLDRTL20100312ABM	150.8
No	KNLD-LD	D28	LD	CP	NEW ORLEANS, LA	BDFCDTL20100201ADQ	150.8
Yes	WMAW-TV	D28	DT	CP	MERIDIAN, MS	BLANK0000026608	119.5
No	WBRC	D29	DT	CP	BIRMINGHAM, AL	BLANK0000034162	376.8
No	WBIH	D29	DT	LIC	SELMA, AL	BLCDT20090619AAY	315.7
No	W29DT-D	D29	LD	LIC	TUSCALOOSA, AL	BLDRTL20140304ADJ	271.4
No	W29DT-D	D29	LD	CP	TUSCALOOSA, AL	BPDTL20140808ABJ	271.5
No	NEW	D29	LD	APP	DE FUNIACK SPRINGS, FL	BNPDTL20090825AUE	342.2
No	WFBD	D29	DT	CP	DESTIN, FL	BLANK0000027353	297.6
No	WEDS-LD	D29	LD	LIC	FORT WALTON, FL	BLANK0000013953	234.2
No	WEDS-LD	D29	LD	CP	FORT WALTON, FL	BLANK0000036573	212.7
No	K47NC-D	D29	LD	APP	LAFAYETTE, LA	BLANK0000051599	199.0
No	K45IM-D	D29	LD	APP	MONROE, LA	BLANK0000054924	263.0
Yes	WVUE-DT	D29	DT	LIC	NEW ORLEANS, LA	BLCDT20110502AEC	146.4
No	W29EB-D	D29	LD	CP	SULPHUR, LA	BNPDTL20100407ABJ	365.5
No	WKNO	D29	DT	LIC	MEMPHIS, TN	BLEDT20060627ABE	432.1
No	KITV-TV	D29	DT	CP	BEAUMONT, TX	BLANK0000028179	407.7
No	WEIQ	D30	DT	CP	MOBILE, AL	BLANK0000027848	196.9
No	WLFT-CD	D30	DC	LIC	BATON ROUGE, LA	BLDTA20110912ACB	152.7
No	KFOL-CD	D30	DC	LIC	HOUMA, LA	BLDTA20100111AGW	202.2
No	KXKW-LD	D30	LD	APP	LAFAYETTE, LA	BLANK0000053054	227.9
Yes	WLBT	D30	DT	LIC	JACKSON, MS	BLCDT20100119AEE	117.4
No	W06DD	N30z	TX	LIC	NATCHEZ, MS	BLTTL20060103ABY	151.7
No	W36AC	N36z	TX	LIC	MCCOMB, MS	BLTTL19890613II	59.0

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D29  
 Mask: Full Service  
 Latitude: 31 16 1.20 N (NAD83)  
 Longitude: 89 49 57.30 W  
 Height AMSL: 139.3 m  
 HAAT: 0.0 m  
 Peak ERP: 15.0 kW  
 Antenna: Omnidirectional  
 Elev Pattn: Generic  
 Elec Tilt: 1.00

50.2 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	60.7 m	37.9 km
45.0	15.0	36.6	31.9
90.0	15.0	58.6	37.6
135.0	15.0	79.8	40.9
180.0	15.0	100.3	43.6
225.0	15.0	53.6	36.6
270.0	15.0	43.8	34.0
315.0	15.0	93.1	42.8

Database HAAT does not agree with computed HAAT  
 Database HAAT: 0 m Computed HAAT: 66 m

Distance to Canadian border: 1320.7 km

Distance to Mexican border: 907.7 km

Conditions at FCC monitoring station: Powder Springs GA  
 Bearing: 57.6 degrees Distance: 558.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
 Bearing: 309.6 degrees Distance: 1698.5 km

**W45AA-D – Engineering STA**  
*Columbia, MS*

---

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%

---- Below is IX received by proposal BLANK0000053265 ----

Proposal receives 8.34% interference from scenario 1  
No IX check failures found.

### Appendix C – RF Exposure Analysis

