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CONSULTING ENGINEERS
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FCC FORM 301, EXHIBIT 43
ENVIRONMENTAL STATEMENT
APPLICATION FOR CONSTRUCTION PERMIT
WSB-TV HOLDINGS, INC.
STATION WSB-DT
ATLANTA, GEORGIA
CH 39 1,000 KW (MAX-DA, BT) 301 METERS

This environmental statement was prepared on behalf of WSB-TV Holdings, Inc. (hereinafter WSB-TV), licensee of station WSB-DT, Atlanta, Georgia, in support of an FCC Form 301 application for construction permit

WSB-DT is licensed (FCC File Number BLCDT-19981026KF) for digital television (DTV) operation on channel 39 (620 to 626 megahertz (MHz)) with 490 kilowatts (kW) average effective radiated power (ERP), horizontally polarized, and 304 meters antenna radiation center height above average terrain (HAAT), from a site located at geographic coordinates 33° 45' 51" North Latitude, 84° 21' 42" West Longitude, referenced to the 1927 North American Datum. The WSB-DT antenna radiation center is 286 meters above ground level (AGL).

The instant application proposes to increase the WSB-DT average ERP from 490 kW to 1,000 kW maximum and to decrease the WSB-DT antenna radiation center HAAT from 304 meters to 301 meters to conform the authorized antenna radiation center HAAT with that computed using the FCC's *tv_process* computer program. No other changes to the licensed WSB-DT facilities are proposed.

Public access to the existing WSB-DT antenna and supporting structure is restricted by a two-meter chain link fence, topped with razor band that encircles the WSB-DT supporting structure.

An analysis has been made of the human exposure to RFR using the calculation methodology described in *OET Bulletin 65, Edition 97-01*, prepared by the FCC Office of Engineering and technology. A conservative vertical plane relative field factor of 0.088, obtained from the manufacturer's theoretical vertical plane radiation pattern for the existing Dielectric Communications, type TFU-30DSC-R O4, transmitting antenna used by WSB-DT, was used in the calculation of power density. The WSB-DT proposed maximum average ERP of 1,000 kW, and, to account for ground reflections, a coefficient of 1.6 were used in

the computations. The WSB-DT power density calculations reported herein were made at 620 MHz, the lower edge of the channel 39.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.41 milliwatt per square centimeter (mW/cm²) at 620 MHz. The FCC MPE limit for occupational/controlled exposure is 2.1 mW/cm² at 620 MHz. At a reference point two meters AGL at the base of the WSB-DT supporting structure, the calculated WSB-DT power density is 0.0032 mW/cm², which is 0.78 percent of the FCC MPE limit for general population/uncontrolled exposure and 0.15 percent of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of *OET Bulletin 65, edition 97-01*, at multiple-user sites, only those licensees whose transmitters produce power density levels in excess of 5.0 percent of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RFR environment into compliance with FCC exposure limits. Since the proposed WSB-DT operation will contribute less than 5.0 percent of the most restrictive permissible exposure at any location on the ground at the multiple-user site,

WSB-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of WSB-DT were not taken into account in this analysis.

While not a “significant contributor” to the exposure levels at any location on the ground, the WSB-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WSB-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, the licensee will take action necessary to prevent the overexposure of workers on the tower, including reducing WSB-DT transmitter power or ceasing WSB-DT operation completely. Additionally, WSB-TV will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

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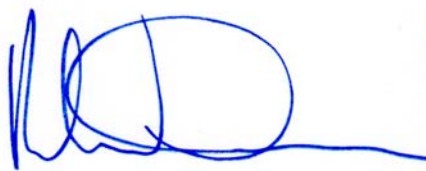
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1. The WSB-DT channel 39 DTV facility utilizes a existing antenna supporting structure located at a multiple use communications site.
2. The provision of Section 1.1306(b)(2) of the FCC Rules pertaining to the use of high-intensity strobe lighting does not apply as an existing supporting structure will be used, and no change in the existing obstruction lighting is proposed.
3. Finally, with regard to RFR exposure concerns, the instant application complies with applicable FCC MPE limits.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on March 3, 2004.


Robert W. Denny, Jr., P.E.

