

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF LICENSE
(FCC FILE NO. BLTTA-20040702AAC)
CLASS A STATION WMDO-CA
FACILITY ID 38437
WASHINGTON, DC
CH 47 16.5 KW (MAX-DA)

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of an application for modification of the license of Class A station WMDO-CA on channel 47 at Washington, DC (FCC File No. BLTTA-20040702AAC, Facility ID 38437). Specifically, this modification application proposes to change transmitter site, decrease effective radiated power (ERP), and increase the antenna radiation center above mean sea level (RCAMSL). No other changes are proposed, including no change in channel (47), frequency offset (+) or community of license (Washington).

Freeze Compliance

This application can be accepted for filing as it does not request a change which is considered "frozen" by FCC's Public Notice (DA 04-2446) released August 3, 2004, *Freeze on the filing of Certain TV and DTV Requests for Allotment or Service Area Changes*. Specifically, the proposed 74 dBu contour will not result in an extension of the currently licensed 74 dBu contour (see Figure 1).

Minor Change Application

This application is considered a "minor change" in facilities pursuant to Section 73.3572(a)(2), as there will be no change in frequency and the licensed 74 dBu contour will wholly encompass the proposed 74 dBu contour.

Proposed Facilities

It is proposed to operate on channel 47 (668-674 MHz) with a "plus" carrier frequency offset using a Andrew model ALP16L2-HSB, directional antenna with an orientation of 113 degrees true.¹ The maximum directional ERP at any horizontal or vertical angle will be 16.5 kW. The antenna will be mounted at the 94 meter level on an

¹ The main lobes of the antenna will be oriented at 50 degrees and 173 degrees true.

existing 201.8 meter tower (Antenna Registration Number 1036610). The antenna radiation center height above mean sea level will be 212 meters.

Response to Paragraph 13

The proposed facility complies with all of the following applicable rule Sections: Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710.

Environmental Considerations

The proposed WMDO-CA television facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation".

The calculated power density towards the base of the tower (-60° to -90° elevation) was calculated using the appropriate equation of the Bulletin. Using a greater than expected vertical relative field value of 0.2 (see Figure 2), a maximum visual effective radiated power of 16.5 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.0005 milliwatt per square centimeter (mW/cm^2), or 0.112 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas ($0.447 \text{ mW}/\text{cm}^2$ for TV channel 47). Therefore, based on the responsibility threshold of 5%, the proposal will comply with the FCC'S RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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.

Finally, it is noted that this technical exhibit only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner as part of the tower registration process.

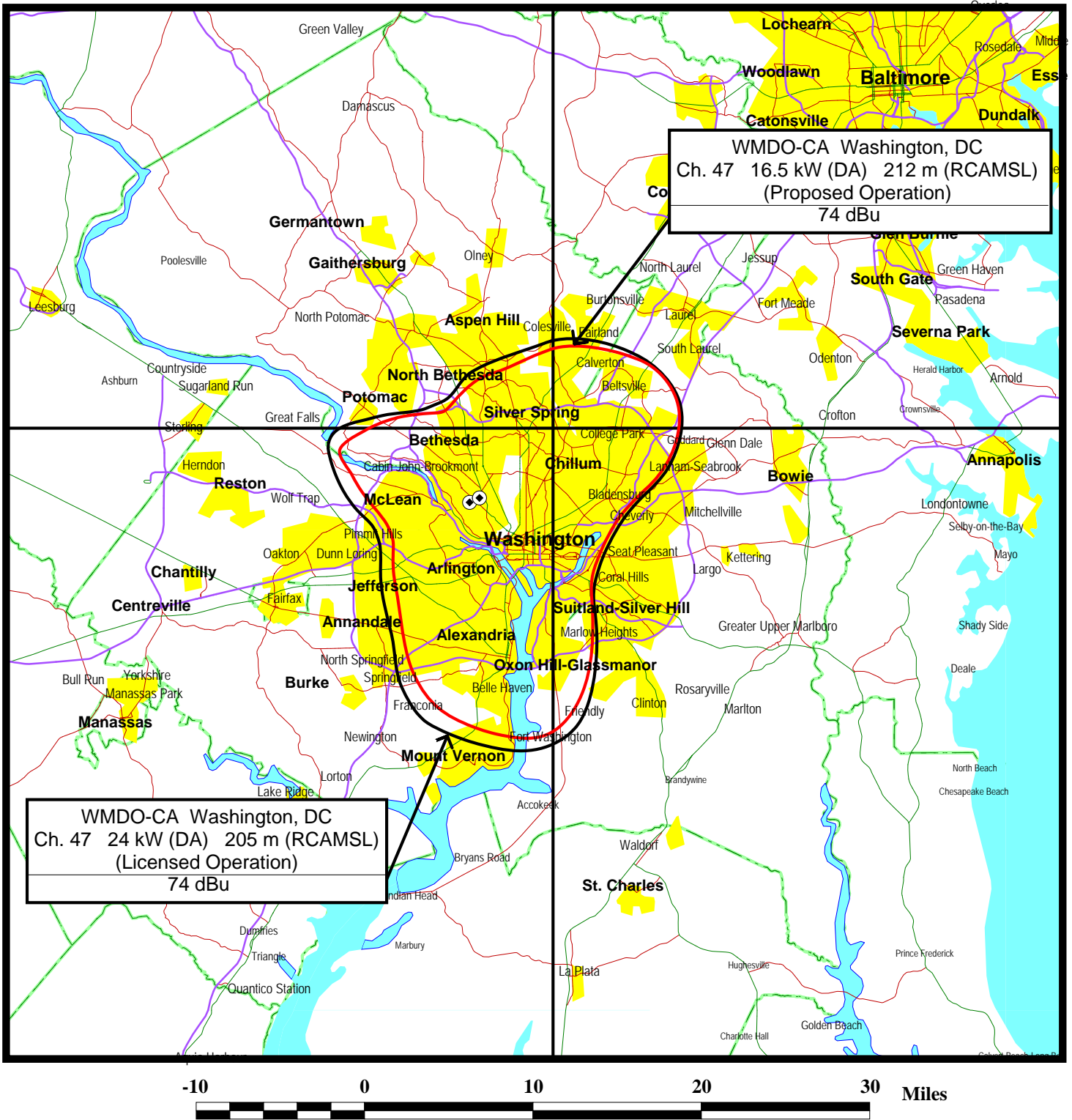


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Figure 1



FREEZE COMPLIANT OPERATION

CLASS A STATION WMDO-CA
 WASHINGTON, DC
 CHANNEL 47

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

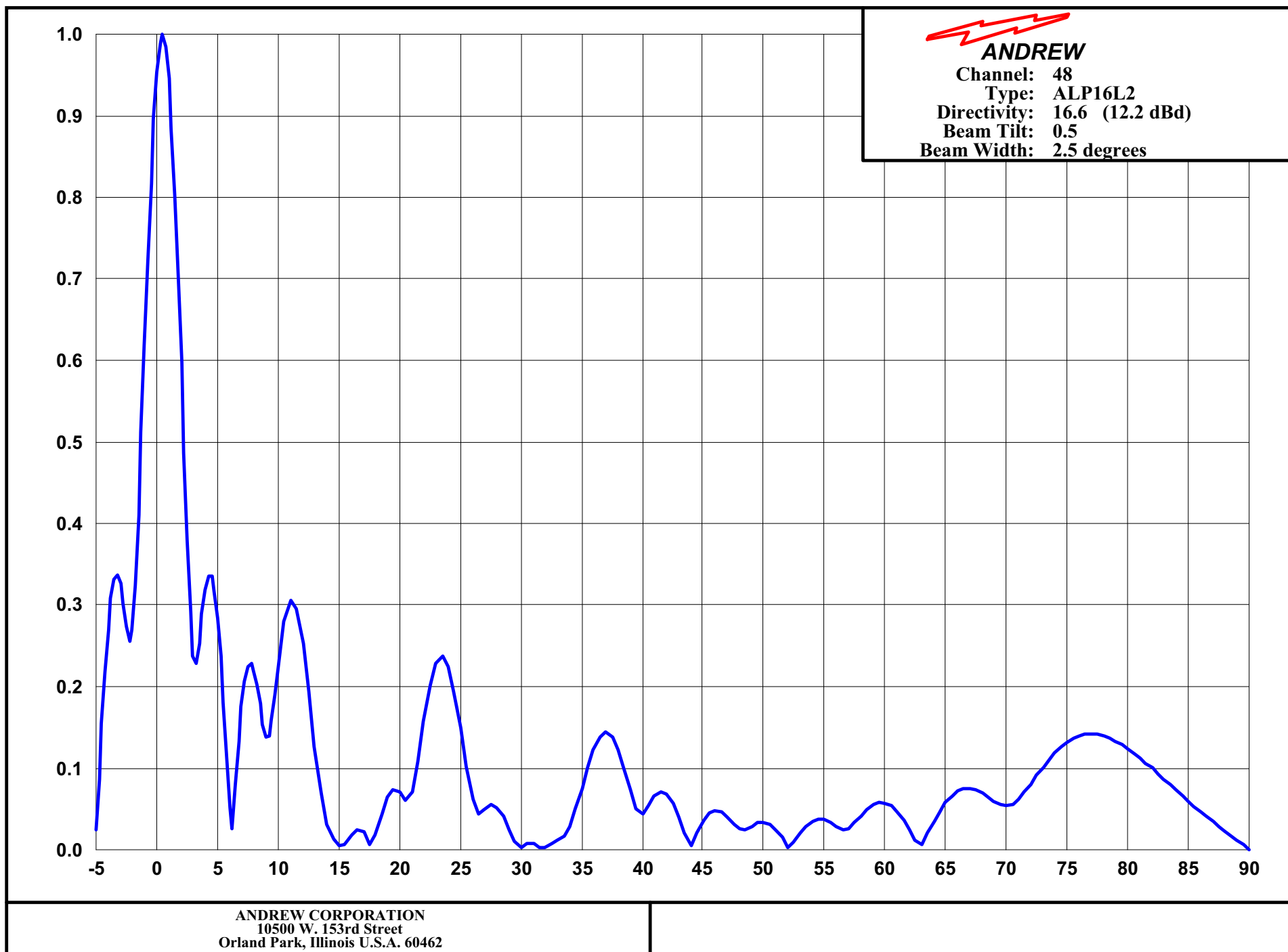


Figure 2