

EXHIBIT NO. 11

ENVIRONMENTAL CONSIDERATIONS
APPLICATION FOR CONSTRUCTION PERMIT
LOW POWER TELEVISION STATION WDFM-LP
DEFIANCE, OHIO

This exhibit was prepared on behalf of low power television station WDFM-LP, Defiance, Ohio, in support of an application for construction permit. The proposed WDFM-LP facility will operate on Channel 26 with a nominal non-directional effective radiated power of 15 kW and an antenna height above mean sea level of 395 m.

With respect to the potential for human exposure to radio frequency (RF) radiation, 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[‡] based on the following conservative assumptions, with the following results:

Call Sign	Channel	Peak Visual ERP or Average ERP (kW)	Aural ERP (kW)	Relative Field Factor [§]	FCC Limit ^{**} (mW/cm ²)	Percentage of Limit
WDFM-LP	26	7.5	0.75	1.00	0.361	1.1%

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 1.1% of the FCC limit for general population / uncontrolled exposure. Therefore,

[‡] The radiation center is located 179 m above ground level.

[§] This is a conservative estimate of the relative field factor in the downward direction.

** for general population/uncontrolled environments

the proposal complies with the FCC limits for human exposure to RF radiation 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 tower or antenna from radio frequency radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr.

September 10, 2001

EXHIBIT NO. 10

INTERFERENCE ANALYSIS
APPLICATION FOR CONSTRUCTION PERMIT
LOW POWER TELEVISION STATION WDFM-LP
DEFIANCE, OHIO

This exhibit was prepared on behalf of low power television station WDFM-LP, Defiance, Ohio, in support of an application for construction permit. The proposed WDFM-LP facility will operate on Channel 26 with a nominal non-directional effective radiated power of 7.5 kW and an antenna height above mean sea level of 395 m. The proposed facility will operate with a transmitter power output of 1.0 kW.

As demonstrated herein, the proposed facilities meet the interference protection requirements of the FCC Rules with respect to all pertinent full-service or low-power/translator television stations. The Longley-Rice interference analysis procedures, as outlined in FCC OET Bulletin No. 69 (OET69), have been employed in a number of cases to demonstrate lack of interference within the allowable rounding tolerance level.

An allocation analysis reveals that the following stations will not meet the contour overlap or spacing provisions of Sections 74.705, 74.706 and 74.707 of the FCC Rules:

Facility	Channel
WMUN-LP, Muncie-OH (CP)	26

Facility	Channel
W26BX, Kalamazoo-MI (CP)	26
WBDT, Springfield-OH	26
WBGU-TV, Bowling Green-OH	26
WKJG-TV, Fort Wayne-IN	33
WVIZ-DT, Cleveland-OH (DTV Allotment)	26
WVIZ-DT, Cleveland-OH (App)	26

A waiver of the FCC interference protection Rules is requested with respect to the above listed stations.

In support of the waiver request, an interference analysis was conducted with respect to each of the above facilities according to OET69 procedures.* It has been determined that 0% of interference will be caused to each of the above facilities by the proposed WDFM-LP facility based on the FCC “0.5% rounding tolerance” procedure.† The results of the analysis are summarized in Figure 1 herein.

Louis Robert du Treil, Jr.

September 10, 2001

* The duTreil, Lundin & Rackley, Inc. OET69 interference analysis program is based on the program and 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 1 km was employed.

† See Report and Order, “In the Matter of Establishment of Class A Television Service,” MM Docket No. 00-10, Released: April 4, 2000.

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INTERFERENCE ANALYSIS
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Summary of Interference Analysis

Facility	Channel	Analog or Digital?	Baseline Service Population (1990)	Permissible IX (%)	Total IX Caused by Proposed (1990)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
WMUN-LP, Muncie-OH (CP)	26	A	74,153	0.5	0	0	0.00
W26BX, Kalamazoo-MI (CP)	26	A	10,734	0.5	0	0	0.00
WBDT, Springfield-OH	26	A	2,686,108	0.5	6,085	<=6,085	<=0.23
WBGU-TV, Bowling Green-OH	26	A	1,145,421	0.5	14	<=14	<=0.001
WKJG-TV, Fort Wayne-IN	33	A	635,723	0.5	0	0	0.00
WVIZ-DT, Cleveland-OH (DTV Allotment)	26	D	3,306,361	0.5	0	0	0.00
WVIZ-DT, Cleveland-OH (App)	26	D	3,744,604	0.5	113	<=113	<=0.003

Note: See Figure 2 for supporting documentation of interference analyses.

INTERFERENCE CAUSED

CELL SIZE : 1.00

Using offset in determining thresholds

Per 6th Report & Order and FCC OET-69 Bulletin

WMUN-L 40-06-43 085-28-32 26(-) 10.400 kw 369 m DA 50.0 % 72.9 dBu

MUNCIE

IN

CP BPTTL19980601LU

0.97 0.96 1.00 0.96 0.97 0.99 0.89 0.69 0.40 0.15 0.03 0.03

0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.03

0.03 0.03 0.03 0.03 0.03 0.03 0.03 0.15 0.40 0.69 0.89 0.99

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	192.8764	74153
not affected by terrain losses	192.8764	74153

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu

DEFIANCE

OH

APP BMP TTL20001117ABX

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

	Area	Pop
Interference	0	0

W26BX 42-07-43 085-20-16 26(-) 5.300 kw 413 m DA 50.0 % 72.9 dBu

KALAMAZOO

MI

CP BPTTJG0601ME

1.00 1.00 1.00 1.00 1.00 0.99 0.95 0.89 0.81 0.73 0.62 0.53

0.43 0.29 0.15 0.07 0.09 0.14 0.15 0.14 0.09 0.07 0.15 0.29

0.43 0.53 0.62 0.73 0.81 0.89 0.95 0.99 1.00 1.00 1.00 1.00

Ref Az: 340.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	444.7464	10734
not affected by terrain losses	444.7464	10734

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu

DEFIANCE

OH

APP BMP TTL20001117ABX

Using DEFAULT vertical antenna pattern

D/U Baseline: 45.00

	Area	Pop
Interference	0	0

WBDT 39-43-28 084-15-18 26(+) 5000.000 kw 614 m DA 50.0 % 62.9 dBu
 SPRINGFIELD OH 11922 1299 FCC NTSC BL: 1317249 FCC IX POP%: 2.6
 LIC BLCT20001103ABK
 1.00 0.99 0.98 0.95 0.92 0.89 0.86 0.83 0.80 0.76 0.70 0.60
 0.49 0.37 0.29 0.30 0.36 0.42 0.44 0.42 0.36 0.30 0.29 0.37
 0.49 0.60 0.70 0.76 0.80 0.83 0.86 0.89 0.92 0.95 0.98 0.99
 Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	21170.28	2686108
not affected by terrain losses	20967.49	2627817

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu
 DEFIANCE OH
 APP BMPTTL20001117ABX
 Using DEFAULT vertical antenna pattern

D/U Baseline: 28.00

	Area	Pop
Interference	271.70	6085(0.2 FCC - 0.5)

WBGU-T 41-08-13 083-54-23 27(+) 1000.000 kw 545 m 50.0 % 63.0 dBu
 BOWLING GREEN OH 16601 1148 FCC NTSC BL: 1148629 FCC IX POP%: 0.0
 LIC BLET19860808KL
 Using DEFAULT vertical antenna pattern
 Area Pop
 within Noise Limited Contour 16600.79 1145421
 not affected by terrain losses 16600.79 1145421

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu
 DEFIANCE OH
 APP BMPTTL20001117ABX
 Using DEFAULT vertical antenna pattern

D/U Baseline: -15.00

	Area	Pop
Interference	0.99	14(0.0 FCC - 0.0)

WKJG-T 41-05-40 085-10-36 33(-) 589.000 kw 479 m 50.0 % 63.6 dBu
 FORT WAYNE IN 11732 608 FCC NTSC BL: 636011 FCC IX POP%: 0.1
 LIC BLCT19800410KH
 Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	12001.05	635723
not affected by terrain losses	12001.05	635723

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu
 DEFIANCE OH
 APP BMPTTL20001117ABX
 Using DEFAULT vertical antenna pattern

D/U Baseline: -30.00

	Area	Pop
Interference	0	0

DWVIZ 41-20-28 081-44-24 26(0) 66.900 kw 585 m DA 90.0 % 39.9 dBu
 CLEVELAND OH 17099 3291 DTVSERVICE: 3291000 NTSCSERVICE: 3019000
 DTVALT DTV ALLOTMENT

0.66	0.80	0.92	1.00	1.00	0.91	0.79	0.65	0.56	0.51	0.51	0.55
0.62	0.74	0.85	0.94	0.95	0.87	0.76	0.62	0.54	0.50	0.50	0.55
0.64	0.79	0.91	1.00	1.00	0.92	0.80	0.66	0.57	0.53	0.52	0.57

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	17529.87	3306361
not affected by terrain losses	17376.28	3299527

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu
 DEFIANCE OH
 APP BMPTTL20001117ABX
 Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	0	0

WVIZ 41-20-28 081-24-25 26(N) 550.000 kw 599 m DA 90.0 % 39.9 dBu
 CLEVELAND OH 17099 3291 DTVSERVICE: 3291000 NTSCSERVICE: 3019000
 APP BPEDT20000501AID
 1.00 0.99 0.94 0.85 0.73 0.59 0.44 0.30 0.22 0.21 0.23 0.25
 0.23 0.21 0.22 0.30 0.44 0.59 0.73 0.85 0.94 0.99 1.00 0.99
 0.96 0.94 0.92 0.90 0.90 0.90 0.90 0.90 0.92 0.94 0.96 0.99

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	22703.72	3744604
not affected by terrain losses	22594.49	3738818

WDFML1 41-17-29 084-32-15 26(-) 7.500 kw 395 m 10.0 % 72.9 dBu
 DEFIANCE OH
 APP BMPTTL20001117ABX

Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	5.90	113 (0.0 FCC - 0.0)

Study end time: 10:26:30

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As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 1.1% of the FCC limit for general population / uncontrolled exposure. Therefore,

[‡] The radiation center is located 179 m above ground level.

[§] This is a conservative estimate of the relative field factor in the downward direction.

^{**} for general population/uncontrolled environments

the proposal complies with the FCC limits for human exposure to RF radiation 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 tower or antenna from radio frequency radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr.

September 10, 2001

Section III - Engineering

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: 26

2. Frequency Offset
 No offset Zero offset Plus offset Minus offset

3. Translator Input Channel No. _____

4. Primary station proposed to be rebroadcast:

Call Sign	City	State	Channel

5. Antenna Location Coordinates: (NAD 27)
41 ° 17 ' 29 " N S Latitude
084 ° 32 ' 15 " E W Longitude

6. Antenna Structure Registration Number: 1026689
 Not applicable FAA Notification Filed with FAA

7. Antenna Location Site Elevation Above Mean Sea Level: 216 meters

8. Overall Tower Height Above Ground Level: 181 meters

9. Height of Radiation Center Above Ground Level: 179 meters

10. Maximum Effective Radiated Power (ERP) Towards Radio Horizon: 7.5 kW

11. Maximum ERP in any Horizontal and Vertical Angle: 7.5 kW

12. Transmitting Antenna: Nondirectional Directional "Off-the-shelf" Directional composite

Manufacturer Scala	Model SL-8
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Directional Antenna Relative Field Values:

Rotation: _____° No rotation N/A (Nondirectional)

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

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.

CERTIFICATION

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. Yes No See Explanation in Exhibit No. 10

TV broadcast analog system protection.

- a. 47 C.F.R. Section 74.705.

Digital TV station protection.

- b. 47 C.F.R. Section 74.706.

Low Power TV and TV translator station protection.

- c. 47 C.F.R. Section 74.707.

14. **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.** Yes No See Explanation in Exhibit No. 11
Exhibit No.

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.

PREPARER'S CERTIFICATION ON PAGE 6 MUST BE COMPLETED AND SIGNED.

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 Louis Robert du Treil, Jr.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature <i>Louis Robert du Treil</i>		Date September 10, 2001	
Mailing Address 201 Fletcher Avenue			
City Sarasota		State or Country (if foreign address) FL	ZIP Code 34237-6019
Telephone Number (include area code) 941-329-6000		E-Mail Address (if available) bobjr@DLR.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).