



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN
APPLICATION FOR MODIFICATION OF
A DTV CONSTRUCTION PERMIT
BPCDT-20080317AGL
WLOS-DT - ASHEVILLE, NORTH CAROLINA
DTV - CH. 13 - 60 kW - 853 meters HAAT**

Prepared for: WLOS Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WLOS Licensee, LLC, licensee of WLOS(TV), channel 13, Asheville, North Carolina, and permittee of WLOS-DT, on post-transition channel 13, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application for modification of its post-transition construction permit BPCDT-20080317AGL. The permittee proposes to construct its post-transition DTV facility according to its current post-transition authorization with two exceptions. It is herein proposed to substitute a new directional antenna, a Dielectric model THV-10A13 C150, with a different horizontal azimuth pattern, as shown in exhibits two to five, for the currently authorized directional antenna and to increase the effective radiated power (ERP) from the currently authorized 29.8 kW to 60 kW. No other changes are proposed.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 6 contains the predicted DTV Noise Limited (41 dBu) contour and the predicted principal community (48 dBu) contour. The 48 dBu contour entirely encompasses the principal community of license, Asheville, North Carolina.

DTV Allocation Considerations

A study was performed utilizing the Commission's application processing software to determine compliance with the post-transition limitations contained in §73.616 of the Commission's rules. Results indicate that the instant proposal to substitute a different directional antenna and increase WLOS-DT's ERP from 29.8 kW to 60 kW is predicted to cause no unacceptable level (0.5%) of new interference to the populations served by any DTV station, expansion construction permit or allotment.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, the interference contour overlap analysis which is provided by TV_Process was considered, based on the proposed WLOS-

DT facility, to establish compliance with the protection requirements contained therein. The study results indicate that no prohibited contour overlap exists with any Class A LPTV stations.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WLOS-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency

electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, $(\text{frequency}/1500)$. The MPE level for "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm^2) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, $(\text{frequency}/300)$. The predicted emissions of WLOS-DT must be considered, along with the predicted emissions from other proposed stations at the site, and within 315 meters of the site. For WLOS-DT, which will operate on DTV Channel 13 (210-216 MHz), the MPE is 0.200 milliwatts per centimeter squared (mW/cm^2) in an "uncontrolled" environment and 1.000 mW/cm^2 in a "controlled" environment. The proposed WLOS-DT facility will operate with a maximum ERP of 60 kW using a horizontally polarized transmitting antenna at a centerline height of 93 meters above ground level (AGL). Considering a very conservative relative field factor of 0.2, the WLOS-DT facility is predicted to produce a power density at two meters above ground level of 0.00481 mW/cm^2 , which is 2.40% of the FCC guideline value for "uncontrolled" environments, and 0.480% of the FCC guideline value for "controlled" environments, making it a minor contributor to the radiofrequency radiation at the site, thus excluded from processing under the FCC's MPE exposure guidelines.

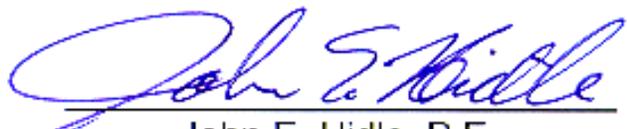
OCCUPATIONAL SAFETY

The permittee for WLOS-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the proposed WLOS-DT antenna. The applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel.

SUMMARY

It is submitted that the instant application for modification of construction permit for WLOS-DT seeking to substitute a different directional antenna and increase its effective radiated power from 29.8 kW to 60 kW, as described herein complies with the Rules, Regulations and Policies of the Federal Communications Commission. This statement, FCC Form 301, Section III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

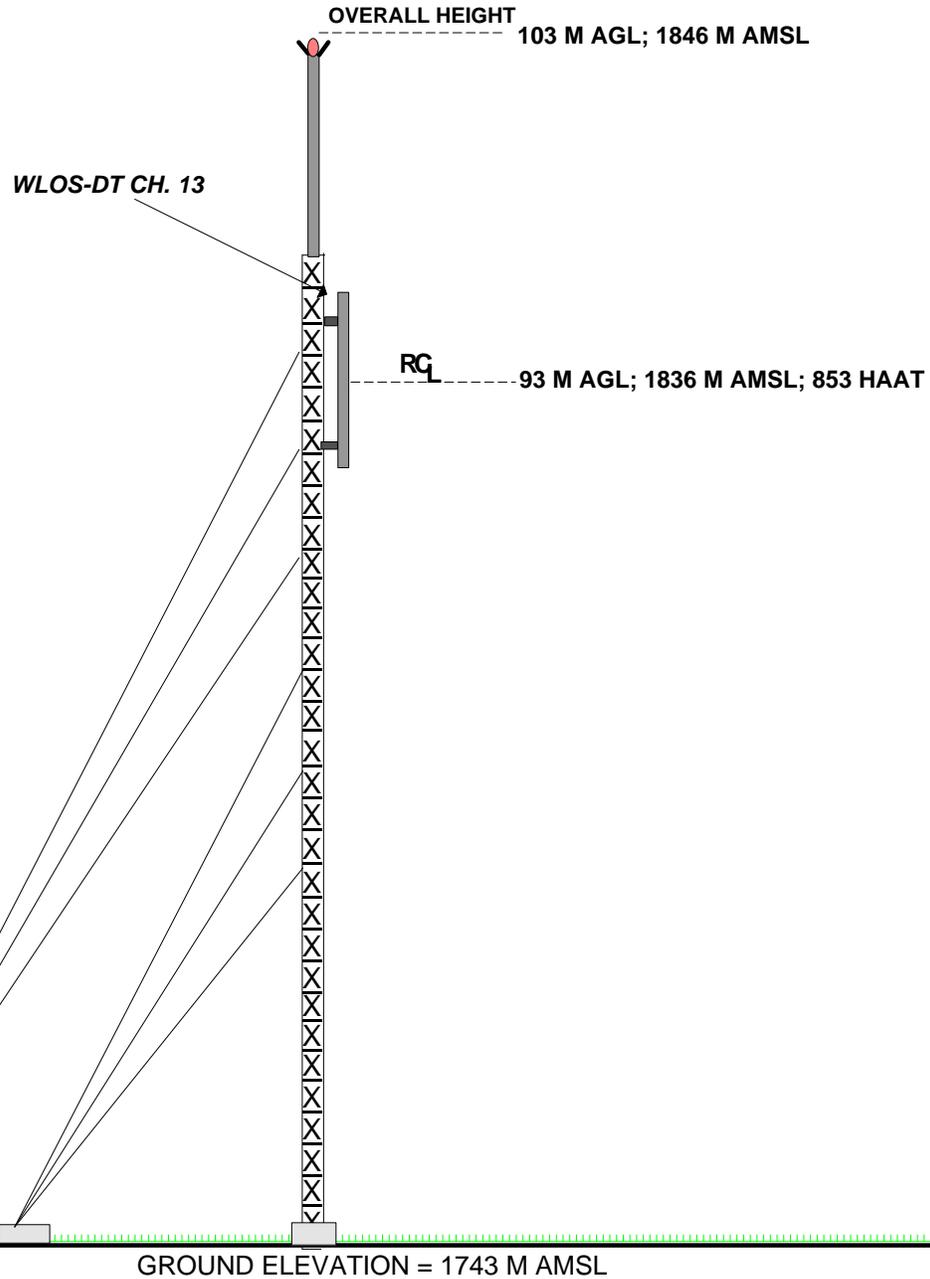
DATED: June 19, 2008


John E. Hidle, P.E.



35° 25' 32" NL
82° 45' 25" WL

EXHIBIT 1



VERTICAL PLAN ANTENNA SKETCH

WLOS-DT, ASHEVILLE, NORTH CAROLINA
CH. 13, 60 kW - 853 m HAAT

JUNE, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



Exhibit No.
TWO

Date **11 Jun 2008**
Call Letters **WLOS** Channel **13**
Location **ASHEVILLE, NC**
Customer **WLOS Licensee, LLC**
Antenna Type **THV-10A13 C150**

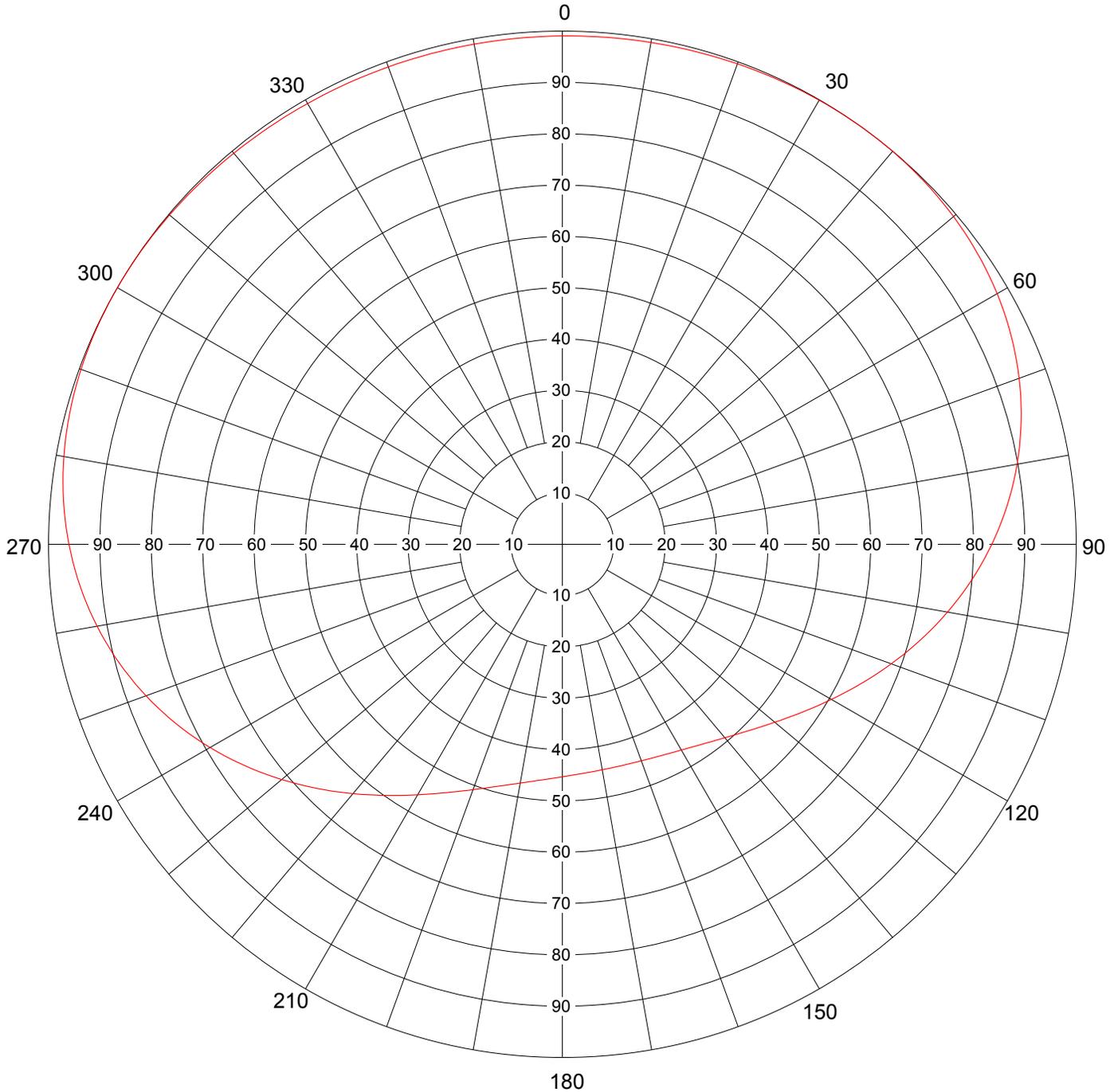
AZIMUTH PATTERN

Gain
Calculated / Measured

1.50 (1.76 dB)
Calculated

Frequency
Drawing #

213 MHz
THV-C150



Remarks:



Exhibit No.
THREE

Date **11 Jun 2008**
 Call Letters **WLOS** Channel **13**
 Location **ASHEVILLE, NC**
 Customer **WLOS Licensee, LLC**
 Antenna Type **THV-10A13 C150**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **THV-C150**

Angle	Field														
0	0.991	45	0.998	90	0.836	135	0.513	180	0.453	225	0.673	270	0.960	315	0.997
1	0.991	46	0.997	91	0.829	136	0.509	181	0.454	226	0.681	271	0.963	316	0.996
2	0.991	47	0.996	92	0.822	137	0.504	182	0.456	227	0.689	272	0.966	317	0.996
3	0.991	48	0.995	93	0.814	138	0.500	183	0.457	228	0.697	273	0.969	318	0.995
4	0.991	49	0.995	94	0.807	139	0.496	184	0.459	229	0.705	274	0.972	319	0.995
5	0.992	50	0.994	95	0.799	140	0.492	185	0.461	230	0.713	275	0.974	320	0.995
6	0.992	51	0.992	96	0.792	141	0.488	186	0.463	231	0.721	276	0.977	321	0.994
7	0.992	52	0.991	97	0.784	142	0.485	187	0.465	232	0.729	277	0.979	322	0.994
8	0.992	53	0.990	98	0.777	143	0.481	188	0.467	233	0.737	278	0.981	323	0.994
9	0.993	54	0.988	99	0.769	144	0.478	189	0.470	234	0.745	279	0.983	324	0.993
10	0.993	55	0.987	100	0.761	145	0.475	190	0.472	235	0.753	280	0.985	325	0.993
11	0.993	56	0.985	101	0.753	146	0.472	191	0.475	236	0.761	281	0.987	326	0.993
12	0.993	57	0.983	102	0.745	147	0.470	192	0.478	237	0.769	282	0.988	327	0.993
13	0.994	58	0.981	103	0.737	148	0.467	193	0.481	238	0.777	283	0.990	328	0.992
14	0.994	59	0.979	104	0.729	149	0.465	194	0.485	239	0.784	284	0.991	329	0.992
15	0.994	60	0.977	105	0.721	150	0.463	195	0.488	240	0.792	285	0.992	330	0.992
16	0.995	61	0.974	106	0.713	151	0.461	196	0.492	241	0.799	286	0.994	331	0.992
17	0.995	62	0.972	107	0.705	152	0.459	197	0.496	242	0.807	287	0.995	332	0.991
18	0.995	63	0.969	108	0.697	153	0.457	198	0.500	243	0.814	288	0.995	333	0.991
19	0.996	64	0.966	109	0.689	154	0.456	199	0.504	244	0.822	289	0.996	334	0.991
20	0.996	65	0.963	110	0.681	155	0.454	200	0.509	245	0.829	290	0.997	335	0.991
21	0.997	66	0.960	111	0.673	156	0.453	201	0.513	246	0.836	291	0.998	336	0.991
22	0.997	67	0.957	112	0.665	157	0.452	202	0.518	247	0.843	292	0.998	337	0.990
23	0.997	68	0.953	113	0.657	158	0.451	203	0.523	248	0.849	293	0.999	338	0.990
24	0.998	69	0.950	114	0.649	159	0.450	204	0.528	249	0.856	294	0.999	339	0.990
25	0.998	70	0.946	115	0.642	160	0.449	205	0.534	250	0.863	295	0.999	340	0.990
26	0.998	71	0.942	116	0.634	161	0.448	206	0.539	251	0.869	296	1.000	341	0.990
27	0.998	72	0.938	117	0.627	162	0.448	207	0.545	252	0.875	297	1.000	342	0.990
28	0.999	73	0.933	118	0.619	163	0.447	208	0.551	253	0.881	298	1.000	343	0.990
29	0.999	74	0.929	119	0.612	164	0.447	209	0.557	254	0.887	299	1.000	344	0.990
30	0.999	75	0.924	120	0.604	165	0.446	210	0.564	255	0.893	300	1.000	345	0.990
31	0.999	76	0.920	121	0.597	166	0.446	211	0.570	256	0.899	301	1.000	346	0.990
32	1.000	77	0.914	122	0.590	167	0.446	212	0.577	257	0.904	302	1.000	347	0.990
33	1.000	78	0.909	123	0.583	168	0.446	213	0.583	258	0.909	303	1.000	348	0.990
34	1.000	79	0.904	124	0.577	169	0.446	214	0.590	259	0.914	304	1.000	349	0.990
35	1.000	80	0.899	125	0.570	170	0.446	215	0.597	260	0.920	305	0.999	350	0.990
36	1.000	81	0.893	126	0.564	171	0.446	216	0.604	261	0.924	306	0.999	351	0.990
37	1.000	82	0.887	127	0.557	172	0.447	217	0.612	262	0.929	307	0.999	352	0.990
38	1.000	83	0.881	128	0.551	173	0.447	218	0.619	263	0.933	308	0.999	353	0.990
39	1.000	84	0.875	129	0.545	174	0.448	219	0.627	264	0.938	309	0.998	354	0.990
40	1.000	85	0.869	130	0.539	175	0.448	220	0.634	265	0.942	310	0.998	355	0.990
41	0.999	86	0.863	131	0.534	176	0.449	221	0.642	266	0.946	311	0.998	356	0.990
42	0.999	87	0.856	132	0.528	177	0.450	222	0.649	267	0.950	312	0.998	357	0.990
43	0.999	88	0.849	133	0.523	178	0.451	223	0.657	268	0.953	313	0.997	358	0.990
44	0.998	89	0.843	134	0.518	179	0.452	224	0.665	269	0.957	314	0.997	359	0.990

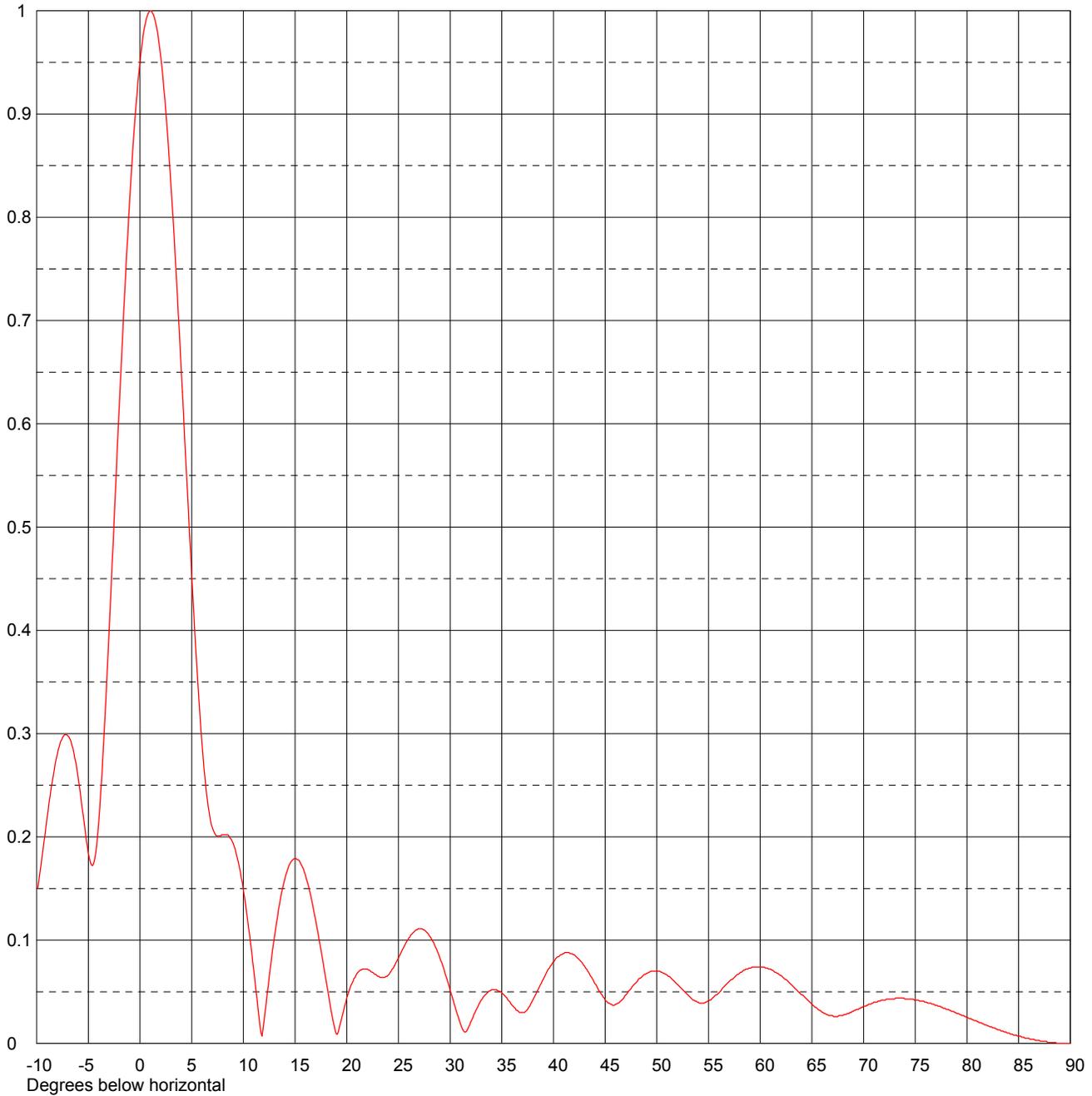
Remarks:



Date **11 Jun 2008**
Call Letters **WLOS** Channel **13**
Location **ASHEVILLE, NC**
Customer **WLOS Licensee, LLC**
Antenna Type **THV-10A13 C150**

ELEVATION PATTERN

RMS Gain at Main Lobe	10.0 (10.00 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	9.0 (9.54 dB)	Frequency	213.00 MHz
Calculated / Measured	Calculated	Drawing #	10V100100-90



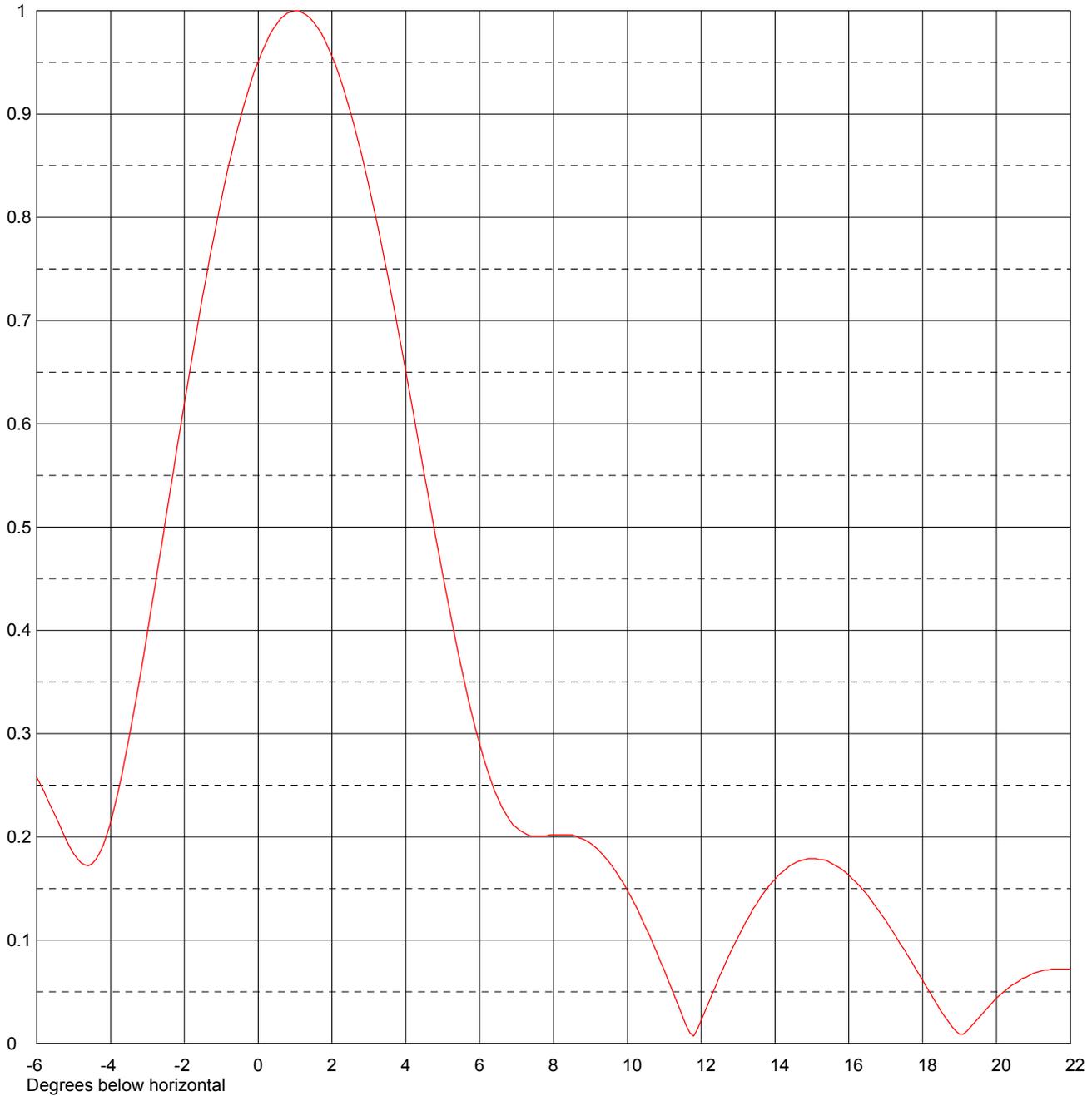
Remarks:



Date **11 Jun 2008**
Call Letters **WLOS** Channel **13**
Location **ASHEVILLE, NC**
Customer **WLOS Licensee, LLC**
Antenna Type **THV-10A13 C150**

ELEVATION PATTERN

RMS Gain at Main Lobe	10.0 (10.00 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	9.0 (9.54 dB)	Frequency	213.00 MHz
Calculated / Measured	Calculated	Drawing #	10V100100



Remarks:



Exhibit No.
FIVE

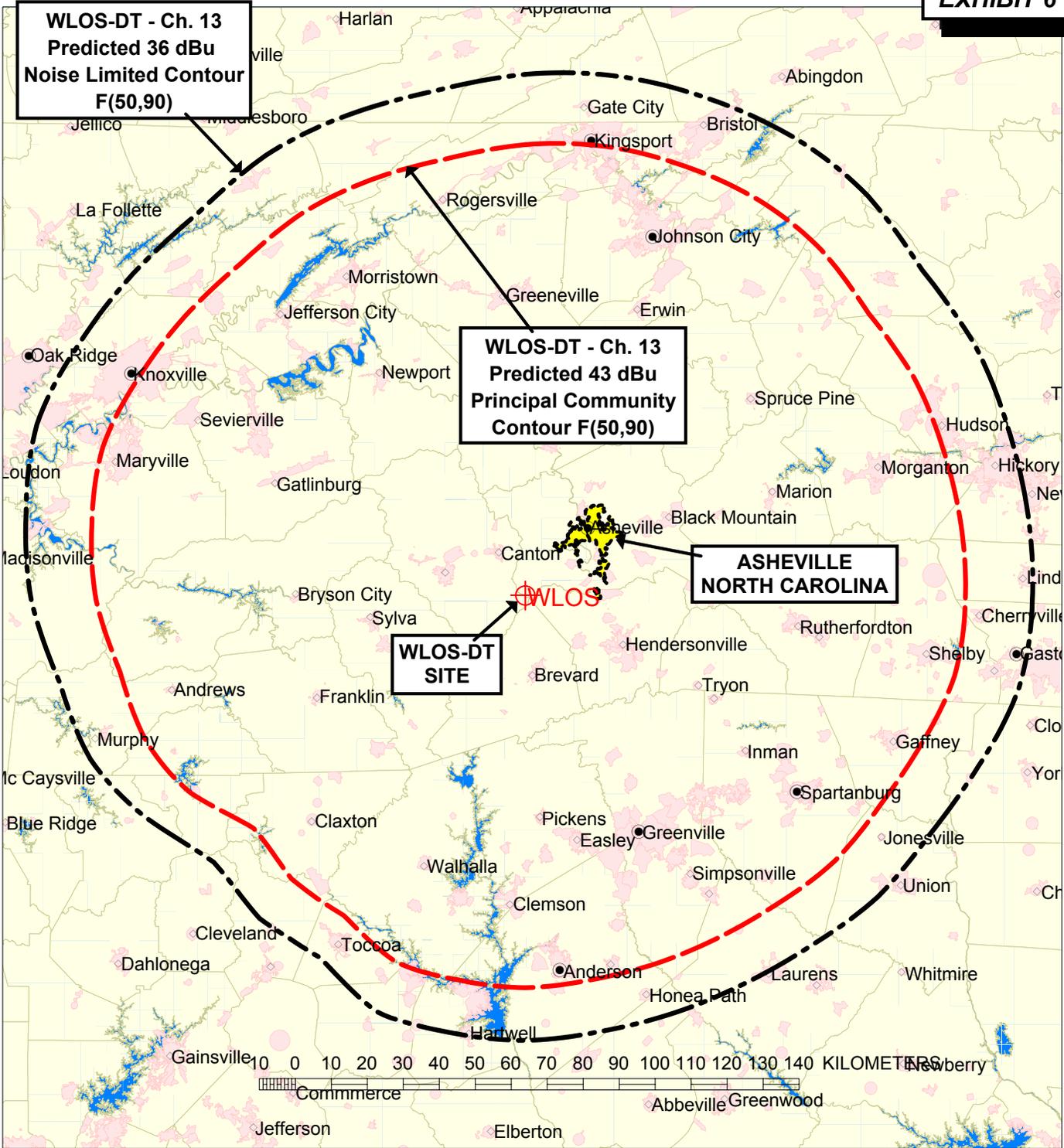
Date **11 Jun 2008**
 Call Letters **WLOS** Channel **13**
 Location **ASHEVILLE, NC**
 Customer **WLOS Licensee, LLC**
 Antenna Type **THV-10A13 C150**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **10V100100**

Angle	Field										
-10.0	0.143	2.4	0.914	10.6	0.105	30.5	0.035	51.0	0.066	71.5	0.041
-9.5	0.179	2.6	0.889	10.8	0.088	31.0	0.019	51.5	0.062	72.0	0.042
-9.0	0.218	2.8	0.861	11.0	0.071	31.5	0.011	52.0	0.057	72.5	0.043
-8.5	0.253	3.0	0.830	11.5	0.026	32.0	0.021	52.5	0.052	73.0	0.043
-8.0	0.280	3.2	0.798	12.0	0.022	32.5	0.032	53.0	0.047	73.5	0.044
-7.5	0.296	3.4	0.763	12.5	0.065	33.0	0.042	53.5	0.042	74.0	0.043
-7.0	0.298	3.6	0.727	13.0	0.103	33.5	0.048	54.0	0.040	74.5	0.043
-6.5	0.286	3.8	0.689	13.5	0.135	34.0	0.052	54.5	0.039	75.0	0.042
-6.0	0.258	4.0	0.650	14.0	0.159	34.5	0.052	55.0	0.041	75.5	0.041
-5.5	0.221	4.2	0.611	14.5	0.174	35.0	0.049	55.5	0.045	76.0	0.040
-5.0	0.184	4.4	0.571	15.0	0.179	35.5	0.044	56.0	0.049	76.5	0.039
-4.5	0.174	4.6	0.532	15.5	0.175	36.0	0.037	56.5	0.055	77.0	0.037
-4.0	0.214	4.8	0.492	16.0	0.163	36.5	0.032	57.0	0.060	77.5	0.035
-3.5	0.296	5.0	0.454	16.5	0.144	37.0	0.030	57.5	0.064	78.0	0.033
-3.0	0.398	5.2	0.417	17.0	0.119	37.5	0.033	58.0	0.068	78.5	0.031
-2.8	0.442	5.4	0.381	17.5	0.091	38.0	0.042	58.5	0.071	79.0	0.029
-2.6	0.486	5.6	0.348	18.0	0.061	38.5	0.052	59.0	0.073	79.5	0.027
-2.4	0.531	5.8	0.317	18.5	0.031	39.0	0.062	59.5	0.074	80.0	0.025
-2.2	0.576	6.0	0.290	19.0	0.009	39.5	0.072	60.0	0.074	80.5	0.023
-2.0	0.619	6.2	0.266	19.5	0.024	40.0	0.079	60.5	0.073	81.0	0.021
-1.8	0.662	6.4	0.245	20.0	0.044	40.5	0.084	61.0	0.072	81.5	0.019
-1.6	0.704	6.6	0.229	20.5	0.058	41.0	0.087	61.5	0.069	82.0	0.017
-1.4	0.743	6.8	0.217	21.0	0.068	41.5	0.088	62.0	0.066	82.5	0.015
-1.2	0.781	7.0	0.209	21.5	0.072	42.0	0.086	62.5	0.062	83.0	0.013
-1.0	0.817	7.2	0.204	22.0	0.072	42.5	0.081	63.0	0.057	83.5	0.012
-0.8	0.850	7.4	0.201	22.5	0.069	43.0	0.075	63.5	0.052	84.0	0.010
-0.6	0.880	7.6	0.201	23.0	0.065	43.5	0.067	64.0	0.047	84.5	0.008
-0.4	0.907	7.8	0.201	23.5	0.064	44.0	0.058	64.5	0.043	85.0	0.007
-0.2	0.931	8.0	0.202	24.0	0.066	44.5	0.050	65.0	0.038	85.5	0.006
0.0	0.951	8.2	0.202	24.5	0.073	45.0	0.042	65.5	0.034	86.0	0.005
0.2	0.968	8.4	0.202	25.0	0.083	45.5	0.038	66.0	0.030	86.5	0.004
0.4	0.982	8.6	0.201	25.5	0.093	46.0	0.038	66.5	0.028	87.0	0.003
0.6	0.992	8.8	0.198	26.0	0.102	46.5	0.041	67.0	0.027	87.5	0.002
0.8	0.998	9.0	0.194	26.5	0.108	47.0	0.047	67.5	0.026	88.0	0.001
1.0	1.000	9.2	0.188	27.0	0.111	47.5	0.053	68.0	0.027	88.5	0.001
1.2	0.998	9.4	0.180	27.5	0.110	48.0	0.059	68.5	0.029	89.0	0.000
1.4	0.993	9.6	0.171	28.0	0.104	48.5	0.064	69.0	0.031	89.5	0.000
1.6	0.984	9.8	0.160	28.5	0.095	49.0	0.068	69.5	0.033	90.0	0.000
1.8	0.972	10.0	0.148	29.0	0.083	49.5	0.070	70.0	0.036		
2.0	0.956	10.2	0.135	29.5	0.068	50.0	0.070	70.5	0.038		
2.2	0.937	10.4	0.120	30.0	0.052	50.5	0.069	71.0	0.040		

Remarks:



PREDICTED COVERAGE CONTOURS

**WLOS-DT, ASHEVILLE, NORTH CAROLINA
DTV - CH. 13 - 60 kW - 853 meters HAAT**

**PREDICTED 43 dBu F(50,90)
PRINCIPAL COMMUNITY CONTOUR**

**PREDICTED 36 dBu F(50,90)
NOISE LIMITED CONTOUR**