

Environment Statement

There will be five other transmitters operating from the tower. The following broadcast stations operate from the tower: WVTX-CA, W41AA(TX), WWVW-LP, W30CO-D, WVKF-FM, and WEGW(FM).

The radiofrequency field (“RFF”) level contribution of WTRF-DT will be added to the calculated value of the total RFF level of the other broadcast stations on the tower.

Station WTRF-DT

Channel 7 Freq: 174-180 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2} \quad \begin{array}{l} ERP = 25.4 \text{ kW (Horizontal only)} \\ R = 62 \text{ meters (antenna height above ground -2 meters)} \\ F = 0.1 \end{array}$$

$$S = < 3 \mu\text{W}/\text{cm}^2$$

Therefore, WTRF-DT contributes less than $3 \mu\text{W}/\text{cm}^2$ at 2 meters above the ground. The limit for an uncontrolled environment (general population) is $200 \mu\text{W}/\text{cm}^2$.

WTRF-DT contributes less than 0.2% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station WVTX-CA

Channel 28 Freq: 554-560 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2} \quad \begin{array}{l} ERP = 0.95 \text{ kW (Horizontal only)} \\ R = 28.4 \text{ meters (antenna height above ground -2 meters)} \\ F = 0.2 \end{array}$$

$$S = < 0.787 \mu\text{W}/\text{cm}^2$$

Therefore, WVTX-CA contributes less than $0.787 \mu\text{W}/\text{cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment (general population) is $371.33 \mu\text{W}/\text{cm}^2$.

WVTX-CA contributes less than 0.3% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station W30CO-D

Channel 30 Freq: 566-572 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2}$$

ERP = 15 kW (Horizontal only)
R = 90.4 meters (antenna height above ground -2 meters)
F = 0.25 (Assumed)

$$S = < 3.832 \mu\text{W}/\text{cm}^2$$

Therefore, W30CO-D contributes less than 3.832 $\mu\text{W}/\text{cm}^2$ at 2 meters above the ground. The limit for an uncontrolled environment (general population) is 379.3 $\mu\text{W}/\text{cm}^2$.

W30CO-D contributes less than 1% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station W41AA(TX)

Channel 41 Freq: 632-638 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2}$$

ERP = 77.8 kW (Horizontal only)
R = 90.4 meters (antenna height above ground -2 meters)
F = 0.2

$$S = < 4.637 \mu\text{W}/\text{cm}^2$$

Therefore, W41AA-TX contributes less than 4.637 $\mu\text{W}/\text{cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment (general population) is 423.33 $\mu\text{W}/\text{cm}^2$.

W41AA-TX contributes less than 3% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station WWVW-LP TX

Channel 56 Freq: 722-728 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2}$$

ERP = 12.1 kW (Horizontal only)
R = 63.2 meters (antenna height above ground -2 meters)
F = 0.2

$$S = < 2.011 \mu\text{W}/\text{cm}^2$$

Therefore, WWVW-LP contributes less than 2.011 $\mu\text{W}/\text{cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment (general population) is 483.33 $\mu\text{W}/\text{cm}^2$.

WWVW-LP contributes less than 0.5% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station WVKF-FM

Channel 239B1 Freq: 95.7 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2} \quad \begin{array}{l} ERP = 6.8 \text{ kW (Horizontal only)} \\ R = 115.4 \text{ meters (antenna height above ground -2 meters)} \\ F = 0.3 \end{array}$$

$$S = < 0.767 \mu\text{W/cm}^2$$

Therefore, WVKF-FM contributes less than $0.767 \mu\text{W/cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment (general population) is $200 \mu\text{W/cm}^2$.

WVKF-FM contributes less than 0.4% RFF level for an uncontrolled environment (general population) two meters above the ground.

Station WEGW-FM

Channel 298B Freq: 107.5 MHz Range

$$S = \frac{33.4 (F^2) ERP}{R^2} \quad \begin{array}{l} ERP = 10.5 \text{ kW (Horizontal only)} \\ R = 193.4 \text{ meters (antenna height above ground -2 meters)} \\ F = 0.3 \end{array}$$

$$S = < 1.65 \mu\text{W/cm}^2$$

Therefore, WEGW-FM contributes less than $1.65 \mu\text{W/cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment (general population) is $200 \mu\text{W/cm}^2$.

WEGW-FM contributes less than 0.9% RFF level for an uncontrolled environment (general population) two meters above the ground.

Therefore, when WTRF-DT is operational, the total RFF percentage two meters above the ground at the highest RFF point will be less than 2% of the limit for an uncontrolled environment.

Based on this analysis, no radiation hazard signs will be necessary.

The total “worst-case” post-transition RFF contribution of all stations two meters above the ground at the base of the WTRF-DT tower is no more than 8% of the FCC guidelines for an

uncontrolled environment which is no more than 2% of the proposed FCC guidelines for a controlled environment. WTRF-DT does not intend to commence post-transition operation of the subject facility until on or about the February 17, 2009 transition deadline, upon permanent discontinuation of operation of the analog operation of WTRF-TV, thereby potentially reducing the RFF at the site.

Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

Environmental Assessment

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the licensee indicates:

- (a)(1) The existing tower is not located in an officially designated wilderness area.
- (a)(2) The existing tower is not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.

- (a)(4) The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The existing tower is not located near any known Indian religious sites.
- (a)(6) The existing tower is not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
LONGLEY-RICE INTERFERENCE ANALYSIS
FOR THE PROPOSED OPERATION
ABOVE ITS ALLOTTED APPENDIX B FACILITIES AND
IN RELATION TO OTHER ALLOTTED APPENDIX B FACILITIES
AND OTHER POTENTIALLY AFFECTED STATIONS IN CDBS
WTRF-DT, WHEELING, WEST VIRGINIA
CHANNEL 7 25.4 KW ND ERP 293 METERS HAAT
JUNE 2008

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>FCC File No.</u>	<u>Result</u>
7	WJLA-DT	WASHINGTON DC	338.3	ALLOT		0.00%
7	WJLA-DT	WASHINGTON DC	338.3	CP	BPCDT-20080507AAI	0.00%
7	WLJC-DT	BEATTYVILLE KY	371.4	LIC	BLCDT-20030410ABL	0.00%
7	WLJC-DT	BEATTYVILLE KY	371.4	ALLOT		0.00%
7	WJBK-DT	DETROIT MI	336.7	ALLOT		no interference
7	WJBK-DT	DETROIT MI	336.7	APP	BPCDT-20080307ACO	no interference
7	WNGS-DT	SPRINGVILLE NY	337.1	ALLOT		no interference
7	WNGS-DT	SPRINGVILLE NY	337.1	APP	BPCDT-20080328AFD	no interference
8	WJW-DT	CLEVELAND OH	165.9	ALLOT		no interference
8	WJW-DT	CLEVELAND OH	165.9	CP	BPCDT-20080311AAN	no interference
8	WWCP-DT	JOHNSTOWN PA	136.7	CP	BPCDT-20080408ABF	0.04%
8	WWCP-DT	JOHNSTOWN PA	136.7	ALLOT		0.04%

COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2

STANDARD ELEVATION PATTERN
AVAILABLE UPON REQUEST
JUNE 2008

SECTION III - D - DTV Engineering

Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.

- 1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:
 - (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. Yes No
 - (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. Yes No
 - (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. Yes No
 - (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). Yes No
 N/A
 - (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B. Yes No
 N/A
- 2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RIF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Yes No

Applicant must **submit the Exhibit** called for in Item 13.

- 3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. Yes No
- 4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. Yes No
- 5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. Yes No

SECTION III - D DTV Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV _____ Analog TV, if any _____

2. Zone: I II III

3. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " N S Latitude
 _____ ° _____ ' _____ " E W Longitude

4. Antenna Structure Registration Number: _____

Not applicable FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: _____ meters

6. Overall Tower Height Above Ground Level: _____ meters

7. Height of Radiation Center Above Ground Level: _____ meters

8. Height of Radiation Center Above Average Terrain: _____ meters

9. Maximum Effective Radiated Power (average power): _____ kW

10. Antenna Specifications:

Manufacturer	Model
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a. Not Applicable

b. Electrical Beam Tilt: _____ degrees Not Applicable

c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No.

d. Polarization: Horizontal Circular Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: Not applicable (Nondirectional)
 Rotation: _____ ° No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? Yes No

Exhibit No.

If "No," attach as an Exhibit justification therefore, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No.

a. If **Certification Checklist Item 2** is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

Yes No N/A

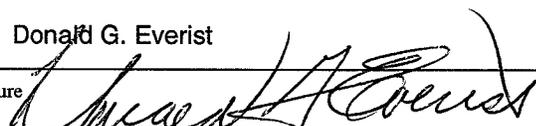
I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in 'good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Donald G. Everist	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date June 19, 2008	
Mailing Address Cohen, Dippell and Everist, P.C, 1300 L Street, NW Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
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