

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
FOR POST-TRANSITION
“APPENDIX B CHECKLIST” FACILITIES
WTTA-DT - ST. PETERSBURG, FLORIDA
DTV - CH. 38, 1000 kW, 438 M HAAT**

Prepared for: BAY TELEVISION, INC.

MARCH, 2008

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WTTA-DT - ST. PETERSBURG, FLORIDA
DTV - CH. 38, 1000 kW, 438 M HAAT**

Prepared for: BAY TELEVISION, INC.

I am an 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.

GENERAL

Bay Television, Inc., licensee of WTTA(TV), Channel 38, St. Petersburg, Florida, and applicant for a Construction Permit for the paired Digital Television Allotment for WTTA-DT, to operate on the current analog Channel 38 after the digital transition, has authorized this office to prepare this statement, FCC Form 301, Sections III and III-D and associated exhibits to be made a part of an Application for Construction Permit for its post-transition DTV Facility, on its current analog channel 38 as reflected in “Appendix B” of the SEVENTH FURTHER NOTICE OF PROPOSED RULEMAKING, adopted October 10, 2006 (MB Docket 87-268).

PROPOSED TECHNICAL FACILITIES

It is proposed herein to implement the post-transition facilities of WTTA-DT on channel 38 utilizing a directional transmitting antenna, a Dielectric model TUA-C3-O6/18U-T utilizing a “cardioid” directional azimuth pattern, a HAAT of 438 meters and an ERP of 1000 kW, side-mounted on the existing antenna support structure, FCC antenna structure registration number 1028292, with the antenna radiation centerline at 435.0 meters above ground level (AGL). A Vertical Plan Antenna Sketch is shown in Exhibit 1. The antenna manufacturer's horizontal plane radiation pattern is shown in Exhibit 2 and tabulated in Exhibit 3. The antenna manufacturer's vertical plane radiation pattern, illustrating the existing antenna's radiation characteristics above and below the horizontal plane, is shown in Exhibits 4 and 5 and tabulated in Exhibit 6.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625 of the FCC's Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699), 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 38 kilometers from the site, the antenna site elevation and coordinates were determined from those reflected in FCC antenna structure registration number 1028292. As shown in Exhibit 7, the predicted 48 dBu, (F50,90) principal community contour completely encompasses the principal community of license as required

by the Commission's rules. The predicted 41 dBu (F 50,90) "protected coverage contour" is also shown in Exhibit 7. Exhibit 7 also shows that the 41 dBu F(50,90) contour of the instant proposed facility does not exceed that of the Appendix B Facility. This proposal therefore meets the requirements for expedited processing.

ALLOCATION CONSIDERATIONS

The Seventh Report and Order and Eighth Further NPRM (MB Docket 87-268) includes the recently adopted DTV Table of Allotments that identifies the specific technical facilities at which the Commission has proposed to allow DTV stations to operate after the DTV transition. In the sense that the instant proposed technical facility for which authorization is being sought is essentially identical to the technical facility as outlined in the Final DTV Table of Allotments, it is presumed that this request will be treated in similar fashion to a "checklist application" for facilities as reflected in the initial DTV Table.

BLANKETING AND INTERMODULATION INTERFERENCE

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

ENVIRONMENTAL CONSIDERATIONS

RADIO FREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted 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 provide 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" (Edition 97-01, August 1997), 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 contains the technical information necessary 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,

(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 in a “controlled” environment is derived from the formula, (frequency/300).

The predicted emissions of WTTA-DT channel 38 must be considered, along with the predicted emissions of other stations that will operate from its site and within 315 km after the digital transition. For WTTA-DT, which will operate on channel 38 (617 MHz), the MPE level for “uncontrolled” environments is $0.411 \text{ mW}/\text{cm}^2$, and for “controlled” environments is $2.055 \text{ mW}/\text{cm}^2$.

The proposed WTTA-DT facility, channel 38, will operate with a maximum ERP of 1000 kW from a horizontally polarized directional transmitting antenna with a centerline height of 435.0 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WTTA-DT facility produces a predicted power density at two meters above ground level of $0.01603 \text{ mW}/\text{cm}^2$, which is 3.90% of the FCC guideline value for “uncontrolled” environments, and 0.780% of the FCC guideline value for “controlled” environments.

As shown in Appendix A, the total predicted percentage of the MPE value at WTTA’s site, considering the cumulative predicted radiation of all broadcast facilities at the site, is only 16.51% of the limit for “uncontrolled” environments, and 3.302% of the limit for “controlled” environments. The site is therefore in compliance with the FCC’s Maximum Permitted Exposure guidelines.

OCCUPATIONAL SAFETY

The permittee of WTTA-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WTTA-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. In light of the above, the proposed modification of the WTTA-DT facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Sections III and 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.

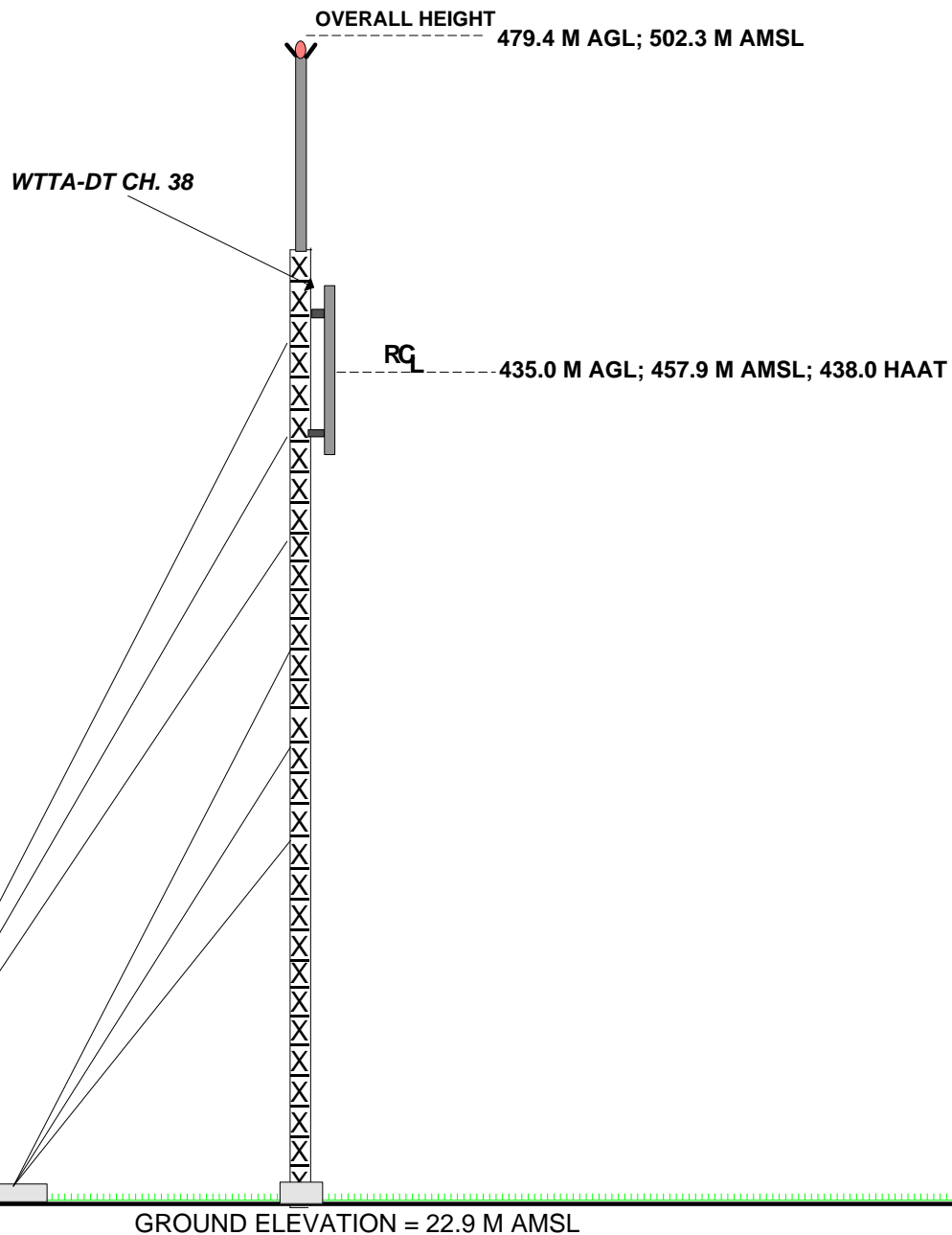
Dated: March 11, 2008



John E. Hidle, Jr.

27° 50' 32" NL
082° 15' 46" WL

EXHIBIT 1



VERTICAL PLAN ANTENNA SKETCH

WTTA-DT ST. PETERSBURG, FLORIDA
CH. 38, 1000 kW ERP - 438 m HAAT

MARCH, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



Exhibit No.

2

Date
Call Letters
Location
Customer
Antenna Type

21 Jul 2005

WTTA-DT Channel 38

St. Petersburg, Florida

Bay Television, Inc.

TUA-C3-06/18U-T

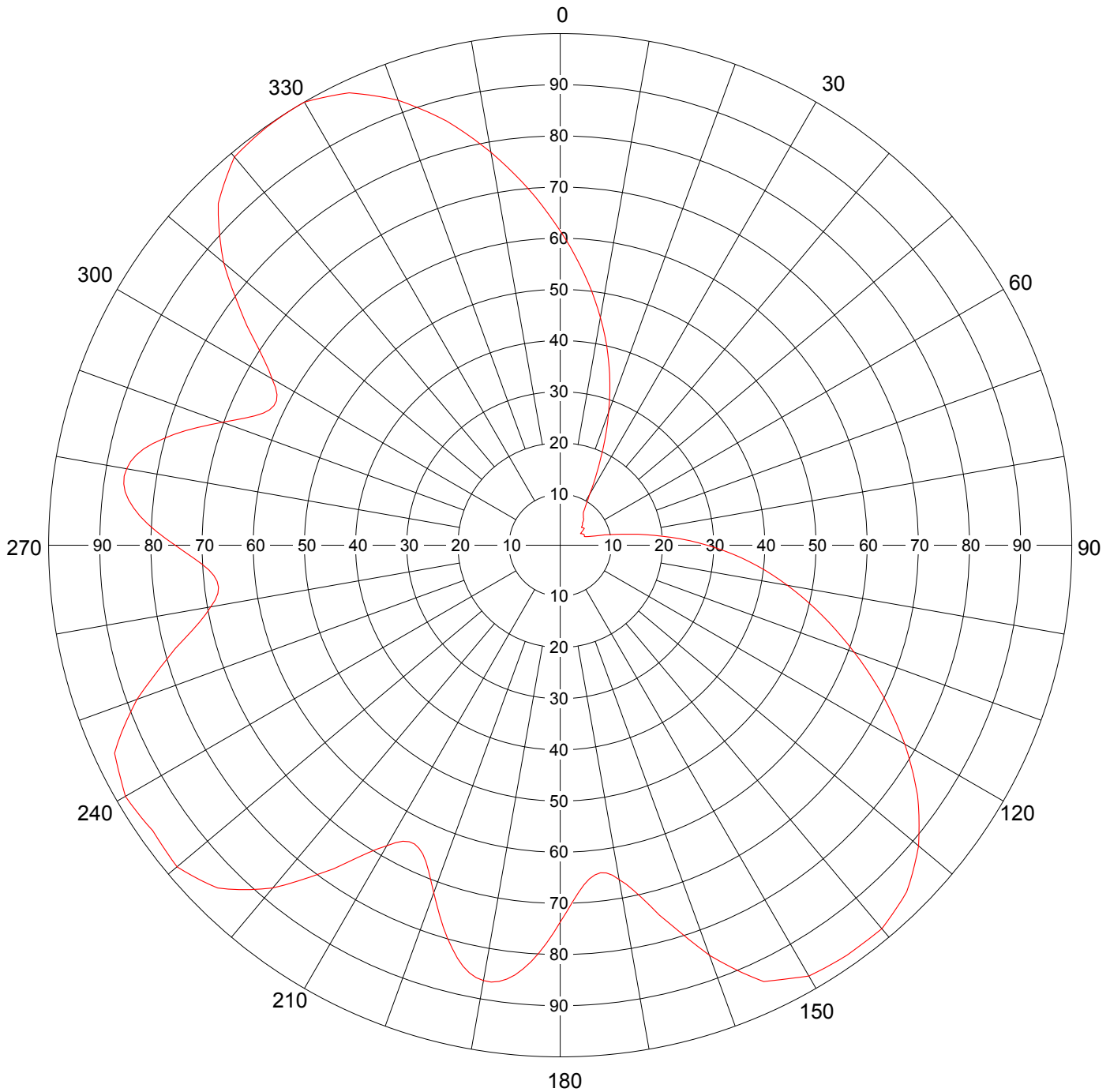
AZIMUTH PATTERN

Gain
Calculated / Measured

2.00 (3.01 dB)
Calculated

Frequency
Drawing #

617 MHz
TUA-C3



Remarks:



Date **21 Jul 2005**
Call Letters **WTTA-DT** Channel **38**
Location **St. Petersburg, Florida**
Customer **Bay Television, Inc.**
Antenna Type **TUA-C3-06/18U-T**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **TUA-C3**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.615	45	0.061	90	0.287	135	0.958	180	0.737	225	0.947	270	0.753	315	0.945
1	0.598	46	0.061	91	0.305	136	0.962	181	0.758	226	0.954	271	0.772	316	0.955
2	0.582	47	0.060	92	0.322	137	0.966	182	0.779	227	0.960	272	0.791	317	0.964
3	0.566	48	0.058	93	0.339	138	0.970	183	0.798	228	0.966	273	0.808	318	0.973
4	0.550	49	0.056	94	0.355	139	0.974	184	0.816	229	0.972	274	0.824	319	0.982
5	0.533	50	0.054	95	0.371	140	0.978	185	0.831	230	0.978	275	0.837	320	0.991
6	0.517	51	0.055	96	0.388	141	0.978	186	0.844	231	0.977	276	0.849	321	0.992
7	0.501	52	0.056	97	0.404	142	0.978	187	0.854	232	0.976	277	0.857	322	0.994
8	0.485	53	0.057	98	0.420	143	0.978	188	0.861	233	0.975	278	0.862	323	0.996
9	0.469	54	0.057	99	0.435	144	0.978	189	0.864	234	0.974	279	0.863	324	0.997
10	0.452	55	0.058	100	0.451	145	0.978	190	0.864	235	0.973	280	0.861	325	0.999
11	0.436	56	0.055	101	0.467	146	0.977	191	0.861	236	0.975	281	0.856	326	0.999
12	0.419	57	0.053	102	0.482	147	0.976	192	0.854	237	0.976	282	0.848	327	1.000
13	0.402	58	0.050	103	0.498	148	0.975	193	0.845	238	0.978	283	0.836	328	1.000
14	0.385	59	0.048	104	0.514	149	0.974	194	0.832	239	0.980	284	0.821	329	1.000
15	0.367	60	0.046	105	0.530	150	0.972	195	0.816	240	0.981	285	0.804	330	1.000
16	0.350	61	0.047	106	0.546	151	0.966	196	0.799	241	0.977	286	0.786	331	0.996
17	0.332	62	0.048	107	0.562	152	0.959	197	0.781	242	0.973	287	0.766	332	0.991
18	0.314	63	0.049	108	0.579	153	0.953	198	0.762	243	0.969	288	0.745	333	0.986
19	0.295	64	0.050	109	0.595	154	0.947	199	0.742	244	0.965	289	0.724	334	0.981
20	0.277	65	0.051	110	0.612	155	0.941	200	0.723	245	0.961	290	0.703	335	0.976
21	0.259	66	0.051	111	0.628	156	0.924	201	0.704	246	0.946	291	0.683	336	0.966
22	0.241	67	0.051	112	0.645	157	0.907	202	0.687	247	0.931	292	0.664	337	0.956
23	0.223	68	0.051	113	0.662	158	0.889	203	0.672	248	0.914	293	0.648	338	0.946
24	0.205	69	0.050	114	0.679	159	0.871	204	0.661	249	0.897	294	0.635	339	0.936
25	0.187	70	0.050	115	0.696	160	0.853	205	0.654	250	0.880	295	0.627	340	0.925
26	0.172	71	0.052	116	0.712	161	0.831	206	0.650	251	0.859	296	0.622	341	0.912
27	0.157	72	0.055	117	0.729	162	0.809	207	0.650	252	0.838	297	0.622	342	0.899
28	0.143	73	0.059	118	0.745	163	0.788	208	0.655	253	0.817	298	0.627	343	0.886
29	0.129	74	0.064	119	0.761	164	0.767	209	0.665	254	0.798	299	0.636	344	0.872
30	0.115	75	0.070	120	0.778	165	0.748	210	0.678	255	0.779	300	0.650	345	0.858
31	0.106	76	0.079	121	0.793	166	0.726	211	0.692	256	0.757	301	0.664	346	0.843
32	0.098	77	0.089	122	0.808	167	0.707	212	0.709	257	0.738	302	0.682	347	0.827
33	0.091	78	0.100	123	0.823	168	0.690	213	0.728	258	0.721	303	0.702	348	0.811
34	0.085	79	0.111	124	0.838	169	0.675	214	0.749	259	0.706	304	0.724	349	0.796
35	0.079	80	0.123	125	0.853	170	0.664	215	0.772	260	0.694	305	0.748	350	0.780
36	0.077	81	0.138	126	0.865	171	0.653	216	0.792	261	0.683	306	0.769	351	0.763
37	0.075	82	0.154	127	0.878	172	0.647	217	0.812	262	0.676	307	0.791	352	0.747
38	0.074	83	0.169	128	0.890	173	0.645	218	0.833	263	0.673	308	0.813	353	0.730
39	0.072	84	0.185	129	0.902	174	0.648	219	0.854	264	0.674	309	0.836	354	0.714
40	0.070	85	0.200	130	0.914	175	0.655	220	0.874	265	0.680	310	0.859	355	0.698
41	0.070	86	0.218	131	0.923	176	0.665	221	0.890	266	0.689	311	0.877	356	0.681
42	0.069	87	0.236	132	0.932	177	0.680	222	0.906	267	0.702	312	0.895	357	0.664
43	0.067	88	0.253	133	0.941	178	0.697	223	0.920	268	0.717	313	0.912	358	0.647
44	0.064	89	0.270	134	0.950	179	0.717	224	0.934	269	0.734	314	0.929	359	0.631

Remarks:



Exhibit No.

4

Date

21 Jul 2005

Call Letters

WTTA-DT

Channel

38

Location

St. Petersburg, Florida

Customer

Bay Television, Inc.

Antenna Type

TUA-C3-06/18U-T

ELEVATION PATTERN

RMS Gain at Main Lobe

13.6 (11.34 dB)

Beam Tilt

0.75 Degrees

RMS Gain at Horizontal

12.1 (10.83 dB)

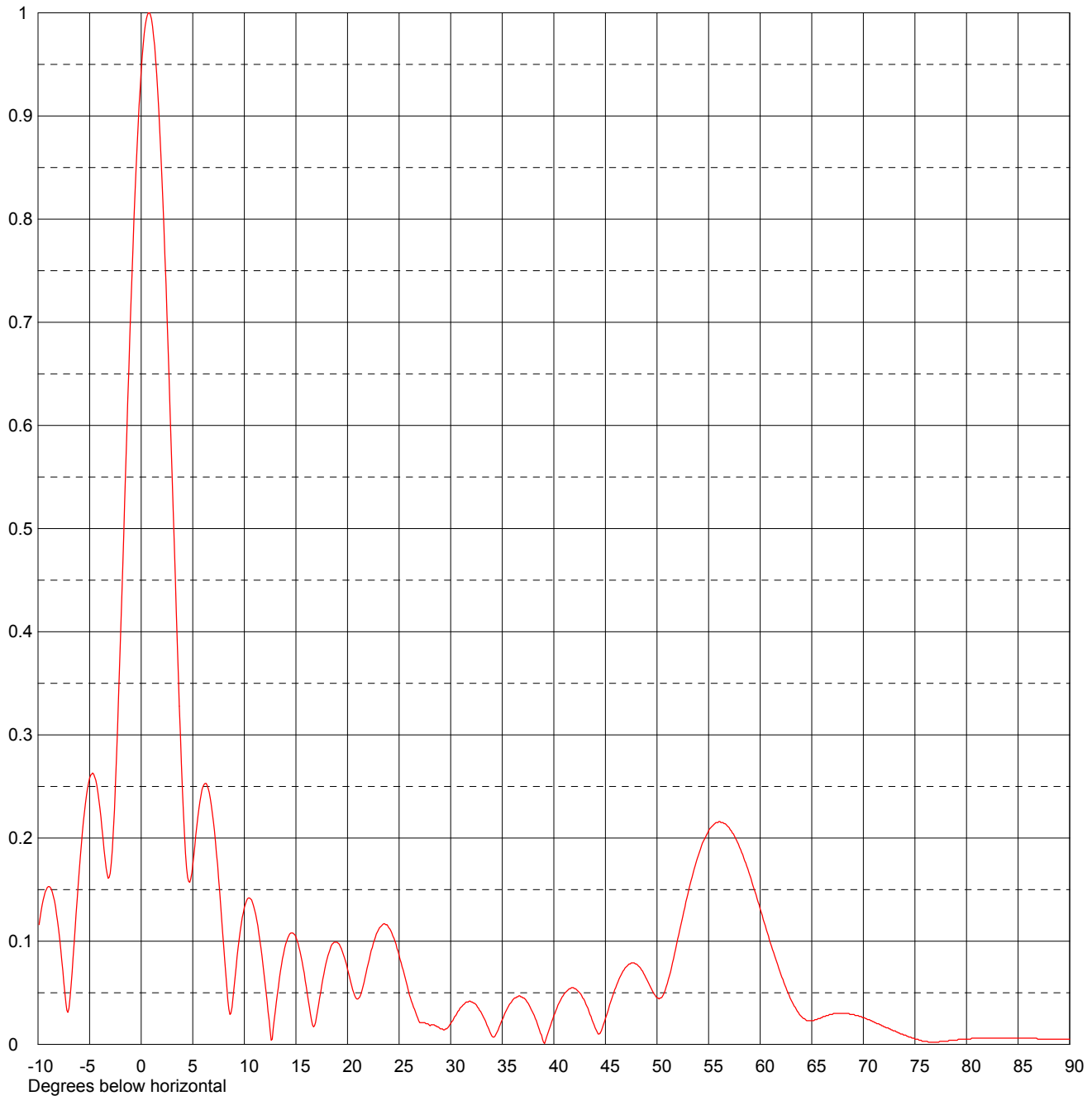
Frequency

617.00 MHz

Calculated / Measured

Calculated

Drawing #

06U136075-90

Remarks:



Exhibit No.

5

Date

21 Jul 2005

Call Letters

WTTA-DT

Channel

38

Location

St. Petersburg, Florida

Customer

Bay Television, Inc.

Antenna Type

TUA-C3-06/18U-T

ELEVATION PATTERN

RMS Gain at Main Lobe

13.6 (11.34 dB)

Beam Tilt

0.75 Degrees

RMS Gain at Horizontal

12.1 (10.83 dB)

Frequency

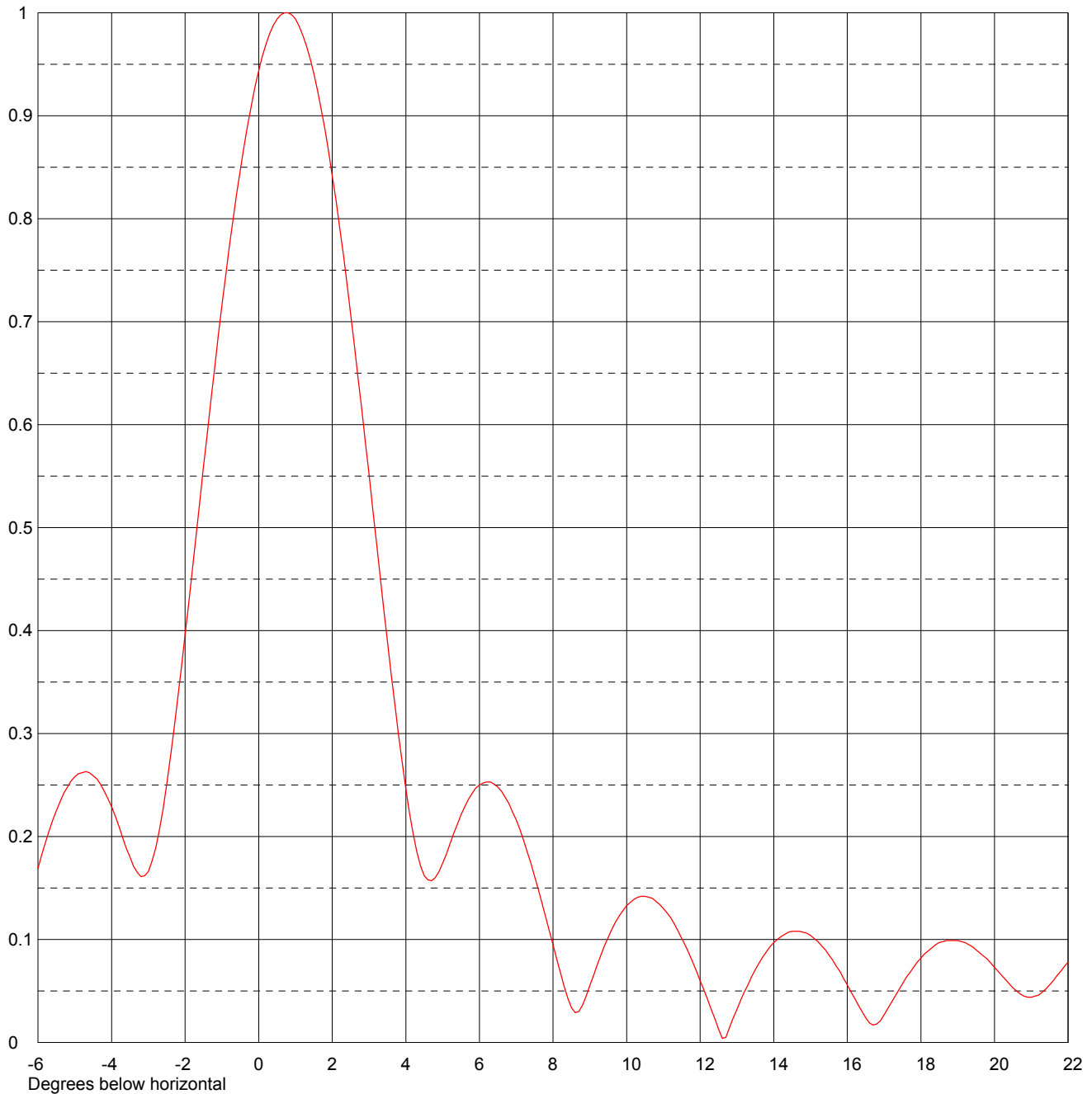
617.00 MHz

Calculated / Measured

Calculated

Drawing #

06U136075



Remarks:



Exhibit No.

6

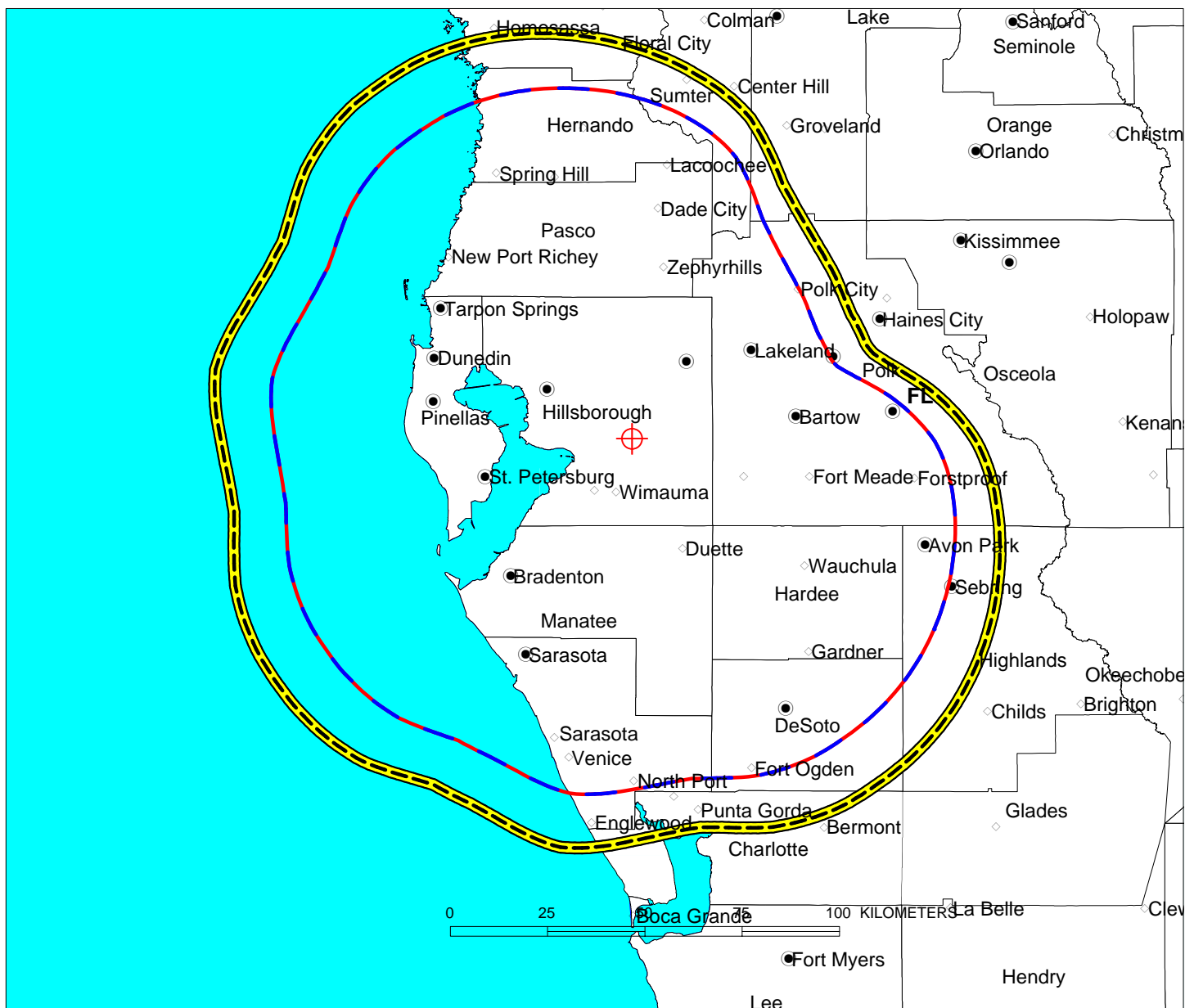
Date **21 Jul 2005**
 Call Letters **WTTA-DT** Channel **38**
 Location **St. Petersburg, Florida**
 Customer **Bay Television, Inc.**
 Antenna Type **TUA-C3-06/18U-T**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **06U136075**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.108	2.4	0.737	10.6	0.141	30.5	0.028	51.0	0.059	71.5	0.020
-9.5	0.140	2.6	0.677	10.8	0.137	31.0	0.036	51.5	0.079	72.0	0.017
-9.0	0.153	2.8	0.615	11.0	0.130	31.5	0.041	52.0	0.102	72.5	0.015
-8.5	0.143	3.0	0.551	11.5	0.101	32.0	0.041	52.5	0.124	73.0	0.013
-8.0	0.111	3.2	0.486	12.0	0.060	32.5	0.038	53.0	0.146	73.5	0.011
-7.5	0.060	3.4	0.421	12.5	0.013	33.0	0.030	53.5	0.166	74.0	0.009
-7.0	0.035	3.6	0.358	13.0	0.032	33.5	0.019	54.0	0.183	74.5	0.007
-6.5	0.098	3.8	0.299	13.5	0.071	34.0	0.008	54.5	0.197	75.0	0.005
-6.0	0.169	4.0	0.246	14.0	0.097	34.5	0.012	55.0	0.207	75.5	0.004
-5.5	0.225	4.2	0.202	14.5	0.108	35.0	0.024	55.5	0.213	76.0	0.003
-5.0	0.258	4.4	0.171	15.0	0.104	35.5	0.035	56.0	0.216	76.5	0.002
-4.5	0.259	4.6	0.158	15.5	0.085	36.0	0.043	56.5	0.214	77.0	0.002
-4.0	0.229	4.8	0.160	16.0	0.056	36.5	0.046	57.0	0.210	77.5	0.003
-3.5	0.180	5.0	0.174	16.5	0.024	37.0	0.045	57.5	0.202	78.0	0.003
-3.0	0.166	5.2	0.193	17.0	0.027	37.5	0.040	58.0	0.191	78.5	0.004
-2.8	0.189	5.4	0.212	17.5	0.057	38.0	0.030	58.5	0.178	79.0	0.004
-2.6	0.227	5.6	0.229	18.0	0.082	38.5	0.017	59.0	0.164	79.5	0.005
-2.4	0.277	5.8	0.242	18.5	0.097	39.0	0.002	59.5	0.148	80.0	0.005
-2.2	0.334	6.0	0.250	19.0	0.099	39.5	0.013	60.0	0.131	80.5	0.006
-2.0	0.396	6.2	0.253	19.5	0.090	40.0	0.028	60.5	0.115	81.0	0.006
-1.8	0.460	6.4	0.251	20.0	0.073	40.5	0.040	61.0	0.098	81.5	0.006
-1.6	0.526	6.6	0.244	20.5	0.053	41.0	0.049	61.5	0.083	82.0	0.006
-1.4	0.591	6.8	0.232	21.0	0.044	41.5	0.054	62.0	0.068	82.5	0.006
-1.2	0.655	7.0	0.216	21.5	0.056	42.0	0.054	62.5	0.055	83.0	0.006
-1.0	0.716	7.2	0.196	22.0	0.078	42.5	0.050	63.0	0.043	83.5	0.006
-0.8	0.772	7.4	0.174	22.5	0.098	43.0	0.042	63.5	0.034	84.0	0.006
-0.6	0.824	7.6	0.149	23.0	0.111	43.5	0.029	64.0	0.027	84.5	0.006
-0.4	0.870	7.8	0.122	23.5	0.117	44.0	0.016	64.5	0.023	85.0	0.006
-0.2	0.910	8.0	0.095	24.0	0.113	44.5	0.011	65.0	0.023	85.5	0.006
0.0	0.944	8.2	0.068	24.5	0.103	45.0	0.025	65.5	0.024	86.0	0.006
0.2	0.970	8.4	0.043	25.0	0.086	45.5	0.041	66.0	0.026	86.5	0.006
0.4	0.988	8.6	0.029	25.5	0.068	46.0	0.055	66.5	0.028	87.0	0.005
0.6	0.998	8.8	0.036	26.0	0.048	46.5	0.067	67.0	0.029	87.5	0.005
0.8	1.000	9.0	0.055	26.5	0.034	47.0	0.075	67.5	0.030	88.0	0.005
1.0	0.994	9.2	0.075	27.0	0.021	47.5	0.079	68.0	0.030	88.5	0.005
1.2	0.978	9.4	0.094	27.5	0.021	48.0	0.078	68.5	0.030	89.0	0.005
1.4	0.955	9.6	0.110	28.0	0.018	48.5	0.072	69.0	0.029	89.5	0.005
1.6	0.924	9.8	0.123	28.5	0.018	49.0	0.063	69.5	0.028	90.0	0.005
1.8	0.887	10.0	0.133	29.0	0.015	49.5	0.053	70.0	0.026		
2.0	0.842	10.2	0.139	29.5	0.015	50.0	0.045	70.5	0.024		
2.2	0.792	10.4	0.142	30.0	0.020	50.5	0.046	71.0	0.022		

Remarks:



WTTA-DT Channel 38, DTV Proposed Facility
Protected Coverage Contour
1000 kW ERP, 438 m HAAT, 41 dBu, F(50,90)
Directional Antenna; Dielectric TUA-C3-06/18U-T

WTTA-DT Channel 38, DTV Proposed Facility
Community Coverage Contour
1000 kW ERP, 438 m HAAT, 48 dBu, F(50,90)
Directional Antenna; Dielectric TUA-C3-06/18U-T

WTTA-DT Channel 38, DTV Table Facility
Protected Coverage Contour
1000 kW ERP, 438 m HAAT, 41 dBu, F(50,90)
Directional Antenna; Dielectric TUA-C3-06/18U-T

WTTA-DT Channel 38, DTV Table Facility
Community Coverage Contour
1000 kW ERP, 438 m HAAT, 48 dBu, F(50,90)
Directional Antenna; Dielectric TUA-C3-06/18U-T

PREDICTED COVERAGE CONTOURS

WTTA-DT, ST. PETERSBURG, FLORIDA
COMMUNITY COVERAGE CONTOUR
OF DTV TABLE OF ALLOTMENTS FACILITY
VS. PROPOSED CHECKLIST FACILITY
MARCH, 2008

CARL T. JONES
CORPORATION

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WTTA-DT, ST. PETERSBURG, FLORIDA
CHANNEL 38, 1000 kW ERP, 438 m HAAT
MARCH, 2008

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WTTA-DT	DT	38	617	H	433	1000.000	0.300	0.01603	0.411	3.90%
WFLA-DT	DT	7	177	H	461	35.000	0.300	0.00050	0.200	0.25%
WFTS-DT	DT	29	563	H	471	987.000	0.300	0.01337	0.375	3.56%
WFTT-DT	DT	47	671	H	313	500.000	0.300	0.01534	0.447	3.43%
WFLZ-FM	FM	227	93.3	H & V	410	100.000	0.300	0.00358	0.200	1.79%
WMTX(FM)	FM	264	100.7	H & V	410	100.000	0.300	0.00358	0.200	1.79%
WFUS(FM)	FM	278	103.5	H & V	409	100.000	0.300	0.00360	0.200	1.80%

TOTAL PERCENTAGE OF ANSI VALUE= 16.51%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*

****Includes the proposed station and all stations within 315 meters.*