

**Goldman Engineering Management  
Dallas, Texas.**

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TECHNICAL EXHIBIT  
APPLICATION FOR FM CONSTRUCTION PERMIT  
FACILITY ID 9310  
STATION WBTN-FM  
BENNINGTON, VERMONT  
CH 232A 3KW 34 M HAAT

TECHNICAL NARRATIVE

This technical narrative is filed in support of an application for construction permit for station WBTN-FM at Bennington, Vermont. This application's sole purpose is to modify WBTN-FM's allocation designation with respect to WDVT (FM) from 72.207 to 73.215 contour protection.

CONTINGENT APPLICATIONS

The instant application is being concurrently filed under the contingent application rules [Section 73.3517 (e)] as the grant of this application is contingent with WDVT (FM), Rutland Vermont, Channel 233A which is applying concurrently to relocate to a new tower site and operate pursuant to Section 73.215 contour protection with respect to WBTN-FM (232A) . Thus, both WDVT and WBTN-FM will be operating pursuant to 73.215 contour protection to each other following the grant of these applications. WBTN-FM will not change its existing operation operating at 3kw and 34m HAAT as currently licensed.

RESPONSE TO PARAGRAPH 14- COMMUNITY COVERAGE

Since WBTN-FM will not be changing any operating parameters, there is no change in its coverage of Bennington, Vermont. All of Bennington will continue to be served by the 70dBu contour.

## RESPONSE TO PARAGRAPH 13, 16- ALLOTTMENT, INTERFERENCE

Although WBTN-FM is not changing any operating parameters, the following table indicates the WBTN-FM allocation situation particularly as it changes with respect to WDTV.

ALLOCATION STUDY, WBTN-FM, BENNINGTON, VT. CHANNEL 232A										
Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
WBAR-FM	NY	LAKE LUZERNE	94.7	234	320 A		APP	61.35	31	30.3
WBAR-FM	NY	LAKE LUZERNE	94.7	234	1250 A		LIC	61.34	31	30.3
WDTV	VT	RUTLAND	94.5	233	3000 A		LIC	74.94	72	2.9
WDTV	VT	RUTLAND	94.5	233	6000 A		APP	70.18	72	-1.8 73.215 per this applica
WKXP	NY	KINGSTON	94.3	232	880 A		LIC	134.82	115	19.8
WKXP	NY	KINGSTON	94.3	232	2250 A		LIC	134.82	115	19.8
WMAS-FM	MA	SPRINGFIELD	94.7	234	50000 B		LIC	104.11	69	35.1
WNYV	NY	WHITEHALL	94.1	231	3000 A		LIC	62.79	72	-9.2 73.213
WRSI	MA	TURNERS FALLS	93.9	230	2500 A		LIC	66.36	31	35.4
WYAI*	NY	SCOTIA	93.7	229	0 A		RSV	70.68	31	39.7
WYKV	NY	RAVENA	94.5	233	3000 A		LIC	71.41	72	-0.6 73.213

\*\* NOTE, THIS APPLICATION DOES NOT PROPOSE A CHANGE IN PHYSICAL OPERATION TO WBTN-FM, ONLY A CHANGE IN ASSIGNMENT WITH RESPECT TO WDTV (FM) FROM 73.207 TO 73.215.

Figure 1 indicates the 73.215 contour relationship between WDTV and WBTN-FM following the grant of this application. The WDTV to WBTN-FM distance of 70.16 is well within the minimum spacing requirement of 49km under 73.215(e).

## RESPONSE TO PARAGRAPH 17 - ENVIRONMENTAL CONSIDERATIONS

Although there will be no change in operating parameters for WBTN-FM, The WBTN-FM facilities were evaluated in terms of potential radiofrequency radiation exposure at 2 meters above ground level on channel 232A with a maximum effective radiated power of 3.0 kilowatts. The power density at 2 meters above ground level at the base of the tower was calculated using the FCC “FM Model for Windows” Power Density vs. Distance Calculator . Figure 2 is the program output for the proposed Shively model 6813, 3-bay, 1.0-λ spaced, non-directional antenna.

According to the output of the FCC program, The WBTN-FM antenna will continue to generate a maximum power density of 2.55 μW/cm<sup>2</sup>, or 1.3% of the permitted level for uncontrolled exposure at 2 meters above ground and an antenna center of radiation height above ground level of 88 meters.

Based on the above information, the WBTN-FM facility fully complies with the FCC standard in regard to uncontrolled exposure to nonionizing radiation.

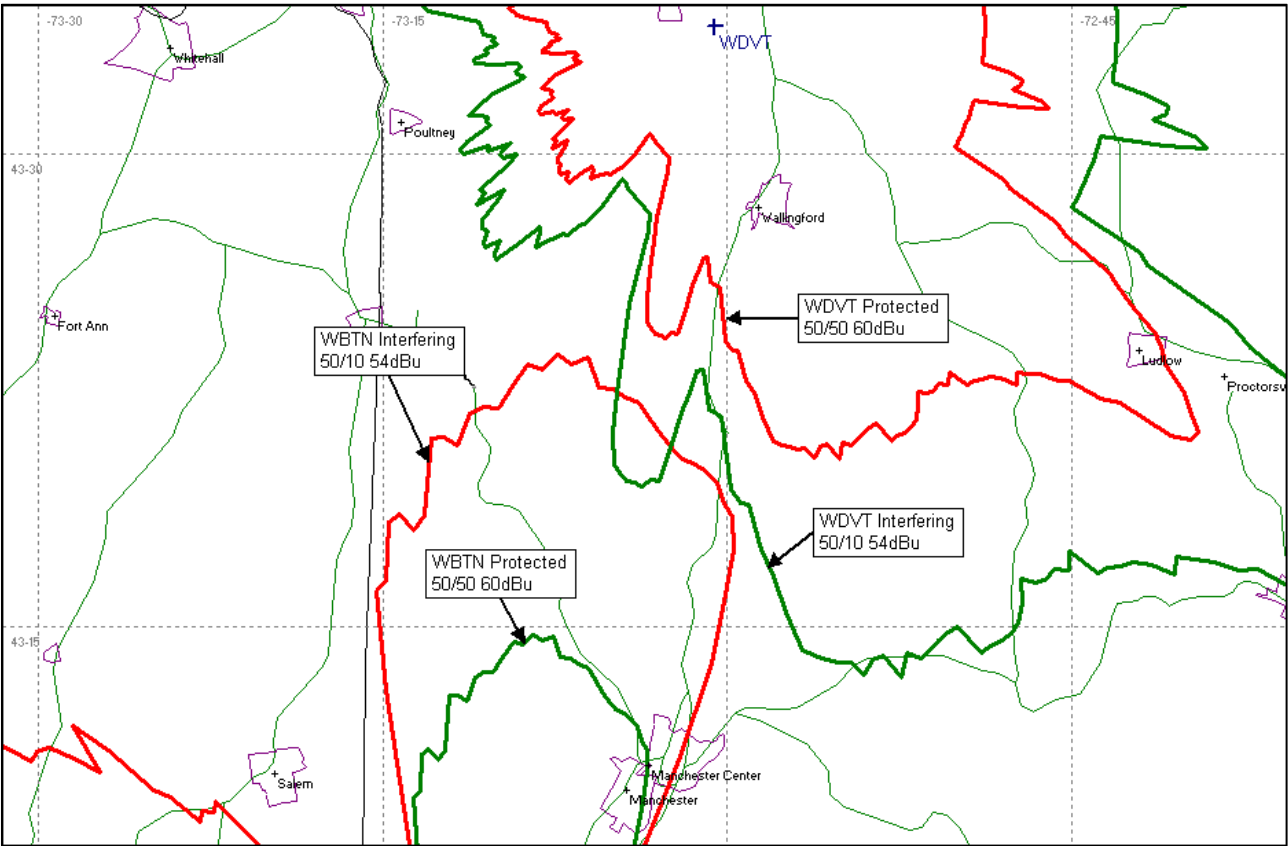
Respectfully Submitted

A handwritten signature in cursive script that reads "Bert Goldman". The signature is written in dark ink and has a fluid, connected style.

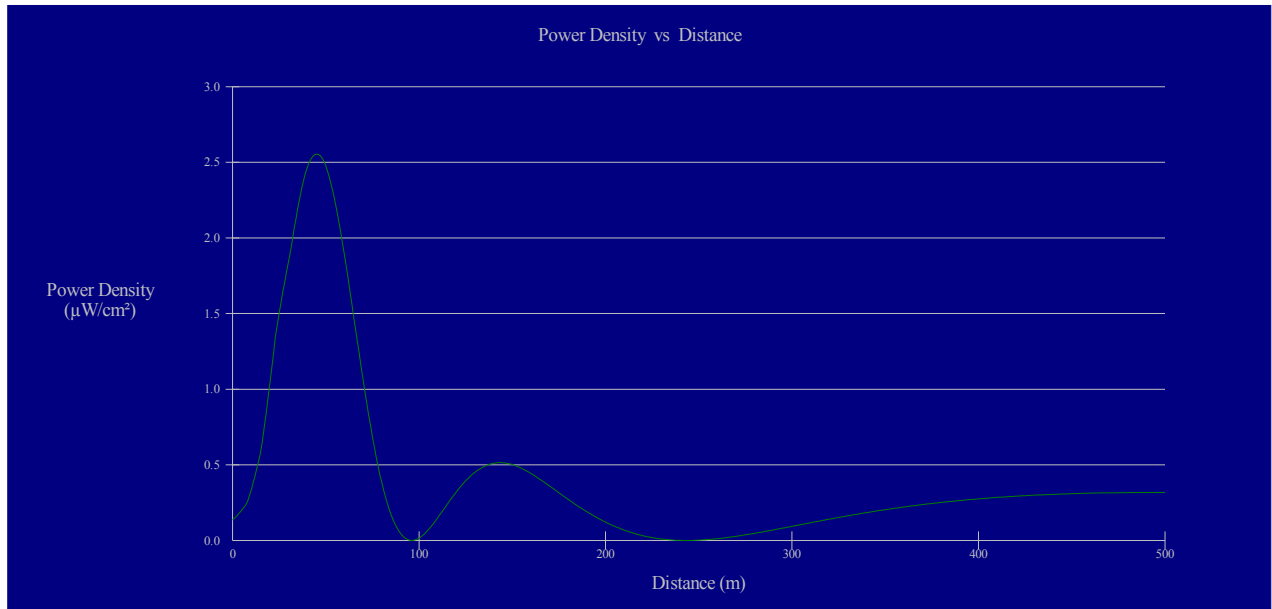
Bert Goldman

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**FIGURE 1 WBTN-FM to WDTV (FM) PROPOSED CONTOUR PROTECTION**



**FIGURE 2, WDV T POWER DENSITY**  
**@ 2M AGL, 3KW H+V, 88M AGL,**  
**SHIVELY 6813-3 (3 ELEMENT 1.0  $\lambda$ )**



**MAXIMUM POWER DENSITY = 2.55  $\mu\text{W}/\text{cm}^2$**