CARL T. JONES
CORPORATION

STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION TO
AMEND AN APPLICATION FOR MODIFICATION OF
A DTV CONSTRUCTION PERMIT
BMPCDT-20080620AKA
WLOS-DT - ASHEVILLE, NORTH CAROLINA
DTV - CH. 13 - 50 kW - 853 meters HAAT

Prepared for: WLOS Licensee, LLC

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 WLOS Licensee, LLC, licensee of WLOS(TV), channel 13, Asheville, North Carolina, and permittee of WLOS-DT, on post-transition channel 13, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application to amend its application, BMPCDT-20080620AKA, for modification of its current post-transition construction permit BPCDT-20080317AGL. The permittee proposes to construct its post-transition DTV facility according to its current post-transition authorization with two exceptions. It is herein proposed to: 1) substitute a new directional antenna, a Dielectric model THV-10A13-R C170, with a different horizontal azimuth pattern as shown in exhibits two to five, for the currently authorized Dielectric THB-C3-6/18-1 directional antenna, and 2) to increase the effective radiated power (ERP) from the currently authorized 29.8 kW to 50 kW. No other changes are proposed.

PURPOSE OF AMENDMENT

The instant amendment is intended to resolve two issues associated with the current pending application, which seeks to increase WLOS-DT's ERP from its authorized value of 29.8 kW to 70 kW. It is noted that the current proposal for 70 kW is predicted to cause a reduction in population proposed to be served by a pending maximization application for WRCB-DT, channel 13, Chattanooga, Tennessee, BPCDT-20080618ABW, as amended, by more than the 0.5% permitted for maximization applications filed within the post-freeze DTV filing window which closed on June 20, 2008. The instant proposal will effectively reduce WLOS-DT's proposed increase in ERP from 70 kW to 50 kW, thereby completely eliminating any predicted interference in excess of the permitted 0.5% to WRCB-DT.

Section 73.622(f)(5) permits a DTV station to increase its technical facilities up to those which will provide a geographic coverage area as large as, but not exceeding, that area served by the "largest station in the market", which, in the Greenville-Spartanburg-Anderson-Asheville DMA appears to be WSPA-DT, channel 7, in Spartanburg, SC. WSPA-DT's currently authorized facility, 20.5 kW ERP @ 657 meters HAAT, provides a service area encompassing 40,644 square kilometers, within which approximately 2,745,000 persons reside. The WLOS-DT technical facility proposed herein, 50 kW ERP @ 853 meters HAAT, will provide a service area of 39,720 square kilometers within which about 2,476,000 persons reside. WLOS-DT's current authorization, 29.8 kW ERP @ 853 meters HAAT, provides a service area of 37,735 square kilometers, within which about 2,348,000 persons reside. The instant amendment will increase the area served by 1,985 square kilometers, and will increase the population served by about 128,000 persons.

DTV ALLOCATION CONSIDERATIONS

A study was performed utilizing the Commission's application processing software to determine compliance with the post-transition limitations contained in §73.616 of the Commission's rules. Results indicate that the instant proposal to substitute a different directional antenna and increase WLOS-DT's ERP from 29.8 kW to 50 kW is predicted to cause no unacceptable level (0.5%) of new interference to the populations served by any DTV station, expansion construction permit, allotment or any other pending application for construction permit to maximize DTV facilities.

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 WLOS-DT 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.

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 FCC antenna registration data. Exhibit 6 contains the predicted DTV Noise Limited (36 dBu) contour and the predicted principal community (43 dBu) contour. The 43 dBu contour entirely encompasses the principal community of license, Asheville, North Carolina.

BLANKETING AND INTERMODULATION INTERFERENCE

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

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish a maximum permissible exposure (MPE) level for occupational or “controlled” situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology’s technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities,

operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHZ and 1500 MHz, primarily UHF TV stations, is derived from the formula, (frequency/1500). The MPE level for "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm^2) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, (frequency/300).

The WLOS-DT site is located on a mountain top which is accessible by cable car. Another licensee has performed measurements and has previously submitted the results to the Commission. That licensee found the site to be in compliance with the Commission environmental requirements.

OCCUPATIONAL SAFETY

The permittee for WLOS-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the proposed WLOS-DT antenna. The applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel.

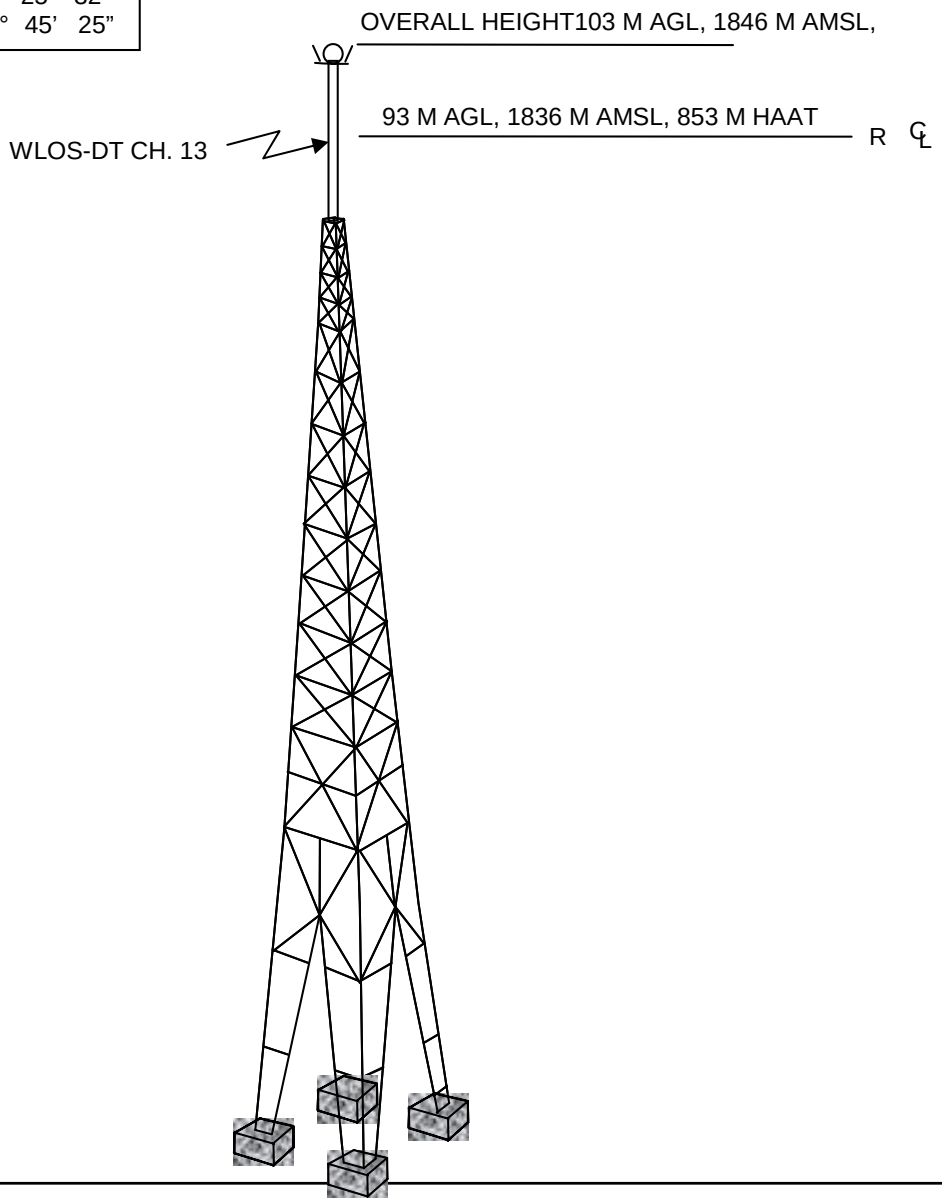
SUMMARY

It is submitted that the instant amendment to WLOS-DT's pending application for modification of construction permit for WLOS-DT seeking to substitute a different directional antenna and increase its effective radiated power from 29.8 kW to 50 kW, 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: January 12, 2009

EXHIBIT 1

NAD-27 COORDINATES
NORTH LATITUDE: 35° 25' 32"
WEST LONGITUDE: 82° 45' 25"



GROUND ELEVATION = 1743 M AMSL

VERTICAL PLAN ANTENNA SKETCH
WLOS-DT, ASHEVILLE, NORTH CAROLINA
CH. 13, 50 kW – 853 m HAAT
JANUARY, 2009

CARL T. JONES
CORPORATION

NOT DRAW TO SCALE

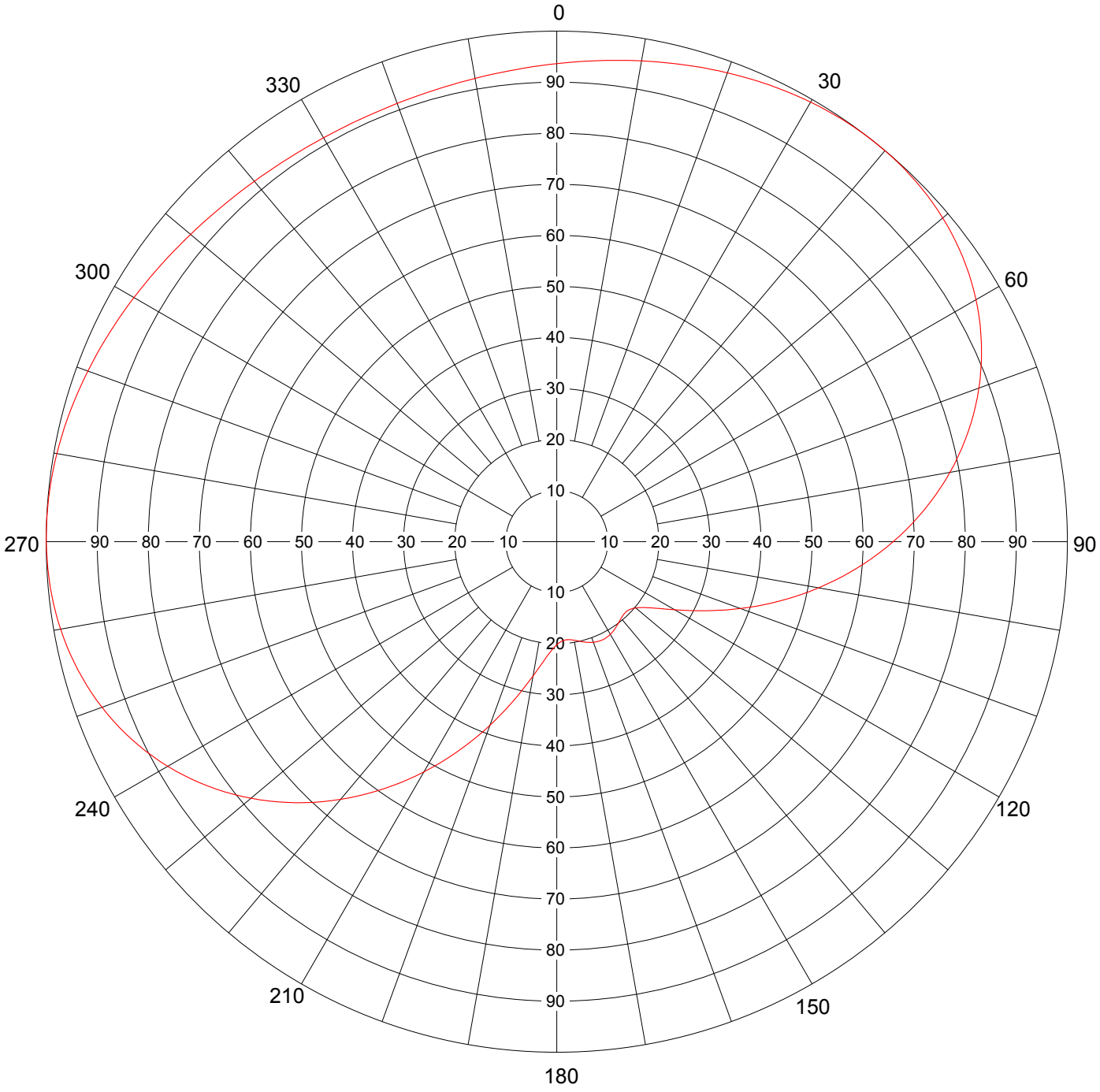
Exhibit No.
TWO

Dielectric

Date	**16 Oct 2008**		
Call Letters	**WLOS**	Channel	**13**
Location	**Asheville, NC**		
Customer	**WLOS Licensee, LLC**		
Antenna Type	**THV-10A13-R C170**		

AZIMUTH PATTERN

Gain	**1.70 (2.30 dB)**	Frequency	**213 MHz**
Calculated / Measured	**Calculated**	Drawing #	**THV-C170**



Remarks:

Exhibit No.
THREE

Dielectric

Date	**16 Oct 2008**		
Call Letters	**WLOS**	Channel	**13**
Location	**Asheville, NC**		
Customer	**WLOS Licensee, LLC**		
Antenna Type	**THV-10A13-R C170**		

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **THV-C170**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.936	45	0.996	90	0.659	135	0.193	180	0.202	225	0.723	270	1.000	315	0.928
1	0.938	46	0.995	91	0.646	136	0.193	181	0.205	226	0.735	271	1.000	316	0.927
2	0.940	47	0.993	92	0.632	137	0.193	182	0.210	227	0.747	272	1.000	317	0.925
3	0.942	48	0.991	93	0.618	138	0.194	183	0.214	228	0.759	273	1.000	318	0.924
4	0.944	49	0.989	94	0.605	139	0.195	184	0.220	229	0.771	274	0.999	319	0.923
5	0.946	50	0.987	95	0.591	140	0.196	185	0.226	230	0.782	275	0.999	320	0.921
6	0.948	51	0.984	96	0.577	141	0.197	186	0.233	231	0.793	276	0.998	321	0.920
7	0.950	52	0.981	97	0.563	142	0.199	187	0.240	232	0.804	277	0.997	322	0.919
8	0.952	53	0.978	98	0.549	143	0.200	188	0.249	233	0.814	278	0.996	323	0.918
9	0.954	54	0.974	99	0.535	144	0.202	189	0.257	234	0.824	279	0.995	324	0.917
10	0.956	55	0.971	100	0.521	145	0.203	190	0.267	235	0.834	280	0.994	325	0.917
11	0.958	56	0.967	101	0.507	146	0.205	191	0.276	236	0.844	281	0.993	326	0.916
12	0.960	57	0.963	102	0.492	147	0.206	192	0.287	237	0.853	282	0.991	327	0.915
13	0.963	58	0.958	103	0.478	148	0.207	193	0.297	238	0.862	283	0.990	328	0.915
14	0.965	59	0.953	104	0.464	149	0.209	194	0.309	239	0.871	284	0.988	329	0.914
15	0.967	60	0.948	105	0.450	150	0.210	195	0.320	240	0.880	285	0.987	330	0.914
16	0.969	61	0.943	106	0.437	151	0.211	196	0.332	241	0.888	286	0.985	331	0.913
17	0.971	62	0.937	107	0.423	152	0.211	197	0.344	242	0.896	287	0.983	332	0.913
18	0.973	63	0.931	108	0.409	153	0.212	198	0.357	243	0.904	288	0.981	333	0.913
19	0.975	64	0.924	109	0.396	154	0.212	199	0.369	244	0.911	289	0.979	334	0.913
20	0.977	65	0.918	110	0.383	155	0.212	200	0.383	245	0.918	290	0.977	335	0.912
21	0.979	66	0.911	111	0.369	156	0.212	201	0.396	246	0.924	291	0.975	336	0.913
22	0.981	67	0.904	112	0.357	157	0.212	202	0.409	247	0.931	292	0.973	337	0.913
23	0.983	68	0.896	113	0.344	158	0.211	203	0.423	248	0.937	293	0.971	338	0.913
24	0.985	69	0.888	114	0.332	159	0.211	204	0.437	249	0.943	294	0.969	339	0.913
25	0.987	70	0.880	115	0.320	160	0.210	205	0.450	250	0.948	295	0.967	340	0.914
26	0.988	71	0.871	116	0.309	161	0.209	206	0.464	251	0.953	296	0.965	341	0.914
27	0.990	72	0.862	117	0.297	162	0.207	207	0.478	252	0.958	297	0.963	342	0.915
28	0.991	73	0.853	118	0.287	163	0.206	208	0.492	253	0.963	298	0.960	343	0.915
29	0.993	74	0.844	119	0.276	164	0.205	209	0.507	254	0.967	299	0.958	344	0.916
30	0.994	75	0.834	120	0.267	165	0.203	210	0.521	255	0.971	300	0.956	345	0.917
31	0.995	76	0.824	121	0.257	166	0.202	211	0.535	256	0.974	301	0.954	346	0.917
32	0.996	77	0.814	122	0.249	167	0.200	212	0.549	257	0.978	302	0.952	347	0.918
33	0.997	78	0.804	123	0.240	168	0.199	213	0.563	258	0.981	303	0.950	348	0.919
34	0.998	79	0.793	124	0.233	169	0.197	214	0.577	259	0.984	304	0.948	349	0.920
35	0.999	80	0.782	125	0.226	170	0.196	215	0.591	260	0.987	305	0.946	350	0.921
36	0.999	81	0.771	126	0.220	171	0.195	216	0.605	261	0.989	306	0.944	351	0.923
37	1.000	82	0.759	127	0.214	172	0.194	217	0.618	262	0.991	307	0.942	352	0.924
38	1.000	83	0.747	128	0.210	173	0.193	218	0.632	263	0.993	308	0.940	353	0.925
39	1.000	84	0.735	129	0.205	174	0.193	219	0.646	264	0.995	309	0.938	354	0.927
40	1.000	85	0.723	130	0.202	175	0.193	220	0.659	265	0.996	310	0.936	355	0.928
41	0.999	86	0.710	131	0.199	176	0.194	221	0.672	266	0.997	311	0.935	356	0.930
42	0.999	87	0.698	132	0.197	177	0.195	222	0.685	267	0.998	312	0.933	357	0.931
43	0.998	88	0.685	133	0.195	178	0.197	223	0.698	268	0.999	313	0.931	358	0.933
44	0.997	89	0.672	134	0.194	179	0.199	224	0.710	269	1.000	314	0.930	359	0.935

Remarks:

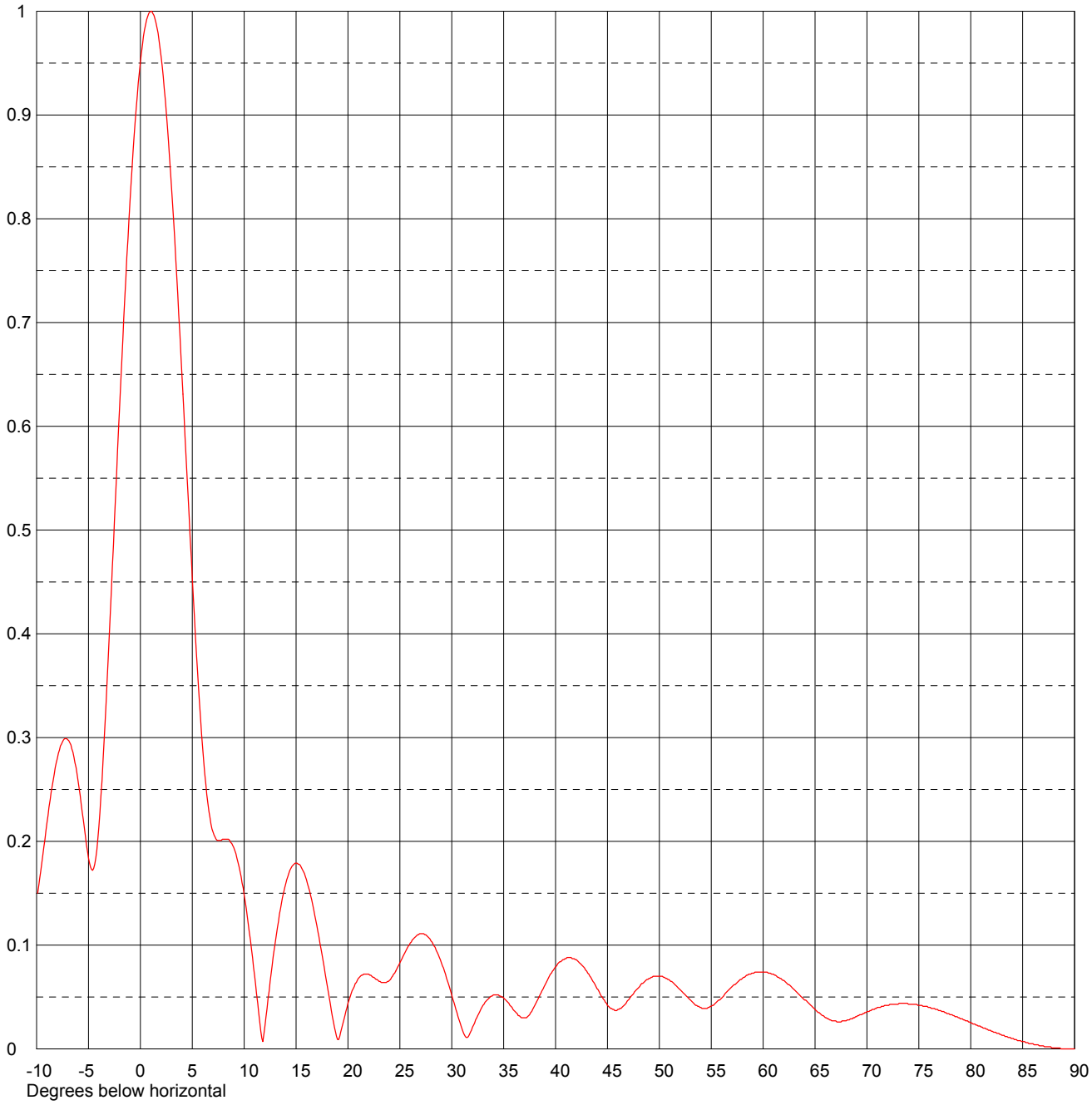
Exhibit No.
FOUR-A

Dielectric

Date	**16 Oct 2008**		
Call Letters	**WLOS**	Channel	**13**
Location	**Asheville, NC**		
Customer	**WLOS Licensee, LLC**		
Antenna Type	**THV-10A13-R C170**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**10.0 (10.00 dB)**	Beam Tilt	**1.00 Degrees**
RMS Gain at Horizontal	**9.0 (9.54 dB)**	Frequency	**213.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**10V100100-90**



Remarks:

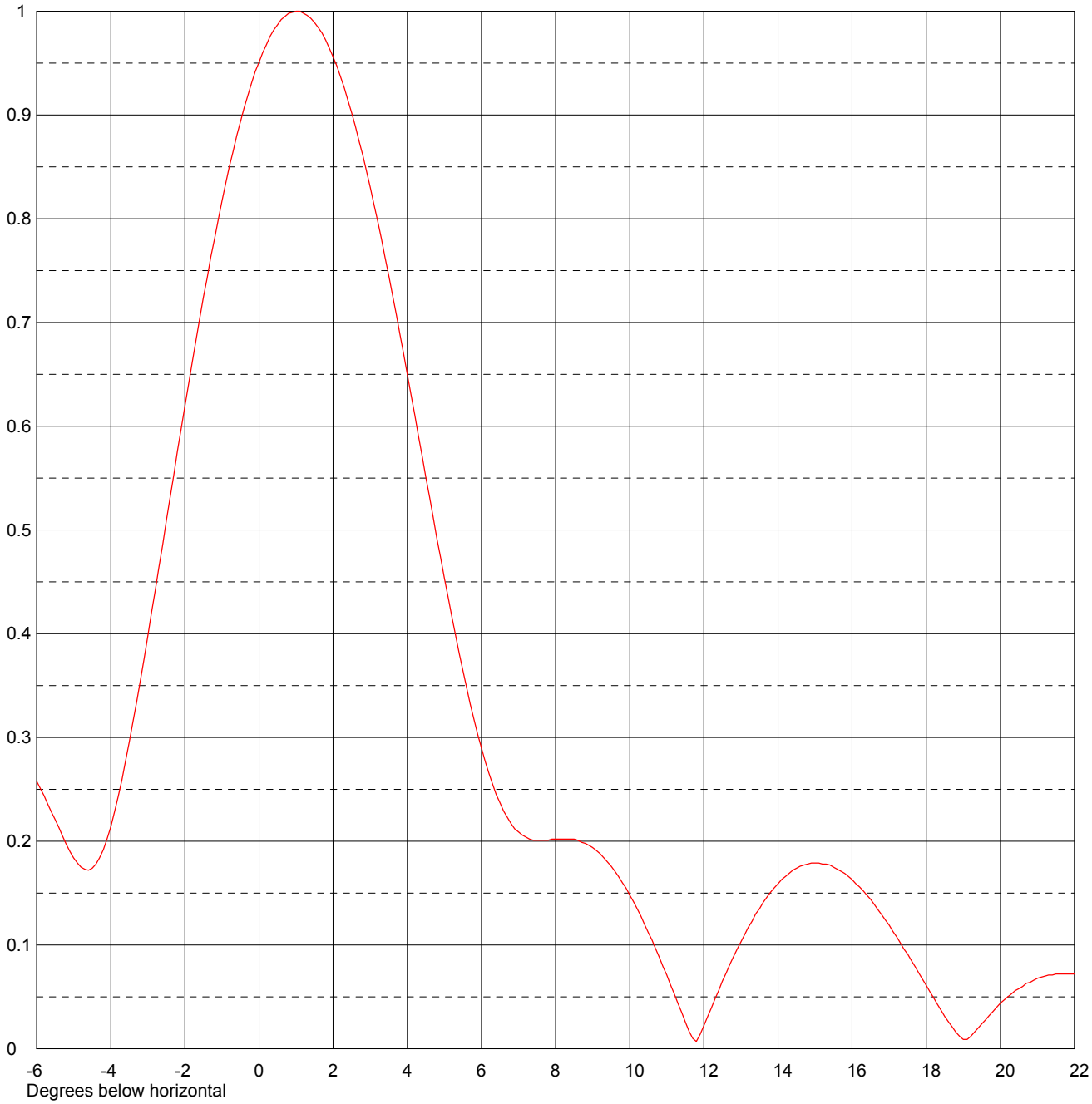
Exhibit No.
FOUR-B

Dielectric

Date	**16 Oct 2008**		
Call Letters	**WLOS**	Channel	**13**
Location	**Asheville, NC**		
Customer	**WLOS Licensee, LLC**		
Antenna Type	**THV-10A13-R C170**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**10.0 (10.00 dB)**	Beam Tilt	**1.00 Degrees**
RMS Gain at Horizontal	**9.0 (9.54 dB)**	Frequency	**213.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**10V100100**



Remarks:

Exhibit No.
FIVE

Dielectric

Date	**16 Oct 2008**		
Call Letters	**WLOS**	Channel	**13**
Location	**Asheville, NC**		
Customer	**WLOS Licensee, LLC**		
Antenna Type	**THV-10A13-R C170**		

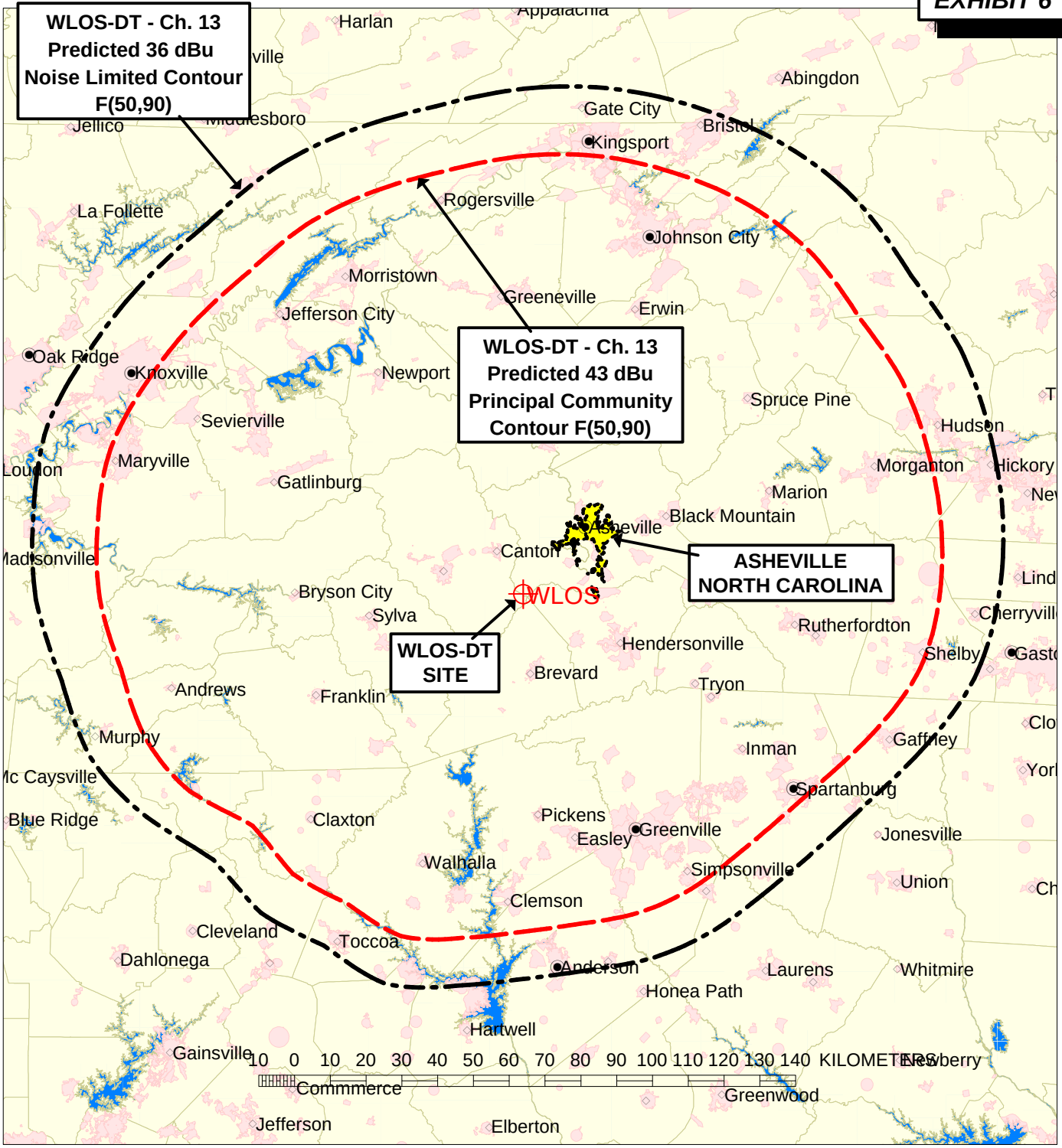
TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **10V100100-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.143	2.4	0.914	10.6	0.105	30.5	0.035	51.0	0.066	71.5	0.041
-9.5	0.179	2.6	0.889	10.8	0.088	31.0	0.019	51.5	0.062	72.0	0.042
-9.0	0.218	2.8	0.861	11.0	0.071	31.5	0.011	52.0	0.057	72.5	0.043
-8.5	0.253	3.0	0.830	11.5	0.026	32.0	0.021	52.5	0.052	73.0	0.043
-8.0	0.280	3.2	0.798	12.0	0.022	32.5	0.032	53.0	0.047	73.5	0.044
-7.5	0.296	3.4	0.763	12.5	0.065	33.0	0.042	53.5	0.042	74.0	0.043
-7.0	0.298	3.6	0.727	13.0	0.103	33.5	0.048	54.0	0.040	74.5	0.043
-6.5	0.286	3.8	0.689	13.5	0.135	34.0	0.052	54.5	0.039	75.0	0.042
-6.0	0.258	4.0	0.650	14.0	0.159	34.5	0.052	55.0	0.041	75.5	0.041
-5.5	0.221	4.2	0.611	14.5	0.174	35.0	0.049	55.5	0.045	76.0	0.040
-5.0	0.184	4.4	0.571	15.0	0.179	35.5	0.044	56.0	0.049	76.5	0.039
-4.5	0.174	4.6	0.532	15.5	0.175	36.0	0.037	56.5	0.055	77.0	0.037
-4.0	0.214	4.8	0.492	16.0	0.163	36.5	0.032	57.0	0.060	77.5	0.035
-3.5	0.296	5.0	0.454	16.5	0.144	37.0	0.030	57.5	0.064	78.0	0.033
-3.0	0.398	5.2	0.417	17.0	0.119	37.5	0.033	58.0	0.068	78.5	0.031
-2.8	0.442	5.4	0.381	17.5	0.091	38.0	0.042	58.5	0.071	79.0	0.029
-2.6	0.486	5.6	0.348	18.0	0.061	38.5	0.052	59.0	0.073	79.5	0.027
-2.4	0.531	5.8	0.317	18.5	0.031	39.0	0.062	59.5	0.074	80.0	0.025
-2.2	0.576	6.0	0.290	19.0	0.009	39.5	0.072	60.0	0.074	80.5	0.023
-2.0	0.619	6.2	0.266	19.5	0.024	40.0	0.079	60.5	0.073	81.0	0.021
-1.8	0.662	6.4	0.245	20.0	0.044	40.5	0.084	61.0	0.072	81.5	0.019
-1.6	0.704	6.6	0.229	20.5	0.058	41.0	0.087	61.5	0.069	82.0	0.017
-1.4	0.743	6.8	0.217	21.0	0.068	41.5	0.088	62.0	0.066	82.5	0.015
-1.2	0.781	7.0	0.209	21.5	0.072	42.0	0.086	62.5	0.062	83.0	0.013
-1.0	0.817	7.2	0.204	22.0	0.072	42.5	0.081	63.0	0.057	83.5	0.012
-0.8	0.850	7.4	0.201	22.5	0.069	43.0	0.075	63.5	0.052	84.0	0.010
-0.6	0.880	7.6	0.201	23.0	0.065	43.5	0.067	64.0	0.047	84.5	0.008
-0.4	0.907	7.8	0.201	23.5	0.064	44.0	0.058	64.5	0.043	85.0	0.007
-0.2	0.931	8.0	0.202	24.0	0.066	44.5	0.050	65.0	0.038	85.5	0.006
0.0	0.951	8.2	0.202	24.5	0.073	45.0	0.042	65.5	0.034	86.0	0.005
0.2	0.968	8.4	0.202	25.0	0.083	45.5	0.038	66.0	0.030	86.5	0.004
0.4	0.982	8.6	0.201	25.5	0.093	46.0	0.038	66.5	0.028	87.0	0.003
0.6	0.992	8.8	0.198	26.0	0.102	46.5	0.041	67.0	0.027	87.5	0.002
0.8	0.998	9.0	0.194	26.5	0.108	47.0	0.047	67.5	0.026	88.0	0.001
1.0	1.000	9.2	0.188	27.0	0.111	47.5	0.053	68.0	0.027	88.5	0.001
1.2	0.998	9.4	0.180	27.5	0.110	48.0	0.059	68.5	0.029	89.0	0.000
1.4	0.993	9.6	0.171	28.0	0.104	48.5	0.064	69.0	0.031	89.5	0.000
1.6	0.984	9.8	0.160	28.5	0.095	49.0	0.068	69.5	0.033	90.0	0.000
1.8	0.972	10.0	0.148	29.0	0.083	49.5	0.070	70.0	0.036		
2.0	0.956	10.2	0.135	29.5	0.068	50.0	0.070	70.5	0.038		
2.2	0.937	10.4	0.120	30.0	0.052	50.5	0.069	71.0	0.040		

Remarks:

EXHIBIT 6



PREDICTED COVERAGE CONTOURS

WLOS-DT, ASHEVILLE, NORTH CAROLINA
DTV - CH. 13 - 50 kW - 853 meters HAAT

PREDICTED 43 dBu F(50,90)
PRINCIPAL COMMUNITY CONTOUR

PREDICTED 36 dBu F(50,90)
NOISE LIMITED CONTOUR

JANUARY 2009

CARL T. JONES CORPORATION