TECHNICAL EXHIBIT
MINOR CHANGE APPLICATION
FOR CONSTRUCTION PERMIT
STATION WPXC-DT (FACILITY ID 71236)
BRUNSWICK, GEORGIA

DECEMBER 13, 2004

CH 24 500 KW (MAX-DA) 418 M

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Technical Narrative

This Technical Exhibit supports a minor change application for a construction permit (CP) for digital television (DTV) station WPXC-DT at Brunswick, Georgia (Facility ID 71236).

Station WPXC was allotted DTV channel 24 at its analog site coordinates of 31-08-22, 81-56-15. The FCC assigned the channel 24 DTV allotment a maximum effective radiated power (ERP) of 262.3 kilowatts (kW) and antenna height above average terrain (HAAT) of 600 meters.

Station WPXC-DT is currently authorized to operate on channel 24 (BMPCDT-20010629ABC). Station WPXC-DT is authorized to use a directional antenna (DA) system. The maximum ERP is 650 kilowatts (kW). The antenna HAAT is 403 meters. The transmitter site coordinates are 30-49-17, 81-44-13 (NAD-27).

Proposed DTV Facilities

This minor change application for CP proposes to change the WPXC-DT transmitter site, reduce the ERP and increase the antenna height. The proposed site coordinates are 30-49-39, 81-44-27. The proposed site is 39.4 kilometers southeast from the WPXC DTV allotment site and 0.8 kilometer northwest from the WPXC-DT CP site. It is

proposed to install a Dielectric model TFU-32DSB-R-C170-QC directional antenna system. The antenna system will be used for the WPXC DTV and analog (NTSC) operations. The antenna pattern is cardioid shaped and the major lobe will be oriented toward 270 degrees True. The antenna pattern maximums will occur at 200 and 340 degrees True. The antenna system has an electrical beam tilt of 0.8 degree. The antenna will be installed with the center of radiation 414.5 meters above ground level (AGL), and 421.2 meters above mean sea level (AMSL). The proposed antenna HAAT is 418 meters. The proposed maximum ERP will be 500 kW (27 dBk). There are no other changes from that authorized, including no change in channel (24) or city of license (Brunswick, GA).

Figure 1 is a map showing the location of the proposed site.

Figure 2 is a sketch of the proposed antenna and supporting structure.

Figure 3 shows the antenna's azimuth and vertical radiation patterns. The antenna system will also be used by station WPXC-TV (Ch.21, Brunswick, GA).

Figure 4 is a map showing the predicted 48 dBu and 41 dBu contours for the proposed WPXC-DT operation. The city limits of Brunswick, Georgia are indicated. The estimated population (2000 Census) and land area within the predicted 41 contour are 1,278,893 people and 22,437 square kilometers, respectively.

Figure 5 is a map showing the predicted 41 dBu F(50,90) contours for the WPXC DTV allotment (262.3 kW-DA, 600 m) and the WPXC-DT CP operation (650 kW-DA, 403 m). The map includes the predicted 41 dBu contour for the proposed WPXC-DT operation. The predicted 41 dBu contour for the proposed WPXC-DT operation is within the envelope formed by the 41 dBu contours for the DTV allotment and CP operation. Therefore, the proposed WPXC-DT operation complies with the FCC's freeze exemption for a minor change application.

Allocation Study

The proposed WPXC-DT operation meets the FCC's interference standards to pertinent analog (NTSC) and DTV assignments using the procedures outlined in the FCC's OET-69 Bulletin and a 2 kilometers grid. The proposed WPXC-DT operation complies with the FCC's "de minimis" interference policy with respect to pertinent Class A TV assignments. If necessary, a waiver of the FCC rules is requested with respect to use of the OET-69 interference procedures.

There are no other TV, DTV or FM stations within 0.7 kilometers of the proposed WPXC-DT site. There are no AM stations located within 5 kilometers (3.1 miles) of the WPXC-DT site. Although no adverse electromagnetic interaction is expected from WPXC-DT's proposed operation, the applicant recognizes its responsibility to correct prohibited interference problems that its proposed operation may create.

The proposed WPXC-DT site is 1207 kilometers west from the closest point of the Canadian border. The proposed WPXC-DT site is more than 1100 kilometers from the Mexican border. The closest FCC monitoring station is at Vero Beach, Florida, approximately 373 kilometers to the south. The closest point of the National Radio Quiet Zone (VA/WVA) is more than 700 kilometers to the north. The closest point of the Table Mountain Radio Quiet Zone (CO) is more than 2300 kilometers to the northwest. The closest radio astronomy site using channel 37 is at Green Bank, West Virginia, approximately 863 kilometers to the north. These separations are considered sufficient to avoid coordination problems.

Radiofrequency Electromagnetic Field Exposure

The proposed WPXC-DT facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the proposed antenna is located 414.5 meters above ground level. The

maximum ERP of 500 kW is assumed. A conservative relative field value of 0.15 was assumed for the antenna's downward radiation (see Figure 3). The calculated power density at a point 2 meters (6.6 feet) above ground level is 0.00219 mW/cm^2. This is 0.6% of the FCC's recommended limit of 0.36 mW/cm^2 for channel 24 for an "uncontrolled" environment. The calculated power density is less than 1% of the FCC's recommended limit for a "controlled" environment.

Access to the transmitting equipment will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

John A. Lundin

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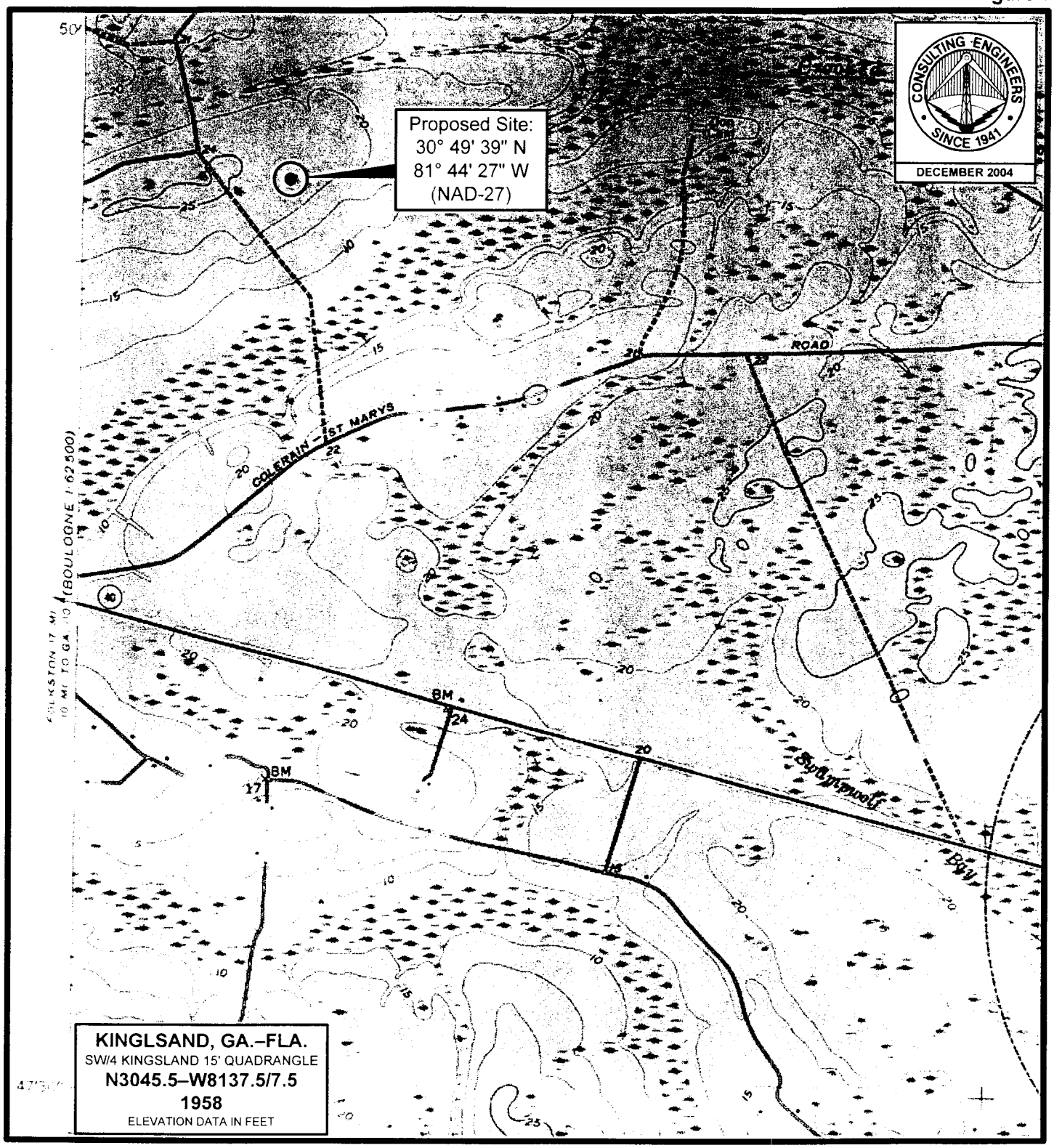
December 13, 2004

Figure 1

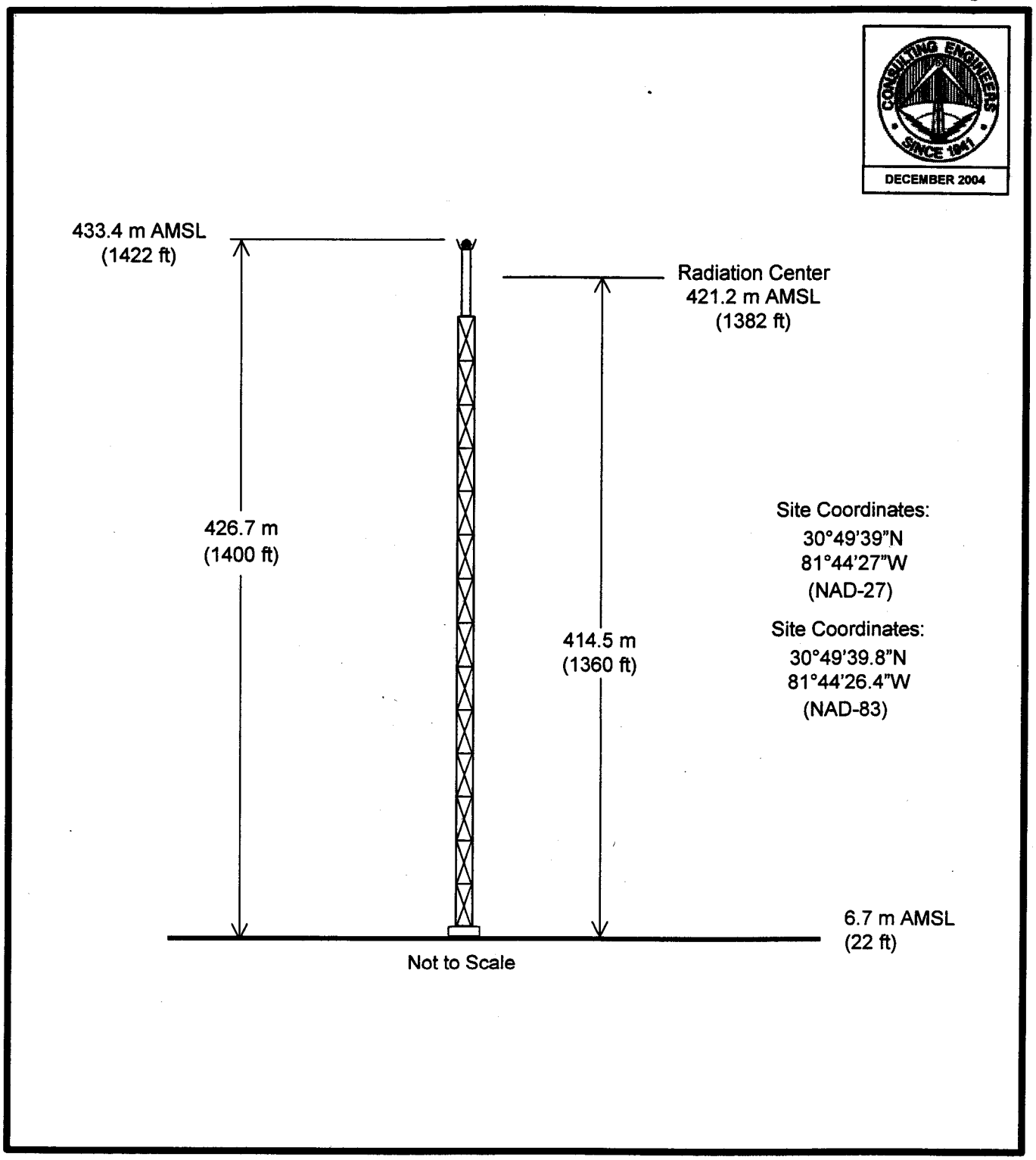


PROPOSED TRANSMITTER LOCATION

TV STATION WPXC

BRUNSWICK, GEORGIA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

WPXC-TV NTSC CH 21 5000 KW-DA 418

WPXC-DT DTV CH 24 500 KW-DA 418

BRUNSWICK, GEORGIA

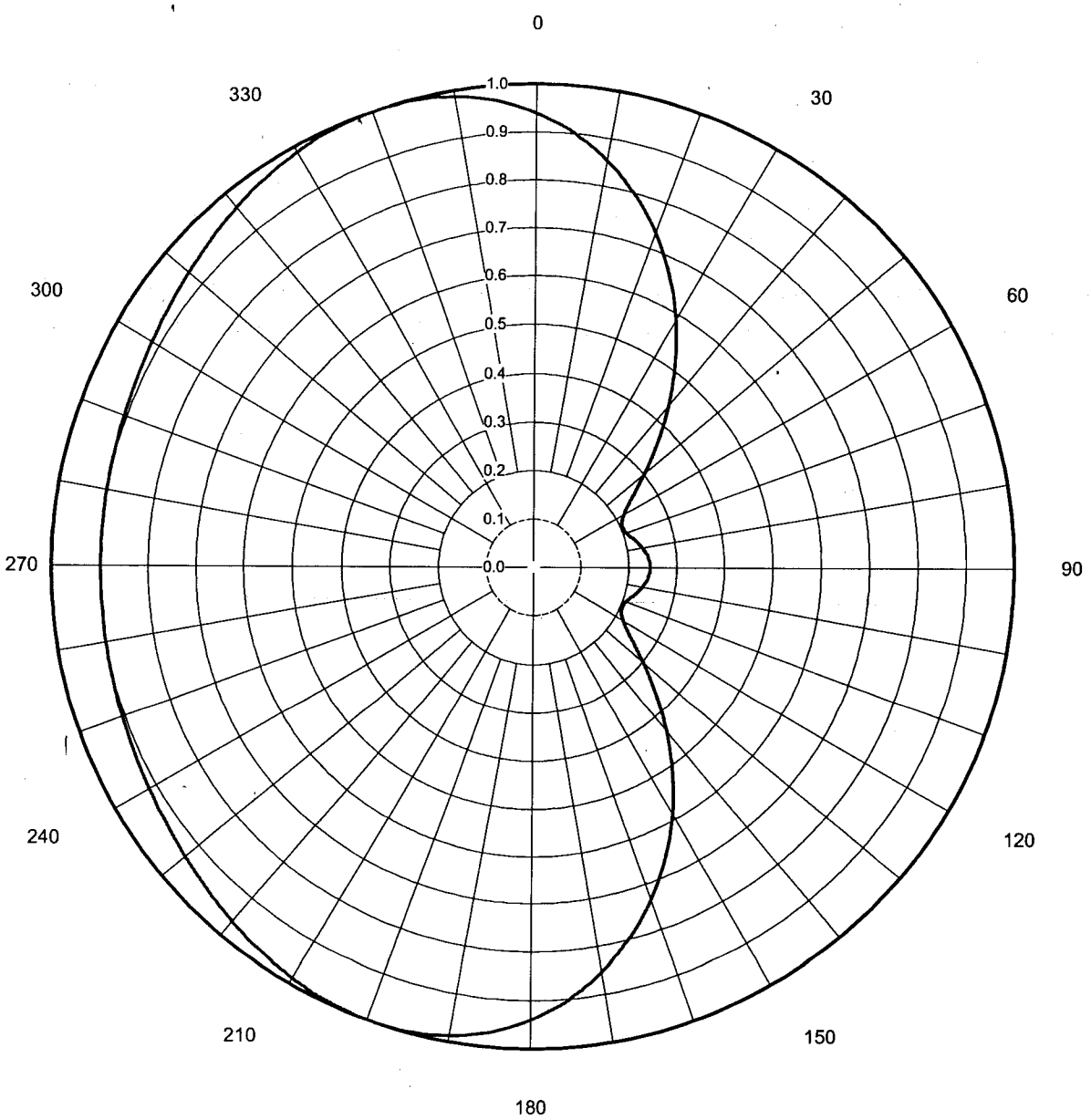
du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Dielectric

Proposal Number	**DCA-10074**	Revision:	**3**
Date	**14-Dec-04**		
Call Letters	**WPXC-DT**	Channel	**24**
Location	**Brunswick, GA**		
Customer	**Paxson Communications Corp.**		
Antenna Type	**TFU-32DSB-R C170 QC**		

AZIMUTH PATTERN

Gain	**1.70**	**(2.30 dB)**	
Calculated / Measured	**Calculated**		
Frequency	**533.00 MHz**		
Drawing #	**TFU-C170-24**		



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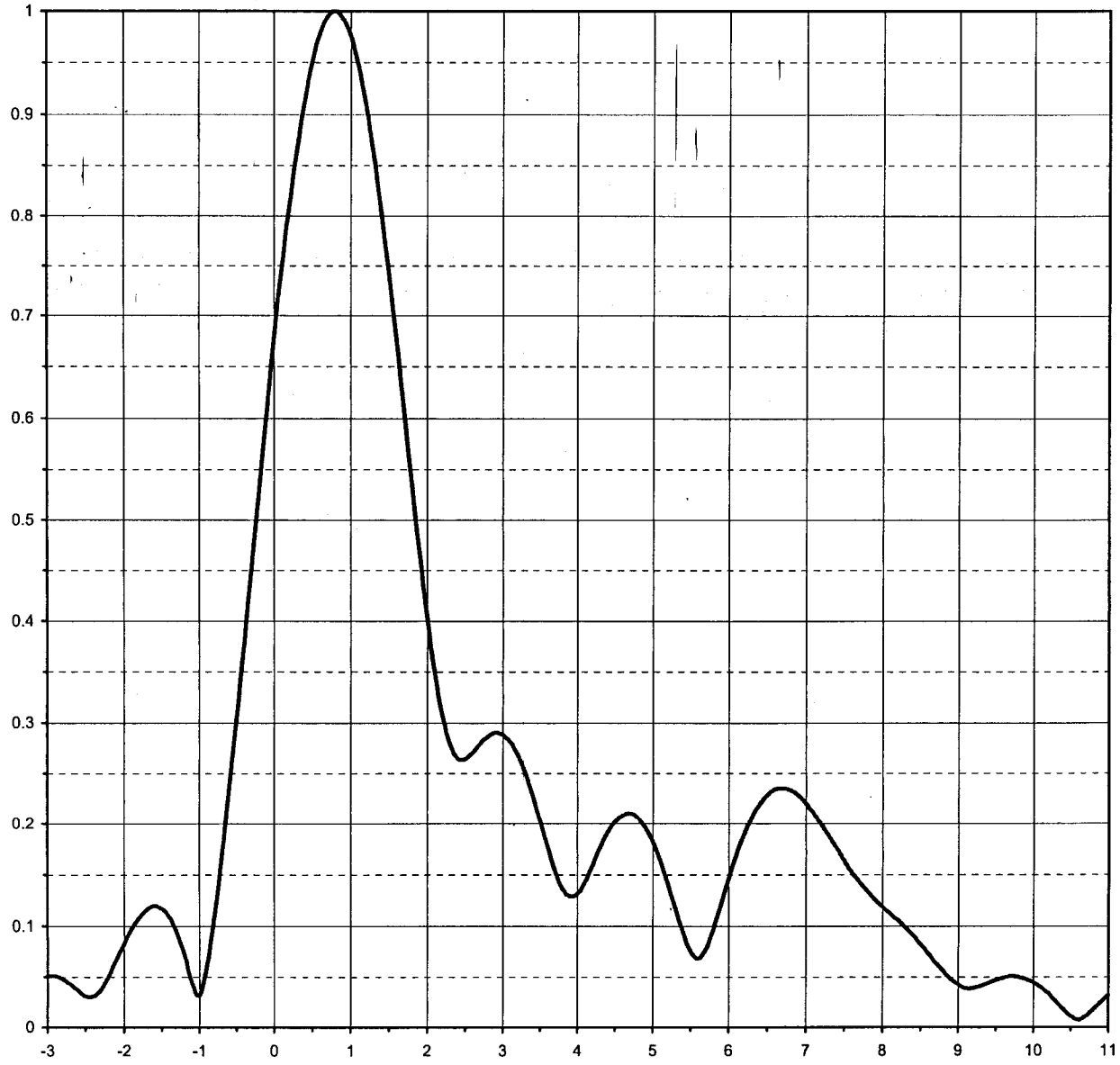
Customer	**Paxson Communications Corp.**		
Antenna Type	**TFU-32DSB-R C170 QC**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**27.50 (14.39 dB)**	Beam Tilt	**0.80 deg**
RMS Gain at Horizontal	**12.70 (11.04 dB)**	Frequency	**533.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**32B275080**



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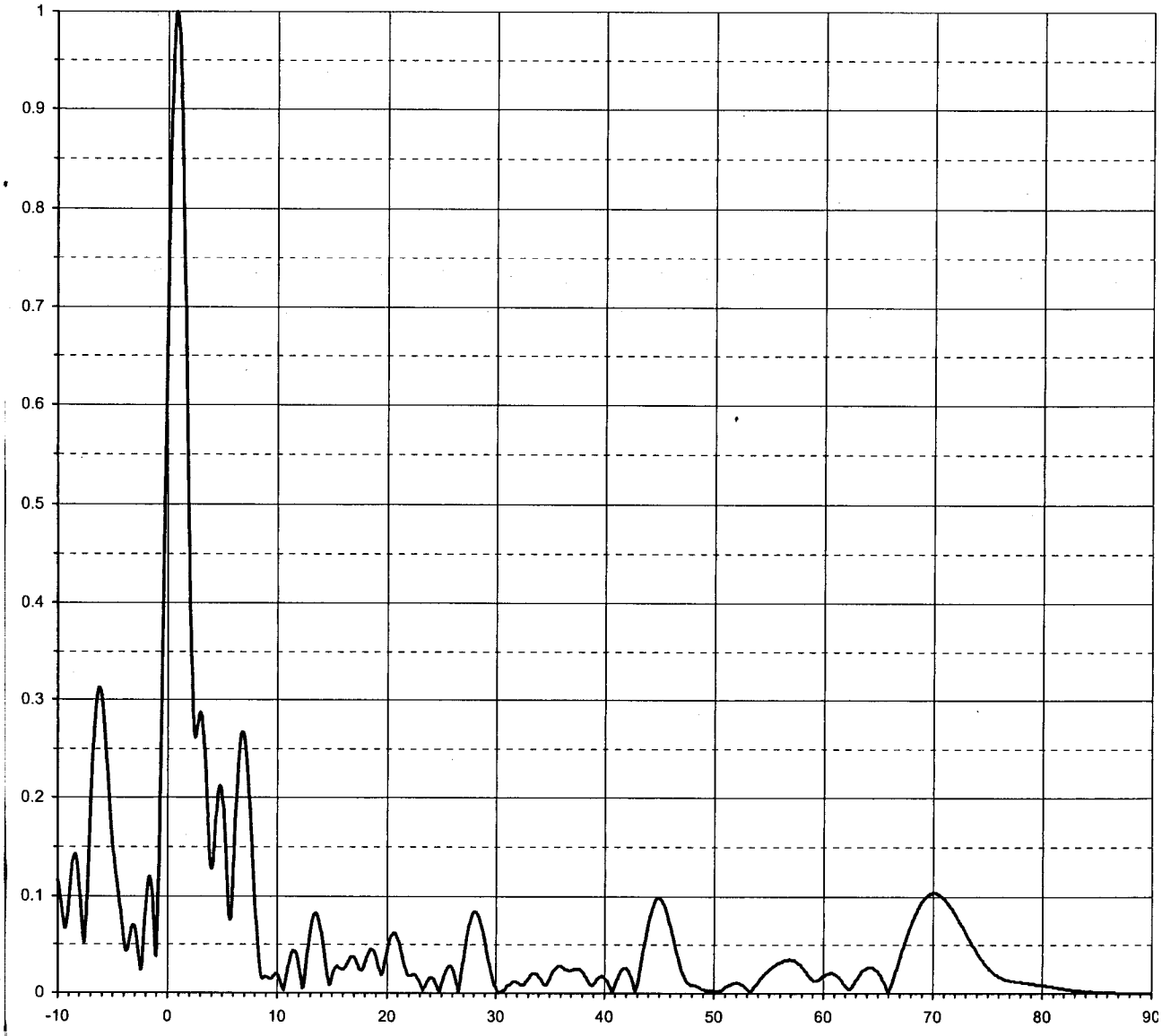
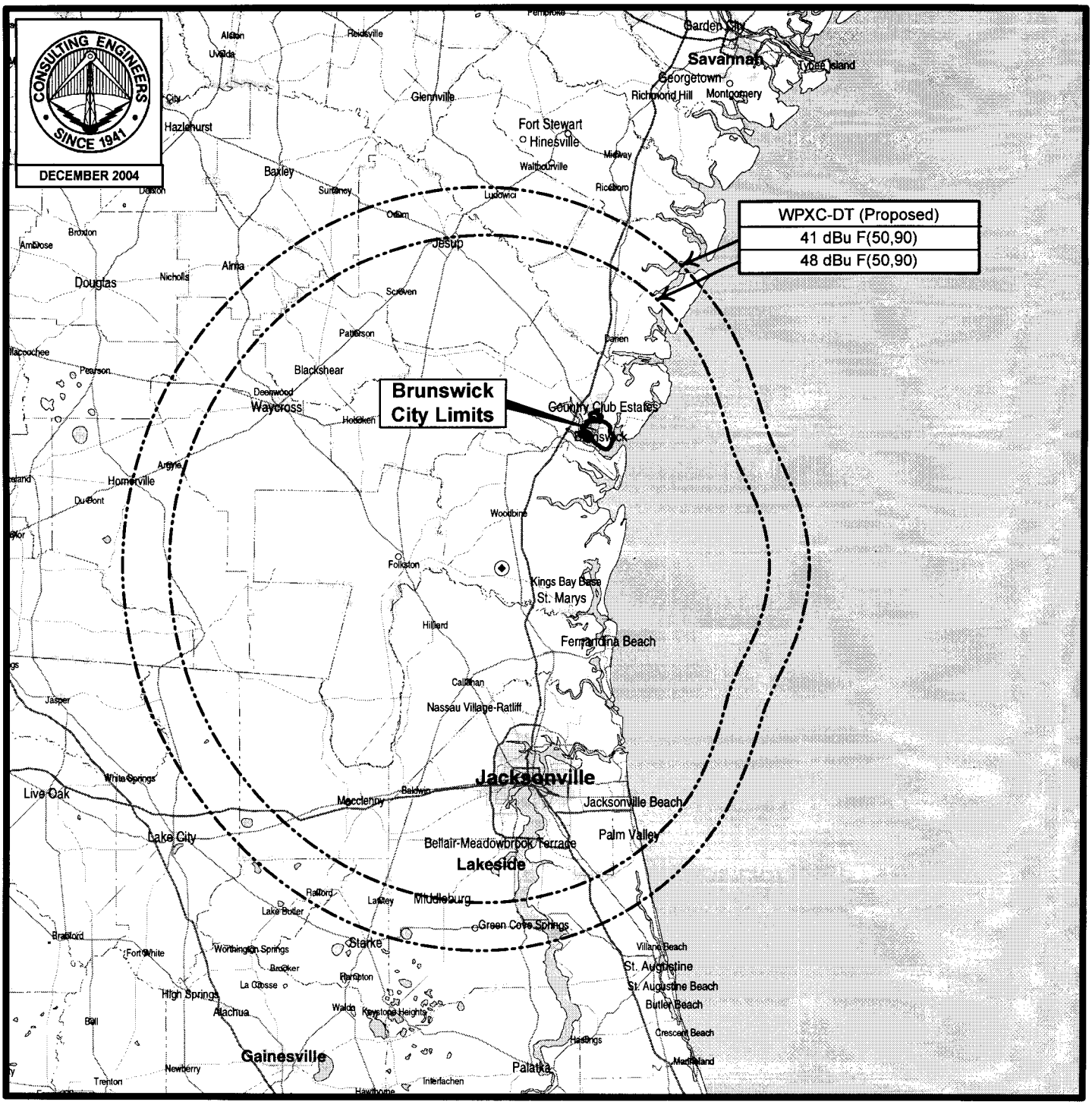
ELEVATION PATTERN

RMS Gain at Main Lobe	**27.50 (14.39 dB)**	Beam Tilt	**0.80 deg**
RMS Gain at Horizontal	**12.70 (11.04 dB)**	Frequency	**533.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**32B275080-90**



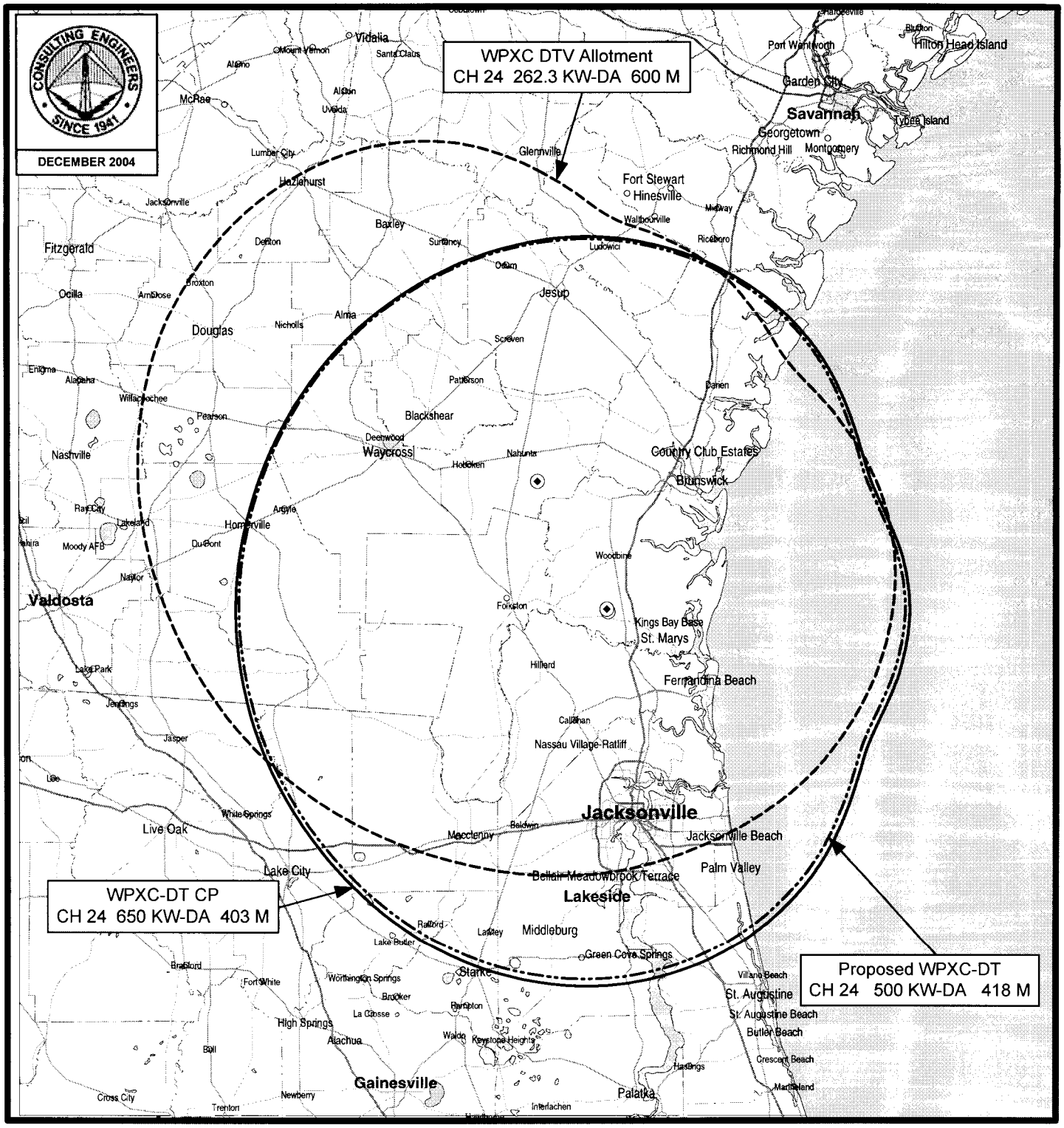


PREDICTED COVERAGE CONTOURS

STATION WPXC-DT
BRUNSWICK, GEORGIA
CH 24 500 KW (MAX-DA) 418

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

Figure 5



PREDICTED 41 dBu COVERAGE CONTOURS

STATION WPXC
BRUNSWICK, GEORGIA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Technical Specifications

Channel		24
Frequency		530-536 MHz
Proposed Site Coordinates (NAD 27)		30° 49' 39" North Latitude 81° 44' 27" West Longitude
Site Elevation above mean sea level		6.7 m
Average elevation above mean sea level of 8 equally spaced radials, 3-16 kilometers		3.7 m
Overall height of antenna structure		
Above ground		426.7 m
Above mean sea level		433.4 m
Height of antenna radiation center		
Above ground		414.5 m
Above mean sea level		421.2 m
Above average terrain		418 m
Transmitter rated power output (average)		20 kW
Transmission line efficiency (1.17 dB loss) (1400 feet of 8-3/16 inch rigid coax)		76.3%
Combiner loss (0.25 dB)		94.4%
Antenna	Dielectric	TFU-32DSB-R-C170-QC
Polarization		Horizontal
Peak Power Gain (16.70 dB)		46.8
Beam Tilt		0.80°
Main Lobes		200° T and 340° T

Proposed Operation

Transmitter output power (average, 11.71 dBk)	14.8 kW
Transmission line/combiner loss (1.42 dB)	4.1 kW
Antenna input power (10.29 dBk)	10.7 kW
Maximum Effective Radiated Power (MAX-DA, 27.0 dBk)	500 kW