

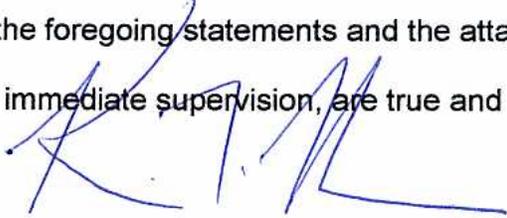
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NATIONAL MINORITY T.V., INC., licensee of television translator W39CL, Channel 39 in Columbia, South Carolina, in support of this Application for Construction Permit to specify digital operation on Channel 50 from the licensed W39CL site. This proposal is being submitted in response to the Commission's assignment of Channel 39 to WBHQ-DT in Sumter, South Carolina. The site of WBHQ-DT is located 26.8 kilometers from that of W39CL, thereby placing this translator in a displacement situation.

It is proposed to mount a standard ERI omnidirectional antenna at the authorized height on the side of the existing 152-meter communications tower. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 51 dBu contour encompasses a significant portion of the Grade A contour that obtains from the licensed W39CL facility. Operating parameters for the proposed facility are tabulated in Exhibit C. An interference study is provided in Exhibit D, and a power density calculation follows as Exhibit E.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1045067 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.


KEVIN T. FISHER

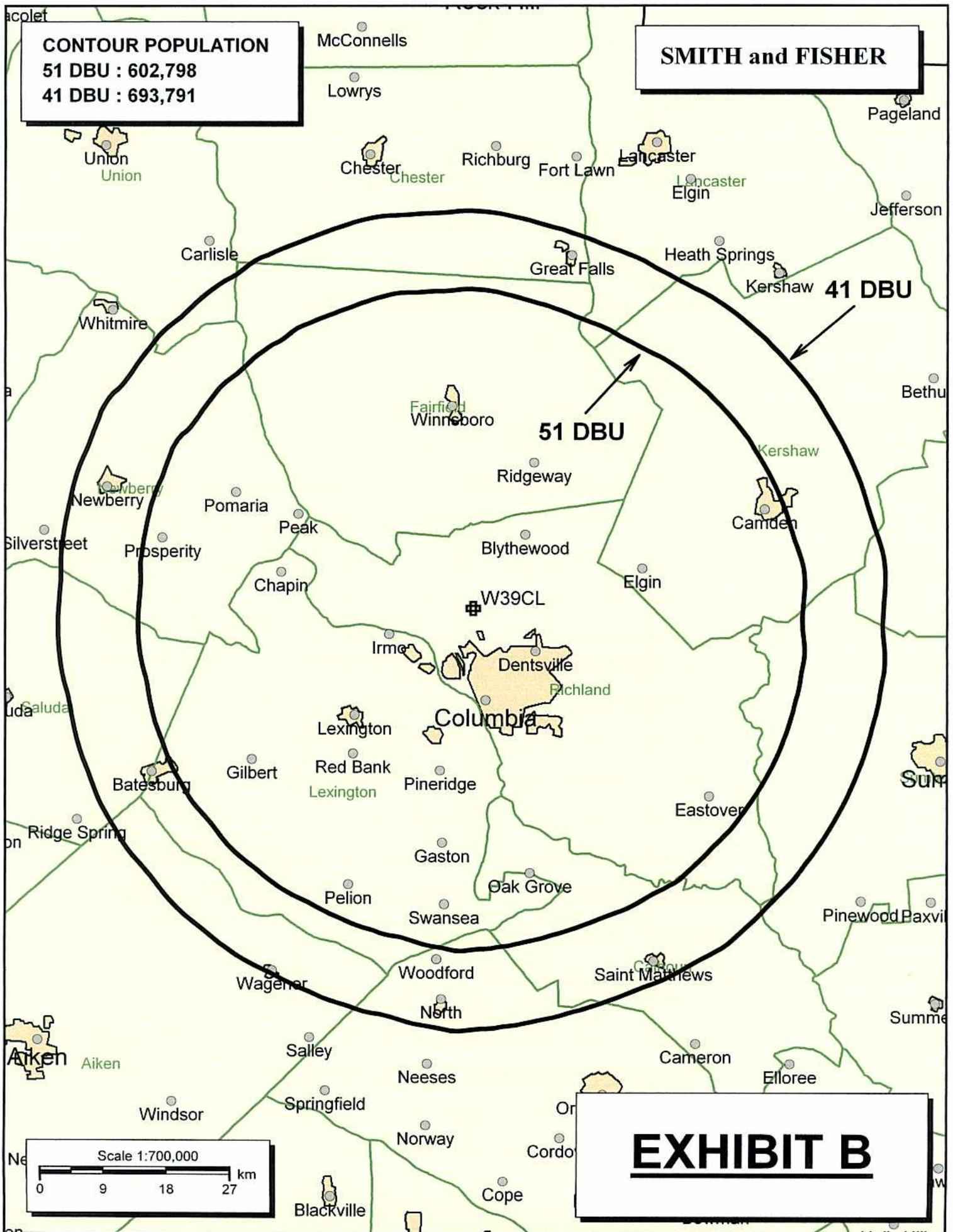
March 14, 2006

CONTOUR POPULATION

51 DBU : 602,798

41 DBU : 693,791

SMITH and FISHER



PROPOSED OPERATING PARAMETERS

PROPOSED W39CL-D
CHANNEL 50 – COLUMBIA, SOUTH CAROLINA

Transmitter Power Output:	1.9 kw
Transmission Line Efficiency:	56.9%
Antenna Power Gain – Toward Horizon:	14.06
Antenna Power Gain – Main Lobe:	14.06
Effective Radiated Power – Toward Horizon:	15.0 kw
Effective Radiated Power – Main Lobe:	15.0 kw
Transmitter Make and Model:	Type-accepted
Rated Output	2.0 kw
Transmission Line Make and Model:	Andrew HJ7-50A
Size and Type:	1-5/8" air heliax
Length:	430 feet*
Antenna Make and Model:	ERI AL8
Orientation	Omnidirectional
Beam Tilt	1.75 degrees
Radiation Center Above Ground:	123 meters
Radiation Center Above Mean Sea Level:	251 meters

*estimated

LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED W39CL-D
CHANNEL 50 – COLUMBIA, SOUTH CAROLINA

We conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 0.1 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed W39CL-D) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-2. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed W39CL-D facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

INTERFERENCE SUMMARY

PROPOSED W39CL-D
CHANNEL 50 – COLUMBIA, SOUTH CAROLINA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
WFXG-DT BMPCDT-20041026AFK	CP	Augusta, GA	51	536,388	929	0.2
WAXN-DT BLCDT-20020426AAN	Lic.	Kannapolis, NC	50	1,658,278	7,304	0.4
WRET-TV BLET-19810706KG	Lic.	Spartanburg, SC	49	1,049,325	223	<0.1

POWER DENSITY CALCULATION

PROPOSED W39CL-D
CHANNEL 50 – COLUMBIA, SOUTH CAROLINA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Columbia facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kw, an antenna radiation center 123 meters above ground, and the vertical pattern of the ERI antenna, maximum power density two meters above ground of 0.00032 mw/cm^2 is calculated to occur 109 meters from the base of the tower. Since this is less than 0.1 percent of the 0.46 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 50 (686-692 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.