

Exhibit 7 - Statement A
CONSTRUCTED FACILITY
prepared for
United Communications Corporation
WWNY-DT Carthage, New York
Facility ID: 68851
Ch. 7 24.9 kW 219 m

United Communications Corporation (“*United*”) is the permittee of digital television station WWNY-DT, Carthage, New York. *United* has completed construction of the DTV facility authorized in the construction permit (“CP”) FCC File No. BMPCDT-20080620AIE. The instant statement has been prepared to report the correct model number for the installed WWNY-DT antenna.

The post-transition WWNY-DT facility was constructed as authorized in the CP. The CP application reported the proposed use of a GE Model TY-30H non-directional antenna. Based on recent discussions with the station’s technical staff, the actual installed antenna is a Harris TAB-12HS that is non-directional in the horizontal plane with 0.3° of electrical beam tilt. A depiction of the antenna vertical plane (elevation) relative field pattern is provided in **Exhibit 7-Figure 1**.

Human Exposure to Radiofrequency Radiation

The installed antenna was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission’s OET Bulletin No. 65 (“OET 65”). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The WWNY-DT antenna that has been employed has a center of radiation 164 meters above ground level. An ERP of 24.9 kilowatts, horizontally polarized, is employed. Based on information provided by the antenna manufacturer, the antenna has a maximum vertical plane (elevation) relative field of 30 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 30 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 7 (center frequency 177 MHz) is 200 $\mu\text{W}/\text{cm}^2$.

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 2.85 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 1.43 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities at locations with multiple transmitters (such as the case at hand) are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of the any other facilities using this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the WWNY-DT operation will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will continue to be

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restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will continue to be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

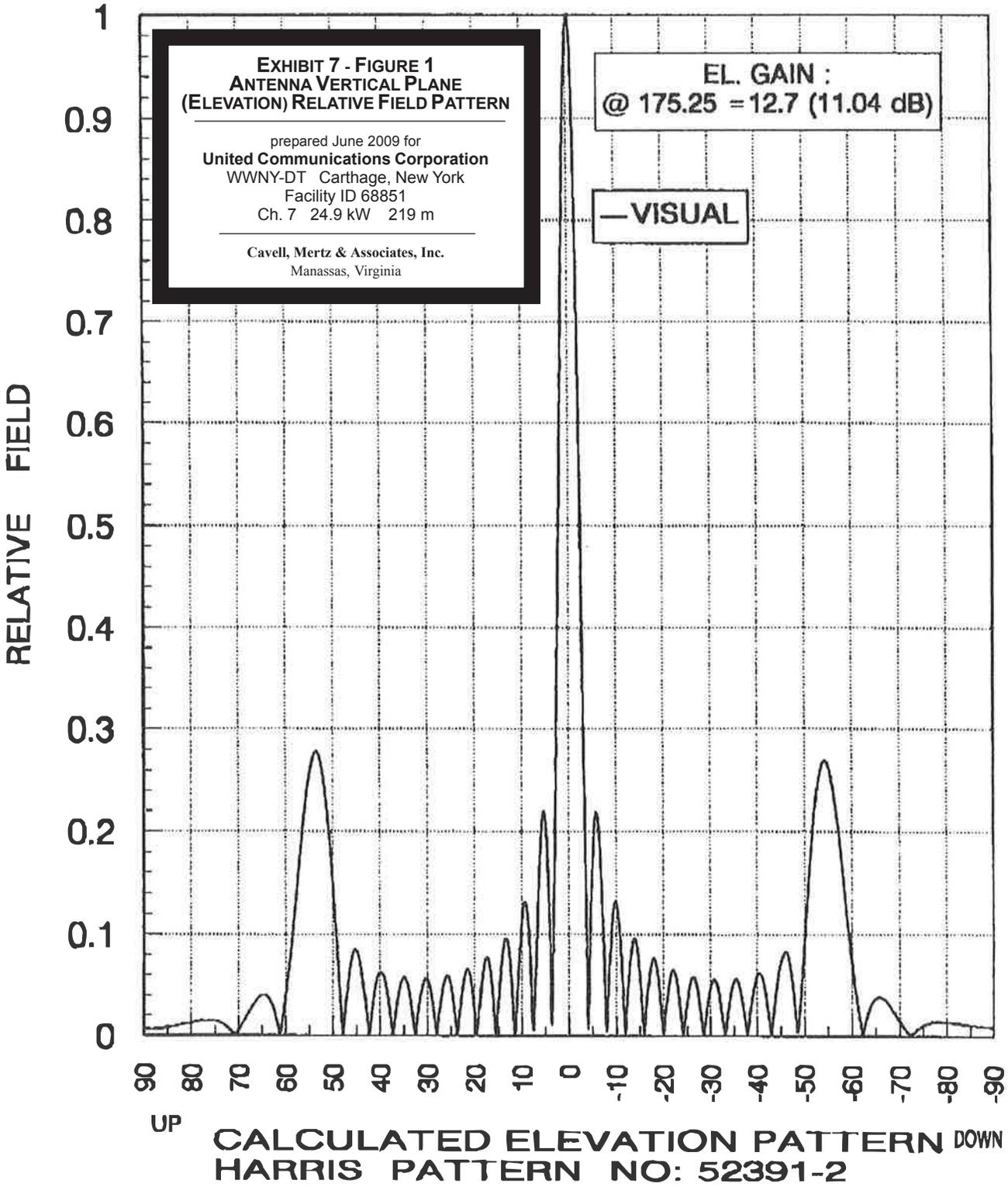


Exhibit 7 - Table 1
ANTENNA / LINE SYSTEM GAINS AND LOSSES
 prepared June 2009 for
United Communications Corporation
 WWNY-DT Carthage, New York
 Facility ID 68851
 Ch. 7 24.9 kW 219 m

License to Cover Construction Permit BMPCDT-20080620AIE

Authorized Effective Radiated Power:	24.90 kW	13.96 dBk
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<u>Antenna System</u>		
Harris TAB-12HS	Max Power Gain:	12.71 11.04 dB
	Antenna Input Power:	1.96 kW 2.92 dBk
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<u>Line Losses</u>		
3 1/8" Rigid Line 600 feet	Efficiency: Loss:	0.83 0.79 dB
Motorized Coaxial Switch	Efficiency: Loss:	0.98 0.10 dB
1 5/8" Rigid Line 12 feet	Efficiency: Loss:	0.99 0.03 dB
	Total Losses:	0.92 dB
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<u>Transmitter Power Output:</u>	2.42 kW	3.84 dBk