

EXHIBIT 42
ENGINEERING STATEMENT RE;
PRINCIPAL COMMUNITY COVERAGE
WGSA-DT 650 KW 461 M AMSL CH. 35
BAXLEY, GEORGIA

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Prepared by
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May, 2001

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INTRODUCTION

This statement was prepared on behalf of Southern TV Corporation, licensee of commercial television broadcast station WGSA, Channel 34, at Baxley, Georgia. WGSA has a construction to activate the digital television (DTV) Channel 35 allotment that was paired with the analog television (TV) license of WGSA. A modification is now being requested for a new antenna location and increased antenna height. This application proposes to locate the DTV Channel 35 antenna on the proposed new multi user TV tower, to be built by Richland towers for the use of several broadcasters, rather than constructing the independent new tower necessary in the original application.

This statement along with Section III-D of FCC Form 301 provides technical information in support of this application by WGSA. All technical data contained in or attached to this statement has been determined in accordance with the current FCC Rules.

PROPOSED CHANGE IN FACILITIES

The WGSA-DT facility will be relocated to a new tower, presently under construction by Richland Towers near Savannah, to be used to support several broadcast station antennas. A new custom antenna stack, using a top mounted Dielectric Model TUC-O5-16/80H-T, will be mounted atop the tower for DTV Channel 35. The antenna radiation center height above average terrain (HAAT) will be 454 meters.

WGSA will operate on DTV Channel 35 in a nondirectional mode with an effective radiated power (ERP) of 650 kW, equal to the maximum DTV ERP allowed for the proposed antenna height. The intended nondirectional ERP exceeds the reference power in the DTV Allotment Plan in certain directions; however, this non-checklist proposal meets both the Commission's interference criteria in Section 73.623 and the maximum power requirement for UHF in Section 73.622(f)(8).

Attached in Exhibit 41 as Figure 1 is a map showing both the 41 and 48 dBu predicted F(50,90) noise limited contours. The map clearly indicates that service to the entire community of Baxley will exceed the former minimum signal requirement of 41 dBu coverage, as set forth in Section 73.625(a) of the FCC Rules. The proposal, however, falls short of the current 48 dBu predicted contour coverage rule, using the standard FCC contour prediction method.

PRINCIPAL COMMUNITY COVERAGE, SUPPLEMENTAL EXHIBIT

A supplemental principal community service showing is attached as Figures 1A and 1B. The first Figure consists of an ITM Longley-Rice field strength prediction graph along the radial from the new proposed WGSA transmitter site through the community of Baxley. The prediction was conducted using the normal ITM input parameters, with the exception of using 90% DTV time variability. This field strength graph shows that the predicted signal over Baxley, and well beyond it, is well in excess of 48dBu.

Also attached as Figure 1B is a contour and area prediction map. This map shows a portion of the normal FCC predicted 48 dBu contour. It also shows the areas expected to receive 48 dBu or better service based on a Longley-Rice analysis. Each grid on the map is one kilometer square. The field strength at the center of each of the grids has been predicted based on the FCC method used in the DTV allotment table calculations. Grids with 48dBu or more signal level are clear (no shading), while those with less than 48 dBu signal level are

cross hatched. It is evident that all of Baxley, and a considerable area around it, is predicted to receive 48dBu or better service.

CONCLUSION

The proposed WGS-A-DT operation supplies the currently required 41 dBu service to Baxley. It does not supply the future required 48 dBu contour over Baxley as predicted by the nominal FCC method employing 3 to 16 kilometer terrain data and the FCC F(50,90) estimated field strength curves. However, the alternative Longley-Rice method, which considers more propagation factors in a more precise method, does predict service well in excess of 48 dBu to Baxley. This grade of service will be required in the future and this showing serves to illustrate that the future 48 dBu service level will be met by the proposed facilities.

Respectfully submitted,
Lohnes and Culver

By _____
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May, 2001

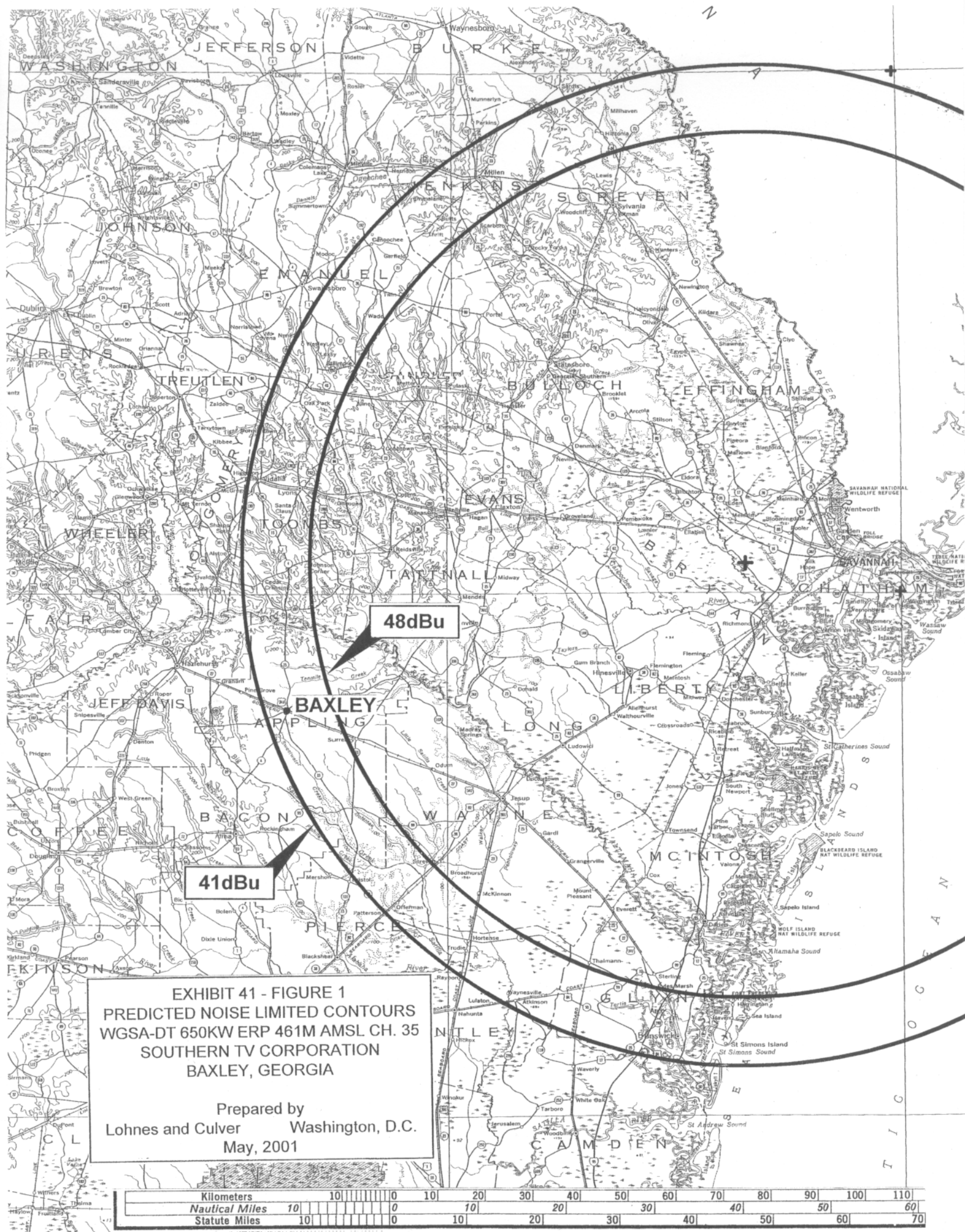
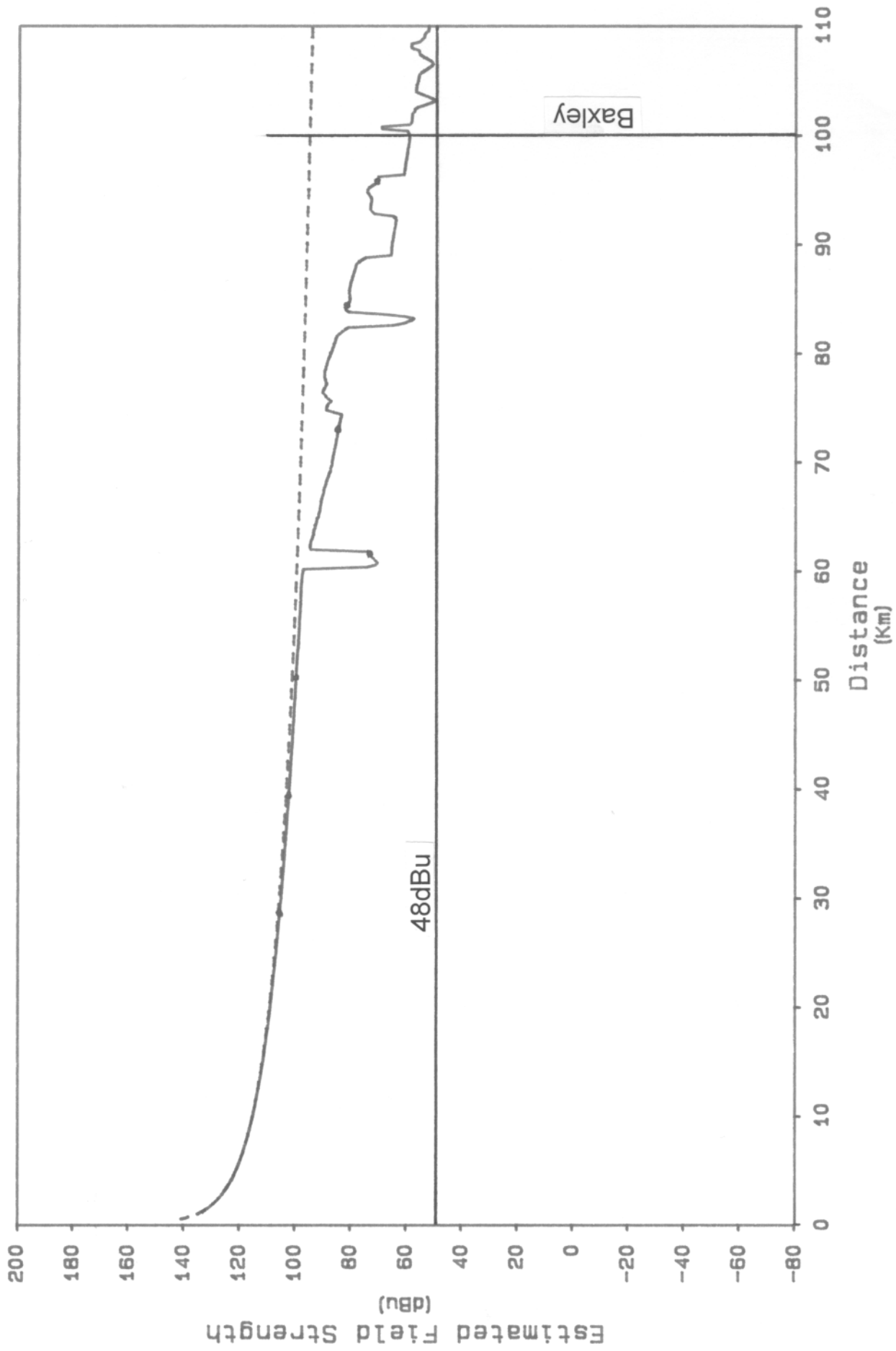


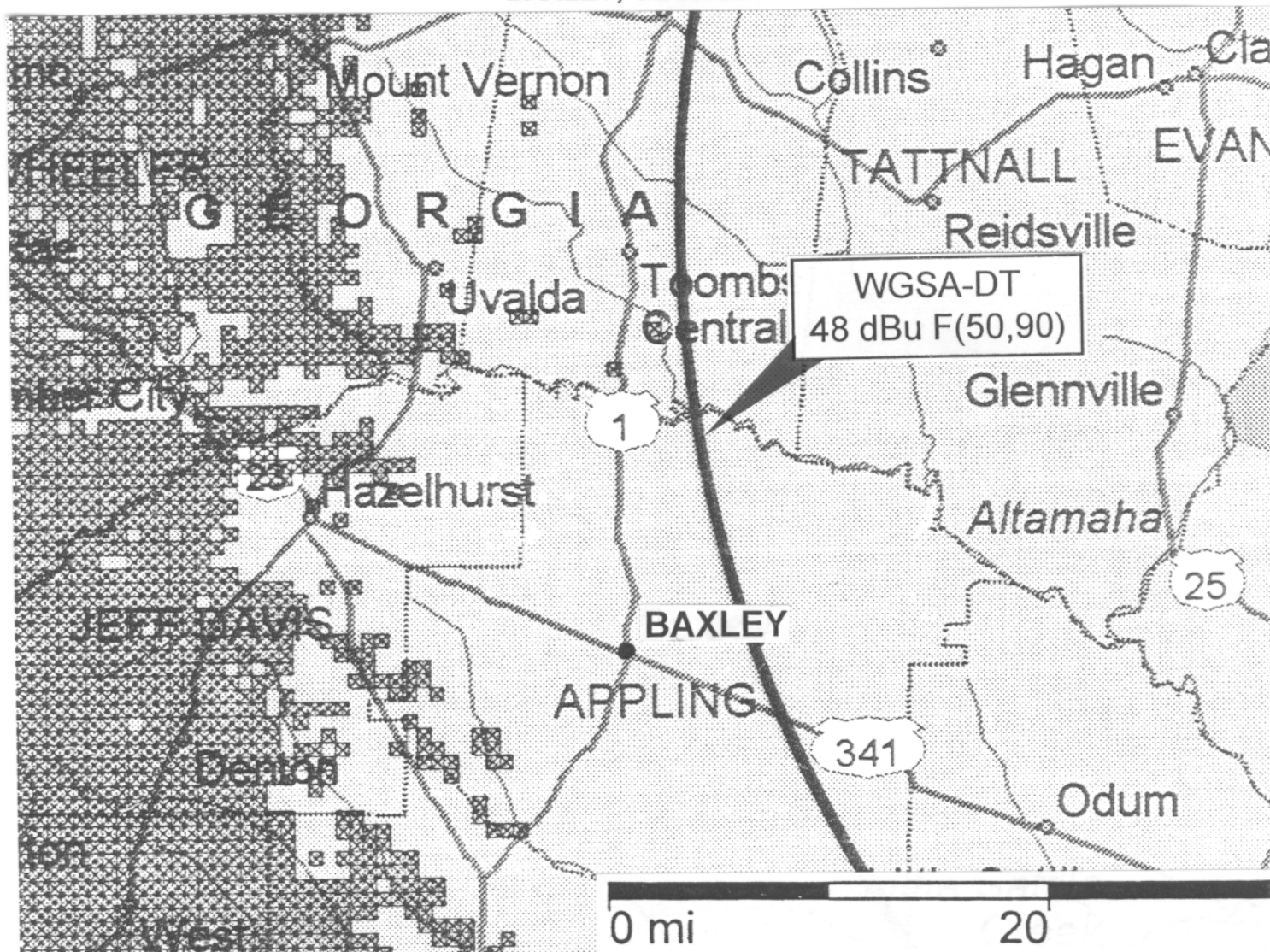
EXHIBIT 42 - FIGURE 1A

LONGLEY-RICE MODEL, ITM VERSION 1.2.2



Location: 32-03-35 81-20-43
Azimuth: 252.0 Deg. True

**EXHIBIT 42 — FIGURE 1B
PRINCIPAL COMMUNITY COVERAGE
ALTERNATIVE SHOWING
WGSA-DT 650 KW 461 M AMSL CH. 35
BAXLEY, GEORGIA**



NOTE: The coverage illustrated above is based on the following method and parameters.

The 48 dBu contour is predicted using the FCC normal method, employing the FCC F(50,90) estimated field strength curves and the 3 to 16 kilometer average terrain data.

The area coverage (shading) was investigated in each 1 kilometer square cell within which the field strength has been predicted at the center of each cell. The prediction method is identical to that used in the FCC DTV allocation process in the Sixth Report and Order (1997) from which the final DTV Table of Allotments (1998) was produced. The method uses a Longley-Rice prediction method and the transmission power, height, azimuth and terrain toward each cell. Those cells receiving 48dBu or more signal level are not shaded. Those receiving less than 48dBu are shown with a cross hatch (shaded).