

**ENGINEERING STATEMENT ON BEHALF OF
WAGM-DT, PRESQUE ISLE, MAINE
CHANNEL 8, ERP 3.7 KW, HAAT 350 METERS**

This Engineering Statement, prepared on behalf of NEPSK, Inc., licensee of WAGM, Presque Isle Maine, is in support of an application for construction permit for post-transition operation of WAGM-DT. The current authorization for digital operation of WAGM-DT is on channel 16 but the station will return to channel 8 for digital operation at the time of the February 2009 transition. Although the current digital allotment table specifies the use of channel 8 by WAGM-DT for post-transition operation, it does not recognize the appropriate antenna type or height above average terrain.

The present analog operation of WAGM on channel 8 utilizes a nondirectional Harris Model TAD-12HDB-3/18 antenna at a height above average terrain of 350 meters. That identical antenna at its present height is to be used for digital operation on channel 8. The allotment table specifies both an antenna pattern and height above average terrain applicable to the channel 16 digital operation, but not applicable to channel 8 operation. Furthermore, although an average effective radiated power of 5.0 kilowatts was proposed by NEPSK to provide a digital coverage area comparable to its analog coverage, only 3.2 kilowatts average effective radiated power is specified in the allotment table.

A study has been conducted using the FCC's tv_process computer program using the parameters: channel 8, HAAT 350 meters, and ERP 5.0 kilowatts. That study shows that no impermissible interference would be either caused or received if WAGM-DT operates with those parameters at its current site. However, a determination has been made that, at a bearing of 110 degrees, the distance to the 36 dBu, noise-limited contour is extended by more than five miles over that

contemplated by the parameters incorporated in the Appendix B allotment table. Accordingly, the ERP now requested is 3.7 kilowatts.

The parameters specified in the foregoing are now in compliance with all three conditions specified in Paragraph 151, relating to waiver of the “freeze,” in the Third Periodic Review Report and Order adopted December 22, 2007. The station proposes to use its currently employed analog antenna, the service area in no direction is extended more than five miles from what would be achieved using the facilities specified in Appendix B, and no impermissible interference would be caused to any other authorized facility.

A request for “freeze” waiver accompanies this application for construction permit.

May 19, 2008