

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING STATEMENT

**SOUTHERN TV CORPORATION
W41CH, HINESVILLE, GA
CH 41- 143 kW (Max-DA) 82 m (RCAMSL)**

9 July 2001

This engineering statement, the Section III of FCC Form 302-CA to which it is attached, and other associated engineering exhibits have been prepared on behalf of Southern TV Corporation (Southern), licensee of low power television (LPTV) station W41CH, Hinesville, Georgia [FCC FACILITY ID NUMBER 69450]. Station W41CH is currently authorized (see FCC File No. BPTT-19981030JB) to operate on NTSC channel 41 (minus offset) with an effective radiated power (ERP) of 143 kW (Max-DA) and an antenna radiation center height above mean sea level (RCAMSL) of 82 meters.

The purpose of the instant application is to convert the authorized W41CH LPTV construction permit facilities to Class A status. The facilities proposed herein are identical to those authorized in BPTT-19981030JB.

The W41CH facilities fully protect other television stations (of all classes) as well as land mobile facilities from prohibited interference in accordance with Rule Sections 73.6011 [see also §74.705], 73.6013 [see also §73.623(c)(2)

through (c)(4)], 73.6012 [see also §74.707], 73.6014 [see also §74.706] and 73.6020 [see also 74.709].

Compliance with the FCC's allocation criteria was determined through the use of a modified version of the FCC's LPONE computer program. The modified program incorporates the revised analog NTSC taboo's and the appropriate D/U ratio's for protection of DTV facilities. (See the *Sixth Report & Order* and the *Memorandum Opinion and Order On Reconsideration of the Sixth Report and Order* in *MM Docket No. 87-268*.) In addition, the program includes the effects of the discrimination provided by a directional receive antenna discussed in OET Bulletin 69. A UHF receive antenna will provide up to 14 dB of additional attenuation depending upon the relative angles from the receive point to the full service transmitter site (desired) and to the proposed LPTV/Class A TV site (undesired).

Figure 1 [attached as Exhibit 9, Question 1, Part A, of Section III to FCC Form 302-CA] is a printout of the results from the modified LPONE program. The W41CH ERP toward the radio horizon was employed in the allocation study. The printout notes one instance of "objectionable interference". However, the affected facility (BNPTTL-20000829AV, CH41-, Willacoochee, GA) was filed 29 August 2000, well after the W41CH construction permit was granted (10 May 1999). Hence, any interference caused by W41CH to the Willacoochee proposal is "grandfathered" and there is no need for W41CH to provide interference protection beyond that which existed at the time the Willacoochee application was filed. Therefore, the printout demonstrates that no prohibited interference is predicted.

The W41CH LPTV operation on channel 41- complies with those portions of the technical rules contained in Part 73 that are applicable to Class A television stations.

The undersigned attests that the instant engineering statement, the associated Section III of FCC Form 302-CA, and other supporting engineering exhibits were prepared by himself or under his direction; and that the statements contained herein are true of his own personal knowledge except those stated to be on information and belief, and as to those statements he verily believes them to be true and correct.



Alan E. Gearing, P.E.

District of Columbia Number 7406