

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of EQUITY BROADCASTING CORPORATION, permittee of Class A Low Power Television Station W27CM, Channel 27 in Birmingham, Alabama, in support of its Application for Construction Permit to specify operation on Channel 24 from the authorized site. This displacement application results from the Commission's authorization of WTTO-DT, Channel 28 in Homewood, Alabama. When the original W27CM application was filed, the WTTO-DT allotment specified an effective radiated power of 280 kw. Subsequently, the Commission has granted WTTO-DT operation with 1000 kw. This causes significant interference to W27CM, thereby placing this Class A station in another displacement situation.

It is proposed to mount a standard 4-bay directional antenna at the 176-meter level of an existing 127-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. Operating parameters for the proposed facility are provided in Exhibit C.

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility meets these requirements except in two instances: W24CJ, Channel 24, Jasper, Alabama, and WHIQ-DT, Channel 24, Huntsville, Alabama.

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W24CJ in Jasper can be excluded from consideration due to the fact that the authorization for that facility has expired. Exhibit E is a copy of Page 1 of the W24CJ authorization, BPTT-19930331BT. As shown, the expiration date of the Construction Permit is April 4, 2001. Review of the FCC's CDBS database reveals that the permittee has not filed for tolling of the expiration date. Therefore, the W24CJ permit must be cancelled.

We then conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69* with respect to WHIQ-DT's authorized facility. The software utilizes a 1-square kilometer cell size and does not count areas inside the DTV station's protected contour where interference from another source (other than proposed W27CM) already exists. The results of this study are provided in Exhibit F. It concludes that the facility proposed herein meets the FCC's *de minimis* interference standard with respect to WHIQ-DT.

As a result, a waiver of Section 73.6013 of the Commission's Rules with respect to interference to WHIQ-DT is requested, if necessary, and believed to be justified based on the aforementioned Longley-Rice study.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1035174 to this tower.

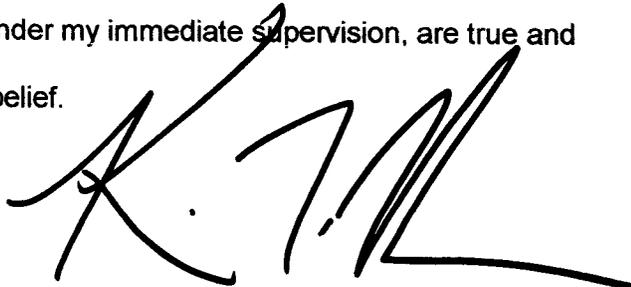
Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Birmingham facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe

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effective radiated power of 3.5 kw, an effective antenna height of 176 meters above ground, and assuming a vertical relative field value of 20 percent at the steeper elevation angles for the proposed antenna, maximum power density two meters above ground of 0.000077 mw/cm² is calculated to occur near the base of the tower. Since this is only 0.02 percent of the 0.35 mw/cm² reference for uncontrolled environments (areas with public access) for a facility operating on Channel 24 (530-536 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a stylized, sweeping flourish at the end.

KEVIN T. FISHER

December 27, 2001

POPULATION (2000 CENSUS)
GRADE A (74 DBU) : 460,812
GRADE B (64 DBU) : 688,051

Smith and Fisher

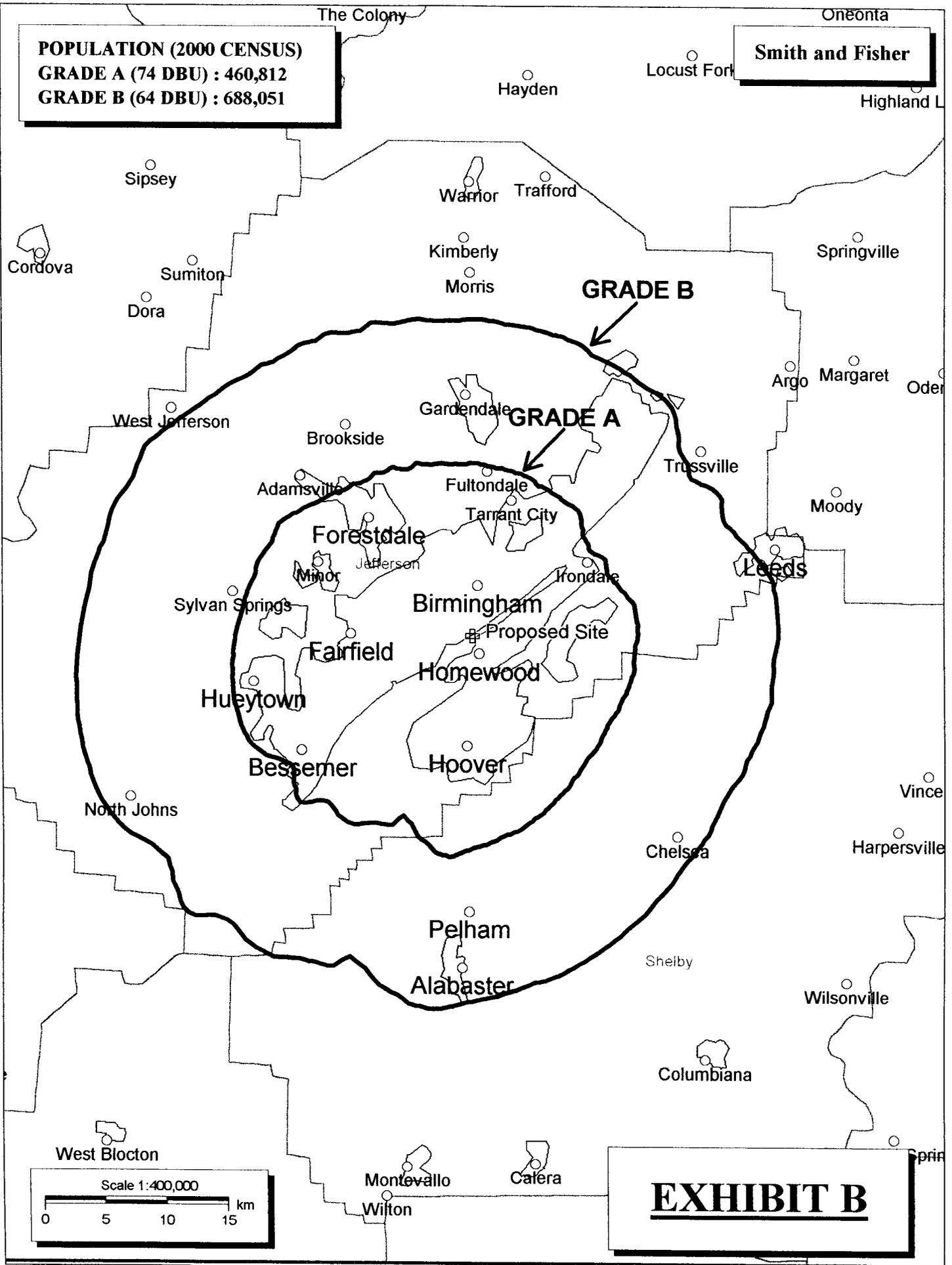


EXHIBIT B

EXHIBIT C

PROPOSED OPERATING PARAMETERS

LOW POWER TELEVISION STATION W27CM
CHANNEL 24 - BIRMINGHAM, ALABAMA

Transmitter Power Output:	1.0 kw
Transmission Line Efficiency:	45.6%
Antenna Power Gain – Toward Horizon:	7.6
Antenna Power Gain – Main Lobe:	7.6
Effective Radiated Power – Toward Horizon:	3.5 kw
Effective Radiated Power – Main Lobe:	3.5 kw
Transmitter Make and Model:	Type-accepted
Rated Output	1.0 kw
Transmission Line Make and Model:	Andrew LDF7-50A
Size and Type	1-5/8" foam heliax
Length	600 feet
Antenna Make and Model:	SWR SWLP40I
Orientation	240° T
Beam Tilt	0.5 degrees
Effective Height Above Ground:	176 meters
Effective Height Above Mean Sea Level:	465 meters

Smith and Fisher

PROPOSED LPTV
CHANNEL 24 - BIRMINGHAM AL

REFERENCE 33 29 04 N LPTV Pwr = 3.5 kW, HAMS L COR= 465 M DISPLAY DATES
86 48 25 W DATA 12-20-01
SEARCH 12-20-01
..... Channel 24+, 530 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin
WHIQ-D*CPM	24	Huntsville	AL 141.27	10.3	> 267.11	-125.84
W24CJ* CP	24+	Jasper	AL 55.20	269.7	> 162.76	-107.56
W24CB* CPM	24Z	Sylacauga	AL 88.09	79.7	> 085.74	2.35
W24CB* LI	24Z	Sylacauga	AL 88.09	79.7	> 082.85	5.24
WLDM* CPM	23-	Tuscaloosa	AL 84.02	235.5	> 077.00	7.02
W23AK* LI	23N	Jasper	AL 45.09	321.4	> 010.35	34.74
NEW AP	24+	Tupelo	MS 199.28	298.5	> 164.08	35.20
W24CK CP	24Z	Selma	AL 124.74	182.9	> 089.23	35.51
WAAYTV CPM	31+	Huntsville	AL 141.18	10.2	> 100.00	41.18
WAAYTV LI	31+	Huntsville	AL 141.26	10.2	> 100.00	41.26
NEW* AP	24-	Hamilton	AL 125.53	302.5	> 075.28	50.25
WHIQ LI	25+	Huntsville	AL 141.30	10.3	> 089.92	51.38
WGXA LI	24+	Macon	GA 313.84	104.2	> 261.74	52.10
WJMY-L AP	25+	Demopolis	AL 101.01	228.3	> 045.59	55.42
WMDN LI	24-	Meridian	MS 218.00	234.3	> 162.07	55.93
WMDN CP	24-	Meridian	MS 219.16	234.0	> 161.45	57.71
WNEG-D CP	24	Toccoa	GA 341.28	67.4	> 279.32	61.96
NEW* AP	24+	Tupelo	MS 199.28	298.5	> 133.64	65.64
WNEGTV ALD	24	TOCCOA	GA 341.28	67.4	> 268.11	73.17

* Actual radials antenna height and directional patterns used (if any)



United States of America
FEDERAL COMMUNICATIONS COMMISSION
TELEVISION BROADCAST STATION
CONSTRUCTION PERMIT

Authorizing Official:

Official Mailing Address:

WTTO, INC.
C/O ABRY COMMUNICATIONS
18 NEWBURY STREET
BOSTON MA 02116

Hossein Hashemzadeh
Supervisory Engineer, LPTV Branch
Video Services Division
Mass Media Bureau

Facility Id: 74142
Call Sign: W24CJ
Permit File Number: BPTT-19930331BT

Grant Date: April 07, 1998
This permit expires 3:00 a.m.
local time, April 04, 2001.

This authorization re-issued to reflect a change in expiration date.

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

Commission rules which became effective on February 16, 1999, have a bearing on this construction permit. See Report & Order, Streamlining of Mass Media Applications, MM Docket No. 98-43, 13 FCC RCD 23056, Para. 77-90 (November 25, 1998); 63 Fed. Reg. 70039 (December 18, 1998). Pursuant to these rules, this construction permit will be subject to automatic forfeiture unless construction is complete and an application for license to cover is filed prior to expiration. See Section 73.3598.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

V-Soft Communications Population Report

WHIQ-D.C (24) Huntsville, AL
 TV Incoming Interference Study
 Signal Resolution: 1 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 # of radials computed for contours: 72
 Contours calculated using 8 radial HAAT.
 LR Profile Spacing Increment: 0.1 km
 Interference considered within the
 reference station's noise limited contour.
 Threshold for reception: 39.757

Study Date: 11/28/2001
 TV Database Date: 11-24-01

Population Database: 2000 US Census (PL)

Percentages calculated using a baseline population of 1,186,566.

Stations which cause interference:

Call Letters	H Units	Population	%	Area (sq. km)
WELF (23Z)	0	15	0.001	1.00
WNEG-D.C (24)	0	3706	0.312	83.63
WGXA (24+)	0	2013	0.170	43.36
WKYUTV (24-)	0	4155	0.350	109.53
WMDN (24-)	0	1270	0.107	60.74
WPTYTV (24Z)	0	2144	0.181	76.04
W27CM.C (24+)	0	8284	0.698	198.42

Masking Summary:

Call Letters	Total Interference		Unique Interference	
	Population	%	Population	%
WELF (23Z)	15	0.001	0	0.000
WNEG-D.C (24)	3706	0.312	909	0.077
WGXA (24+)	2013	0.170	158	0.013
WKYUTV (24-)	4155	0.350	3094	0.261
WMDN (24-)	1270	0.107	123	0.010
WPTYTV (24Z)	2144	0.181	763	0.064
W27CM.C (24+)	8284	0.698	5327	0.449

 Totals for WHIQ-D.C (24)

Calculation Area Population:	1,258,444	(31970.0 sq. km)
Not Affected by Terrain Loss:	1,186,566	(30217.3 sq. km)
Total NTSC Interference:	14,392	(395.4 sq. km)

DTV Only Interference:	909	(39.3 sq. km)
Total DTV Interference:	3,706	(83.6 sq. km)
Interfered Population:	15,301	(434.7 sq. km)
Interference Free:	1,171,265	(29782.6 sq. km)
Percent Interference:	1.29		
Terrain Blocked Population:	71,878	(1752.7 sq. km)
Contour Area Population:	1,256,868		