

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WMOR-TV COMPANY, permittee of WMOR-DT, Lakeland, Florida, in support of its amendment to its Application for Modification of Construction Permit BPCDT-19991101AEU to revise the antenna height (BMPCDT-20011101AA). This amendment is responsive to the Commission's letter of April 11, 2002, which raised several questions about the application.

First, the tower owner changed the ground elevation and tower height in its registration but failed to advise WMOR-DT. Attached hereto is a revision of Section III-D of FCC Form 301. It should be noted that this change does not change geographic coordinates or the antenna height above average terrain, so other portions of the application remain valid.

Next, the Commission states that the proposed power/height combination exceeds the allowable value in the Rules. However, WMOR-DT is in the Tampa-St. Petersburg-Sarasota market, and in that market is WEDU-DT, which is allotted 1000 kw at 473 meters. Since WMOR-DT specifies 1000 kw at only 458 meters its facilities will be exceeded by at least one other market station, putting this application in compliance with §73.622(f)(5).

Further, the Commission notes that the proposed facility would cause interference to Class A stations WSVT-LP, Channel 18, and WARP-LP, Channel 20. An interference study reveals that both the authorized and the proposed WMOR-DT facilities would cause interference to 381 persons within the WSVT-LP 74 dbμ contour and that both the authorized and the proposed WMOR-DT facilities would cause interference to 15,038 persons within the WARP-LP 74 dbμ contour. Thus, since the proposed interference to either Class A station is no greater

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than the interference caused to those stations by the authorized WMOR-DT facility, this proposal is in compliance with §73.623(c)(5).

Because the antenna height above ground will be slightly less, we have studied the RF transmissions of this facility with regard to their environmental effect. Employing the methods set forth in *OET Bulletin No. 65* and considering the vertical pattern of the proposed Dielectric antenna, we calculate maximum power density two meters above ground from the proposed facility to be  $0.00032 \text{ mw/cm}^2$ , at locations 318 meters from the tower base, which is but 0.094 percent of the  $0.34 \text{ mw/cm}^2$  reference at this frequency for uncontrolled areas. Further, WMOR-DT will take whatever preventive steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive RF energy. On this basis, and since the maximum environmental contribution from this source is to be much less than five percent of the reference, a grant of this application would clearly remain a minor environmental action.

I declare under penalty of perjury that the foregoing statements and the attached Engineering Report, which was prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



NEIL M. SMITH

April 26, 2002