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LEHIGH VALLEY PUBLIC TELECOMMUNICATIONS CORPORATION

LICENSEE OF WLVT-DT

ALLENTOWN, PENNSYLVANIA

FCC FILE No. BPEDT-20080201AQV

FACILITY ID 36989

**APPLICATION FOR A MODIFICATION OF CONSTRUCTION PERMIT
TO SPECIFY POST DTV TRANSITION OPERATION ON CHANNEL 39**

RFR STATEMENT EXHIBIT 37

June 1, 2008

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RFR ENGINEERING EXHIBIT 37

RFR STATEMENT

This application is for a modification of an outstanding Construction Permit for WLVT-DT to return post transition to its analog channel, Channel 39. Lehigh Valley Public Telecommunications Corporation, Licensee of WLVT-DT, is currently in full compliance with the RFR energy requirements of 47 CFR 1.1310.

The maximized post transition operation of WLVT-DT will be on Channel 39 and with an ERP of 52 kW directional and with horizontal polarization. WLVT-DT, as reported in previous filings with the Commission, along with other users of this joint use facility, is currently in full compliance with RFR requirements of FCC OET 65 and 47 CFR 1.1312. The proposed Channel 39 DTV post transition operation, when combined with the simultaneous shutdown of WLVT-TV, Channel 39 analog at 575 kW visual, pre-transition WLVT-DT, Channel 62 at 50 kW visual MAX DA and the co-located pre-transition WFMZ-TV operating on Channel 69 with 5000 kW MAX-DA; WFMZ-DT operating at 800 kW, results in a net reduction of existing RFR levels on and in the immediate vicinity of the multiple use tower of 6,019 kW with no changes in antenna placement.

Since the total RFR energy from the multiple use tower has been reduced by approximately 6,019 kW and no antenna heights have been altered, the resultant RFR energy levels on and near this multiple use tower will be reduced significantly as of February 18, 2009 and Lehigh Valley Public Telecommunications Corporation will continue to be in full compliance with FCC OET-69 and FCC 47 CFR 1.1310.