

EXHIBITS 6 and 7
APPLICATION FOR MINOR MODIFICATION TO
CONSTRUCTION PERMIT FOR W69EH

This Technical Exhibit is attached to FCC Form 346 in support of Applicant's request for a minor modification to the Construction Permit for W69EH, (Facility ID. NO. 131071). Applicant proposes to locate to a new tower site. However, NO frequency change is proposed and W69EH's existing protected FCC Grade A (74dbu) contour overlaps the proposed Grade A (74dbu) contour. AS THE EXISTING FACILITY'S GRADE A 74DBU CONTOUR AND THE PROPOSED FACILITY'S 74DBU CONTOUR OVERLAP, THIS APPLICATION CONSTITUTES A MINOR MODIFICATION PURSUANT TO COMMISISON'S RULES, SPECIFICALLY SECTION 73.3572

The proposed modified facility has the following specification:

Frequency Offset:	PLUS OFFSET
Antenna radiation center height above ground level:	120 meters
Maximum effective radiated power:	150 KW
Antenna type and model #:	SCA 4DR-16-2HW
Orientation:	230 degrees
NAD 27 Coordinates:	38-58-01.5 N 76-15-30.1 W
FCC Tower Registration:	1035691

A study has been conducted using the provisions of sections 74.703, 74.705, 74.706, 74.707, and 74.709 which indicates that the proposal will not create prohibited interference with other existing or proposed NTSC full power, DTV, Land Mobile, Class A or LPTV facilities other than to one pending LPTV and one NTSC Full-Power facility. However, based upon the provisions of OET 69, the proposed minor modification complies with the FCC's interference criteria toward both facilities. Below is a complete analysis and tabulation of the predicted interference that would be caused to both facilities by this minor modification pursuant to the provisions of OET 69. This analysis indicates that no prohibited interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Sections 74.707 and 74.705, based upon the results of the OET 69 study.**

LPTV Facility

An interference analysis was conducted using 74.707 criteria and OET 69 Bulletin standards with regard to the effect of the proposed minor modification on the LPTV facility listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

LPTV	FCC Service Population	Proposed Interference Population
W69AC CH 69 No Offset Romney, WV FILE NO. BLTT-1616 License	1,006	0 (0.0%)

The results of the study indicate that Zero interference will be caused to W69AC by the proposed minor modification.

NTSC Full-Power Facility

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC Full-Power facility listed below. As indicated in the table below, the operation of the proposed station will result in virtually no interference to persons in the Full-Powers' protected contours.

Protected Full-Power Station	FCC Service Population	Proposed Interference Population
WNUV, CH 54Z Baltimore, MD FILE NO. BLCT- BLCT-19890914KF License	5,818,488	1,013 (0.02%)

As indicated in the above table, the operation of the proposed station will cause virtually Zero interference to WNUV.

Environmental Considerations

The proposed LPTV CH 69 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 150 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.179 milliwatt per square centimeter (MW/ CM2), or 33.5 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.534 MW/CM2 for TV channel 69). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure 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.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.