

TECHNICAL EXHIBIT
AMENDMENT OF APPLICATION FOR
CONSTRUCTION PERMIT
TELEVISION STATION WFFF-DT
BURLINGTON, VERMONT

February 16, 2006

CHANNEL 43 47 KW (MAX-DA) 839 M

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Technical Statement

This Technical Exhibit was prepared on behalf of digital television broadcast station WFFF-DT, Burlington, Vermont, in support of an amendment to its pending application for construction permit (See FCC File No. BPCDT-19991019ABX). WFFF-DT is paired with analog NTSC TV station WFFF-TV, Channel 44. The instant application proposes operation of the WFFF-DT facility using a proposed new tower structure located within 100 meters of the WFFF-DT allotment reference point. The proposal complies with the DTV application “checklist” filing requirements.*

The proposed facility will not result in any extension of the predicted 41 dBu noise-limited contour relative to the WFFF-DT allotment facility.† Therefore, the proposal meets the terms of the FCC Filing Freeze for television stations.‡

Proposed Facilities

The proposed transmitting antenna will be a RF Technologies model SFN-3050-O3-STACK, which will be top-mounted on top of the WVNY-DT (Channel 13) pylon that will share the tower structure. The transmitter site elevation is 1,223 m

* See FCC *Public Notice*, “Commission Details Application Filing Procedures Digital Television (DTV)”, Released: October 16, 1997; and, FCC *Public Notice*, “Additional Application Processing Guidelines for Digital Television (DTV)”, Released: August 10, 1998.

† See Figure 2.

‡ See *August 2004 Filing Freeze PN*, DA 04-2446 (MB rel. Aug. 3, 2004).

AMSL. The antenna center of radiation will be located at 38 m above ground level and 1,261 m AMSL. The proposed WFFF-DT facility will operate on Channel 43 with a maximum directional average ERP of 16.7 dBk (47 kW) and antenna radiation center HAAT of 839 m.

The proposed facility is located in the Canadian border area. The proposed transmitter site is located 55 km from the closest point on the U.S./Canadian border. Canadian coordination of this proposal is not required because it is a “checklist” application.

The closest FCC Monitoring station is located at Belfast, Maine, at distance of 296 km at a bearing of 90°True. The closest Radio Astronomy site conducting research on Channel 37 is located at Hancock, New Hampshire, at distance of 189 km at a bearing of 159°True. There are no AM broadcast stations located within 3.2 km of the proposed transmitter site.

The proposed facility provides minimum 48 dBu, f(50,90), coverage of Burlington in compliance with Section 73.625(a)(1) of the FCC Rules. Figure 2 herein is a map depicting the predicted coverage contours of the proposed facility.

Tower Registration

The proposed structure will have an overall height of 42 m above ground level and there are no airports located within 8 km of the proposed site. Therefore, antenna structure registration is not required; nor is FAA notification required for the proposed structure. (See Figure 1.)

Allocation Considerations

The proposed WFFF-DT facility meets the criteria of Section 73.622(f)(2) of the FCC Rules. Therefore, pursuant to that section, the application shall not be subject to further consideration of electromagnetic interference to other DTV or analog TV broadcast stations.[§]

Environmental Considerations

The proposed antenna structure is to be constructed in an established “antenna farm” consisting of several towers on Mt. Mansfield. Therefore, the proposal is categorically excluded from environmental processing pursuant to the Section 1.1306(Note 3) of the FCC Rules.

The applicant, in coordination with other occupants of the Mt. Mansfield “antenna farm,” shall conduct RF power density measurements throughout the transmitter site area to confirm compliance with the FCC specified guidelines for human exposure to RF energy. Therefore, the proposal complies with Section 1.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy.^{**}

The transmitter site is to be restricted from access. In the event that personnel are required to enter the restricted area or climb the tower structure, the

[§] This is presumed to include consideration of electromagnetic interference with respect to Class A television stations.

^{**} See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:
http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf

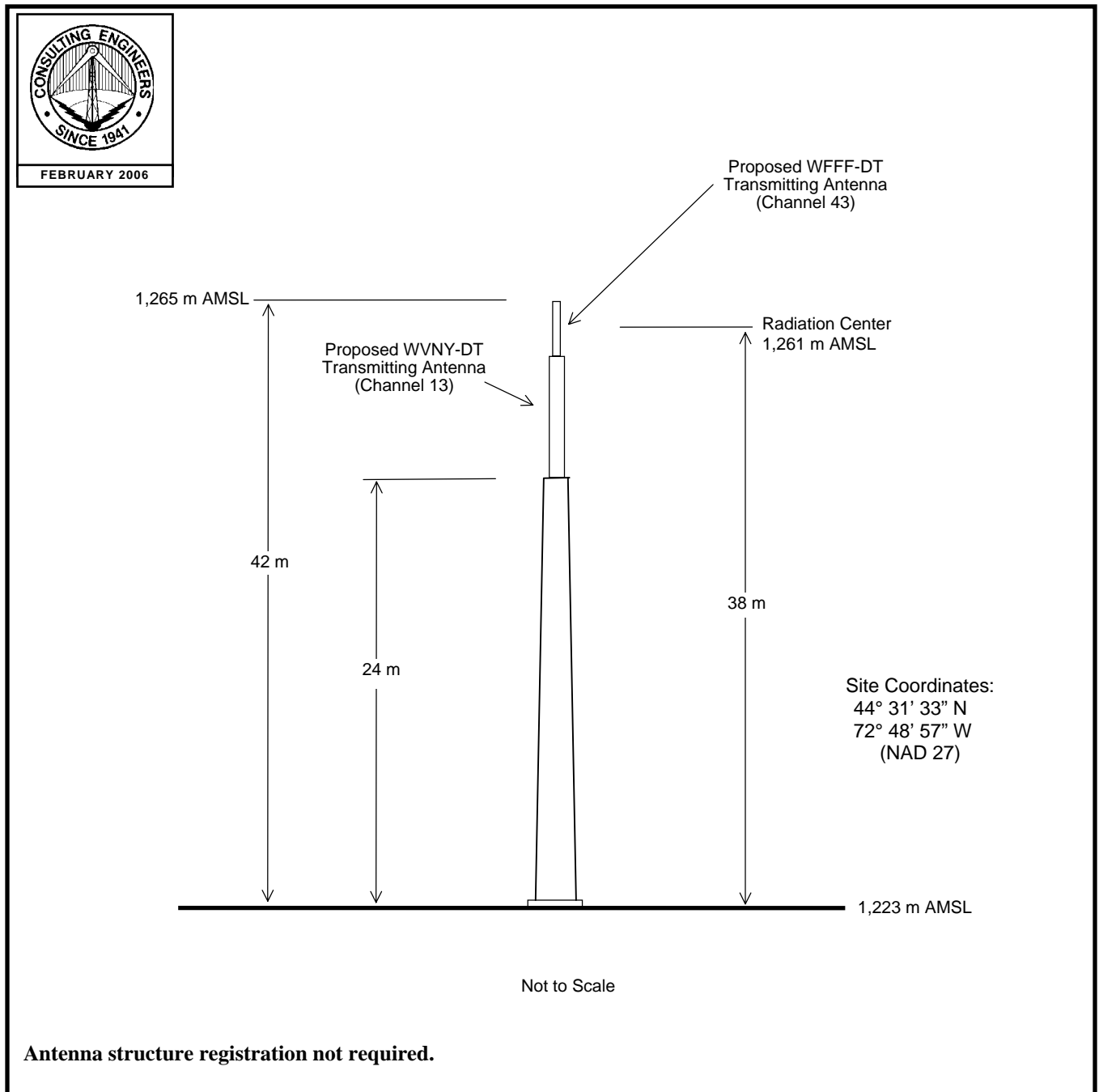
WFFF-DT transmissions shall be reduced or terminated as necessary to prevent RF exposure above the FCC recommended limits.

A handwritten signature in black ink, appearing to read "Louis du Treil, Jr.", with a stylized flourish at the end.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237-6019

February 16, 2006



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

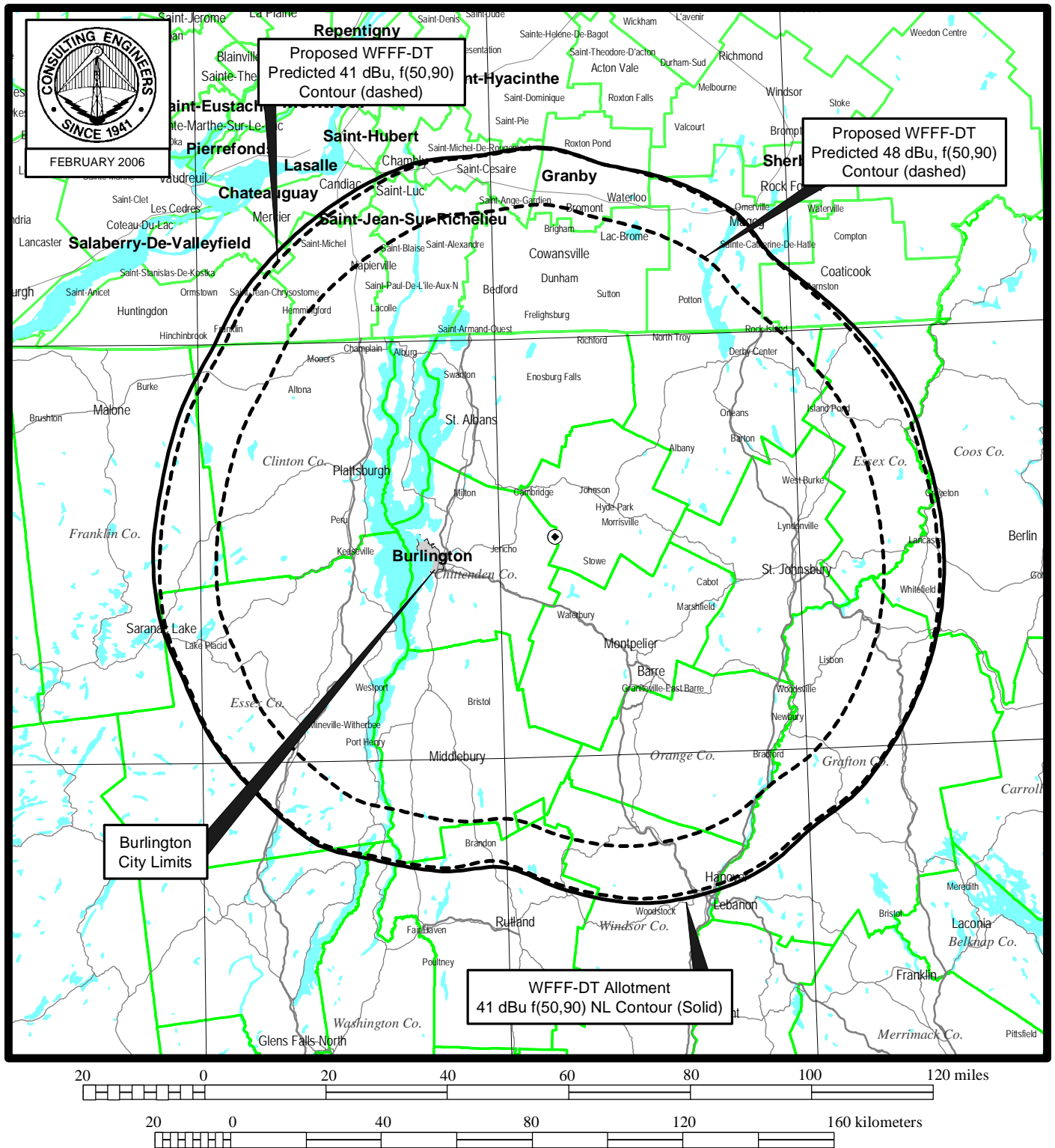
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du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



PREDICTED COVERAGE CONTOURS

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

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Transmitting Antenna Manufacturer's Pattern Data

(two pages follow)

RF Technologies LLC
Azimuth Gain=1.13 (0.53 dB)
Azimuth Pattern= 3 slot omni
Project# 05629-12
Rotation 0 degrees
For WFFF DT

