CARL T. JONES
CORPORATION

STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR A
CONSTRUCTION PERMIT TO MAKE A
MINOR CHANGE IN A LICENSED FACILITY
BLCDT-20090618ADB
WAGM-TV - PRESQUE ISLE, MAINE
DTV - CH. 8 - 10 kW - 350 m HAAT

Prepared for: NEPSK, INC.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by NEPSK, INC, licensee of WAGM-TV, channel 8, Presque Isle, Maine, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application for construction permit for a minor change in its licensed facility, BLCDT-20090618ADB. The applicant proposes only a change in Effective Radiated Power (ERP). No other changes are herein proposed. The instant proposal represents a gain in population compared to WAGM-TV's current authorization and is predicted to serve 102.55% of WAGM-TV's current population. See exhibit 1.

PROPOSED NON-DIRECTIONAL ANTENNA

WAGM-TV will use its authorized antenna, a Harris model TAD-12HBD-3/18 Horizontally Polarized omni-directional antenna, FCC antenna ID number 38177.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from the FCC CDBS. Exhibit 2 contains the predicted Noise Limited (36 dBu) contour and the predicted principal community (43 dBu) contour, which entirely encompasses the principal community of license, Presque Isle, Maine.

ALLOCATION CONSIDERATIONS

Domestic allocation study

An allocation study was performed, using the Commission's application processing software TV_Process, to ensure that the proposed DTV transmission facility complies with the Commission's *post-transition* interference criteria in Section 73.616. The study was evaluated to determine if the proposed post-transition DTV facility for WAGM-TV on channel 8 is predicted to cause any level of new prohibited interference to any post-transition DTV stations, any current expansion construction permits, or applications for expansion CPs, or any Appendix B DTV allotments. Results indicate that the instant proposal to increase WAGM-TV's ERP to 10 kW is predicted to cause no unacceptable

level of new interference to the populations served by any existing DTV station, DTV expansion application or construction permit or any post-transition DTV allotment contained in Appendix B.

International Allocation Study

The instant application proposes an ERP of 10 kW. The proposed facility: 10 kW ERP at a Height Above Average Terrain (HAAT) of 350 meters exceeds the allotment facility of 8.0 kW ERP at a HAAT of 333 meters that is listed in the United States Plan of Allotments and Primary Assignments contained in an August 2008 exchange of letters of agreement between Industry Canada and the FCC. Since the instant amendment proposes a facility exceeding the allotment for WAGM-TV, a technical study was performed to ascertain what, if any, effect the proposal might have on any authorized Canadian station, construction permit or vacant allotment. For WAGM-TV, the proposed station, the study shows that the "Proposed station is beyond the site to nearest cell evaluation distance" to any relevant existing or proposed Canadian television facility. Accordingly, it is believed that no additional Canadian coordination, other than notification, would be necessary.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, the interference contour overlap analysis which is provided by TV_Process was considered, based on the proposed WAGM-TV facility, to establish compliance with the protection requirements contained therein. The study results indicate that no prohibited contour overlap exists with any Class A LPTV stations.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WAGM-TV transmitter/antenna site. The applicant recognizes its responsibility to remedy all complaints of interference that might be created by this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT & OCCUPATIONAL SAFETY

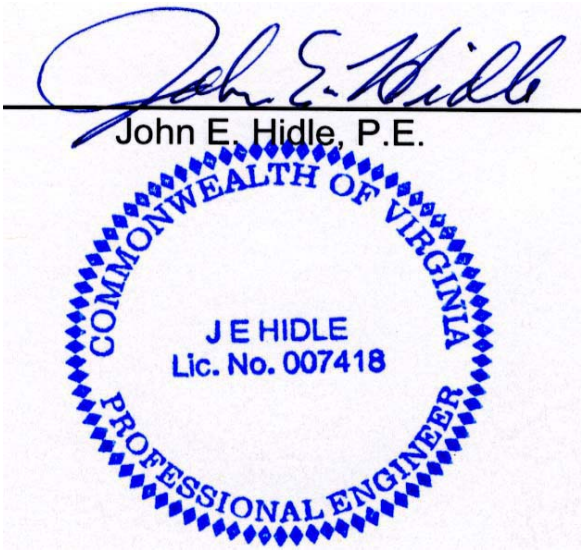
The WAGM-TV facility is located in a relatively inaccessible area along with other facilities. The instant application proposes an ERP of 10 kW at a centerline height above ground of 43 meters. Using the methodology in OET Bulletin 65 to calculate the predicted power density at 2 meters above ground level, the result is 0.00997 milliwatts per square centimeter, or only 4.98% of the guideline for exposure in an uncontrolled environment. The predicted power density is therefore less than the 5% threshold of responsibility.

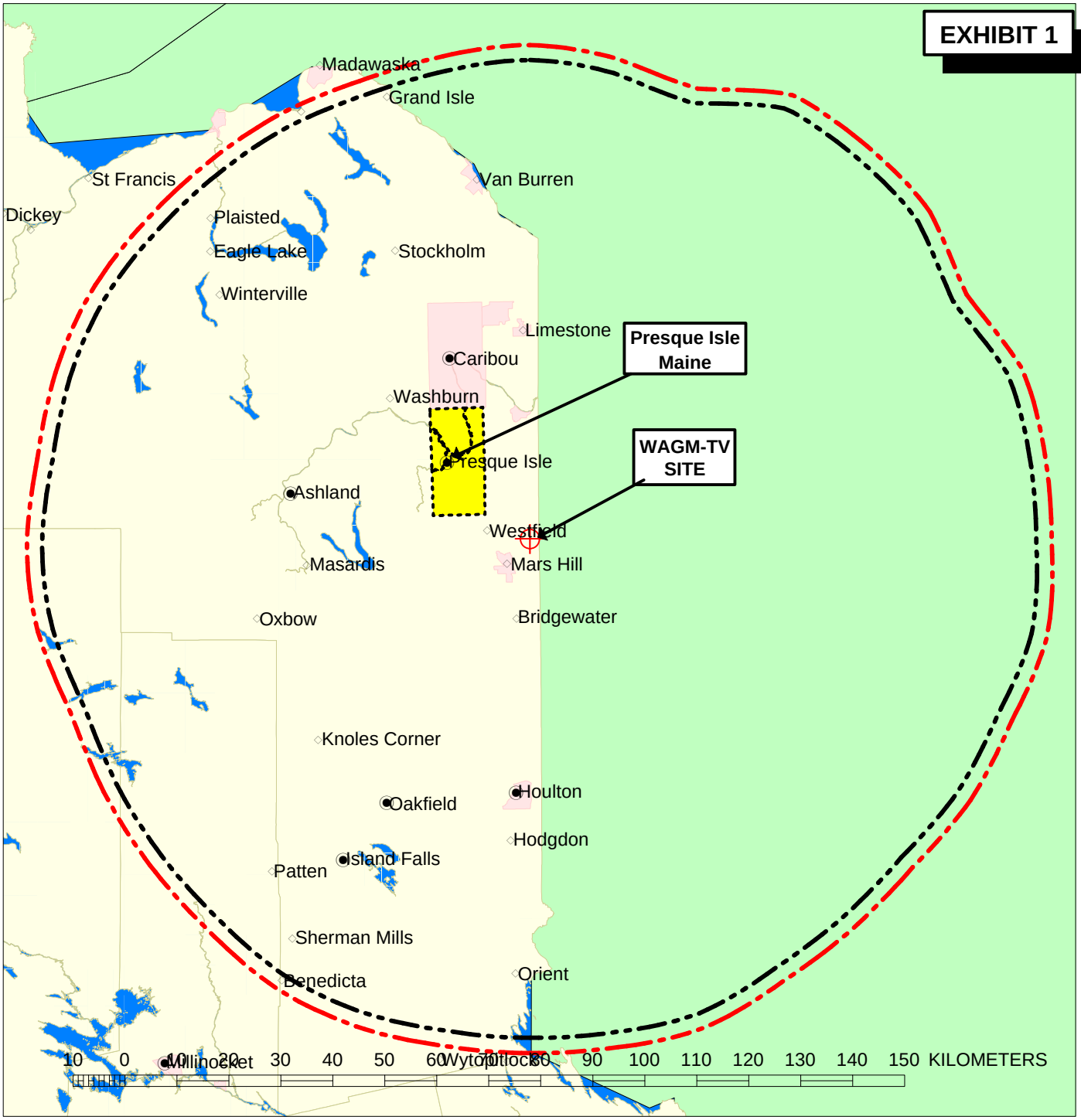
Nevertheless, each and every station located at the site is aware of safety precautions necessary when work is being conducted on towers at or near the site. WAGM-TV will be a party, with the other stations located at the site, to a joint use RFR safety agreement and is committed to the safety of personnel working on or near the WAGM-TV transmitting antenna. WAGM-TV will reduce power or suspend operation as necessary to ensure the safety and protection of workers at the site.

SUMMARY

It is submitted that the instant application for construction permit for WAGM-TV seeking to alter its authorized ERP from 6.9 kW to 10 kW and to utilize the existing antenna transmission facilities of WAGM-TV for post-transition digital operation on channel 8, as described herein, complies with the Rules, Regulations and Policies of the Federal Communications Commission. This statement, FCC Form 301, Section III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: September 21, 2009





PREDICTED COVERAGE CONTOURS

WAGM-TV, PRESQUE ISLE, MAINE

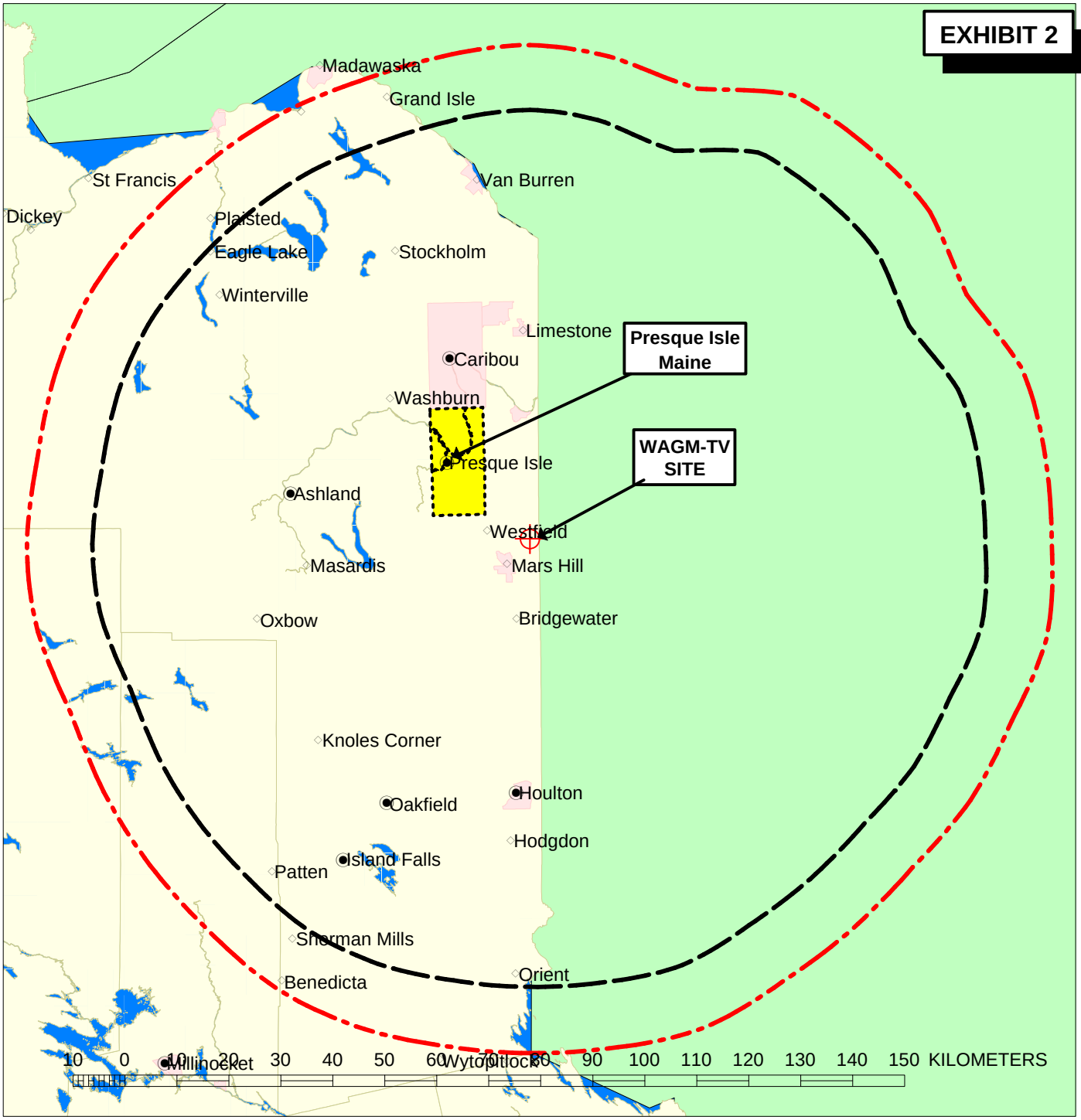
CH. 8, 10 kW - 350.0 m HAAT

Predicted DTV Noise Limited Contour
App - 10 kW - Ch. 8 - F(50,90) - 36 dBu
US Population (2000 census)
65,947 - 28,775 sq km

Predicted DTV Noise Limited Contour
License - 6.9 kW - Ch. 8 - F(50,90) - 36 dBu
US Population (2000 census)
64,309 - 27,065 sq km

SEPTEMBER 2009

CARL T. JONES CORPORATION



PREDICTED COVERAGE CONTOURS

WAGM-TV, PRESQUE ISLE, MAINE

CH. 8, 10 kW - 350.0 m HAAT

Predicted DTV Noise Limited Contour
10 kW - Ch. 8 - F(50,90) - 36 dBu
US Population (2000 census)
65,947 - 28,775 sq km

Predicted DTV Principal Community Contour
10 kW - Ch. 8 - F(50,90) - 43 dBu
US Population (2000 census)
60,074 - 21,780 sq km

SEPTEMBER 2009

CARL T. JONES CORPORATION