

**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 WDVT.

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
WDVT	VT	RUTLAND	94.5	233	3000 A	LIC		74.94	72	2.9
WDVT	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 WDVT (FM) FROM 73.207 TO 73.215.

Figure 1 indicates the 73.215 contour relationship between WDVT and WBTN-FM following the grant of this application. The WDVT 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.

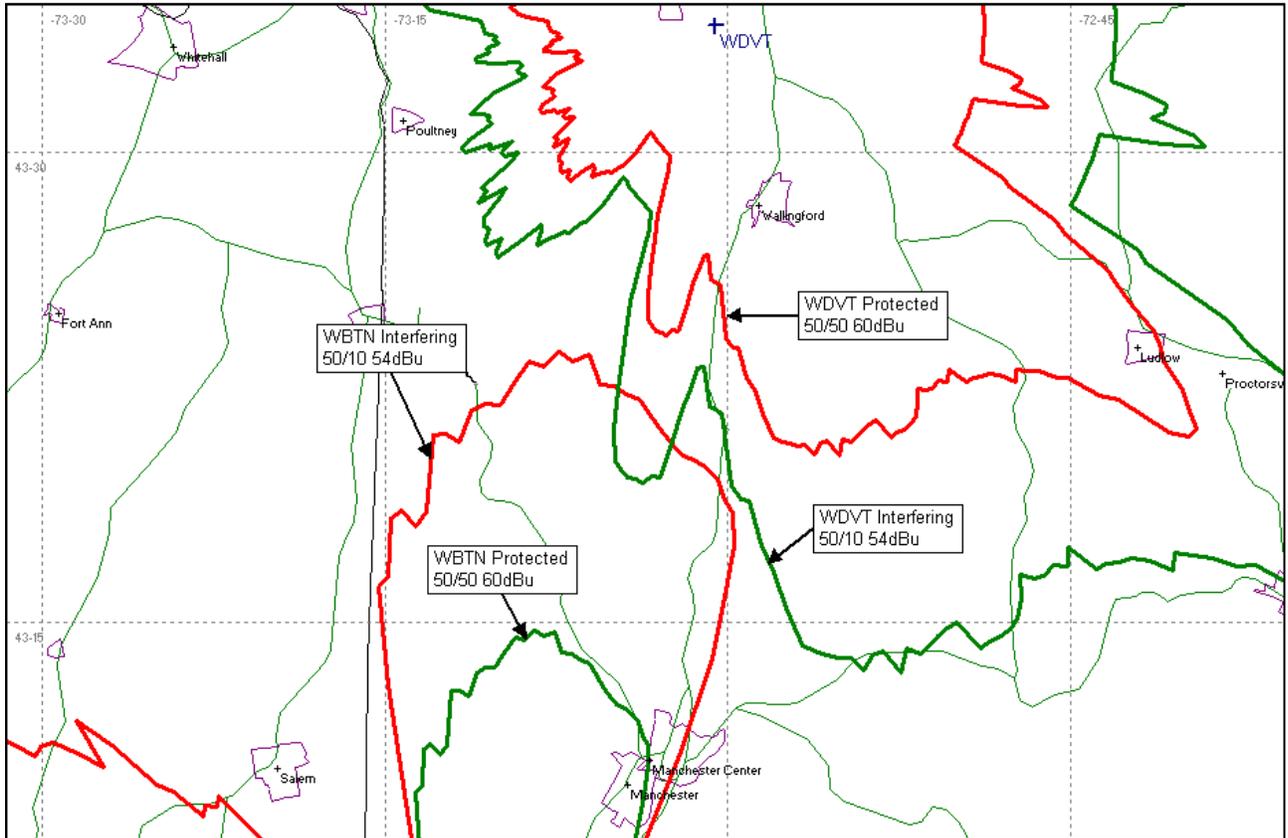
Respectfully Submitted

A handwritten signature in cursive script that reads "Bert Goldman". The signature is fluid and includes a long, sweeping horizontal line at the end.

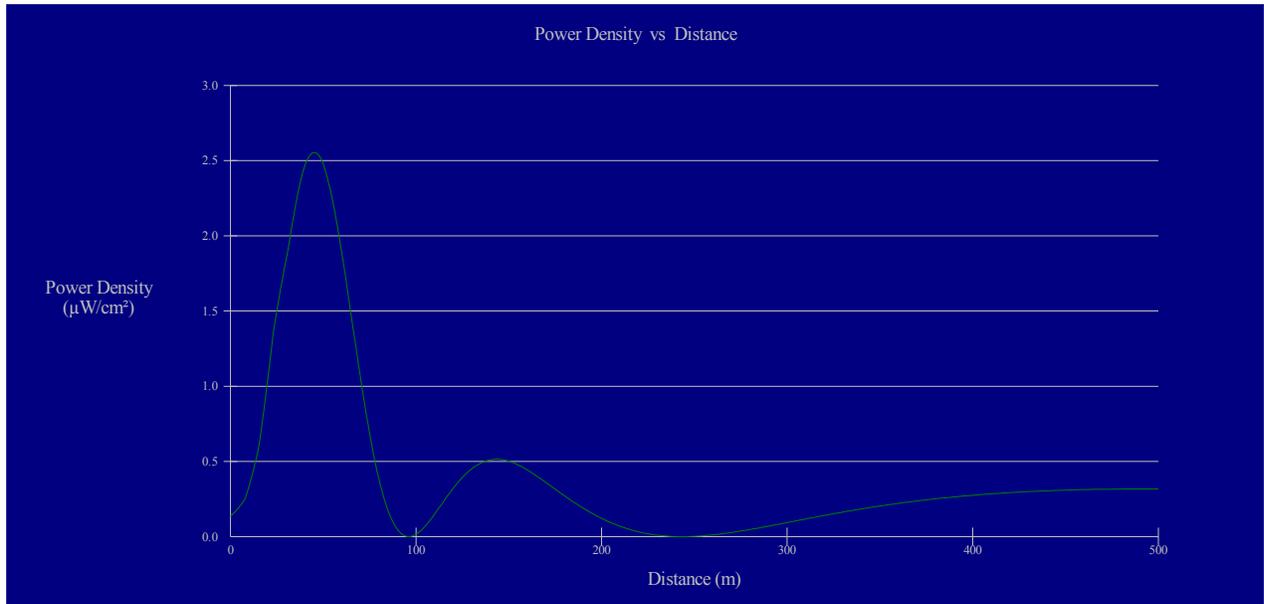
Bert Goldman

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



**FIGURE 2, WDVVT POWER DENSITY  
@ 2M AGL, 3KW H+V, 88M AGL,  
SHIVELY 6813-3 (3 ELEMENT 1.0 λ)**



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