

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
LPTV STATION W18AT (FACILITY ID 17736)
GARY, INDIANA
CH 18 15 KW

Technical Narrative

This Technical Exhibit supports a flash-cut application for LPTV station W18AT. Station W18AT is licensed (BLTTL-199203330IQ) to operate on analog channel 18 with a directional antenna maximum (visual) effective radiated power (ERP) of 26.3 kW and an antenna height above mean sea level (RCAMSL) of 232 meters.

Proposed Facilities

This application proposes digital operation on the current channel (18), at the current transmitter site and with a non-directional antenna. The transmitter site coordinates remain (NAD27): 41-36-10 N, 87-20-15 W. A Dielectric TLP-8A antenna, with a maximum ERP of 15 kW and antenna RCAMSL of 232 meters is proposed.

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

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. Using the procedures outlined in the FCC's OET-69 Bulletin, a 2 kilometer cell size resolution 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). 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 to the remaining LPTV/translator stations.

The W18AT site is 348.8 kilometers from the closest point of the US-Canada border. Figure 2 is a map showing the predicted co-channel analog (NTSC) and DTV interfering contours for the proposed W18AT operation. The predicted 30.2 dBu F(50,10) contour is for interference to co-channel Canadian analog allotments. The predicted 12.4 dBu F(50,10) contour is for interference to co-channel Canadian DTV allotments. As shown, the predicted interfering contours do not even extend into Canada, and therefore it is believed there are no Canadian allocation issues.

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 W18AT facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation". This Bulletin provide assistance in determining whether FCC-regulated transmitting facilities, operations or devices comply with limits for human exposure to radiofrequency (RF) electromagnetic fields adopted by the Commission in 1996.¹

Public access to the building roof-top will be restricted. Therefore, the area in the vicinity of the transmitter site is defined as a "controlled" environment. As shown on Figure 2, the maximum vertical relative field for depression angles towards the rooftop (-60°

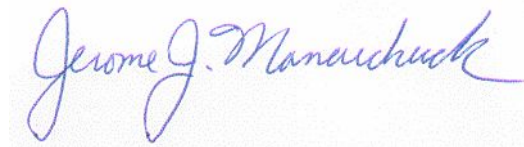
¹ See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

to -90° elevation) is less than 0.25. Therefore, using a “conservative” vertical relative field value of 0.25, a non-directional visual effective radiated power of 15 kW, and an antenna radiation height above the building roof-top of 11 meters, the calculated power density at 2 meters above the rooftop is 0.3867 milliwatt per square centimeter (mW/cm²), or 23.3 percent of the Commission's recommended limit for a “controlled” environment (1.66 mW/cm² for TV channel 18). Since this is the only broadcast facility on the building and the calculated power density is less than 100% of the “controlled” environment limit, it is believed the facility complies with the FCC’s RF emission rules. However, if necessary measurements will be made to show compliance.

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 place 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 proposal is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

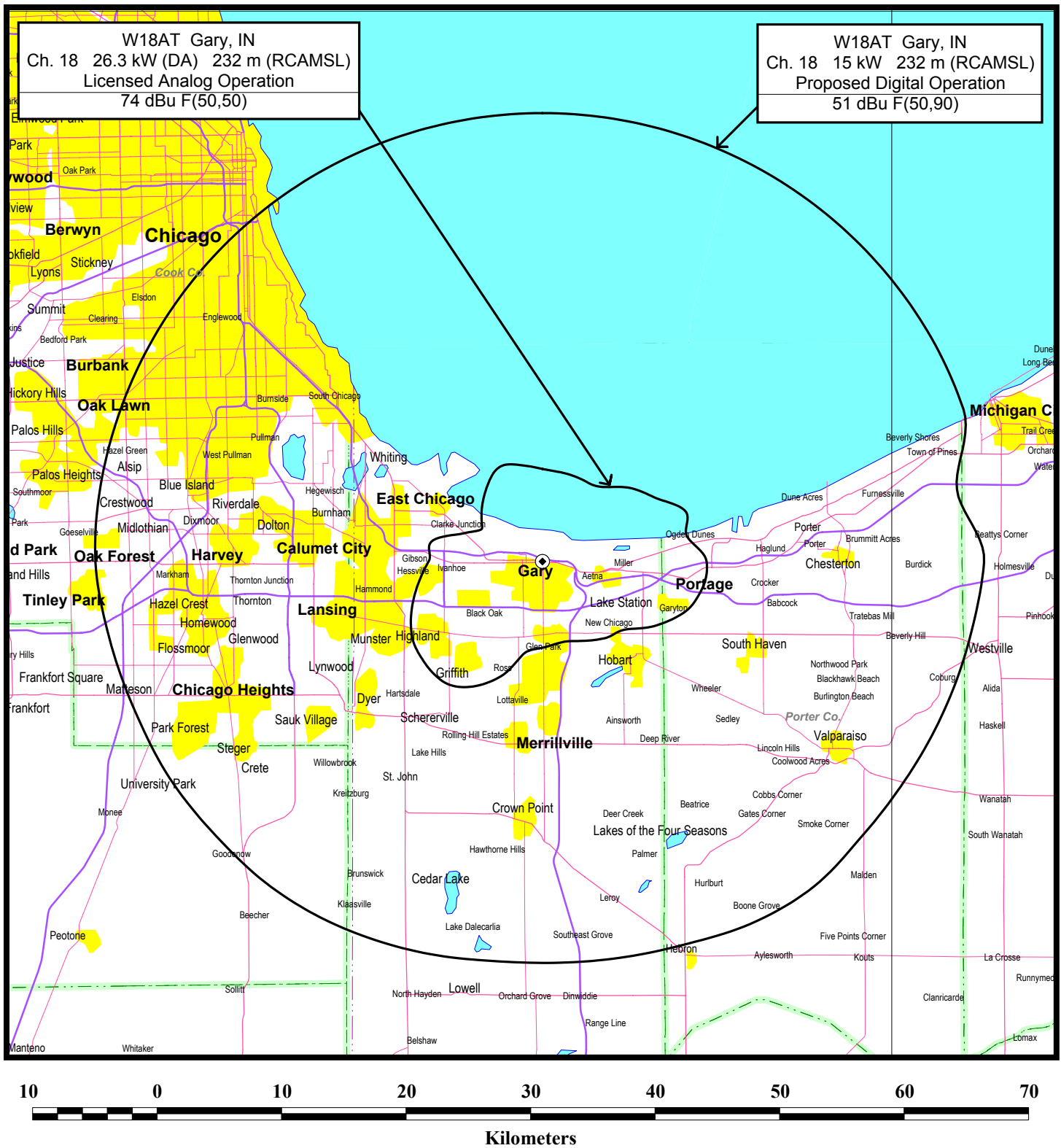


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
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March 30, 2006

Figure 1

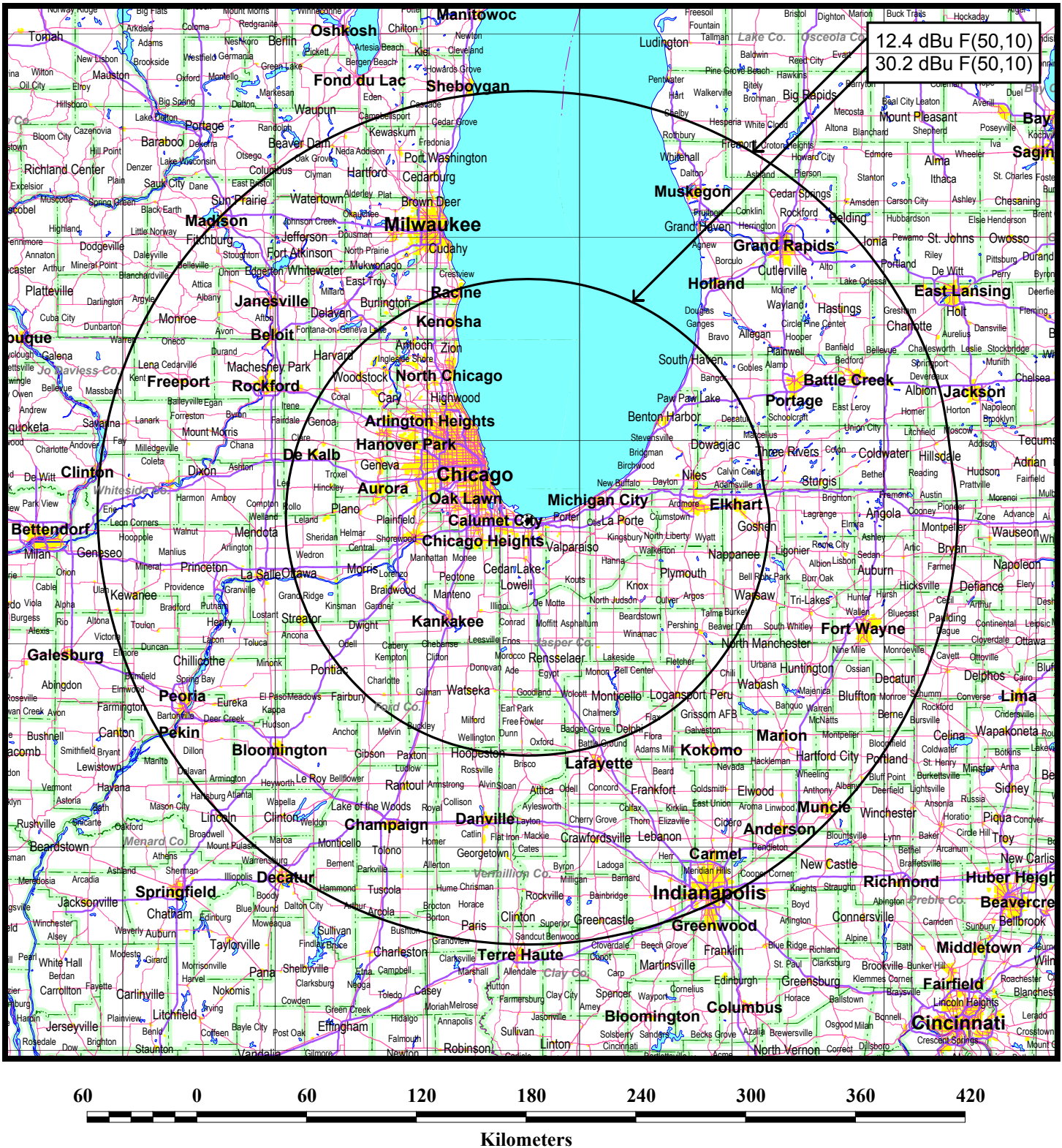


FCC PREDICTED COVERAGE CONTOURS

LPTV STATION W18AT
GARY, INDIANA
CH 18 15 KW 232 M (RCMSL)

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

Figure 2



CANADIAN ALLOCATION MAP

LPTV STATION W18AT

GARY, INDIANA

CH 18 15 KW 232 M (RCMSL)

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

Date
Call Letters
Location
Customer
Antenna Type

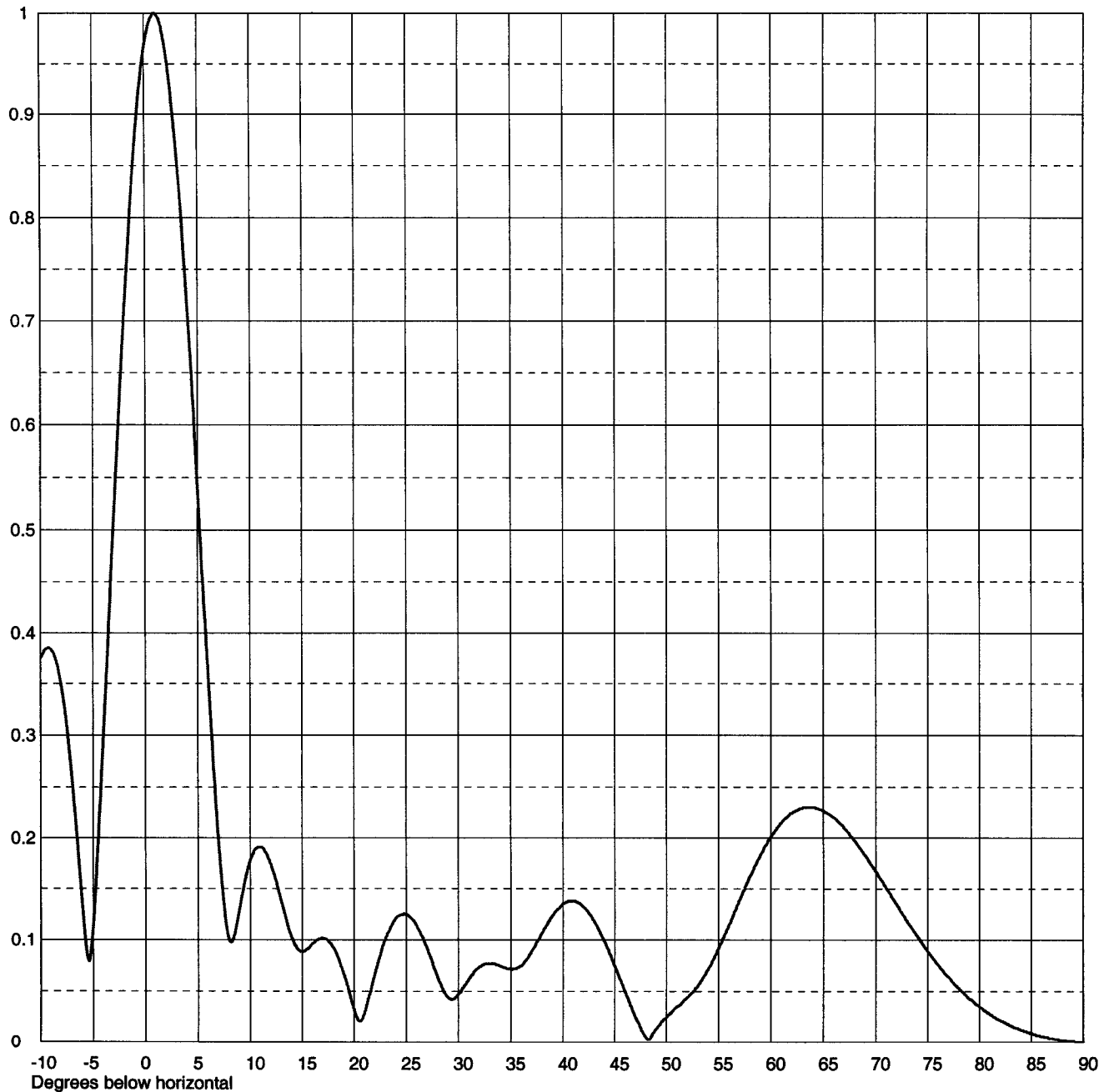
29 Mar 2006

Channel 18

Gary, IN
LESEA
TLP-8A

ELEVATION PATTERN

RMS Gain at Main Lobe	8.0 (9.03 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	7.5 (8.75 dB)	Frequency	497.00 MHz
Calculated / Measured	Calculated	Drawing #	08L080100-90



Remarks: