

ENGINEERING STATEMENT

This application proposes to modify 000054804, a construction permit for WHTV-LD (FID 127812) on channel 31 licensed to the Applicant herein.

The Applicant proposes to modify the antenna make and model which has identical pattern as the existing authorization antenna. No other changes are proposed. The proposed facility is less than 30 miles distance from the existing licensed facility. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility. The proposed facility was studied using TVStudy v2.2.5 using the following parameters and the results are as follow:

- Study cell size: 1.00 km
- Profile point spacing: 0.10 km

It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

Digital TV and Class A Station Protection

The proposed facility of is predicted to cause interference to the existing licensed facility of W31EF-D (FID 128222) and W32EI-D (FID 130470). These stations are licensed to the Applicant herein and the Applicant hereby agrees to accept interference.

Except as referenced above, 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 licenses and construction permits (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 Effect

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. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.