

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of REGAL MEDIA, INC., licensee of television translator W39CO, Channel 39 in Richmond, Virginia, in support of its Application for Construction Permit to specify digital operation on Channel 28 from the present site, as a digital companion channel.

It is proposed to mount an Andrew AL8 omnidirectional antenna, at the 141-meter level of an existing 152-meter communications tower. An interference study is provided in Exhibit B, and a coverage map in Exhibit C. A power density calculation follows as Exhibit D.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1025772 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

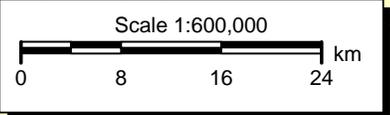
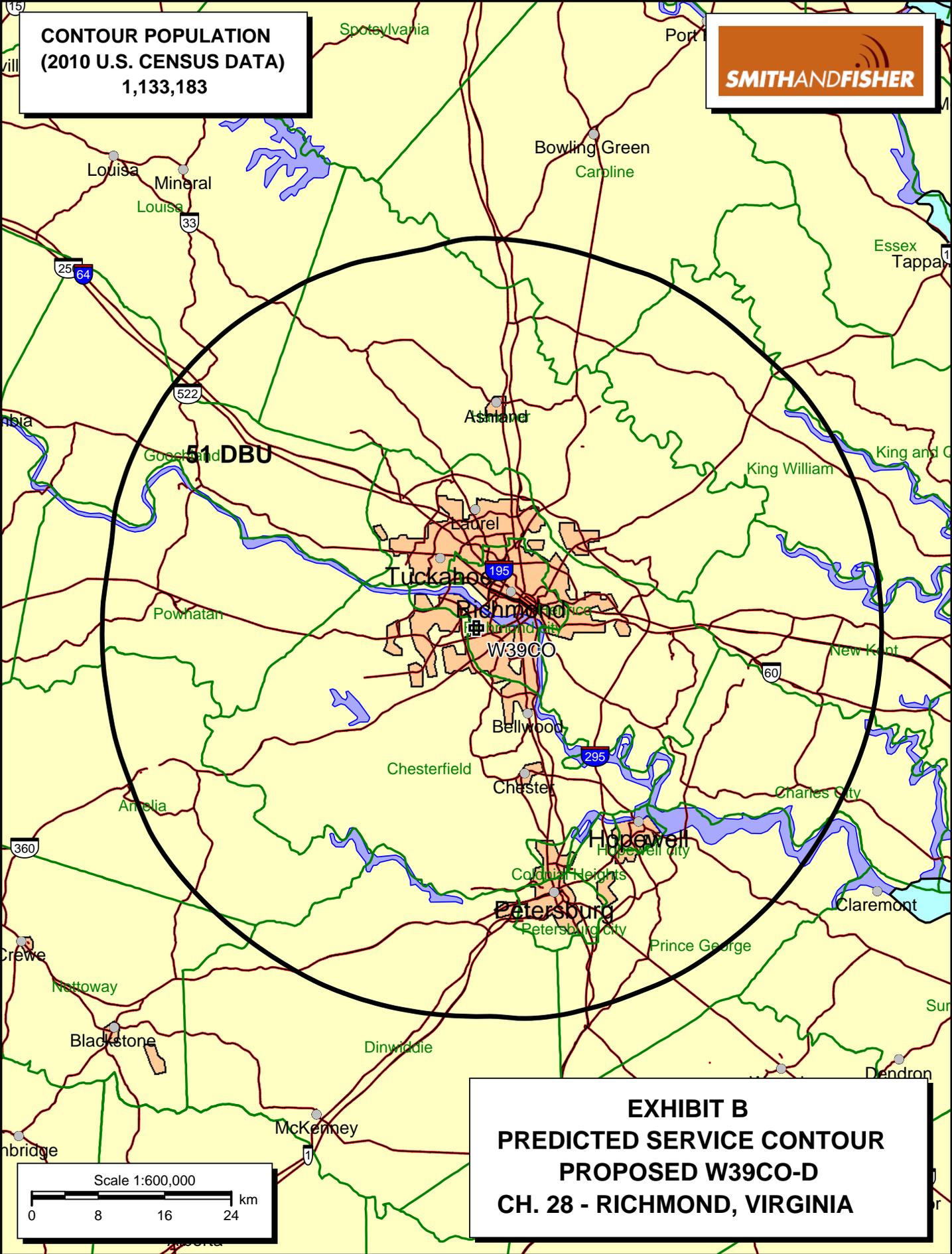


KYLE T. FISHER

July 6, 2012



**CONTOUR POPULATION
(2010 U.S. CENSUS DATA)
1,133,183**



**EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED W39CO-D
CH. 28 - RICHMOND, VIRGINIA**

LONGLEY-RICE INTERFERENCE STUDY
PROPOSED W39CO-D
CHANNEL 28 – RICHMOND, VIRGINIA

We conducted a detailed interference study using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than the proposed W39CO-D facility) already is predicted to exist (also known as "masking"). The results of this study are provided in Exhibit B-2. It concludes that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed digital W39CO-D facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

INTERFERENCE SUMMARY

PROPOSED W39CO-D
CHANNEL 28 – RICHMOND, VIRGINIA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
WFPT-D BLEDT-20090330AFA	Lic.	Frederick, MD	28	3,995,442	16,871	0.4
WRDC-D BLCDT-20090612AID	Lic.	Durham, NC	28	2,990,678	709	<0.1

POWER DENSITY CALCULATION

PROPOSED W39CO-D
CHANNEL 28 – RICHMOND, VIRGINIA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Richmond facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kW, an antenna radiation center 141 meters above ground, and the specific elevation pattern of an Andrew AL8 antenna, maximum power density two meters above ground of 0.00024 mW/cm^2 is calculated to occur 125 meters from the base of the tower. Since this is 0.1 percent of the 0.37 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 28 (554-560 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.