

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
LPTV STATION W28DA (FACILITY ID 73362)
PITTSFIELD, ETC., MASSACHUSETTS
CH 28 2.8 KW-ND

Technical Narrative

This Technical Exhibit supports a flash-cut digital television (DTV) application for TV translator station W28DA at Pittsfield, Etc., Massachusetts. Station W28DA is licensed to operate on analog channel 28 (BLTT-20061011AAH). A non-directional antenna system is employed with a visual effective radiated power (ERP) of 9.3 kilowatts (kW). The antenna radiation center height (RCAMSL) is 438.9 meters above mean sea level (AMSL). The FCC antenna structure registration number is 1252704 and the site coordinates are 42-25-26, 73-15-57 (NAD-27).

Proposed Facilities

This application proposes digital operation on current channel (28), at the current transmitter site, at the same antenna height, and with the same non-directional antenna. A Kathrein-Scala model SL-8NF, non-directional antenna system will be used. The proposed DTV ERP is 2.8 kW-ND and the antenna RCAMSL will remain 438.9 meters AMSL.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

Allocation Considerations – *pre transition*

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations, prior to the full-service transition to DTV (analog shutoff). Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer grid, and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments).

Allocation Considerations – *post transition*

A study has been conducted to assure that the proposal will not create prohibited interference with allotted or proposed, DTV stations after the full-service transition to DTV (analog shutoff). Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer grid, and 2000 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments).

If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin. The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed W28DA facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 24.4 meters above ground level. The proposed maximum ERP is 2.8 kW. Based on a downward relative field of 0.3 (see Figure 2 for the elevation pattern), the calculated power density at a point 2 meters (6.6 feet) above ground

level will not exceed 5% of the FCC's recommended limit of 0.37 mW/cm^2 for channel 28 for an "uncontrolled" environment.

Access to the rooftop is restricted. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

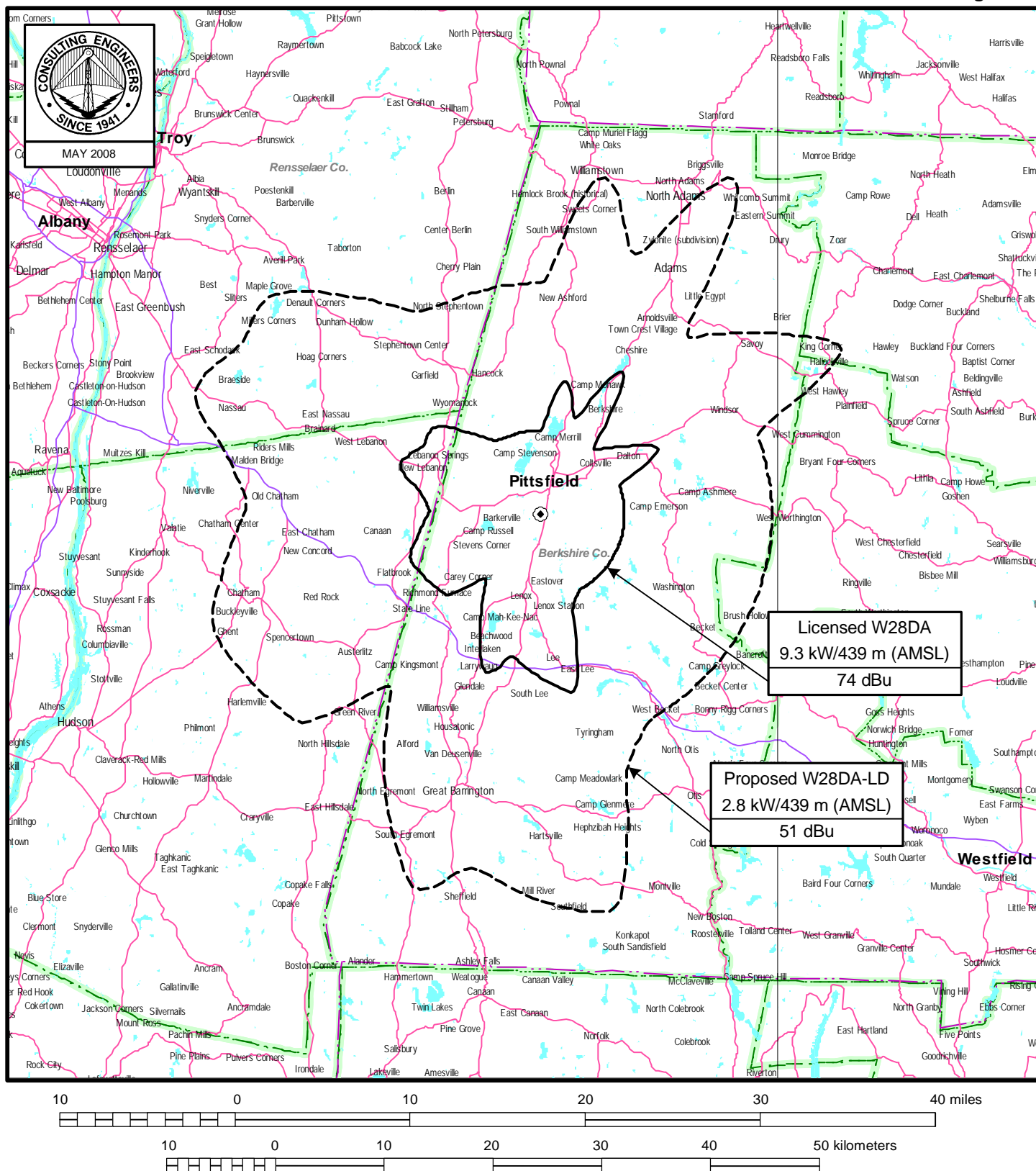
It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.



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Figure 1



COVERAGE MAP

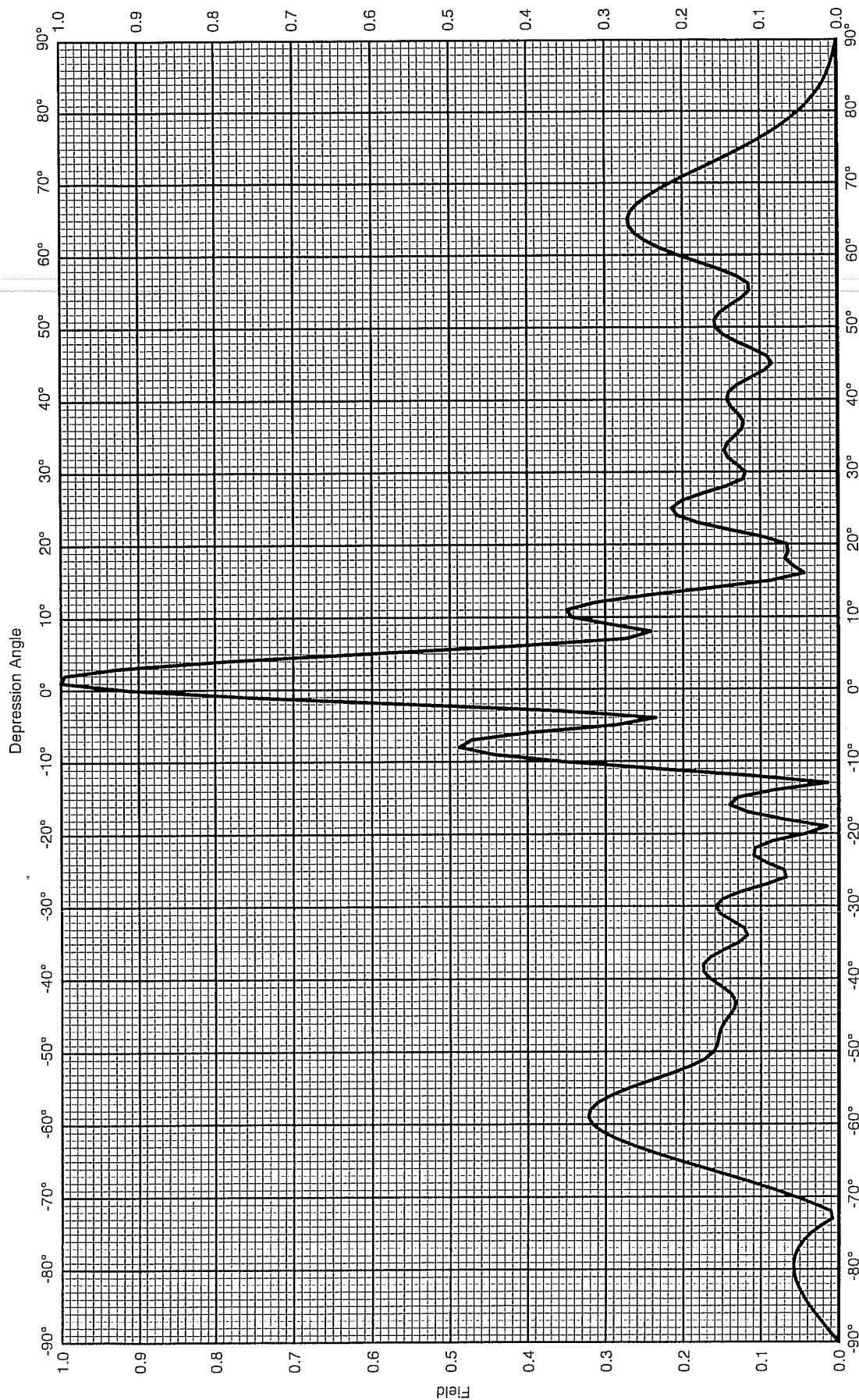
STATION W28DA

PITTSFIELD, ETC., MASSACHUSETTS

CH 28 2.8 KW

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Figure 2



SL-8NF Paraslot UHF-TV Antenna

Ch-28

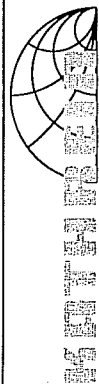
Maximum gain: 10.5 dBd (12.65 dBi)

Gain at horizon: 9.7 dBd (11.85 dBi)

Horizontal polarization

Vertical radiation pattern

Null-fill



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