



**STATEMENT OF JOHN E. HIDLE, P.E.  
IN SUPPORT OF AN  
APPLICATION TO AMEND A PENDING APPLICATION  
FOR CONSTRUCTION PERMIT  
BPCDT-19991101ACD  
WUHF-DT - ROCHESTER, NEW YORK  
DTV - CH. 28 - 1000 kW(DA-MAX) - 161 M HAAT**

Prepared for: WUHF Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a registered Professional Engineer in the Commonwealth of Virginia, Registration No. 7418, and in the State of New York, Registration No. 63418.

**GENERAL**

This office has been authorized by WUHF Licensee, LLC, licensee of WUHF(TV), channel 31, Rochester, New York, and applicant for the paired DTV allotment WUHF-DT, channel 28, to prepare this statement, FCC Form 301, Sections III and III-D, and the associated exhibits in support of an application to amend its pending application for construction permit, BPCDT-19991101ACD. It is proposed herein to change WUHF-DT's site to a new tower located 109 meters away in a direction of 236E from the tower specified in the pending application. The new tower support structure, owned by American Tower Corporation, is located at 43E 8' 5" N latitude, 77E 35' 7" W longitude. The structure is registered in the FCC tower registration database, No. 1228608. This application seeks to re-locate the proposed WUHF-DT facility to this new tower because the tower currently specified in its pending application does not have the capacity to support the proposed

WUHF-DT antenna. The re-location of WUHF-DT as proposed herein will serve to further the Commission's goals in the deployment of DTV service in the United States since the new tower was designed to accommodate numerous television transmission facilities, which is expected to serve to lessen the effects of the "receive antenna orientation problem" that results when television transmitter system sites are scattered in multiple locations within a television market area. Additionally, the proposed relocation of WUHF-DT is expected to contribute to cooperative operational efficiencies among itself and other television licensees, which should further improve service to the public.

#### **PROPOSED DIRECTIONAL ANTENNA**

The applicant proposes to utilize the same antenna currently specified, a Dielectric TFU-24 GTH-R 3BP300 directional transmitting antenna. It is proposed to top mount the antenna at the top of the support structure. It is intended to stack the antenna above several other broadcast antennas proposed to be located at the same site. A Vertical Plan Antenna Sketch showing various elevations at the proposed site is provided in Exhibit 1.

#### **PREDICTED COVERAGE CONTOURS**

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (derived from 47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the

National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 2 shows the predicted 41dBF Noise Limited, and the 48 dBF principal community contours for the proposed WUHF-DT facility. It is readily apparent that the predicted 48 dBF contour, as shown in Exhibit 2, completely encompasses the principal community of license.

## **ALLOCATION CONSIDERATIONS**

### **NTSC and DTV Allocation Considerations**

A study was performed, using the FCC's interference analysis processing software, tv\_process, to determine if the proposed slight relocation of WUHF-DT is predicted to cause any level of new prohibited interference to NTSC or DTV stations, DTV expansion construction permits or NTSC construction permits, cut-off pending DTV expansion applications or DTV allotments. Results of the FCC program "tv-process" indicate that the instant proposal to relocate WUHF-DT is predicted to cause no unacceptable level of new interference to the populations served by any relevant television station, construction permit, application or allotment.

### **Class A Television Allocation Considerations**

As required in Section 73.613 of the FCC's Rules, as established in the Report and Order establishing Class A Television Service, released April 4, 2000, and applicable to applications submitted subsequent to May 1, 2000, a study of interference contour overlap was performed, based on the proposed relocated WUHF-DT facility, to establish

compliance with the protection requirements contained therein. The study results indicate that WUHF-DT's pending application is essentially co-located with WBXO-LP, channel 36. According to Section 73.623(c)(2) of the Commission's rules the permitted Desired to Undesired (D/U) signal ratio for the N-8 channel relationship is -32 dB. According to WBXO-LP's construction permit the station is authorized to operate at an ERP of 12 kW. WUHF-DT's proposed ERP of 1000 kW is 19.2 dB above 12 kW. This means that, since the fixed D/U power ratio is -19.1 dB, and since the stations are essentially co-located, it is not possible under any circumstance, within WBXO-LP's protected service area, for the D/U ratio to reach -32 dB, therefore no interference is predicted to exist. Additionally, WUHF-DT's pending application is not obligated to protect any Class A station since it was filed prior to the creation of Class A stations.

No prohibited contour overlap is predicted to occur with any other LPTV station which was granted a Certificate of Eligibility for Class A Status in Public Notice DA 00-1224, Released June 2, 2000, or any other LPTV station which has since obtained Class A licensed status.

#### **BLANKETING AND INTERMODULATION INTERFERENCE**

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WUHF-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

### **ENVIRONMENTAL CONSIDERATIONS**

The proposal described herein meets the criteria specified in Section 1.1306 of the FCC Rules and Regulations as an action, which is categorically excluded from environmental processing. The proposed TV facility involves neither a site location specified under Section 1.1307(a)(1)-(7) of the Rules nor high intensity lighting as specified in Section 1.1307(a)(8).

### **RADIO FREQUENCY IMPACT**

Effective October 15, 1997, the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields, as adopted by the Commission in 1996. Bulletin No. 65 contains the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC Maximum Permitted Exposure (MPE) level for “uncontrolled” environments is derived from the formula,  $(\text{frequency}/1500)$ , for UHF TV stations. The MPE level for UHF stations in a “controlled” environment is derived from the formula,  $(\text{frequency}/300)$ . We must consider the contributions of WUHF-DT channel 28, and the other proposed and existing stations at the proposed site. For WUHF-DT, which operates on television Channel 28 (557 MHz), the MPE is 0.371 milliwatts per centimeter squared ( $\text{mW}/\text{cm}^2$ ) in an “uncontrolled” environment and  $1.857 \text{ mW}/\text{cm}^2$  in a “controlled” environment. The proposed WUHF-DT facility will operate with a maximum ERP of 1000 kW from a horizontally polarized directional transmitting antenna with a centerline height of 89.3 meters above ground level (AGL). Based on the vertical plane radiation pattern included herein as exhibit 5, the maximum relevant vertical relative field factor will not exceed 0.05. Using a relative field factor of 0.05 and “worst-case” considerations, WUHF-DT is predicted to produce a maximum power density at two meters above the ground level of  $0.01096 \text{ mW}/\text{cm}^2$ , which is 2.95 % of the FCC guideline value for “uncontrolled” environments. Consequently the proposed WUHF-DT transmitter facility itself complies with the FCC’s guidelines for human exposure to non-ionizing RF electromagnetic fields.

As shown in the overall site study (Appendix A), other RF transmission facilities within 300 meters of the new tower could possibly contribute in excess of an additional 1600% of the acceptable “uncontrolled” environment guideline. Included herein as Appendix B are copies of the environmental compliance exhibits which were submitted with WUHF(TV)’s application for license renewal. The exhibits detail the steps taken by the owners of the

WUHF site to identify potential hazard areas and the steps they have taken to preclude “uncontrolled” access to those areas which may pose a significant hazard. These exhibits demonstrate that the WUHF Pinnacle Hill site is presently in compliance. From the exhibits shown, it can be seen that the highest power density at 2 meters above ground level outside of the presently restricted area is  $0.17 \text{ mW/cm}^2$ . When the proposed WUHF-DT facility is considered along with the existing facilities, the highest power density that can be expected will then be  $0.17 \text{ mW/cm}^2$  plus the contribution of WUHF-DT. This results in a maximum power density outside the restricted area of  $0.181 \text{ mW/cm}^2$ , which is less than the  $0.2 \text{ mW/cm}^2$  guideline, and as such, the proposed operation of WUHF-DT is not predicted to result in any additional non-ionizing RF radiation hazards.

### **OCCUPATIONAL SAFETY**

The licensee of WUHF(TV) and applicant for construction permit for WUHF-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WUHF-DT antenna. The applicant is committed to reducing power, spreading the work over a period of time to reduce the average exposure levels, and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel. When such work is necessary it will be coordinated by means of an agreement among the stations located at the site. In light of the above, the proposed WUHF-DT facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

**SUMMARY**

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Sections III and III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: May 3, 2002

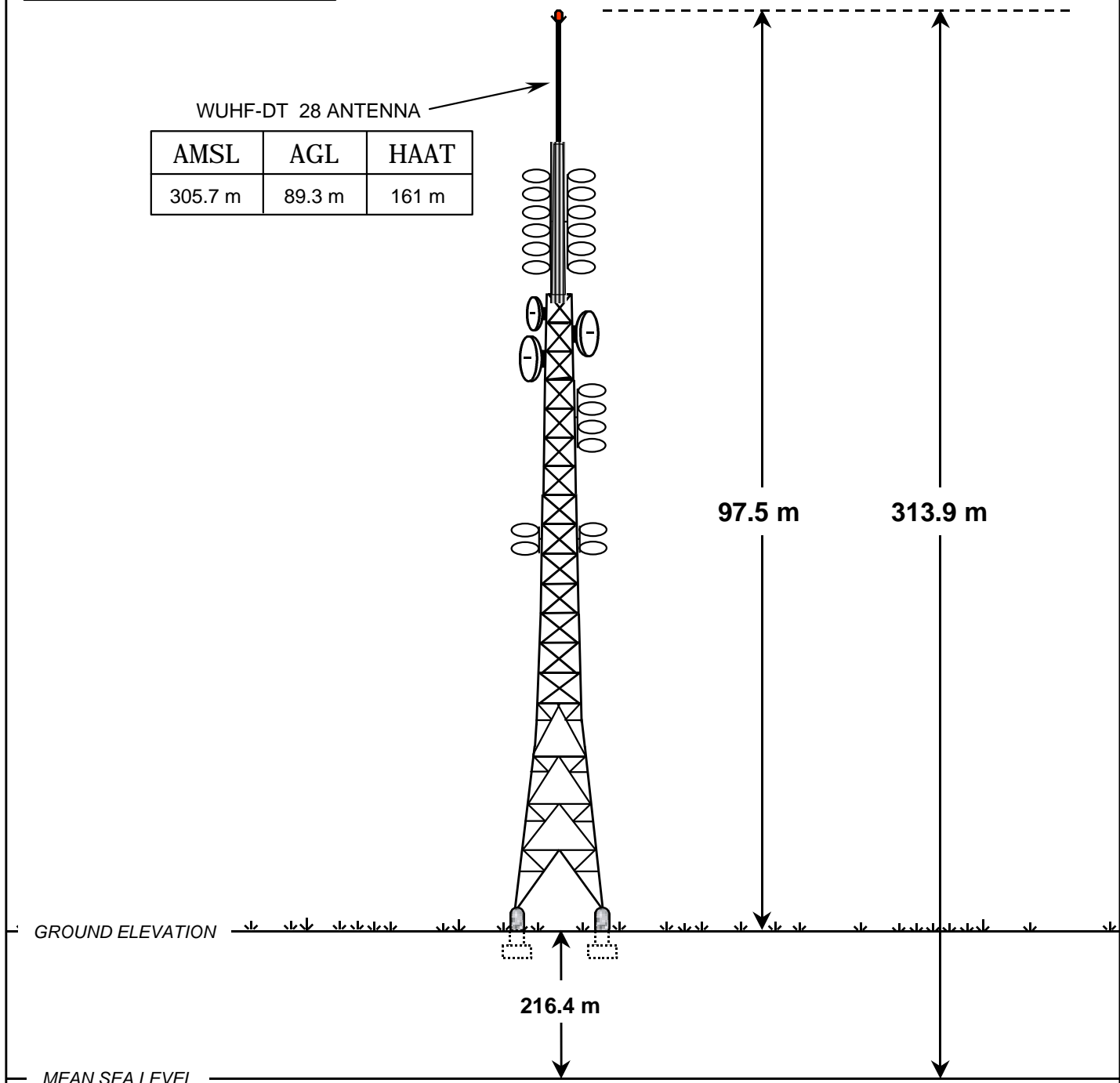
  
John E. Hidle, P.E.





**COORDINATES NAD-27**  
NORTH LATITUDE : 43° 08' 05"  
WEST LONGITUDE : 77° 35' 07"

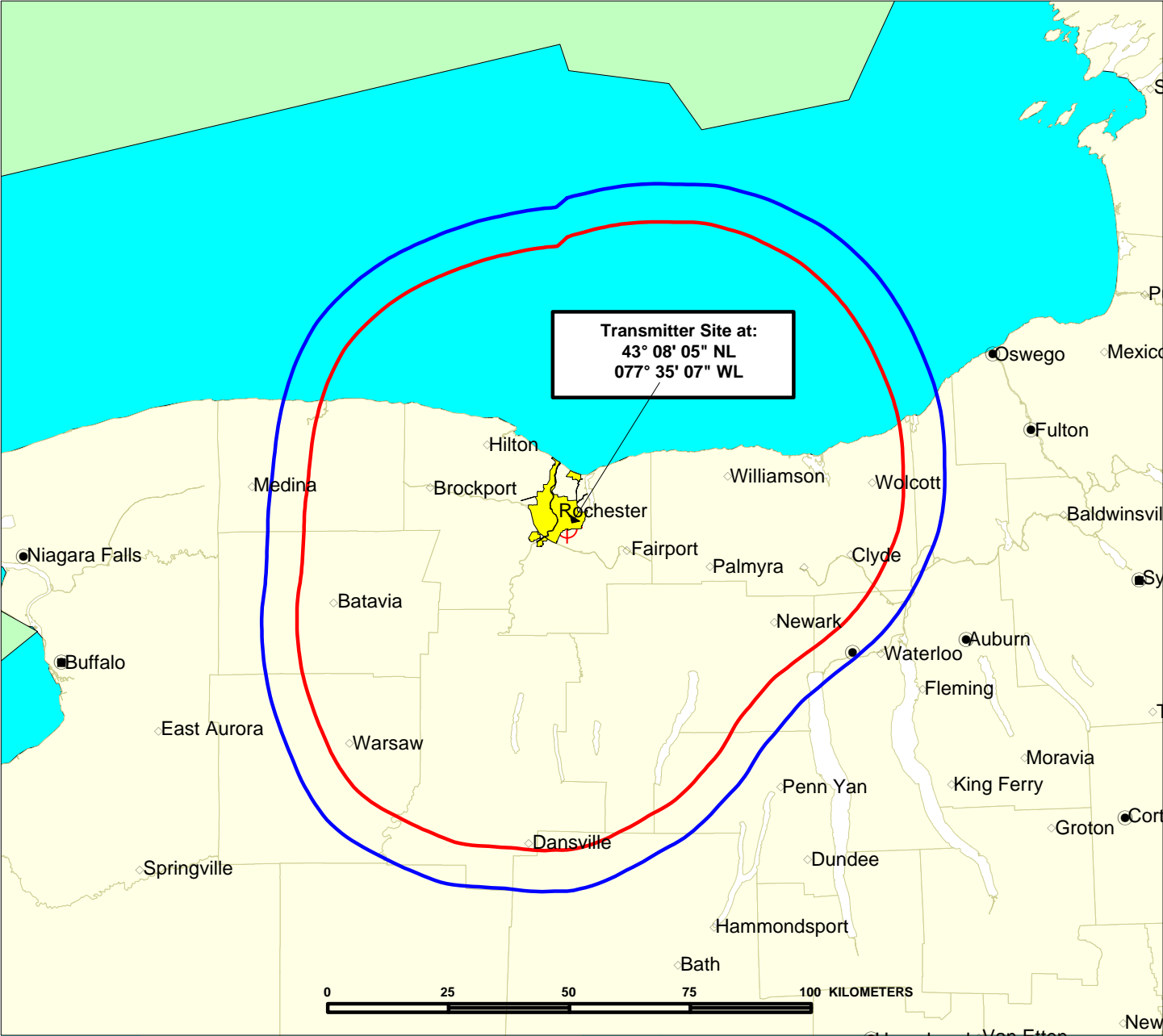
**EXHIBIT 1**



**VERTICAL PLAN ANTENNA SKETCH**  
WUHF-DT - ROCHESTER, NEW YORK  
Ch. 28 - 1000 kW ERP - 161 m HAAT  
MAY, 2002

**CARL T. JONES**  
CORPORATION

NOTE : NOT DRAWN TO SCALE



41 dBu F(50,90) Protected Coverage Contour

48 dBu F(50,90) City Grade Coverage Contour

Rochester Corporate Limits

**WUHF-DT Channel 28 Rochester, New York**  
**Coverage Contours of Proposed Facility**  
**1000 kW ERP; 161 m HAAT; Directional Antenna**  
**May, 2002**



Date  
Call Letters  
Location  
Customer  
Antenna Type

**03 May 2002**  
**WUHF-DT** Channel **28**  
**Rochester, NY**  
**WUHF Licensee, LLC**  
**TFU-24GTH-R 3BP300**

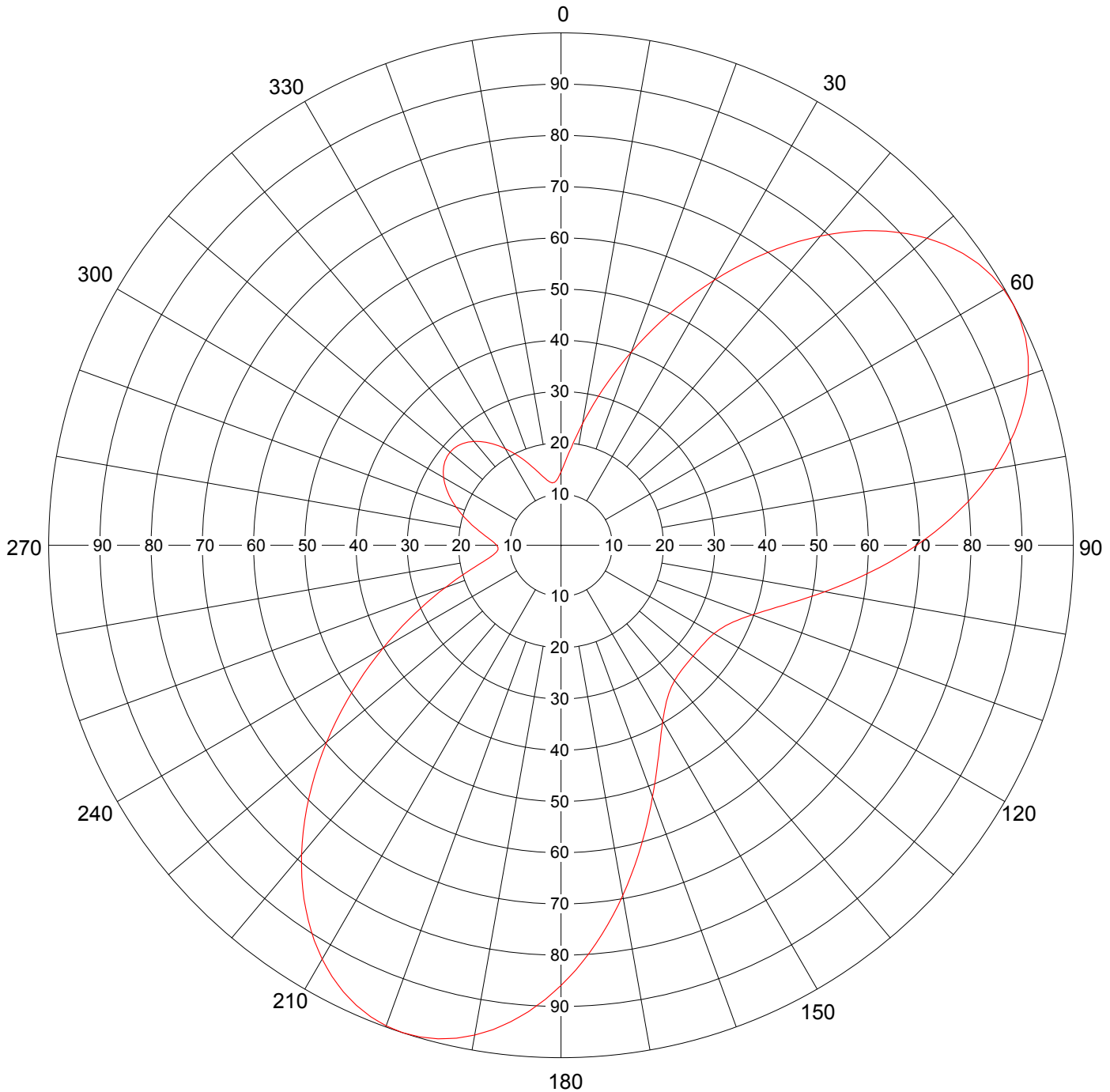
### AZIMUTH PATTERN

RMS Gain at Main Lobe  
Calculated / Measured

**3.00 (4.77 dB)**  
**Calculated**

Frequency  
Drawing #

**557 MHz**  
**TFU-3BP300**



Remarks:



Date **03 May 2002**  
 Call Letters **WUHF-DT** Channel **28**  
 Location **Rochester, NY**  
 Customer **WUHF Licensee, LLC**  
 Antenna Type **TFU-24GTH-R 3BP300**

## TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **TFU-3BP300**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.143	45	0.868	90	0.694	135	0.338	180	0.859	225	0.696	270	0.125	315	0.278
1	0.149	46	0.883	91	0.676	136	0.339	181	0.873	226	0.676	271	0.128	316	0.276
2	0.156	47	0.896	92	0.658	137	0.340	182	0.887	227	0.657	272	0.130	317	0.274
3	0.164	48	0.909	93	0.641	138	0.341	183	0.900	228	0.637	273	0.133	318	0.271
4	0.172	49	0.921	94	0.623	139	0.343	184	0.912	229	0.617	274	0.136	319	0.268
5	0.182	50	0.932	95	0.606	140	0.345	185	0.924	230	0.597	275	0.140	320	0.265
6	0.192	51	0.943	96	0.588	141	0.347	186	0.935	231	0.577	276	0.144	321	0.261
7	0.203	52	0.953	97	0.571	142	0.350	187	0.945	232	0.557	277	0.148	322	0.257
8	0.215	53	0.961	98	0.554	143	0.354	188	0.954	233	0.537	278	0.153	323	0.253
9	0.227	54	0.969	99	0.538	144	0.358	189	0.962	234	0.517	279	0.158	324	0.248
10	0.240	55	0.976	100	0.522	145	0.363	190	0.971	235	0.497	280	0.163	325	0.244
11	0.254	56	0.983	101	0.507	146	0.368	191	0.977	236	0.477	281	0.168	326	0.239
12	0.268	57	0.987	102	0.492	147	0.374	192	0.983	237	0.458	282	0.173	327	0.234
13	0.283	58	0.992	103	0.478	148	0.381	193	0.988	238	0.439	283	0.179	328	0.229
14	0.298	59	0.995	104	0.464	149	0.389	194	0.993	239	0.420	284	0.184	329	0.223
15	0.314	60	0.998	105	0.451	150	0.397	195	0.995	240	0.401	285	0.190	330	0.218
16	0.331	61	0.999	106	0.438	151	0.406	196	0.998	241	0.383	286	0.196	331	0.212
17	0.348	62	1.000	107	0.427	152	0.416	197	0.999	242	0.365	287	0.201	332	0.207
18	0.365	63	0.999	108	0.416	153	0.427	198	1.000	243	0.348	288	0.207	333	0.201
19	0.383	64	0.998	109	0.406	154	0.438	199	0.999	244	0.331	289	0.212	334	0.196
20	0.401	65	0.995	110	0.397	155	0.451	200	0.998	245	0.314	290	0.218	335	0.190
21	0.420	66	0.993	111	0.389	156	0.464	201	0.995	246	0.298	291	0.223	336	0.184
22	0.439	67	0.988	112	0.381	157	0.478	202	0.992	247	0.283	292	0.229	337	0.179
23	0.458	68	0.983	113	0.374	158	0.492	203	0.987	248	0.268	293	0.234	338	0.173
24	0.477	69	0.977	114	0.368	159	0.507	204	0.983	249	0.254	294	0.239	339	0.168
25	0.497	70	0.971	115	0.363	160	0.522	205	0.976	250	0.240	295	0.244	340	0.163
26	0.517	71	0.962	116	0.358	161	0.538	206	0.969	251	0.227	296	0.248	341	0.158
27	0.537	72	0.954	117	0.354	162	0.554	207	0.961	252	0.215	297	0.253	342	0.153
28	0.557	73	0.945	118	0.350	163	0.571	208	0.953	253	0.203	298	0.257	343	0.148
29	0.577	74	0.935	119	0.347	164	0.588	209	0.943	254	0.192	299	0.261	344	0.144
30	0.597	75	0.924	120	0.345	165	0.606	210	0.932	255	0.182	300	0.265	345	0.140
31	0.617	76	0.912	121	0.343	166	0.623	211	0.921	256	0.172	301	0.268	346	0.136
32	0.637	77	0.900	122	0.341	167	0.641	212	0.909	257	0.164	302	0.271	347	0.133
33	0.657	78	0.887	123	0.340	168	0.658	213	0.896	258	0.156	303	0.274	348	0.130
34	0.676	79	0.873	124	0.339	169	0.676	214	0.883	259	0.149	304	0.276	349	0.128
35	0.696	80	0.859	125	0.338	170	0.694	215	0.868	260	0.143	305	0.278	350	0.125
36	0.715	81	0.844	126	0.337	171	0.712	216	0.853	261	0.138	306	0.280	351	0.124
37	0.733	82	0.829	127	0.337	172	0.729	217	0.838	262	0.133	307	0.281	352	0.123
38	0.752	83	0.813	128	0.337	173	0.746	218	0.822	263	0.130	308	0.282	353	0.123
39	0.770	84	0.797	129	0.337	174	0.764	219	0.805	264	0.127	309	0.282	354	0.123
40	0.788	85	0.780	130	0.336	175	0.780	220	0.788	265	0.125	310	0.283	355	0.125
41	0.805	86	0.764	131	0.337	176	0.797	221	0.770	266	0.123	311	0.282	356	0.127
42	0.822	87	0.746	132	0.337	177	0.813	222	0.752	267	0.123	312	0.282	357	0.130
43	0.838	88	0.729	133	0.337	178	0.829	223	0.733	268	0.123	313	0.281	358	0.133
44	0.853	89	0.712	134	0.337	179	0.844	224	0.715	269	0.124	314	0.280	359	0.138

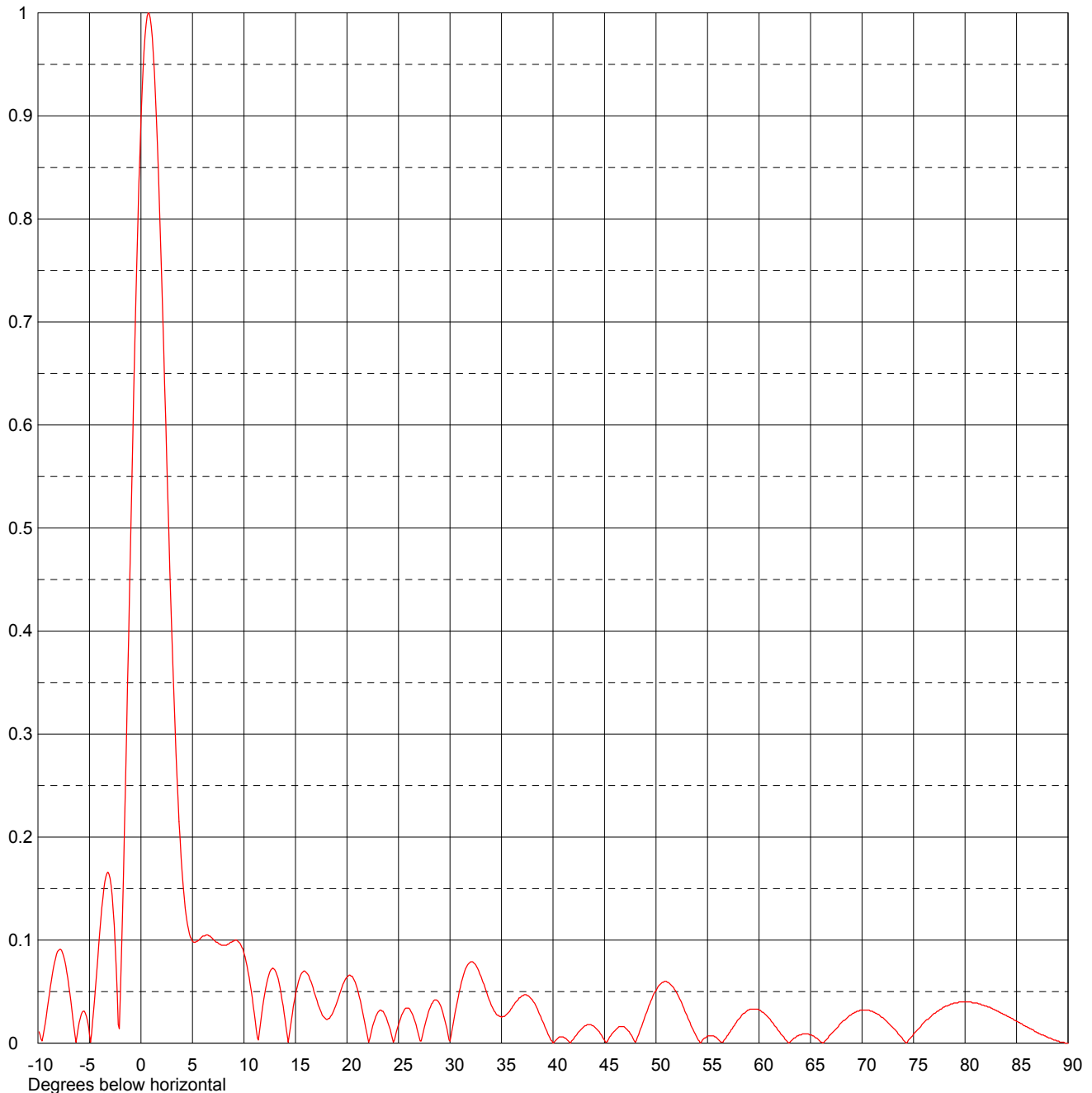
Remarks:



Date	<b>03 May 2002</b>		
Call Letters	<b>WUHF-DT</b>	Channel	<b>28</b>
Location	<b>Rochester, NY</b>		
Customer	<b>WUHF Licensee, LLC</b>		
Antenna Type	<b>TFU-24GTH-R 3BP300</b>		

### ELEVATION PATTERN

RMS Gain at Main Lobe	<b>21.5 (13.32 dB)</b>	Beam Tilt	<b>0.75 Degrees</b>
RMS Gain at Horizontal	<b>17.3 (12.38 dB)</b>	Frequency	<b>557.00 MHz</b>
Calculated / Measured	<b>Calculated</b>	Drawing #	<b>24G215075-90</b>



Remarks:



Date **03 May 2002**  
 Call Letters **WUHF-DT** Channel **28**  
 Location **Rochester, NY**  
 Customer **WUHF Licensee, LLC**  
 Antenna Type **TFU-24GTH-R 3BP300**

## TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **24G215075-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.014	2.4	0.603	10.6	0.057	30.5	0.030	51.0	0.060	71.5	0.028
-9.5	0.007	2.6	0.531	10.8	0.044	31.0	0.054	51.5	0.056	72.0	0.025
-9.0	0.040	2.8	0.461	11.0	0.029	31.5	0.072	52.0	0.049	72.5	0.020
-8.5	0.073	3.0	0.396	11.5	0.011	32.0	0.079	52.5	0.039	73.0	0.015
-8.0	0.090	3.2	0.336	12.0	0.047	32.5	0.076	53.0	0.027	73.5	0.009
-7.5	0.084	3.4	0.282	12.5	0.069	33.0	0.065	53.5	0.015	74.0	0.003
-7.0	0.055	3.6	0.236	13.0	0.071	33.5	0.051	54.0	0.005	74.5	0.003
-6.5	0.015	3.8	0.197	13.5	0.054	34.0	0.037	54.5	0.003	75.0	0.009
-6.0	0.020	4.0	0.165	14.0	0.022	34.5	0.028	55.0	0.007	75.5	0.014
-5.5	0.031	4.2	0.141	14.5	0.015	35.0	0.025	55.5	0.007	76.0	0.020
-5.0	0.009	4.4	0.123	15.0	0.047	35.5	0.028	56.0	0.004	76.5	0.024
-4.5	0.043	4.6	0.111	15.5	0.066	36.0	0.034	56.5	0.001	77.0	0.029
-4.0	0.108	4.8	0.103	16.0	0.069	36.5	0.041	57.0	0.008	77.5	0.032
-3.5	0.157	5.0	0.099	16.5	0.060	37.0	0.046	57.5	0.016	78.0	0.035
-3.0	0.160	5.2	0.098	17.0	0.044	37.5	0.046	58.0	0.023	78.5	0.037
-2.8	0.143	5.4	0.099	17.5	0.030	38.0	0.042	58.5	0.029	79.0	0.039
-2.6	0.114	5.6	0.100	18.0	0.023	38.5	0.033	59.0	0.032	79.5	0.040
-2.4	0.072	5.8	0.102	18.5	0.027	39.0	0.021	59.5	0.033	80.0	0.040
-2.2	0.018	6.0	0.104	19.0	0.039	39.5	0.009	60.0	0.032	80.5	0.040
-2.0	0.048	6.2	0.104	19.5	0.054	40.0	0.000	60.5	0.029	81.0	0.039
-1.8	0.124	6.4	0.105	20.0	0.064	40.5	0.005	61.0	0.024	81.5	0.038
-1.6	0.209	6.6	0.104	20.5	0.065	41.0	0.006	61.5	0.017	82.0	0.036
-1.4	0.300	6.8	0.103	21.0	0.053	41.5	0.002	62.0	0.011	82.5	0.034
-1.2	0.395	7.0	0.101	21.5	0.031	42.0	0.004	62.5	0.004	83.0	0.032
-1.0	0.491	7.2	0.099	22.0	0.006	42.5	0.011	63.0	0.001	83.5	0.029
-0.8	0.586	7.4	0.098	22.5	0.017	43.0	0.016	63.5	0.005	84.0	0.027
-0.6	0.677	7.6	0.096	23.0	0.030	43.5	0.018	64.0	0.008	84.5	0.024
-0.4	0.760	7.8	0.095	23.5	0.031	44.0	0.016	64.5	0.009	85.0	0.021
-0.2	0.834	8.0	0.095	24.0	0.019	44.5	0.011	65.0	0.008	85.5	0.019
0.0	0.896	8.2	0.095	24.5	0.001	45.0	0.003	65.5	0.005	86.0	0.016
0.2	0.945	8.4	0.096	25.0	0.018	45.5	0.006	66.0	0.001	86.5	0.013
0.4	0.978	8.6	0.097	25.5	0.031	46.0	0.012	66.5	0.003	87.0	0.010
0.6	0.997	8.8	0.098	26.0	0.034	46.5	0.016	67.0	0.009	87.5	0.008
0.8	0.999	9.0	0.099	26.5	0.024	47.0	0.015	67.5	0.014	88.0	0.006
1.0	0.987	9.2	0.100	27.0	0.006	47.5	0.009	68.0	0.020	88.5	0.004
1.2	0.961	9.4	0.099	27.5	0.015	48.0	0.001	68.5	0.024	89.0	0.002
1.4	0.921	9.6	0.097	28.0	0.033	48.5	0.014	69.0	0.028	89.5	0.001
1.6	0.871	9.8	0.093	28.5	0.042	49.0	0.028	69.5	0.031	90.0	0.000
1.8	0.812	10.0	0.087	29.0	0.038	49.5	0.041	70.0	0.032		
2.0	0.746	10.2	0.079	29.5	0.022	50.0	0.051	70.5	0.032		
2.2	0.675	10.4	0.069	30.0	0.002	50.5	0.058	71.0	0.031		

Remarks:

**SUMMARY OF RADIOFREQUENCY  
RADIATION STUDY**  
WUHF-DT, ROCHESTER, NEW YORK  
CHANNEL 28, 1000 kW ERP, 161 m HAAT  
MAY, 2002

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT **</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm<sup>2</sup>)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm<sup>2</sup>)</u>	<u>PERCENT UNCONTROLLED LIMIT</u>
WUHF-DT	DT	28	557	H	87.3	1000.000	0.050	0.01096	0.371	2.95%
WUHF-TV	TV	31	575	H	91	5000.000	0.300	0.90777	0.383	236.81%
WROC-TV	TV	8	183	H	91	316.000	0.300	0.05737	0.200	28.69%
WHEC-TV	TV	10	195	H	91	316.000	0.300	0.05737	0.200	28.69%
WOKR-TV	TV	13	213	H	93	316.000	0.300	0.05493	0.200	27.47%
WBXO-LP	TV	15	479	H	42	1.330	0.300	0.00113	0.319	0.35%
WXXI-DT	DT	16	485	H	70	200.000	0.300	0.12269	0.323	37.95%
WXXI-TV	TV	21	515	H	92	1230.000	0.300	0.21848	0.343	63.63%
WAWW-LP	TV	38	617	H	32	27.200	0.300	0.03994	0.411	9.71%
W47BM	TV	47	671	H	32	11.500	0.300	0.01688	0.447	3.77%
W59BV	TV	59	743	H	33	9.400	0.300	0.01298	0.495	2.62%
W63BM	TV	63	767	H	42	8.830	0.300	0.00753	0.511	1.47%
WXXI-FM	FM	218	91.5	H & V	73	45.000	1.000	0.56425	0.200	282.12%
WZNE-FM	FM	231	94.1	H & V	27	2.500	1.000	0.22915	0.200	114.57%
WCMF-FM	FM	243	96.5	H & V	74	50.000	1.000	0.61011	0.200	305.06%
WPXY-FM	FM	250	97.9	H & V	59	50.000	1.000	0.95978	0.200	479.89%
W300AM	FM	300	107.5	H & V	25	0.010	1.000	0.00107	0.200	0.53%

**TOTAL PERCENTAGE OF ANSI VALUE= 1626.28%**

*\*\* The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*



EXHIBIT 1  
FORM FCC 303-S  
WUHF(TV)  
ROCHESTER, NEW YORK

## ENVIRONMENTAL COMPLIANCE EXHIBIT

Grant of this application will not have a significant environmental impact.

First, it is noted that this application is for renewal of license for an existing station and proposes no new construction or modification of the existing facility. Nonetheless, the facilities will have no significant environmental impact as defined by 47 C.F.R. Section 1.1307(a). These facilities are not located in an officially designated wilderness area or wildlife preserve. The facilities do not pose a threat to any endangered species or designated critical habitats or are likely to jeopardize the continued existence of any proposed endangered or threatened species as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973. The facilities do not physically or visibly affect sites significant to American history. The facilities do not affect any Indian religious sites and are not located in a flood plain. Significant changes in surface features are not involved in this application. The tower and supporting structure is not equipped with high intensity white lights.

Second, the WUHF(TV) transmitter and antenna are located on a multi-user site on Pinnacle Hill in the town of Brighton. With regard to 47 C.F.R. Section 1.1307(b), recent EMR measurements taken at ground level indicated that there is one small area that exceeds the human exposure levels of radiofrequency radiation as defined in Sections 1.1310 & 2.1093 and Bulletin OET 65 and 65A. This is located in a grassy area adjacent to the base of another site users tower. Any site workers or the general public does not normally access it. In order to protect the general public, a gated fence topped with barbed wire has been erected around the area. The gate to the fence is locked and marked with RF Radiation Warning signs. The general public is further protected from exposure by No Trespassing signs posted on the access road to the site. A seven-foot high gated chain link fence topped with barbed wire surrounds the transmitting tower. The gate is locked and marked with RF Radiation warning signs. The transmitter building is locked and protected by both entry and fire alarms monitored by Doyle Security. The Pinkerton Security Company patrols the site, except during winter months.

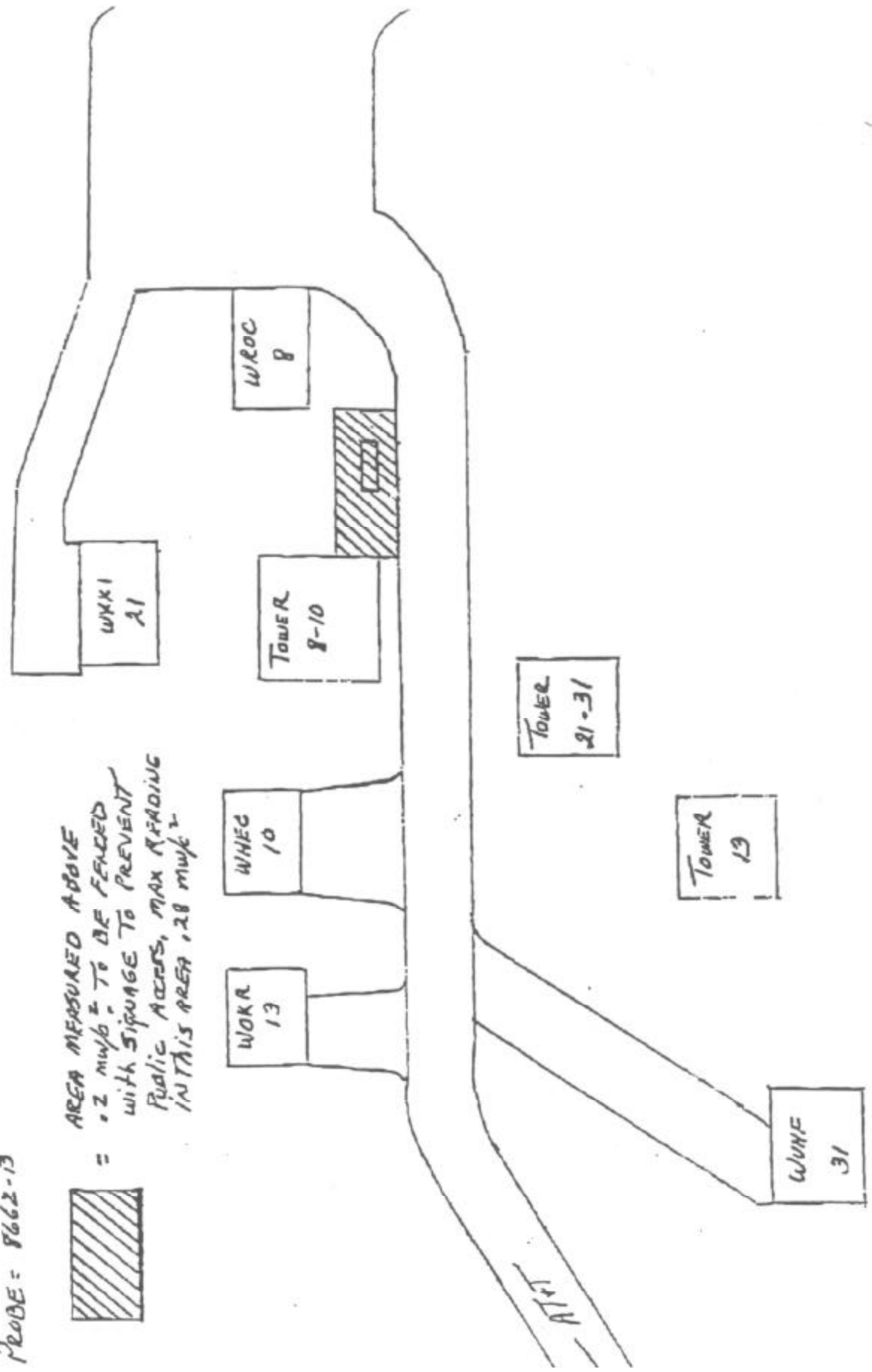
Finally, the site users have joined together to ensure the safety of site workers and have conducted an RF Radiation analysis of the site pursuant to the standards established in FCC Bulletin OET-65. Based on the results of this analysis, conducted by John F.X. Browne & Associates, P.C., protocols have been established for the reduction of power or cessation of operation of various site users whenever maintenance requires. The site users agree and cooperate to observe these protocols. A copy of this RF Radiation analysis is available at both the transmitter site and studio.



12-15-98



MEASUREMENTS TAKEN WITH  
NARDA METER SER. # 13010  
CALIBRATED 6-29-98  
UNIT # 664491  
MODE 8616  
PROBE = 8662-13



MEASUREMENTS TAKEN WITH  
NARDA METER, SER. # 13010  
CALIBRATED 6-29-98  
UNIT # 664491  
MODE 8616  
PROBE = 8662-B  
READINGS =  $\text{mW}/\text{cm}^2$

12-15-98

