

ENGINEERING STATEMENT
ON BEHALF OF
VISION COMMUNICATIONS, LLC
RE APPLICATION FOR NEW LPTV STATION
CORNING, NEW YORK
CHANNEL 41 (-) 7.0 KW 635.5 METERS RCAMSL

JUNE 2005

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

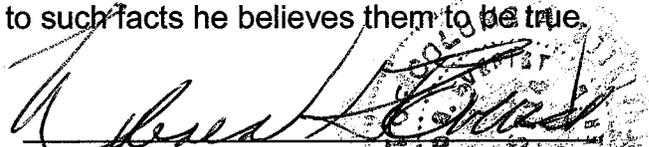
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

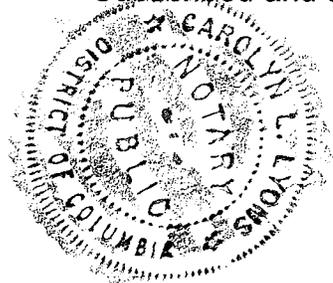
That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 31st day of May, 2005.




Notary Public

My Commission Expires: 2/28/2008

This engineering statement has been prepared on behalf of Vision Communications, LLC (“Vision”) in support of its request for a new low-power television (“LPTV”) station at Corning, New York. Operation is proposed on Channel 41 (-) with a maximum effective radiated power (“ERP”) of 7 kW at a radiation center above mean sea level (“RCAMSL”) of 635.5 meters.

The geographic coordinates of the proposed site are as follows:

North Latitude: 42° 08' 31"

West Longitude: 77° 04' 40"

(NAD-27)

The Tower Registration No. 1045276.

Vision respectfully requests a waiver of the Commission’s interference prediction rules specified in Section 74.703 to utilize receive-antenna discrimination towards both DTV and NTSC stations. In addition, Vision elects to permit its co-owned full-service station WYDC, Channel 48, Corning, New York, to receive local oscillator interference from the proposed Channel 41 LPTV station, and therefore, requests a waiver of Section 74.705(b)(4).

Environmental Statement

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure in radiofrequency field (“RFF”) as set forth in the OET Bulletin No. 65 (Edition 97-01) and Supplement A. For an effective radiated power of 7 kW and a radiation center of 123.5 meters above ground and a downward radiation factor of 0.142, the proposed LPTV operation would have a maximum of 0.08 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RFF level at

2 meters above the base of the tower. The current FCC guideline for Channel 41 is $423.3 \mu\text{W}/\text{cm}^2$ for an uncontrolled environment.

New LPTV Station

Frequency = 632-638 MHz

$$S = \frac{33.4 (F^2) \text{ Total ERP}}{R^2}$$

Total ERP = 0.4 [7 kW (visual)] + 0.7 kW (aural) = 3.5 kW

R = RCAGL -2 meters = 121.5 meters

F = 0.142 (field factor)

$$S = 0.08 \mu\text{W}/\text{cm}^2$$

The proposed LPTV station contributes less than $0.08 \mu\text{W}/\text{cm}^2$ at 2 meters above ground. The limit for an uncontrolled environment is $423.3 \mu\text{W}/\text{cm}^2$ for station broadcasting in the 632-638 MHz range.

Therefore:

The proposed LPTV facility contributes less than 0.02% RFF for an uncontrolled environment two meters above ground at the tower site.

As previously stated, the total RFF contribution by the proposed LPTV station is calculated to be less than 0.02% of the current FCC guidelines for general population exposure, and therefore, is not expected to significantly increase the RFF level in the vicinity of the proposed site. Section 1.1307 provides that if the calculated assessment is less than 5 percent then the proposed facility is deemed compliant. As demonstrated above, the proposed facility will cause much less than 5% and therefore will comply with Section 1.1307 of the Rules.

Authorized personnel and rigging contractors will be alerted to the potential zone of high radiation on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or

contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

An environmental assessment (“EA”) is categorically excluded under Section 1.1306 of the FCC Rules and Regulations since the applicant indicates that:

- (a)(1) The proposed facilities are not located in an officially designated wilderness area.
- (a)(2) The proposed facilities are not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of critical habitats.
- (a)(4) The proposed facilities will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The proposed facilities are not located near any known Indian religious sites.
- (a)(6) The proposed facilities are not located in a flood plain.
- (a)(7) There will be no significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) There is no proposed change in tower lighting.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines outlined in OET Bulletin 65, Edition 97-01 and Supplement A. Authorized personnel will be alerted to areas of the antennas where potential energy levels are in excess of the FCC guidelines as contained in OET Bulletin 65, Edition 97-01 and Supplement A. A security fence with a locked gate at the base of the tower and precludes access.

Section III - Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: _____

2. Frequency Offset:

No offset Zero offset Plus offset Minus offset

3. Translator Input Channel No. _____

4. Primary station proposed to be rebroadcast:

Call Sign	City	State	Channel
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5. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " N S Latitude
_____ ° _____ ' _____ " E W Longitude

6. Antenna Structure Registration Number: _____

Not applicable FAA Notification Filed with FAA

7. Antenna Location Site Elevation Above Mean Sea Level: _____ meters

8. Overall Tower Height Above Ground Level: _____ meters

9. Height of Radiation Center Above Ground Level: _____ meters

10. Maximum Effective Radiated Power (ERP) Towards Radio Horizon: _____ kW

11. Maximum ERP in any Horizontal and Vertical Angle: _____ kW

12. Transmitting Antenna: Nondirectional Directional "Off-the-shelf" Directional composite

Manufacturer	Model
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Directional Antenna Relative Field Values:

Rotation: _____ ° No rotation N/A (Nondirectional)

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. Yes No See Explanation in Exhibit No.

TV broadcast analog system protection.

- a. 47 C.F.R. Section 74.705.

Digital TV station protection.

- b. 47 C.F.R. Section 74.706.

Low Power TV and TV translator station protection.

- c. 47 C.F.R. Section 74.707.

14. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.*, the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance. An **Exhibit is required.** Yes No See Explanation in Exhibit No.
Exhibit No.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 6 MUST BE COMPLETED AND SIGNED.

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Martin R. Doczkat		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date May 31, 2005	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100			
City Washington		State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111		E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001),
AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)),
AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).