

TECHNICAL EXHIBIT  
REQUEST FOR SPECIAL TEMPORARY AUTHORITY (STA)  
CLASS A STATION WBFL-CA  
FACILITY ID 48763  
VALDOSTA, GEORGIA  
CH 13 0.009 KW

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of request for Special Temporary Authority (STA), pursuant to Section 73.1635, to operate WBFL-CA on channel 13 (210-216 MHz) with facilities that differ from its licensed facility.

Class A Station WBFL-CA is currently licensed (BTVA-20001207ADU) to operate on NTSC channel 13 at Valdosta with minus carrier frequency offset, a directional maximum effective radiated power (ERP) of 0.009 kW and an antenna radiation center height above mean sea level (RCAMSL) of 165 meters. As detailed elsewhere in this STA application, WBFL-CA has operated pursuant to an STA on analog channel 13 at Quitman, Georgia.

Response to Paragraph 8 and Proposed STA facilities

Class A station WBFL-CA proposes operation on channel 13 with minus carrier frequency offset, a maximum nondirectional ERP of 0.009 kilowatts, an RCAMSL of 152 meters, and employing a Scala HDCA-5 “composite” directional antenna system from the following site coordinates (ASR 1019858):

North Latitude 30° 40' 08"

West Longitude 83° 19' 31"

No other changes are proposed. Figure 1 is a map showing the licensed and proposed STA 68 dBu contours for Class A station WBFL-CA.

Interference Compliance

Studies indicate that the proposed STA facility complies with all the following applicable rule Sections: Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 73.710. The studies were based on the provisions of Bulletin No. 69.

Environmental Protection Act

The proposed WBFL-CA facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation."<sup>1</sup> The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation of the Bulletin. Using a "worst-case" vertical relative field value of 1.0, a peak visual effective radiated power of 0.009 kW, 10 percent aural power, and an antenna center of radiation height above ground level of 115 meters, the calculated power density at 2 meters above ground level at the base of the tower is less than 0.0001 milliwatt per square centimeter (mW/cm<sup>2</sup>), or less than 0.05 percent of the Commission's recommended limit for an "uncontrolled" environment (0.2 mW/cm<sup>2</sup> for TV channel 13).

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, procedures will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure 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.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.



W. Jeffrey Reynolds

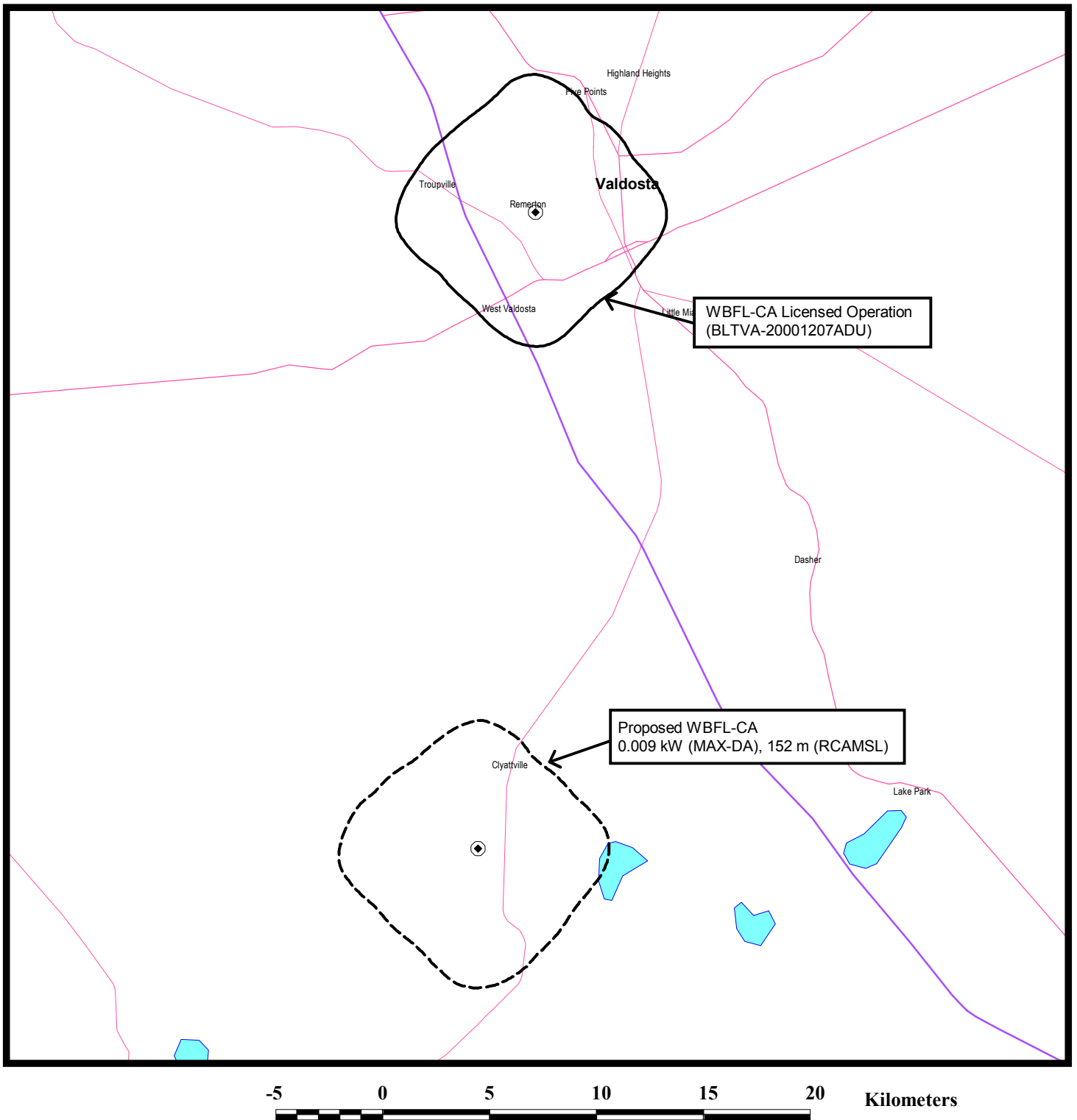
du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
(941)329-6000  
JEFF@DLR.COM

April 11, 2008

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<sup>1</sup> 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.

Figure 1



## PREDICTED 68 dBu CONTOURS

CLASS A STATION WBFL-CA  
VALDOSTA, GEORGIA  
CH 13 0.009 KW (MAX-DA)

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