

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF
DTV CONSTRUCTION PERMIT
FCC FILE NO. BPCDT-19980910KE
FACILITY ID 7727
STATION WGFL-DT
HIGH SPRINGS, FLORIDA
CH 28 168 KW (MAX-DA) 265 M

Technical Narrative

This technical exhibit was prepared in support of an application for modification of the construction permit for station WGFL-DT on channel 28 at High Springs, Florida (BPCDT-19980910KE). By means of this instant modification application, WGFL-DT proposes to change to a directional antenna system, change transmitter site, increase the antenna radiation height above average terrain (HAAT) from 259 meters to 265 meters and decrease the directional antenna maximum effective radiated power (ERP) from 625 kW to 168 kW. No other changes are proposed. The instant application is considered a minor change in facilities pursuant to Section 73.3572(a). Furthermore, as detailed below, the instant application is also acceptable for filing under the criteria set forth in the FCC TV/DTV freeze as there will be no increase in WGFL-DT's authorized DTV service area in any direction.¹

Proposed Facilities

It is proposed to operate WGFL-DT from the licensed NTSC WGFL-TV site (FCC Tower registration 1242355, NAD27 coordinates: 29-37-47 N, 82-34-24 W) on DTV channel 28 (554-560 MHz) with a directional antenna maximum ERP of 168 kW and an antenna HAAT of 265 meters. It is proposed to utilize an ERI model ALP24L4-HSW-28 directional antenna which will be mounted at the 261 meter level on the existing tower structure, will incorporate an electrical beam tilt of 1 degree, and will be oriented at 55 degrees true.² The proposed antenna radiation center height above mean sea level will be 287 meters.

¹ See FCC Public Notice dated August 3, 2004 entitled "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes" (DA 04-2446).

² The major lobe orientations will be at 55°, 125° and 345° true.

Antenna Data

Figure 1 provides graphs of the horizontal and vertical plane relative field patterns for the proposed ERI model ALP24L4-HSW-28, horizontally polarized, directional antenna system.

Response to Paragraph 11 - Interference Protection

Figure 2 is the separation study for DTV channel 28 from the proposed WGFL-DT site. The study has been used to determine the assignments requiring interference studies using the procedures outlined in the FCC's OET-69 bulletin. An interference analysis has been conducted using the procedures outlined in the FCC's OET-69 bulletin which demonstrates that the proposal complies with the interference protection provisions of Section 73.623(c)(2).³

Class A Allocation Considerations

A study has been conducted which indicates that the WGFL-DT proposal will not create prohibited interference to other existing, authorized or proposed Class A stations.

Compliance with TV Freeze Order

Figure 3 is a map which depicts the location of the predicted 41 dBu, F(50,90) contours for the authorized WGFL-DT operation (BPCDT-19980910KE) and the herein proposed WGFL-DT DTV channel 28 operation. As indicated, the 41 dBu contour for the instant modification application is entirely within the 41 dBu contour for the authorized operation. Therefore, it is believed that the instant modification application is acceptable for filing under the criteria set forth in the FCC TV/DTV freeze as there will be no increase in WGFL-DT's DTV channel 28 service area, based on the authorized facilities, in any direction.

³ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed.

City Coverage

Figure 3 also depicts the predicted 48 dBu, F(50,90) coverage contour for the herein proposed WGFL-DT channel 28 operation. As indicated, High Springs is located within the 48 dBu contour. The High Springs city limits were derived from information contained in the 2000 U.S. Census for Florida.

The distances to the predicted 41 dBu and 48 dBu, F(50,90) coverage contours were determined in accordance with the provisions of Section 73.625. The average elevations from 3.2 to 16.1 kilometers from the transmitter site, were obtained from the NGDC 3-second terrain database and were used for determining the distances to coverage contours.

Objectionable Interference

There are no AM stations located within 15 kilometers (9.3 miles) of the proposed transmitter site. Figure 4 provides a tabulation of all known authorized full service FM and TV stations within 16 kilometers of the proposed WGFL-DT site. Although no adverse electromagnetic impact is expected, the applicant recognizes its responsibility to correct problems, which are a result of its proposed operation.

The proposed site is more than 1339 kilometers from the closest point of the Canadian border. The proposed site is more than 1000 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Vero Beach, Florida located 294 kilometers to the southeast. The National Radio Quiet Zone (VA/WV) is 896 kilometers to the north. The Table Mountain Radio Quiet Zone (CO) is more than 2362 kilometers to the northwest. The closest radio astronomy site conducting research on TV channel 37 is at Green Bank, West Virginia located 1010 kilometers to the north. All these separations are considered sufficient to avoid interference from the proposed operation.

Environmental Protection Act

The proposed facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna is located 261 meters above ground level. The maximum DTV ERP is 168 kW (horizontal polarization). A "worst-case" vertical plane relative field value of 0.3 (for angles below 60 degrees downward) is assumed for the antenna's downward radiation (see Figure 1, Sheet 2). The calculated power density at a point 2 meters above ground level is 0.0075 mW/cm². This is 2.0% of the FCC's recommended limit of 0.37 mW/cm² for channel 28 for an "uncontrolled" environment. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with RFR warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect with the other stations in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure.

Finally, it is noted that this technical exhibit only addresses the potential for radio frequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been

provided to the FCC by the tower owner as part of the tower registration process.



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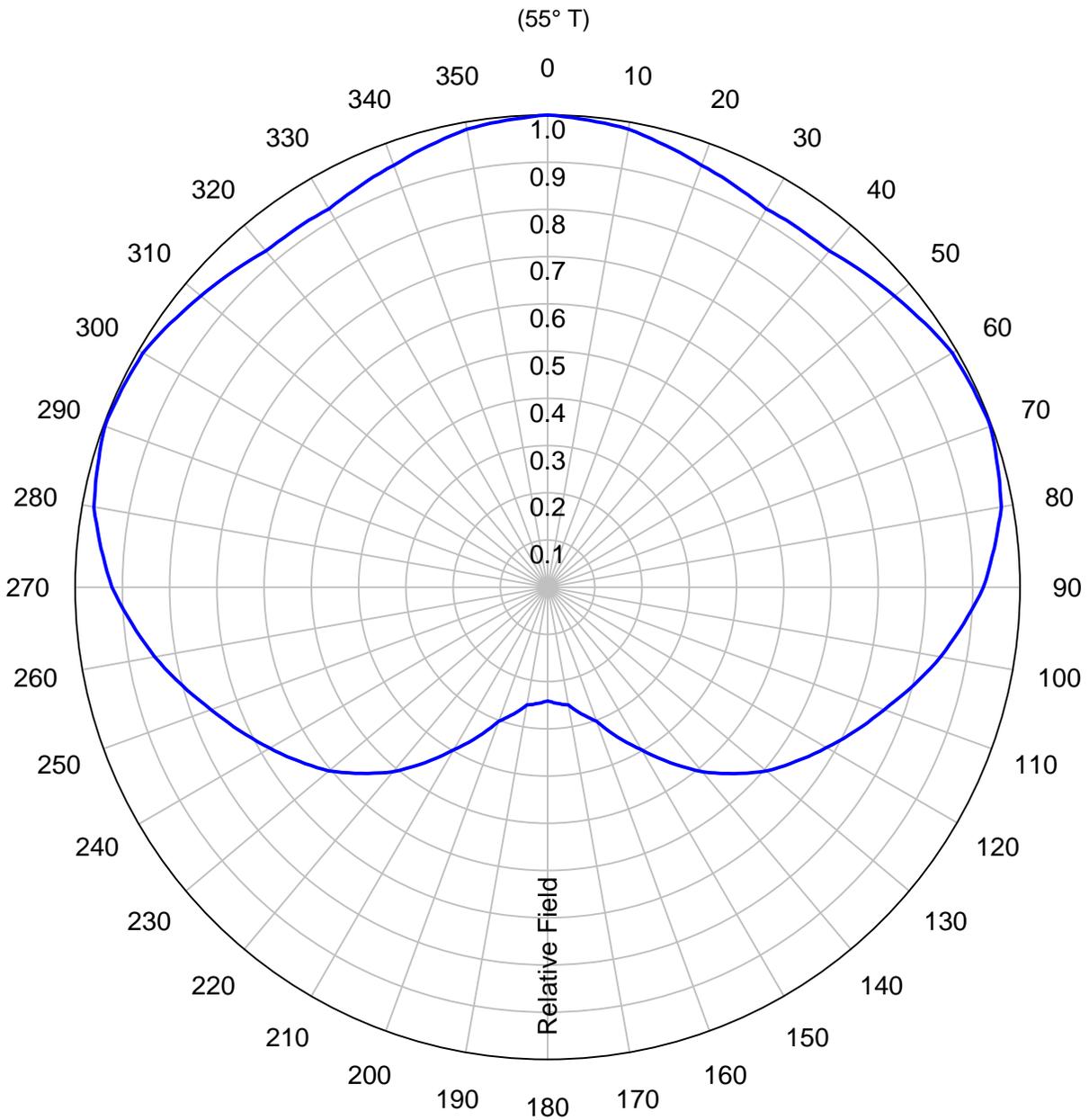
June 15, 2006

ALP24L4-HSW-28

AZIMUTH PATTERN

Type: ALP-W
Directivity: Numeric 1.56 dBd 1.93
Peak(s) at: _____

Channel: 28
Location: _____
Polarization: Horizontal
Note: Pattern shape and directivity may vary with channel and mouting configuration.



ALP24L4-HSW-28

ELEVATION PATTERN

Type:	ALP24L4		Channel:	28
Directivity:	Numeric	dBd	Location:	
Main Lobe:	25.21	14.02	Beam Tilt:	-1.00
Horizontal:	7.57	8.79	Polarization:	Horizontal

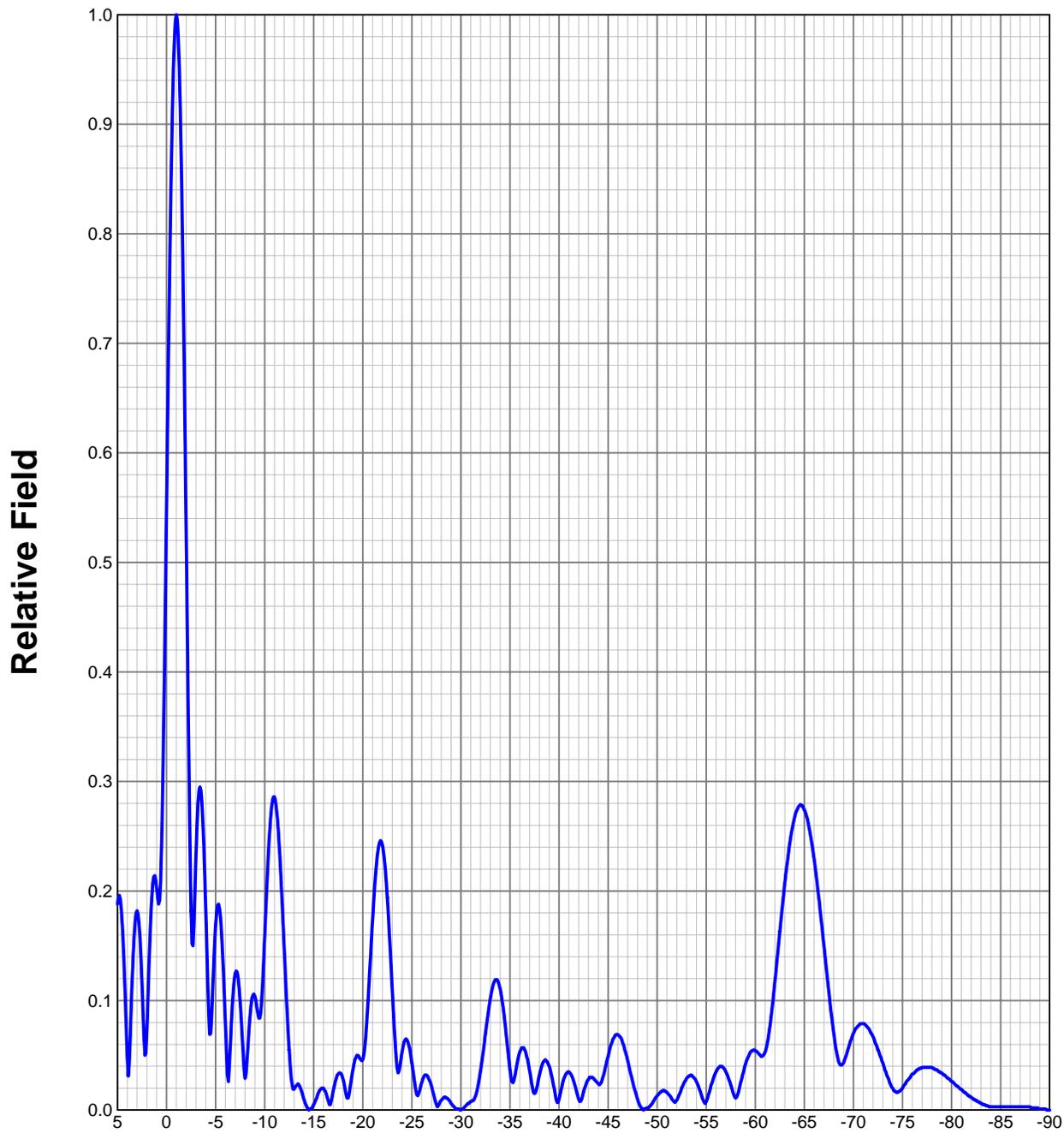


Figure 2

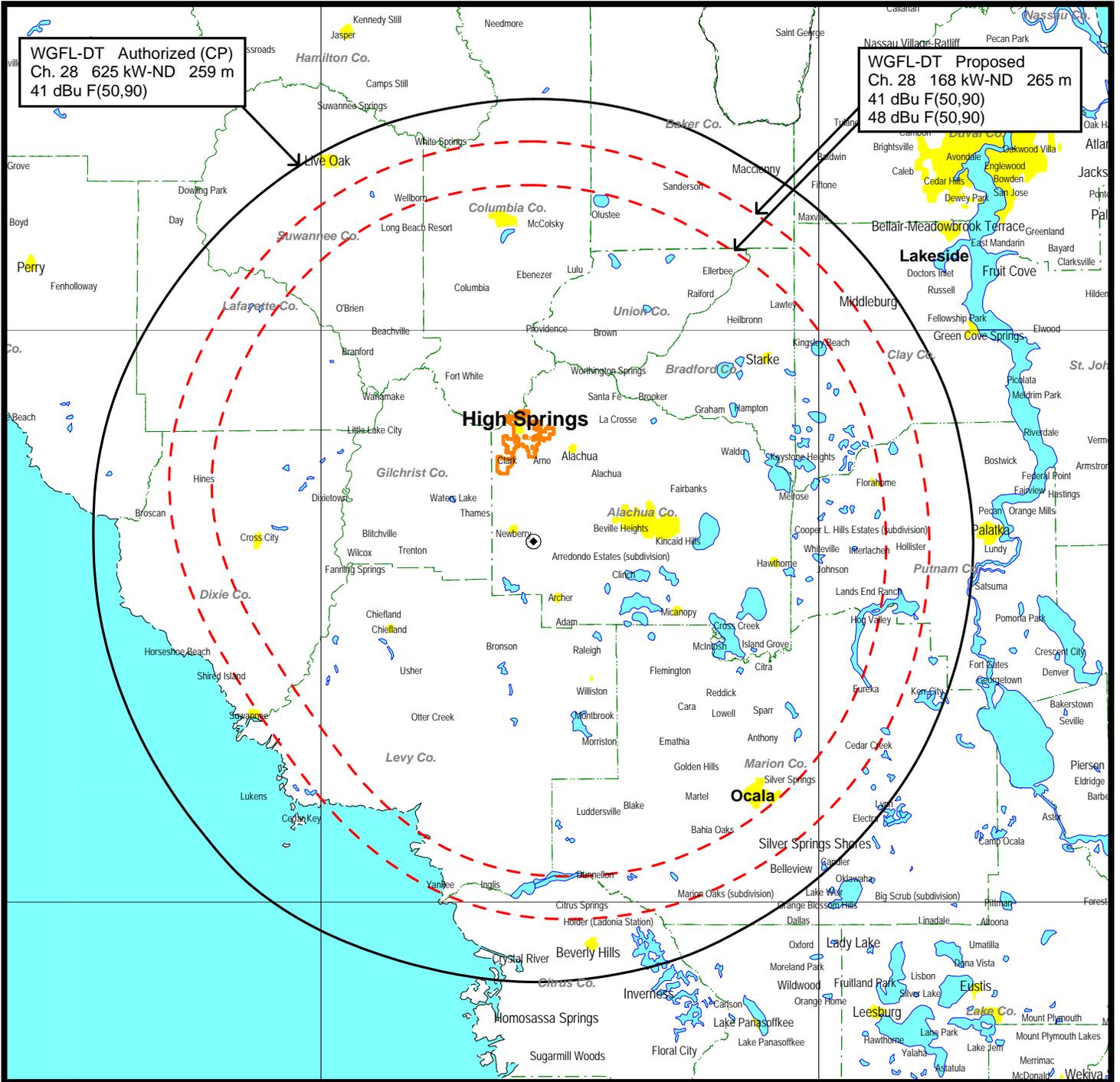
CDBS TV/DTV SEPARATION STUDY

Job Title: Proposed WGFL-DT, High Springs, FL
 Channel: 28
 Class:
 Type: DT

Separation Buffer: 32 km
 Coordinates: 29-37-47 082-34-24
 Zone: III

Call Id	City St	File Status Num	Channel Zone	ERP HAAT	DA Id	Latitude Longitude	Bear	Dist. (km)	Req. min	Req. max
WCJB-TV 16993	GAINESVILLE FL	BLCT LIC C	20(Z) 19821029KEIII	2820.000 287	D 20629	29-32-11 082-24-00	121.7	19.7 4.38	24.1	96.6 Close
WJXX 11893	ORANGE PARK FL	BLCT LIC C	25(-) 19971016KFIII	5000.000 201	N 42631	30-04-27 081-48-23	56.1	89.0 7.61	24.1	96.6 Short
WVEN-TV 131	DAYTONA FL	BEA BLCT LIC C	26(Z) 20041026ACIII	5000.000 304	D 59085	29-17-10 081-29-37	109.8	111.5 14.85	24.1	96.6 Close
DWGFL 7727	HIGH SPRING FL	DTV	28() III	103.900 278	D	29-37-47 082-34-24	90.2			
WGFL 7727	HIGH SPRING FL	BPCDT CP C	28() 19980910KEIII	625.000 259	N 37686	29-37-46 082-34-25	220.5			
WGFL 7727	HIGH SPRING FL	BDSTA STA C	28() 20020228AE	5.470 154	D 42791	29-44-22 082-23-09	56.0			
WFTS-TV 64588	TAMPA FL	BLCT LIC C	28(Z) 19880303KEIII	2630.000 471	N 39936	27-50-32 082-15-46	171.3	200.4 44.19	244.6	244.6 Short
960920W 83965	GAINESVILLE FL	BPCT CP C	29(Z) 19960920WRIII	3600.000 278	D 69176	29-37-47 082-34-25	269.8	0.0 11.97	12.0	106.0 Close
WAWS 11909	JACKSONVILL FL	BLCT LIC C	30(+) 20030328ANIII	4000.000 307	D 41680	30-16-51 081-34-12	52.9	120.8 24.19	24.1	96.6 Clear
98327	MADISON FL	C	36(-) III		N	30-28-05 083-24-43	319.3	123.2 26.59	24.1	96.6 Clear

Figure 3



PREDICTED COVERAGE CONTOURS

DTV STATION WGFL-DT
HIGH SPRINGS, FLORIDA
CH 28 168 KW (MAX-DA) 265 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

du Treil, Lundin, and Rackley

Coordinates: 29-37-47 082-34-24 Frequency Range: - Range: 16

Date: 6/8/2006

CDBS FM Inquiry List

Page: 1

Rec Type	Fac Id	Call	Status	Chan	Svc Class	Class	City	St	DA	Latitude	Longitude	ERP (kW)	HAAT (m)	RCAMSL (m)	Bear	Dist. (km)
C	21506	WJLF	LIC	219	FM	A	GAINESVILLE	FL	D	29-38-34	082-25-13	2.000	122.0	151.0	84.4	14.9
C	23352	WSKY-F	LIC	247	FM	C2	MICANOPY	FL	N	29-37-46	082-34-25	13.500	289.0	312.0	220.5	0.0
C	24208	WYKS	LIC	287	FM	A	GAINESVILLE	FL	N	29-37-53	082-25-08	3.000	142.0	173.0	89.3	15.0

du Treil, Lundin, and Rackley

Coordinates: 29-37-47 082-34-24 Channel Range: - Range: 16

Date: 6/8/2006

CDBS Tv Inquiry List

Page: 1

Rec Type	Facility Id	Call	Status	Chan	Svc Class	Class	City	St	DA	Latitude	Longitude	ERP (kW)	HAAT (m)	RCAMSL (m)	Bearing	Dist. (km)
C	7727	WGFL	LIC	53	TV		HIGH SPRINGS	FL	N	29-37-47	082-34-24	5000.00	278	305	0	0
C	83965	960920W	CP	29	TV		GAINESVILLE	FL	D	29-37-47	082-34-25	3600.00	278	305	269.8	0.03
C	7727	WGFL	CP	28	DT		HIGH SPRINGS	FL	N	29-37-46	082-34-25	625.000	259	283	220.4	0.04
C	70413	WBXG-C	LIC	33	CA		GAINESVILLE	FL	D	29-38-37	082-25-11	23.600		135	84.02	14.95
C	70413	WBXG-C	APP	33	CA		GAINESVILLE	FL	D	29-37-55	082-25-08	32.000		112	89.01	14.96