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**CONSULTING ENGINEERS**  
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**FCC FORM 301, EXHIBIT 44**  
**ENVIRONMENTAL ANALYSIS**  
**APPLICATION FOR MODIFICATION OF**  
**CONSTRUCTION PERMIT**  
**(FCC FILE NUMBER BPCDT-19991101AJJ)**  
**SPRINGFIELD BROADCAST PARTNERS**  
**STATION WRSP-DT**  
**SPRINGFIELD, ILLINOIS**  
**CH 44            335 KW (MAX-BT)            415 METERS**

This environmental analysis was prepared on behalf of Springfield Broadcasting Partners (hereinafter SBP), permittee of station WRSP-DT. Springfield, Illinois, in support of an FCC Form 301 minor change application for modification of construction permit for WRSP-DT that seeks to reduce authorized average effective radiated power (ERP) from 1000 kilowatts (kW) to 335 kW, to modify authorized antenna radiation center heights from 405 meters above ground level (AGL), 588 meters above mean sea level (AMSL), and 416 meters above average terrain (AAT) to 407 meters AGL, 590 meters AMSL, and 415 meters AAT.

WRSP-DT is currently authorized (FCC File Number BPCDT-19991101AJJ) for DTV operation on channel 44 (650 to 656 megahertz (MHz)) with 1000 kW average ERP, horizontally polarized and 416 meters antenna

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radiation center height above average terrain (HAAT) from a site located at geographic coordinates 39° 47' 57" North Latitude, 89° 26' 46" West Longitude, referenced to the 1927 North American Datum.

The instant application proposes to decrease maximum average ERP to 335 kW and to decrease antenna radiation center HAAT to 415 meters utilizing a Dielectric Communications, type TFU-26DSC-R O4 omnidirectional transmitting antenna from the authorized WRSP-DT site. The newly proposed WRSP-DT antenna radiation center is 407 meters above ground level (AGL). The antenna structure registration (ASR) number for the WRSP-DT tower is 1008934.

Public access to the WRSP-DT antenna and supporting structure is restricted by a two-meter chain link fence topped with barbed wire that encircles the base of the WRSP-DT supporting structure. There is no casual or inadvertent access to the WRSP-DT transmitter site by the general public.

An analysis has been made of the human exposure to RFR using the calculation methodology described in *OET Bulletin 65, Edition 97-01*, prepared

by the FCC Office of Engineering and Technology. A conservative vertical plane relative field factor of 0.11, obtained from the manufacturer's theoretical vertical plane radiation pattern for the WRSP-DT, Dielectric Communications, type TFU-26DSC-R O4 transmitting antenna, and the WRSP-DT average ERP of 335 kW were used in the calculation of power density. To account for ground reflections, a coefficient of 1.6 also was included in the calculations. The WRSP-DT power density calculations, the results of which are reported herein, were made at 650 MHz, the lower edge of the WRSP-DT channel assignment.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.43 milliwatt-per-square-centimeter (mW/cm<sup>2</sup>) at 650 MHz. The FCC MPE limit for occupational/controlled exposure is 2.17 mW/cm<sup>2</sup> at 650 MHz. At a reference point two meters AGL at the base of the WRSP-DT supporting structure, the calculated WRSP-DT power density is 0.00083 mW/cm<sup>2</sup>, which is 0.19 percent of the FCC MPE limit for general population/uncontrolled exposure, and 0.038 percent of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of *OET Bulletin 65, Edition 97-01*, at multiple-user sites, only those licensees whose transmitters produce power density levels in excess of 5.0 percent of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RFR environment into compliance with FCC exposure limits. Since the proposed WRSP-DT operation will contribute less than 5.0 percent of the more restrictive MPE at any location on the ground at the site, WRSP-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of WRSP-DT were not taken into account in this analysis.

While not a “significant contributor” to the exposure levels at any location on the ground, the WRSP-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WRSP-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, SBP will take action necessary to prevent the overexposure of workers on the tower, including reducing WRSP-DT transmitter power or ceasing WRSP-DT operation completely. Additionally, SBP will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental process since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The WRSP-DT channel 44 DTV facility utilizes an existing supporting structure which is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest.
2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since WRSP-DT proposed to use an existing supporting structure and no change in the existing obstruction lighting is proposed.
3. Finally, with regard to RFR exposure concerns, compliance with applicable FCC MPE limits would be achieved.

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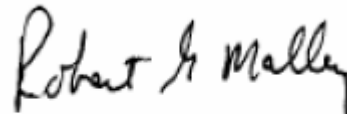
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**CERTIFICATION**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on December 20, 2004.



Robert G. Mallery



Tiffany E. Ligon