

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR LPTV W61AI

W61AI
FCC File No. BLTT-19890620IF
Facility ID. No. 4330

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for displacement relief and the grant of a construction permit for W61AI (BLTT-19890620IF, Facility ID. 4330).

Station W61AI is presently licensed to operate on NTSC Channel 61, and, as such, is located on an out-of-core channel. Accordingly, W61AI files this displacement relief application seeking to move to an in-core channel, namely 43.

The proposed operational parameters for W61AI are as follows:

Frequency Offset:	MINUS OFFSET
Antenna radiation center height above ground level:	180 meters
Maximum effective radiated power:	45 KW
Antenna type and model #:	ACS ATS6X1
Antenna Orientation	210 Degrees
Transmitter Site	28-02-21 N 83-39-20 W

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, Class A, or Land Mobile facilities other than NTSC Full-Power stations WFTS-TV, Channel 28, Tampa, Florida; WXPX, Channel 42, Bradenton, Florida; WWSB, Channel 40, Sarasota, Florida; WTOG, Channel 44, St. Petersburg, Florida; WBHS-TV, Channel 50, Tampa, Florida; and WLCB-TV, Channel 45, Leesburg, Florida, and DTV facility WXPX, Channel 42, Bradenton, Florida. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that absolutely no interference will be caused by the operation of the proposed facility to the above listed stations or any other facility. **Accordingly, applicant requests a waiver of Sections 74.705 and 74.706, based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power stations and DTV station.**

Full Service NTSC Facility

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below is a tabulation of the results from the OET 69 Bulletin study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
WFTS-TV, CH 28 TAMPA, FL BPCT-19960702KP CONSTRUCTION PERMIT	3,156,502	0 (0.0%)
WFTS-TV, CH 28 TAMPA, FL BLCT-19880303KE LICENSE	3,072,098	0 (0.0%)
WBHS-TV, CH 50 TAMPA, FL BLCT-19880616KH LICENSE	3,036,391	0 (0.0%)
WBHS-TV, CH 50 TAMPA, FL BPCT-19960710KG CONSTRUCTION PERMIT	3,066,298	0 (0.0%)
WLCB-TV, CH 45 LEESBURG, FL BLET-20001212AAT LICENSE	1,140,733	0 (0.0%)
WWSB, CH 40 SARASOTA, FL BLCT-19790920KI LICENSE	2,007,851	0 (0.0%)
WWSB, CH 40 SARASOTA, FL BPCT-19991012AAS CONSTRUCTION PERMIT	2,001,367	0 (0.0%)
WTOG, CH 44 ST. PETERSBURG, FL BLCT-19990415KI LICENSE	3,133,411	0 (0.0%)
WXPX, CH 42 BRADENTON, FL BPCT-20020215AAZ APPLICATION	3,019,228	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause ZERO interference to any existing or proposed NTSC facilities.

DTV Facilities

An interference analysis was conducted using 74.706 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on DTV facility WXPX, CH 42, Bradenton, Florida. Below is a tabulation of the results from the OET 69 Bulletin study.

Protected Class A Station	FCC Service Population	Proposed Interference Population
WXPX, CH 42 BRADENTON, FL DTV ALLOTMENT	2,477,926	0 (0.0%)
WXPX, CH 42 BRADENTON, FL BPCDT-19990602KF CONSTRUCTION PERMIT	3,174,858	0 (0.0%)

As the above table indicates, there will be absolutely ZERO interference caused to WXPX by W61AI's proposed facility.

Land Mobile

There are no co-channel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 43 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 45 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0007 milliwatt per square centimeter (MW/CM2), or 0.2% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.431 MW/CM2 for TV channel 43). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.