

TECHNICAL EXHIBIT  
APPLICATION FOR MODIFICATION OF  
CONSTRUCTION PERMIT  
TELEVISION STATION WMBC-DT  
NEWTON, NEW JERSEY

July 1, 2004

CHANNEL 18 1000 KW (MAX-DA) 250 M

TECHNICAL EXHIBIT  
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TELEVISION STATION WMBC-DT  
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Technical Statement

This Technical Exhibit was prepared on behalf of digital television broadcast station WMBC-DT, Newton, New Jersey, in support of an application for modification of construction permit (See FCC File No. BPCDT-19991029AFC). WMBC-DT is authorized for operation on Channel 18 with a non-directional effective radiated power (ERP) of 95 kW and antenna height above average terrain (HAAT) of 333 m. The purpose of this application is to relocate the transmitter site, decrease the antenna HAAT and to specify a directional antenna operation with maximum ERP of 1000 kW.

As described in detail herein, the proposed operation meets the *de minimis* interference protection requirements as outlined FCC's DTV Processing Guidelines,<sup>\*</sup> the FCC's *Second Memorandum Opinion and Order*,<sup>†</sup> and the *DTV Report and Order and Further Notice of Proposed Rule Making*.<sup>‡</sup>

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<sup>\*</sup> See FCC *Public Notice*, "Additional Application Processing Guidelines for Digital Television (DTV)", Released: August 10, 1998.

<sup>†</sup> See *Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders*, FCC-98-315, Released: December 18, 1998.

<sup>‡</sup> See *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39, FCC 01-24, released January 19, 2001.

Proposed Facilities

The proposed facility provides minimum 48 dBu, f(50,90), coverage of Newton in compliance with Section 73.625(a)(1) of the FCC Rules, as adopted by the FCC in MM Docket No. 00-39. Figure 2 herein is a map depicting the predicted coverage contours of the proposed facility. It is noted that there are terrain obstructions in the path from the proposed transmitter site toward Newton. However, a Longley-Rice analysis of coverage over Newton indicates that there would be minimum 48 dBu, f(50,90) coverage over all of Newton considering a land use land clutter factor of 6 dB, which is the maximum for lower band UHF stations, such as Channel 18, according to the FCC Individual Location Longley-Rice (ILLR) model. This clutter factor is consistent with the maximum value outlined in the *First Report and Order* in FCC ET Docket No. 00-11 for UHF Channels 14-36 in a “Mixed Urban/Buildings” land use category.

The proposed facility meets the maximum permissible ERP requirements for UHF DTV stations as outlined in Section 73.622(f)(8)(i) of the FCC Rules. According to this section of the Rules, considering a proposed antenna HAAT for the proposed WMBC-DT facility of 250 m, the maximum permissible ERP is 1000 kW.

No adverse electromagnetic impact is expected as a result of the proposed operation. However, the applicant recognizes its responsibility to correct objectionable electromagnetic interference problems that result from its proposed operation.

Tower Registration

The proposed antenna structure has been registered with the FCC. The FCC antenna structure registration number is 1045123. There will be no change in the overall height of the antenna structure as a result of the instant proposal.

Domestic Allocation Considerations

The proposed WMBC-DT Channel 18 facility meets the requirements of Section 73.623 of the FCC Rules concerning predicted interference to other existing U.S. NTSC facilities and U.S. DTV allotments and assignments. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules; OET Bulletin No. 69; and published FCC guidelines for preparation of such interference analyses. The Longley-Rice interference analyses were conducted using the software maintained by du Treil, Lundin & Rackley, Inc. based on the FCC published software routines.<sup>§</sup> Stations selected for analysis were determined pursuant to the distance requirements outlined in the FCC DTV Processing Guidelines Public Notice. Accordingly, co-channel DTV and NTSC stations within 429 km and 407 km, respectively, were examined for potential interference; and first-adjacent DTV and NTSC stations within 229 km and 207 km, respectively, were examined for potential interference. Analog taboo-related NTSC stations within 142 km were examined for potential interference. The results of the interference analyses for the proposed WMBC-DT facility are summarized herein at Figure 3. As indicated therein, the proposed facility will meet the 2%/10% criterion outlined in the FCC Rules and published guidelines with respect to all considered stations.

With respect to Class A TV station protection, the proposal has been evaluated according to the requirements of Section 73.623(c)(5) of the FCC Rules. The analysis reveals one potentially affected Class A TV station facility, as follows:

WEBR-CA, Manhattan, NY, Channel 17 (FCC File No. BLTTL-19960116JC)

A contour analysis indicates that there would be prohibited contour overlap between the proposed WMBC-DT facility and the WEBR-CA facilities. However, the applicant

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<sup>§</sup> The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is a precise implementation of the procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed.

requests a waiver pursuant to Section 73.623(c)(5)(iii) of the FCC Rules to permit the use of the Longley-Rice terrain dependent propagation model as described in FCC OET Bulletin No. 69. An analysis of predicted interference with respect to the WEBR-CA facility prepared according to OET Bulletin No. 69 reveals zero predicted interference to the WEBR-CA facilities (See Figure 3).

With respect to the Land Mobile allotment for Channel 19 at Philadelphia, the proposed facility will be located 130.0 km from the Channel 19 reference coordinates. The present WMBC-DT construction permit facility is located 127.3 km from the Philadelphia Channel 19 reference coordinates. Therefore, the proposal will result in a separation of 2.7 km greater than the existing WMBC-DT construction permit location. Given the increase in the separation, the proposal is believed to be in compliance with Section 73.623(e) of the FCC Rules concerning Land Mobile operations in Channels 14-20.

#### Environmental Considerations

An evaluation was conducted for the proposed facility concerning compliance with Section 1.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy.\*\* Calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground<sup>††</sup> based on the following conservative assumptions, with the following results:

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\*\* 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](http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf)

†† The antenna radiation center height above ground is 193 m.

<b>Call Sign</b>	<b>Channel</b>	<b>Total Average ERP (kW)</b>	<b>Relative Field Factor<sup>‡‡</sup></b>	<b>FCC Limit<sup>§§</sup> (mW/cm<sup>2</sup>)</b>	<b>Percentage of Limit</b>
WMBC-DT	18	1000	0.13	0.331	4.7%

As indicated above, the total exposure to RF radiation at 2-m above ground level will not exceed 4.7% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF energy and it is categorically excluded from environmental processing. The applicant, in coordination with other users of the transmission facility, shall reduce power or cease operation as necessary to protect persons having access to the WMBC-DT tower or antenna from radio frequency radiation in excess of the FCC guidelines.

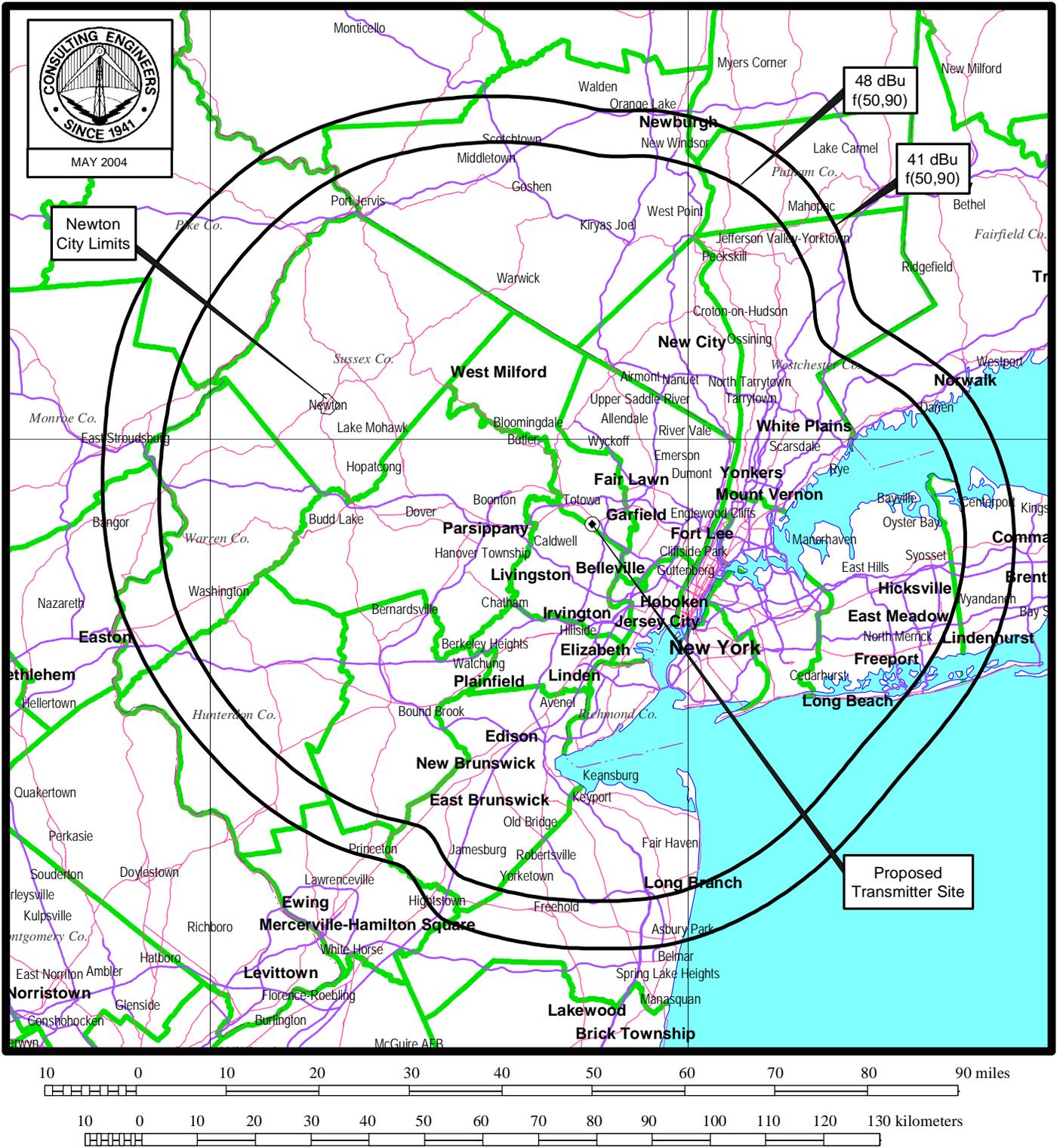
Louis Robert du Treil, Jr.

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

July 1, 2004

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<sup>‡‡</sup> This is a conservative estimate of the relative field factor in the downward direction.  
<sup>§§</sup> for general population/uncontrolled environments



## PREDICTED COVERAGE CONTOURS

TELEVISION STATION WMBC-DT  
 NEWTON, NEW JERSEY  
 CHANNEL 18 1000 KW (MAX-DA) 250 M

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

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Summary of Allocation Analysis

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	17	WEBR-CA	MANHATTAN NY	22.2	LIC	BLTTL	19960116JC
2	17	WMHT	SCHENECTADY NY	197.7	LIC	BLET	331
3	17	WPHL-TV	PHILADELPHIA PA	126.9	LIC	BLCT	2611
4	17	WOST-DT	BLOCK ISLAND RI	213.9	PLN	DTVPLN	DTVP0279
5	17	WPXQ	BLOCK ISLAND RI	213.9	APP	BPCDT	19991022AAT
6	18	WUVN	HARTFORD CT	154.6	LIC	BLCT	19870304KI
7	18	WMFP	LAWRENCE MA	294.8	APP	BPCDT	19991101AFC
8	18	WMFP-DT	LAWRENCE MA	309.2	PLN	DTVPLN	DTVP0307
9	18	WETM-TV	ELMIRA NY	261.7	LIC	BLCT	19980615KE
10	18	WNPI-TV	NORWOOD NY	406.7	LIC	BMLET	19910906KG

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
11	18	WNPI-TV	NORWOOD NY	406.7	CP	BPET	20030109AAJ
12	20	WTXX	WATERBURY CT	122.7	LIC	BLCT	19820428KE
13	21	WLIW	GARDEN CITY NY	63.5	LIC	BLET	20030416AAN
14	25	WNYE-TV	NEW YORK NY	22.2	LIC	BLET	19920220KG

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	--	--	--	*	0.000	--	pass
2	--	--	--	*	0.000	--	pass
3	--	--	--	*	0.000	--	pass
4	--	--	--	*	0.000	--	pass
5	--	--	--	*	0.000	--	pass
6	558131	600946	3790703	42815	1.129	2.0	pass
7	--	--	--	*	0.000	--	pass
8	--	--	--	*	0.000	--	pass

\* There is no interference predicted.

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
9	2735	5052	562932	2317	0.412	2.0	pass
10	--	--	--	*	0.000	--	pass
11	--	--	--	*	0.000	--	pass
12	--	--	--	*	0.000	--	pass
13	1442133	1442133	12635361	0	0.000	2.0	pass
14	370535	371938	17047209	1403	0.008	2.0	pass

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Transmitting Antenna  
Manufacturer's Pattern Data

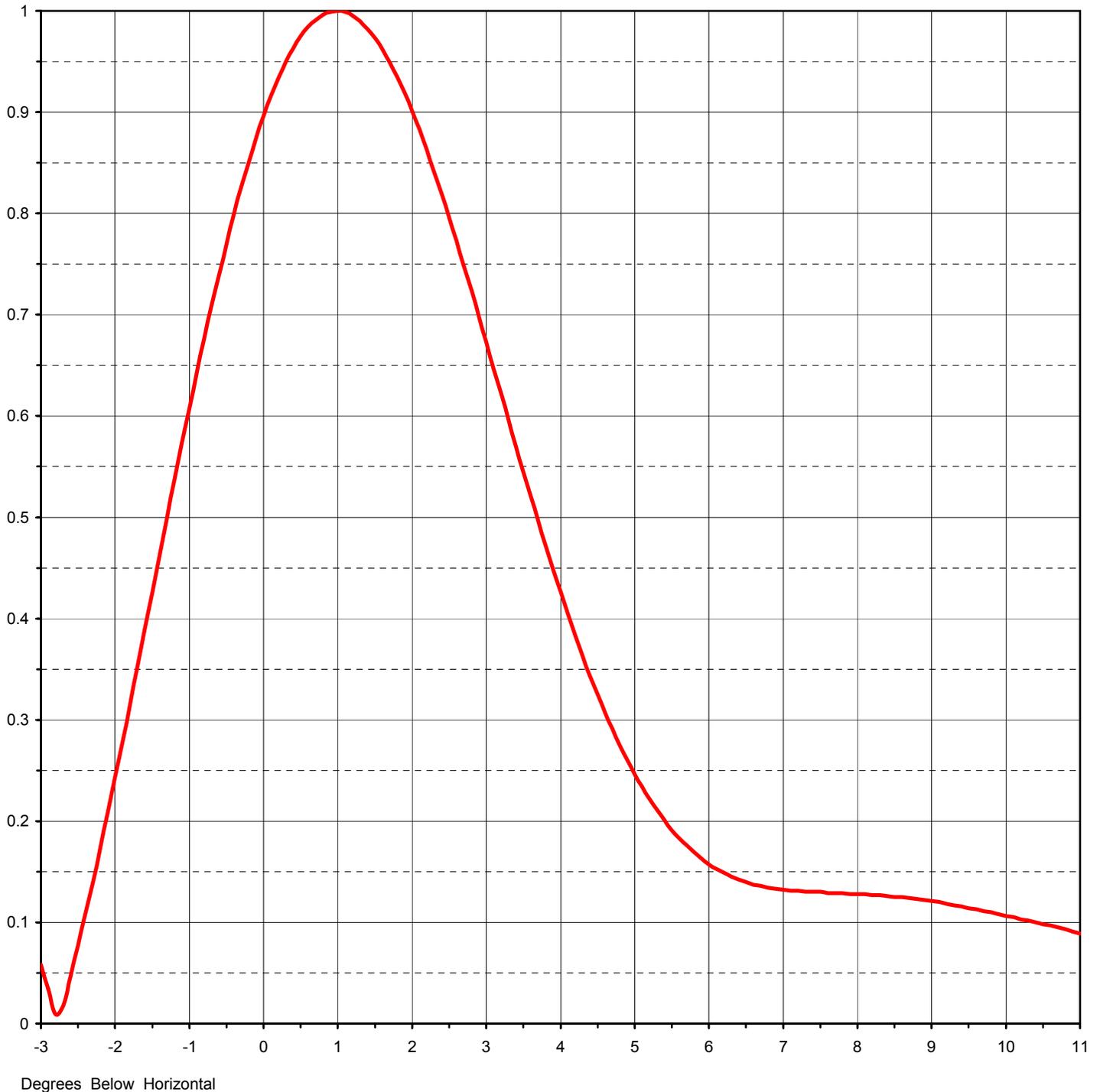
(five pages follow)



Proposal Number **DCA-10501**  
Date **9-Mar-04**  
Call Letters **WMBC-DT** Channel **18**  
Location **Newton, NJ**  
Customer  
Antenna Type **TFU-16GTH-R 2S350**

### ELEVATION PATTERN

RMS Gain at Main Lobe	<b>14.00 ( 11.46 dB )</b>	Beam Tilt	<b>1.00 deg</b>
RMS Gain at Horizontal	<b>11.20 ( 10.49 dB )</b>	Frequency	<b>497.00 MHz</b>
Calculated / Measured	<b>Calculated</b>	Drawing #	<b>18G140100</b>

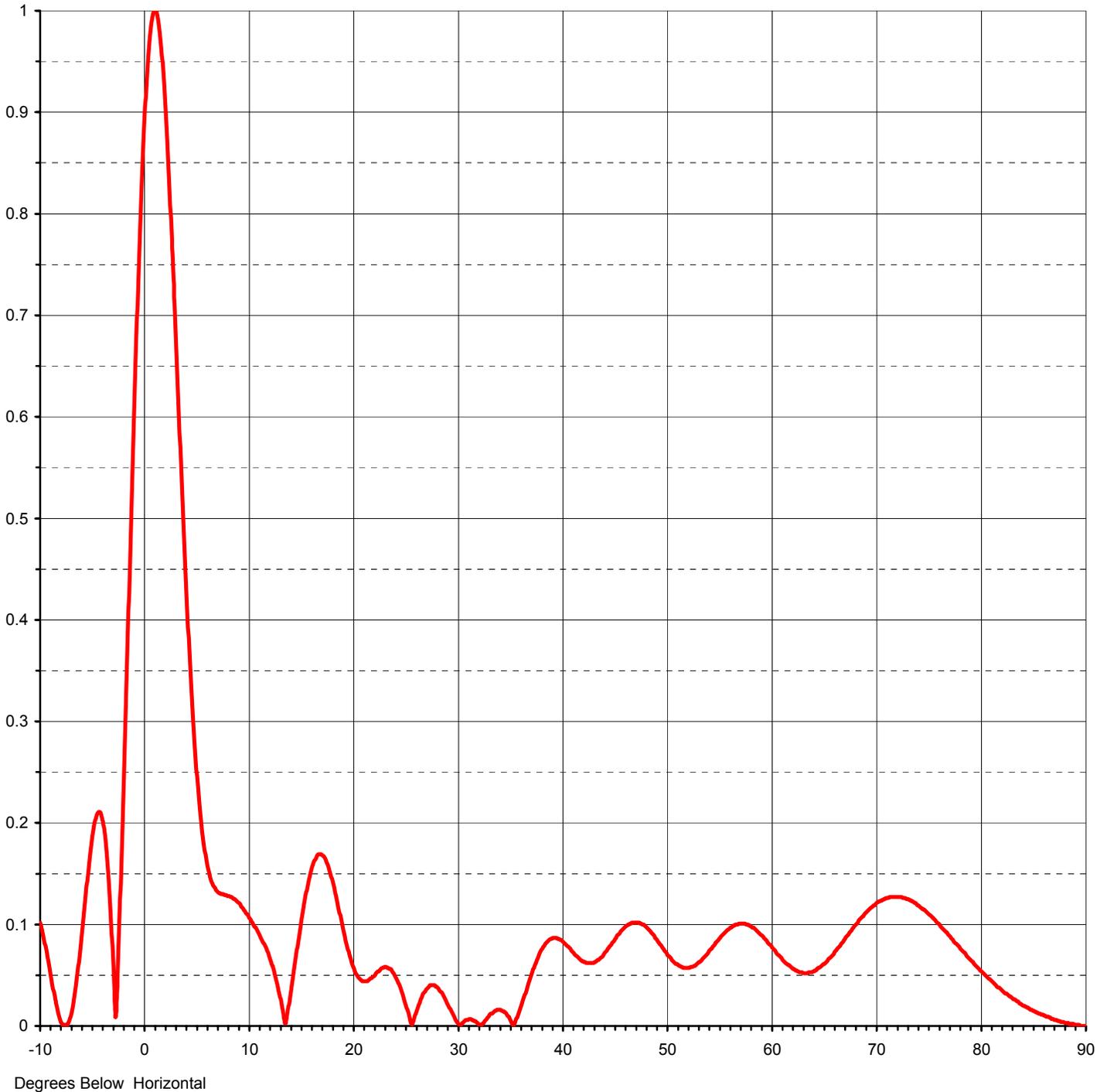




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RMS Gain at Horizontal	<b>11.20 ( 10.49 dB )</b>	Frequency	<b>497.00 MHz</b>
Calculated / Measured	<b>Calculated</b>	Drawing #	<b>18G140100-90</b>





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 Location **Newton, NJ**  
 Customer  
 Antenna Type **TFU-16GTH-R 2S350**

### TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **18G140100-90**

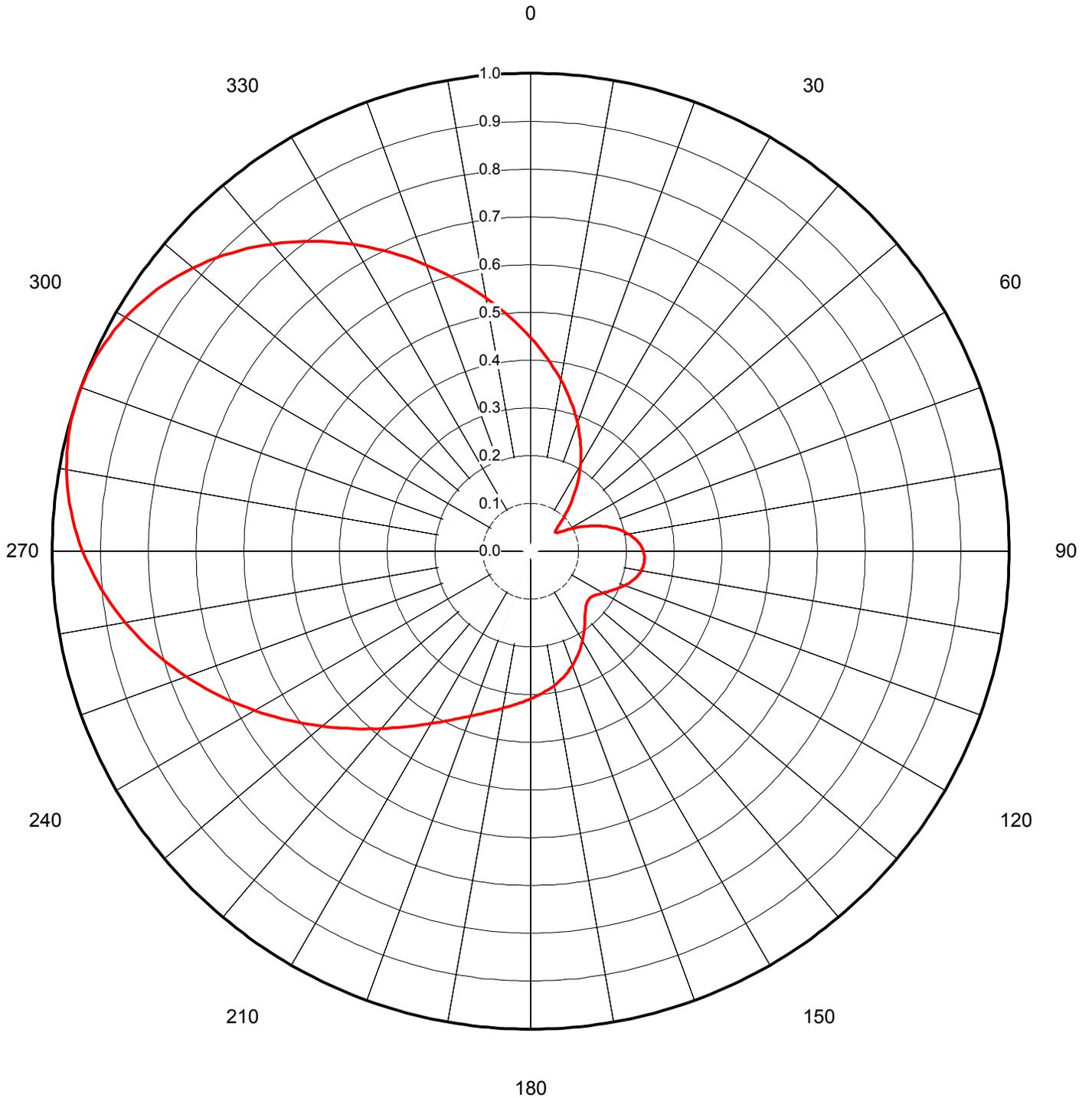
Angle	Field										
-10.0	0.102	2.4	0.819	10.6	0.098	30.5	0.003	51.0	0.061	71.5	0.127
-9.5	0.079	2.6	0.773	10.8	0.095	31.0	0.006	51.5	0.058	72.0	0.127
-9.0	0.051	2.8	0.724	11.0	0.091	31.5	0.006	52.0	0.057	72.5	0.126
-8.5	0.023	3.0	0.673	11.5	0.081	32.0	0.002	52.5	0.058	73.0	0.125
-8.0	0.004	3.2	0.622	12.0	0.069	32.5	0.003	53.0	0.062	73.5	0.122
-7.5	0.001	3.4	0.570	12.5	0.052	33.0	0.009	53.5	0.067	74.0	0.119
-7.0	0.013	3.6	0.520	13.0	0.031	33.5	0.014	54.0	0.072	74.5	0.115
-6.5	0.046	3.8	0.472	13.5	0.003	34.0	0.016	54.5	0.079	75.0	0.110
-6.0	0.092	4.0	0.426	14.0	0.029	34.5	0.014	55.0	0.085	75.5	0.105
-5.5	0.143	4.2	0.383	14.5	0.064	35.0	0.007	55.5	0.091	76.0	0.100
-5.0	0.187	4.4	0.343	15.0	0.098	35.5	0.003	56.0	0.096	76.5	0.094
-4.5	0.210	4.6	0.307	15.5	0.129	36.0	0.017	56.5	0.099	77.0	0.088
-4.0	0.202	4.8	0.275	16.0	0.152	36.5	0.032	57.0	0.101	77.5	0.082
-3.5	0.152	5.0	0.246	16.5	0.166	37.0	0.048	57.5	0.101	78.0	0.076
-3.0	0.058	5.2	0.222	17.0	0.169	37.5	0.062	58.0	0.099	78.5	0.071
-2.8	0.009	5.4	0.201	17.5	0.161	38.0	0.074	58.5	0.095	79.0	0.065
-2.6	0.047	5.6	0.183	18.0	0.145	38.5	0.082	59.0	0.090	79.5	0.059
-2.4	0.108	5.8	0.169	18.5	0.123	39.0	0.086	59.5	0.085	80.0	0.054
-2.2	0.174	6.0	0.157	19.0	0.099	39.5	0.087	60.0	0.079	80.5	0.049
-2.0	0.243	6.2	0.149	19.5	0.077	40.0	0.084	60.5	0.072	81.0	0.044
-1.8	0.315	6.4	0.142	20.0	0.059	40.5	0.079	61.0	0.067	81.5	0.039
-1.6	0.389	6.6	0.137	20.5	0.048	41.0	0.073	61.5	0.061	82.0	0.035
-1.4	0.463	6.8	0.134	21.0	0.044	41.5	0.068	62.0	0.057	82.5	0.031
-1.2	0.537	7.0	0.132	21.5	0.045	42.0	0.064	62.5	0.054	83.0	0.027
-1.0	0.608	7.2	0.131	22.0	0.049	42.5	0.062	63.0	0.053	83.5	0.024
-0.8	0.676	7.4	0.130	22.5	0.054	43.0	0.062	63.5	0.052	84.0	0.020
-0.6	0.740	7.6	0.129	23.0	0.058	43.5	0.065	64.0	0.054	84.5	0.018
-0.4	0.799	7.8	0.129	23.5	0.056	44.0	0.071	64.5	0.057	85.0	0.015
-0.2	0.851	8.0	0.128	24.0	0.050	44.5	0.077	65.0	0.061	85.5	0.012
0.0	0.896	8.2	0.127	24.5	0.039	45.0	0.084	65.5	0.067	86.0	0.010
0.2	0.934	8.4	0.126	25.0	0.023	45.5	0.091	66.0	0.073	86.5	0.008
0.4	0.963	8.6	0.125	25.5	0.005	46.0	0.097	66.5	0.079	87.0	0.006
0.6	0.984	8.8	0.123	26.0	0.012	46.5	0.101	67.0	0.086	87.5	0.005
0.8	0.996	9.0	0.121	26.5	0.026	47.0	0.102	67.5	0.093	88.0	0.003
1.0	1.000	9.2	0.118	27.0	0.036	47.5	0.101	68.0	0.100	88.5	0.002
1.2	0.995	9.4	0.116	27.5	0.040	48.0	0.098	68.5	0.106	89.0	0.001
1.4	0.982	9.6	0.113	28.0	0.039	48.5	0.093	69.0	0.112	89.5	0.000
1.6	0.962	9.8	0.111	28.5	0.033	49.0	0.086	69.5	0.117	90.0	0.000
1.8	0.935	10.0	0.108	29.0	0.023	49.5	0.079	70.0	0.121		
2.0	0.901	10.2	0.105	29.5	0.013	50.0	0.072	70.5	0.124		
2.2	0.863	10.4	0.102	30.0	0.004	50.5	0.065	71.0	0.126		



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Date **9-Mar-04**  
Call Letters **WMBC-DT** Channel **18**  
Location **Newton, NJ**  
Customer  
Antenna Type **TFU-16GTH-R 2S350**

### AZIMUTH PATTERN

Gain **3.50** (5.44 dB)  
Calculated / Measured **Calculated**  
Frequency **497.00 MHz**  
Drawing # **TFU-2S350-18**





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**TABULATION OF AZIMUTH PATTERN**

Azimuth Pattern Drawing #: **TFU-2S350-18**

Angle	Field														
0	0.447	45	0.095	90	0.236	135	0.163	180	0.309	225	0.525	270	0.936	315	0.883
1	0.438	46	0.088	91	0.237	136	0.165	181	0.311	226	0.533	271	0.942	316	0.875
2	0.429	47	0.083	92	0.238	137	0.168	182	0.313	227	0.542	272	0.949	317	0.866
3	0.421	48	0.077	93	0.238	138	0.170	183	0.316	228	0.551	273	0.954	318	0.857
4	0.413	49	0.073	94	0.239	139	0.173	184	0.318	229	0.560	274	0.960	319	0.848
5	0.404	50	0.069	95	0.239	140	0.177	185	0.320	230	0.569	275	0.965	320	0.839
6	0.396	51	0.067	96	0.239	141	0.180	186	0.323	231	0.579	276	0.969	321	0.830
7	0.388	52	0.065	97	0.238	142	0.184	187	0.325	232	0.588	277	0.974	322	0.821
8	0.380	53	0.066	98	0.237	143	0.187	188	0.328	233	0.597	278	0.978	323	0.811
9	0.372	54	0.066	99	0.236	144	0.191	189	0.331	234	0.607	279	0.982	324	0.801
10	0.364	55	0.069	100	0.235	145	0.195	190	0.333	235	0.617	280	0.985	325	0.791
11	0.356	56	0.071	101	0.233	146	0.199	191	0.336	236	0.626	281	0.988	326	0.781
12	0.348	57	0.076	102	0.231	147	0.203	192	0.339	237	0.636	282	0.991	327	0.771
13	0.340	58	0.080	103	0.229	148	0.208	193	0.342	238	0.646	283	0.993	328	0.761
14	0.332	59	0.085	104	0.227	149	0.212	194	0.345	239	0.656	284	0.996	329	0.751
15	0.324	60	0.091	105	0.224	150	0.216	195	0.349	240	0.666	285	0.997	330	0.741
16	0.317	61	0.097	106	0.222	151	0.220	196	0.352	241	0.676	286	0.998	331	0.731
17	0.309	62	0.103	107	0.219	152	0.224	197	0.356	242	0.686	287	0.999	332	0.720
18	0.301	63	0.109	108	0.216	153	0.228	198	0.359	243	0.696	288	1.000	333	0.710
19	0.293	64	0.116	109	0.212	154	0.232	199	0.363	244	0.706	289	1.000	334	0.700
20	0.286	65	0.122	110	0.209	155	0.236	200	0.367	245	0.717	290	1.000	335	0.689
21	0.278	66	0.129	111	0.206	156	0.240	201	0.371	246	0.727	291	0.999	336	0.679
22	0.270	67	0.135	112	0.202	157	0.244	202	0.375	247	0.737	292	0.999	337	0.668
23	0.262	68	0.142	113	0.199	158	0.248	203	0.380	248	0.747	293	0.997	338	0.658
24	0.255	69	0.148	114	0.195	159	0.251	204	0.385	249	0.757	294	0.996	339	0.648
25	0.247	70	0.155	115	0.191	160	0.255	205	0.389	250	0.767	295	0.993	340	0.637
26	0.239	71	0.161	116	0.188	161	0.258	206	0.394	251	0.776	296	0.991	341	0.627
27	0.231	72	0.167	117	0.184	162	0.261	207	0.400	252	0.786	297	0.988	342	0.617
28	0.224	73	0.172	118	0.181	163	0.265	208	0.405	253	0.796	298	0.985	343	0.607
29	0.216	74	0.178	119	0.178	164	0.268	209	0.411	254	0.805	299	0.982	344	0.597
30	0.208	75	0.184	120	0.174	165	0.271	210	0.416	255	0.815	300	0.978	345	0.587
31	0.200	76	0.189	121	0.172	166	0.274	211	0.422	256	0.824	301	0.974	346	0.577
32	0.192	77	0.194	122	0.169	167	0.277	212	0.428	257	0.833	302	0.969	347	0.567
33	0.184	78	0.199	123	0.166	168	0.280	213	0.435	258	0.842	303	0.964	348	0.557
34	0.176	79	0.203	124	0.164	169	0.282	214	0.441	259	0.851	304	0.959	349	0.548
35	0.169	80	0.208	125	0.162	170	0.285	215	0.448	260	0.860	305	0.954	350	0.538
36	0.161	81	0.212	126	0.160	171	0.288	216	0.455	261	0.869	306	0.948	351	0.528
37	0.153	82	0.215	127	0.159	172	0.290	217	0.462	262	0.877	307	0.942	352	0.519
38	0.145	83	0.219	128	0.158	173	0.293	218	0.469	263	0.885	308	0.936	353	0.510
39	0.138	84	0.222	129	0.158	174	0.295	219	0.477	264	0.893	309	0.929	354	0.500
40	0.130	85	0.225	130	0.158	175	0.297	220	0.484	265	0.901	310	0.922	355	0.491
41	0.122	86	0.228	131	0.158	176	0.300	221	0.492	266	0.909	311	0.915	356	0.482
42	0.115	87	0.230	132	0.159	177	0.302	222	0.500	267	0.916	312	0.907	357	0.473
43	0.108	88	0.232	133	0.160	178	0.304	223	0.508	268	0.923	313	0.899	358	0.464
44	0.101	89	0.234	134	0.161	179	0.307	224	0.516	269	0.930	314	0.892	359	0.455