

ENGINEERING EXHIBIT

Application for Construction Permit

prepared for

Polnet Communications, Ltd.

W22DG-D Park Ridge, Illinois

Facility ID 168237

Ch. 20 10 kW

Table of Contents

FCC Form 346, Section III – Engineering Data (Digital)

Exhibit 11

Statement A	Allocation Considerations - Interference Analysis
Figure 1	Antenna Horizontal Plane Radiation Pattern
Figure 2	Antenna Vertical Plane (Elevation) Radiation Pattern
Table I	Interference Analysis Results Summary

Exhibit 12

Statement B	Environmental Considerations
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This material supplies a "hard copy" of the engineering portions of this application as entered January 12, 2009 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.

SECTION III - ENGINEERING DATA (Digital)

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1.	Channel Number: 20																																																																																																
2.	Translator Input Channel No. :																																																																																																
3.	Primary station proposed to be rebroadcast: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">Facility Identifier</td> <td style="width:25%;">Call Sign</td> <td style="width:25%;">City</td> <td style="width:15%;">State</td> <td style="width:10%;">Channel</td> </tr> </table>	Facility Identifier	Call Sign	City	State	Channel																																																																																											
Facility Identifier	Call Sign	City	State	Channel																																																																																													
4.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 42 Minutes 2 Seconds 39 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 88 Minutes 2 Seconds 36 <input checked="" type="radio"/> West <input type="radio"/> East																																																																																																
5.	Antenna Structure Registration Number: 1064582 <input type="checkbox"/> Not Applicable [Exhibit 10] <input type="checkbox"/> Notification filed with FAA																																																																																																
6.	Antenna Location Site Elevation Above Mean Sea Level: 228.4 meters																																																																																																
7.	Overall Tower Height Above Ground Level: 95.1 meters																																																																																																
8.	Height of Radiation Center Above Ground Level: 92.3 meters																																																																																																
9.	Maximum Effective Radiated Power (ERP): 10 kW																																																																																																
10.	Transmitter Output Power: 1.38 kW																																																																																																
11.	a. Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://fjallfoss.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. <input checked="" type="radio"/> Nondirectional <input type="radio"/> Directional "Off-the-shelf" <input type="radio"/> Directional composite Manufacturer DIE Model TLP-8A b. Electrical Beam Tilt: 1 degrees <input type="checkbox"/> Not Applicable c. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf") Rotation (Degrees): <input type="checkbox"/> No Rotation <table border="1" style="width:100%; border-collapse: collapse; text-align:center;"> <thead> <tr> <th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th> </tr> </thead> <tbody> <tr><td>0</td><td></td><td>10</td><td></td><td>20</td><td></td><td>30</td><td></td><td>40</td><td></td><td>50</td><td></td></tr> <tr><td>60</td><td></td><td>70</td><td></td><td>80</td><td></td><td>90</td><td></td><td>100</td><td></td><td>110</td><td></td></tr> <tr><td>120</td><td></td><td>130</td><td></td><td>140</td><td></td><td>150</td><td></td><td>160</td><td></td><td>170</td><td></td></tr> <tr><td>180</td><td></td><td>190</td><td></td><td>200</td><td></td><td>210</td><td></td><td>220</td><td></td><td>230</td><td></td></tr> <tr><td>240</td><td></td><td>250</td><td></td><td>260</td><td></td><td>270</td><td></td><td>280</td><td></td><td>290</td><td></td></tr> <tr><td>300</td><td></td><td>310</td><td></td><td>320</td><td></td><td>330</td><td></td><td>340</td><td></td><td>350</td><td></td></tr> <tr> <td colspan="12">Additional Azimuths</td> </tr> </tbody> </table>	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0		10		20		30		40		50		60		70		80		90		100		110		120		130		140		150		160		170		180		190		200		210		220		230		240		250		260		270		280		290		300		310		320		330		340		350		Additional Azimuths											
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[Relative Field Polar Plot](#)

	NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.
12.	Out-of-channel Emission Mask: <input type="radio"/> Simple <input checked="" type="radio"/> Stringent

CERTIFICATION

13.	Interference : The proposed facility complies with all of the following applicable rule sections. <input checked="" type="radio"/> Yes <input type="radio"/> No
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	47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030.	See Explanation in [Exhibit 11]
14.	<p>Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an Exhibit is required.</p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 12]</p>
15.	<p>Channels 52-59. If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:</p> <p><input type="checkbox"/> The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.</p>	
16.	<p>Channels 60-69. If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application , all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreements(s) with 700 MHz public safety regional planning committee(s) and state administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.</p> <p><input type="checkbox"/> Pursuant to Section 74.786(e), the applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.</p>	
<p>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</p>		

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name ROBERT J. CLINTON		Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature		Date 1/12/2009	
Mailing Address CAVELL, MERTZ & ASSOCIATES, INC. 7839 ASHTON AVENUE			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20109 - 2883
Telephone Number (include area code) 7033929090		E-Mail Address (if available) BCLINTON@CAVELLMERTZ.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 1

Description: ASSIGNOR'S CONSENT TO FILE MODIFICATION

POLNET COMMUNICATIONS, LTD. ('POLNET') IS THE PROPOSED ASSIGNEE OF ANALOG CLASS A STATION W24AJ, AURORA, ILLINOIS, AND A CONSTRUCTION PERMIT FOR ASSOCIATED DIGITAL COMPANION STATION W22DG-D. POLNET NOTES THAT IT IS FILING THE INSTANT APPLICATION PURSUANT TO SECTION 73.3517(A) OF THE COMMISSION'S RULES. ATTACHED IS A STATEMENT SIGNED BY THE LICENSEE/PERMITTEE/ASSIGNOR OF THE AFOREMENTIONED STATIONS GRANTING POLNET PERMISSION TO FILE THIS APPLICATION.

Attachment 1

Exhibit 10

Description: EXHIBIT 10

PLEASE SEE EXHIBIT 12 - STATEMENT B FOR DISCUSSION REGARDING THE ANTENNA SUPPORT STRUCTURE.

Attachment 10

Exhibit 11

Description: EXHIBIT 11 - STATEMENT A

EXHIBIT 11 - STATEMENT A - ALLOCATION SITUATION

Attachment 11

Description
EXHIBIT 11 - STATEMENT A

Exhibit 12

Description: EXHIBIT 12 - STATEMENT B

EXHIBIT 12 - STATEMENT B - ENVIRONMENTAL STATEMENT (WITH TABLE OF CONTENTS AND COPY OF SECTION III - ENGINEERING DATA)

Attachment 12

Description

EXHIBIT 12 - STATEMENT B

Exhibit 12 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Polnet Communications, Ltd.
W22DG-D Park Ridge, Illinois
Facility ID 168237
Ch. 20 10 kW

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Nature of The Proposal

Polnet Communications, Ltd., ("Polnet") proposes herein a minor modification under the LPTV displacement Rules for W22DG-D, Channel 22, Aurora, Illinois (file number BDCCDTL-20061025ABB). The instant proposal herein seeks a minor modification to specify a different operating frequency, a different antenna system, and a lower effective radiated power ("ERP") than that presently authorized.

The proposed W22DG-D antenna will be mounted above the rooftop of an existing structure (ASR 1064582). A change in overall structure height is required as a result of the instant proposal; therefore an FAA study is being requested. Upon receipt of a "Determination of No Hazard," the ASR will be updated to reflect the proposed changes. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules.

Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

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ENVIRONMENTAL CONSIDERATIONS
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The proposed W22DG-D antenna will have a center of radiation 92.3 meters above ground level. An ERP of 10 kilowatts, horizontally polarized, will be employed utilizing a Dielectric model TLP-8A non-directional antenna. According to data provided by the antenna manufacturer, the maximum relative field value in downward directions (between 15 and 90 degrees below the horizontal) is less than 25 percent on Channel 20. Thus, a value of 25 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 20 (center frequency 509 MHz) is 339.3 $\mu\text{W}/\text{cm}^2$.

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

S	=	power density in microwatts/cm ²
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 2.6 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 0.77 percent of the general population/uncontrolled limit. At ground level locations away from the base of the building, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna. Access to the rooftop of the building on which the antenna support structure will be located will be restricted to trained building service and station personnel. The building materials of the rooftop serve to further attenuate the power density levels such that any occupants in the building will be shielded from RF energy. Consequently, it is believed that members of the general public will not be exposed to RF levels in excess of FCC limits.

Exhibit 12 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 3 of 3)

§1.1307(b)(3) states that facilities at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities using this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Structure Workers and the General Public

Access to the rooftop of the building on which the antenna support structure is located will be restricted to trained building service and station personnel. As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public are not exposed to RF levels in excess of the Commission's guidelines.

A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the rooftop in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, placement of RF exposure warning signs on the antenna support structure, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with other users of this site.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.