

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF AN APPLICATION FOR
MODIFICATION OF CONSTRUCTION PERMIT
BPCDT-19991029AHK
WICS-DT SPRINGFIELD, ILLINOIS
TV - CH. 42 – 950 kW – 402.2 M HAAT**

Prepared for: WICS LICENSEE, LLC.

DECEMBER, 2004

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TV - CH. 42 – 950 kW – 402.2 M HAAT**

Prepared for: WICS LICENSEE, LLC.

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

This office has been authorized by WICS Licensee, LLC., permittee of WICS-DT, channel 42, Springfield, Illinois, to prepare this statement, FCC Form 301, Sections III and III-D, and the associated exhibits in support of an Application to Modify WICS-DT's facility as authorized in its outstanding construction permit, FCC file number BPCDT-19991029AHK. This Application complies with the Freeze on the Filing of Certain TV and DTV Requests for Allotment and Service Area Changes, FCC Public Notice DA 04-2446, because the instant proposed modifications would not extend the currently authorized service area of WICS-DT in any azimuthal direction. (See Exhibit 7). Therefore, this application is acceptable for filing.

It is proposed herein that the existing Construction Permit of WICS-DT, that reflects the use of a non-directional transmitting antenna, be modified to authorize the use of an alternative directional transmitting antenna at WICS-DT's currently authorized site, to be side mounted on the authorized support structure underneath the transmitting antenna of the main NTSC-analog facility of WICS(TV). This change is necessary because the currently authorized height of the antenna as reflected in the outstanding Construction Permit is based upon the exact height of the WICS-DT allotment, which replicated the height of the existing antenna of the analog facility of WICS on channel 20. Because the existing WICS(TV) antenna occupies this space on the tower (FCC Antenna Structure Registration Number 1008823, located at 39° 48' 15" NL, 089° 27' 40" WL, (NAD-27)) it is proposed that the new DTV antenna be side-mounted underneath the existing antenna. The directional antenna requested is more appropriate for the purpose of side mounting on the tower structure, as opposed to top mounting.

As a result of the necessary antenna mounting reconfiguration on the new tower, the permittee requests authorization to lower the WICS-DT antenna centerline height above mean sea level 33.8 meters. This will result in a decrease in antenna centerline height above mean sea level from 612.0 meters to 578.2 meters, and a decrease in antenna radiation centerline height above average terrain (HAAT) from 436.0 meters to 402.2 meters. Based upon the lower HAAT and the use of a directional transmitting antenna, maintaining a similar distance to the 41 dBu F(50,90) (Grade B equivalent) contour will require an increase in effective radiated power (ERP) from 725 kW to 950 kW. With the

exception of the specification of an alternate transmitting antenna, the decrease in height and the increase in power, all other characteristics of the authorized WICS-DT technical facility will remain essentially unchanged. Again, these proposed modifications will not extend the currently authorized service area of WICS-DT in any azimuthal direction, but will match the service area as closely as possible. (See Exhibit 7).

PROPOSED DIRECTIONAL ANTENNA

The permittee of WICS-DT requests authorization herein to utilize a directional transmitting antenna, a Dielectric model TFU-24DSB-I(C), in a side-mounted configuration on the tower steel underneath the transmitting antenna for the analog facilities of WICS(TV). The antenna stack will be located on the existing tower at 39° 48' 15" NL, 089° 27' 40" WL, (NAD-27), antenna Structure Registration Number 1008823. A vertical plan antenna sketch, detailing the position of the antenna on the tower is attached as 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 proposed antenna's radiation characteristics above and below the horizontal plane, is shown in Exhibits 4A and 4B, and tabulated in Exhibit 5.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625 of the Rules, utilizing the appropriate F(50,90) propagation

curves (47 CFR Section 73.699, Figure 9), 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 16 kilometers from the site, the antenna site elevation and coordinates were determined from the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. Exhibit 6 shows that the predicted 48 dBu F(50,90) principal community contour completely encompasses the principal community of license as required by Section 73.625(1) of the Commission's Rules. The predicted 41 dBu (Grade B equivalent) contour is also shown in Exhibit 6.

ALLOCATION CONSIDERATIONS

Full Service Television Considerations

An interference study was performed, using the Commission's application analysis program, "TV-Process," to ensure that the proposed WICS-DT facility is in compliance with the Commission's *de minimis* interference requirements in regard to full service NTSC and DTV stations. TV-Process indicated no unacceptable interference to the authorized or requested facility of any full service NTSC or DTV station.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, as established in the Report and Order establishing Class A Television Service, released April 4, 2000, a study of interference contour overlap was performed, based on the WICS-DT facility proposed

herein, to establish compliance with the protection requirements contained therein. Results of the contour overlap study indicate that the instant proposal will result in no increase in prohibited contour overlap of LPTV stations which have obtained Class A status.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and/or non-broadcast facilities are located within 10 km of the proposed WICS-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

The Commission's guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions were adopted October 15, 1997. 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 WICS-DT channel 42 must be considered, along with the predicted emissions from any other authorized stations at its authorized site.

The proposed WICS-DT facility on channel 42 (641 MHz) will operate with a maximum ERP of 950 kW from a horizontally polarized directional transmitting antenna with a centerline height of 398.4 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WICS-DT facility produces a

predicted power density at two meters above ground level of 0.01817 mW/cm^2 , which is 4.25% of the FCC guideline value for "uncontrolled" environments, and 0.850% of the FCC guideline value for "controlled" environments.

As shown in Appendix A, the total predicted percentage of the MPE value at the new tower site, considering the cumulative predicted radiation of all of the stations which are located at the site, is only 7.870% of the limit for "uncontrolled" environments, and 1.574% of the limit for "controlled" environments. The site is therefore in compliance with the FCC's Maximum Permitted Exposure guidelines.

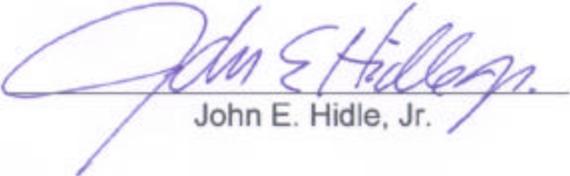
OCCUPATIONAL SAFETY

The licensee of WICS-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WICS-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 WICS-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.

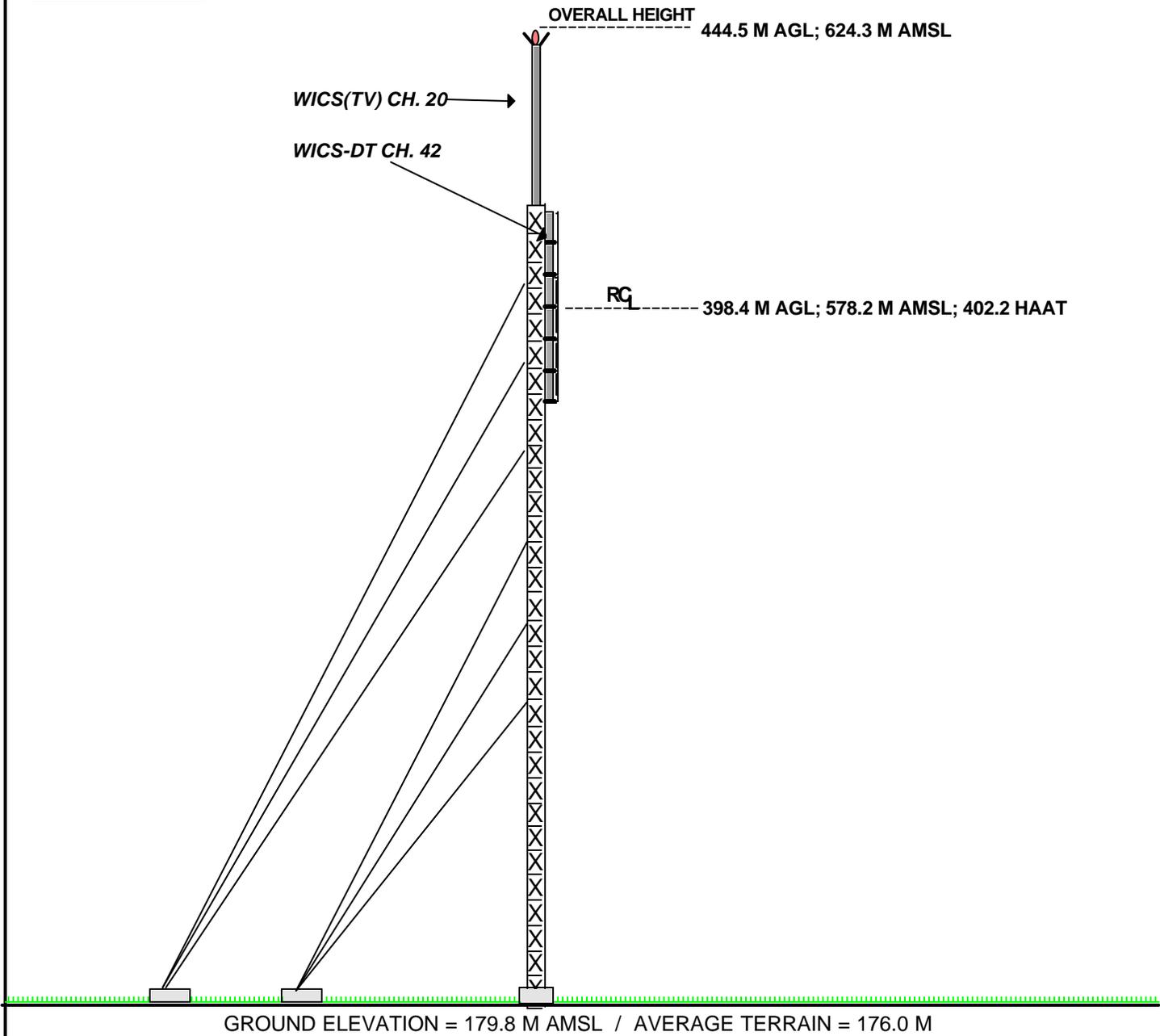
Dated: December 8, 2004



John E. Hidle, Jr.

39° 48' 27" NL
089° 27' 40" WL

EXHIBIT 1



GROUND ELEVATION = 179.8 M AMSL / AVERAGE TERRAIN = 176.0 M

VERTICAL PLAN ANTENNA SKETCH
WICS-DT, SPRINGFIELD, ILLINOIS
CH. 42, 950 kW - 402.2 m HAAT
DECEMBER, 2004

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE

Azimuth Pattern

Gain **1.8**
Calculated / measured **Calculated**

(2.55dB)

Frequency **641 MHz**
Drawing# **DSB-I**

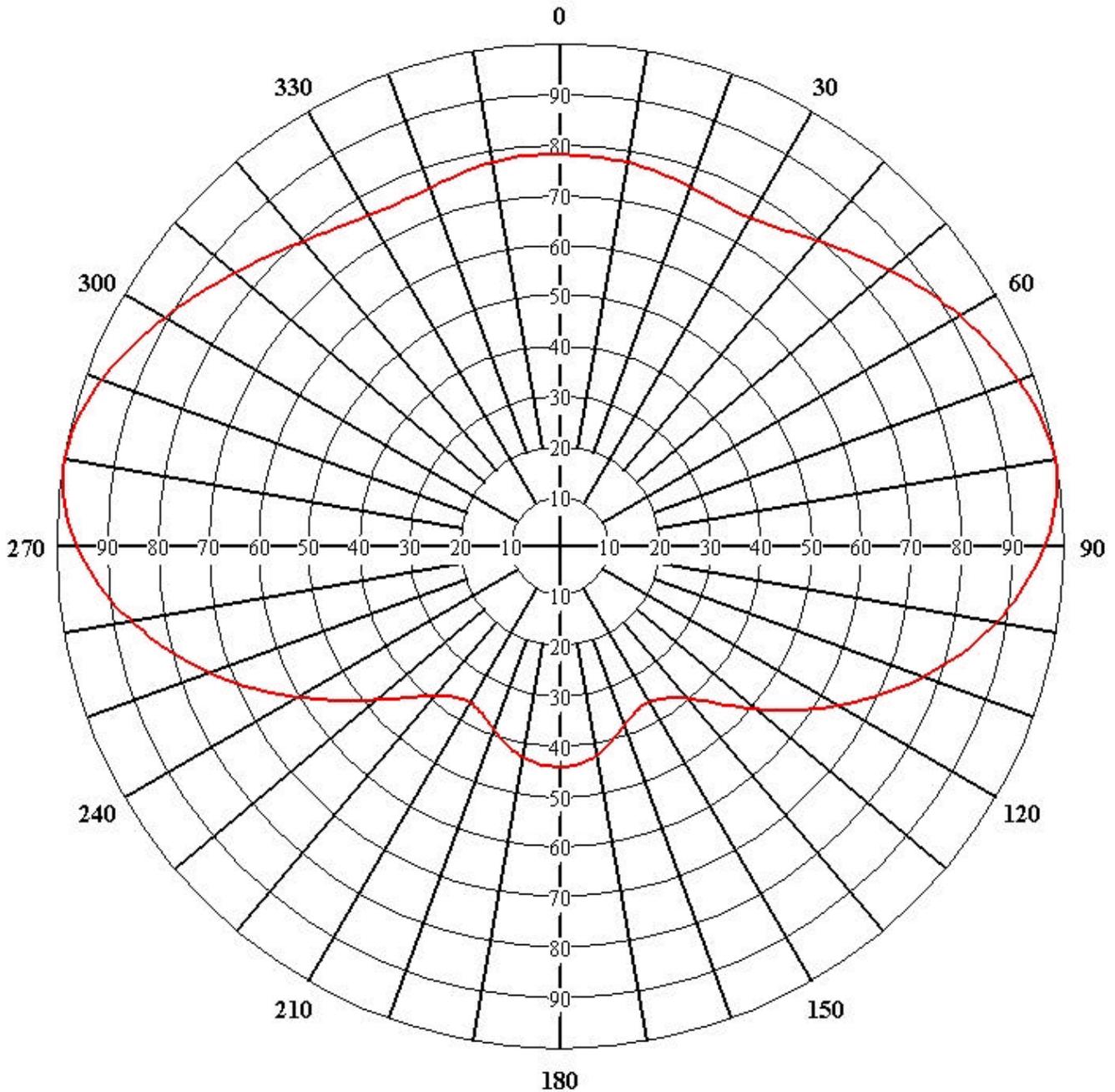




Exhibit Number
Date
Call Letters
Channel
Location
Antenna Type

THREE
December, 2004
WICS
DT42
Springfield, IL
TFU-24DSB-I (C)

TABULATION OF AZIMUTH PATTERN

Angle	Field														
0	0.781	45	0.823	90	0.964	135	0.446	180	0.441	225	0.429	270	0.961	315	0.819
1	0.780	46	0.830	91	0.957	136	0.435	181	0.441	226	0.438	271	0.968	316	0.814
2	0.780	47	0.836	92	0.950	137	0.425	182	0.441	227	0.447	272	0.974	317	0.809
3	0.779	48	0.842	93	0.943	138	0.415	183	0.440	228	0.457	273	0.980	318	0.804
4	0.779	49	0.848	94	0.935	139	0.406	184	0.440	229	0.468	274	0.985	319	0.799
5	0.779	50	0.855	95	0.927	140	0.399	185	0.439	230	0.479	275	0.989	320	0.795
6	0.778	51	0.862	96	0.918	141	0.392	186	0.438	231	0.490	276	0.993	321	0.791
7	0.778	52	0.868	97	0.910	142	0.386	187	0.436	232	0.502	277	0.995	322	0.786
8	0.777	53	0.875	98	0.900	143	0.380	188	0.434	233	0.514	278	0.998	323	0.783
9	0.776	54	0.881	99	0.891	144	0.376	189	0.432	234	0.526	279	0.999	324	0.779
10	0.776	55	0.888	100	0.881	145	0.372	190	0.429	235	0.539	280	1.000	325	0.776
11	0.775	56	0.894	101	0.871	146	0.368	191	0.426	236	0.552	281	1.000	326	0.772
12	0.774	57	0.901	102	0.861	147	0.365	192	0.423	237	0.565	282	0.999	327	0.770
13	0.773	58	0.907	103	0.850	148	0.362	193	0.420	238	0.578	283	0.998	328	0.767
14	0.771	59	0.913	104	0.839	149	0.360	194	0.416	239	0.592	284	0.995	329	0.765
15	0.770	60	0.919	105	0.828	150	0.359	195	0.411	240	0.605	285	0.993	330	0.763
16	0.768	61	0.925	106	0.817	151	0.358	196	0.407	241	0.619	286	0.989	331	0.761
17	0.766	62	0.930	107	0.805	152	0.358	197	0.403	242	0.633	287	0.985	332	0.759
18	0.765	63	0.936	108	0.793	153	0.359	198	0.398	243	0.647	288	0.981	333	0.758
19	0.763	64	0.941	109	0.781	154	0.361	199	0.394	244	0.661	289	0.976	334	0.758
20	0.761	65	0.946	110	0.768	155	0.363	200	0.389	245	0.675	290	0.971	335	0.757
21	0.759	66	0.951	111	0.755	156	0.366	201	0.385	246	0.688	291	0.966	336	0.757
22	0.758	67	0.956	112	0.743	157	0.369	202	0.381	247	0.702	292	0.960	337	0.758
23	0.756	68	0.961	113	0.730	158	0.373	203	0.377	248	0.716	293	0.954	338	0.758
24	0.755	69	0.966	114	0.717	159	0.376	204	0.373	249	0.729	294	0.948	339	0.759
25	0.754	70	0.970	115	0.704	160	0.381	205	0.370	250	0.743	295	0.942	340	0.761
26	0.754	71	0.975	116	0.691	161	0.385	206	0.367	251	0.756	296	0.936	341	0.762
27	0.754	72	0.979	117	0.677	162	0.390	207	0.365	252	0.769	297	0.929	342	0.764
28	0.754	73	0.984	118	0.664	163	0.394	208	0.363	253	0.783	298	0.923	343	0.766
29	0.755	74	0.988	119	0.651	164	0.399	209	0.362	254	0.795	299	0.917	344	0.767
30	0.756	75	0.991	120	0.638	165	0.403	210	0.362	255	0.808	300	0.910	345	0.769
31	0.758	76	0.994	121	0.625	166	0.408	211	0.362	256	0.821	301	0.904	346	0.771
32	0.760	77	0.997	122	0.612	167	0.412	212	0.362	257	0.833	302	0.897	347	0.773
33	0.763	78	0.998	123	0.599	168	0.417	213	0.364	258	0.845	303	0.891	348	0.775
34	0.766	79	1.000	124	0.585	169	0.420	214	0.366	259	0.856	304	0.885	349	0.776
35	0.770	80	1.000	125	0.572	170	0.424	215	0.368	260	0.868	305	0.878	350	0.778
36	0.775	81	0.999	126	0.559	171	0.428	216	0.372	261	0.879	306	0.872	351	0.779
37	0.779	82	0.998	127	0.546	172	0.431	217	0.376	262	0.890	307	0.866	352	0.780
38	0.784	83	0.996	128	0.533	173	0.433	218	0.380	263	0.900	308	0.859	353	0.781
39	0.789	84	0.993	129	0.520	174	0.436	219	0.386	264	0.910	309	0.853	354	0.781
40	0.795	85	0.990	130	0.508	175	0.437	220	0.391	265	0.920	310	0.847	355	0.781
41	0.800	86	0.986	131	0.495	176	0.439	221	0.398	266	0.929	311	0.841	356	0.781
42	0.806	87	0.981	132	0.482	177	0.440	222	0.405	267	0.938	312	0.836	357	0.781
43	0.812	88	0.976	133	0.470	178	0.440	223	0.412	268	0.946	313	0.830	358	0.781
44	0.817	89	0.970	134	0.458	179	0.441	224	0.420	269	0.954	314	0.825	359	0.781

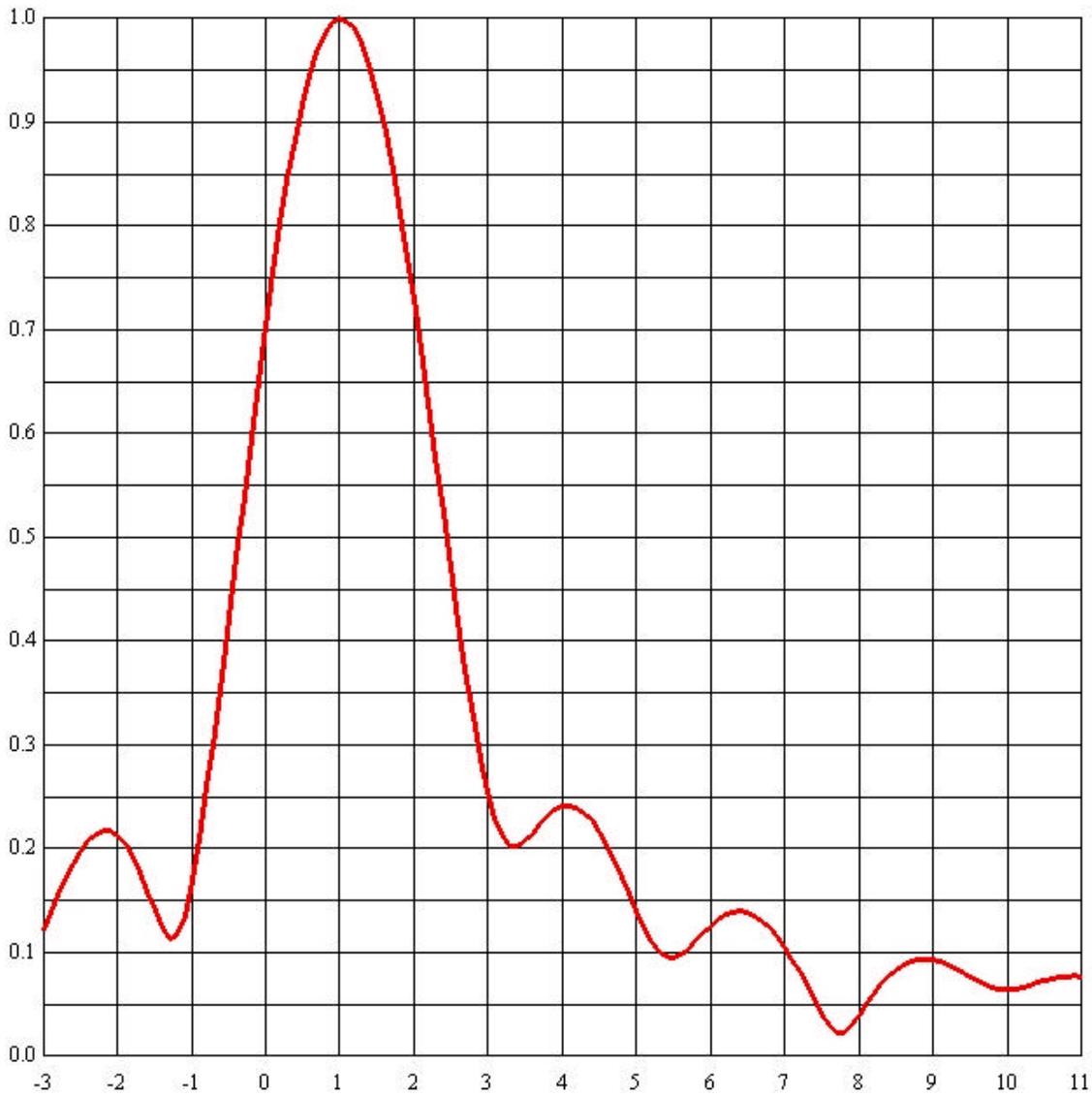


Exhibit Number
Date
Call Letters
Channel
Location
Antenna Type

FOUR - A
December, 2004
WICS
DT42
Springfield, IL
TFU-24DSB-I (C)

Elevation Pattern

RMS Gain at Main Lobe	24.0	13.80 dB	Beam Tilt	1 degrees
RMS Gain at Horizontal	11.8	10.72 dB	Frequency	641 MHz
Calculated / Measured	Calculated		Drawing#	24B240100-90



Degrees below horizontal.

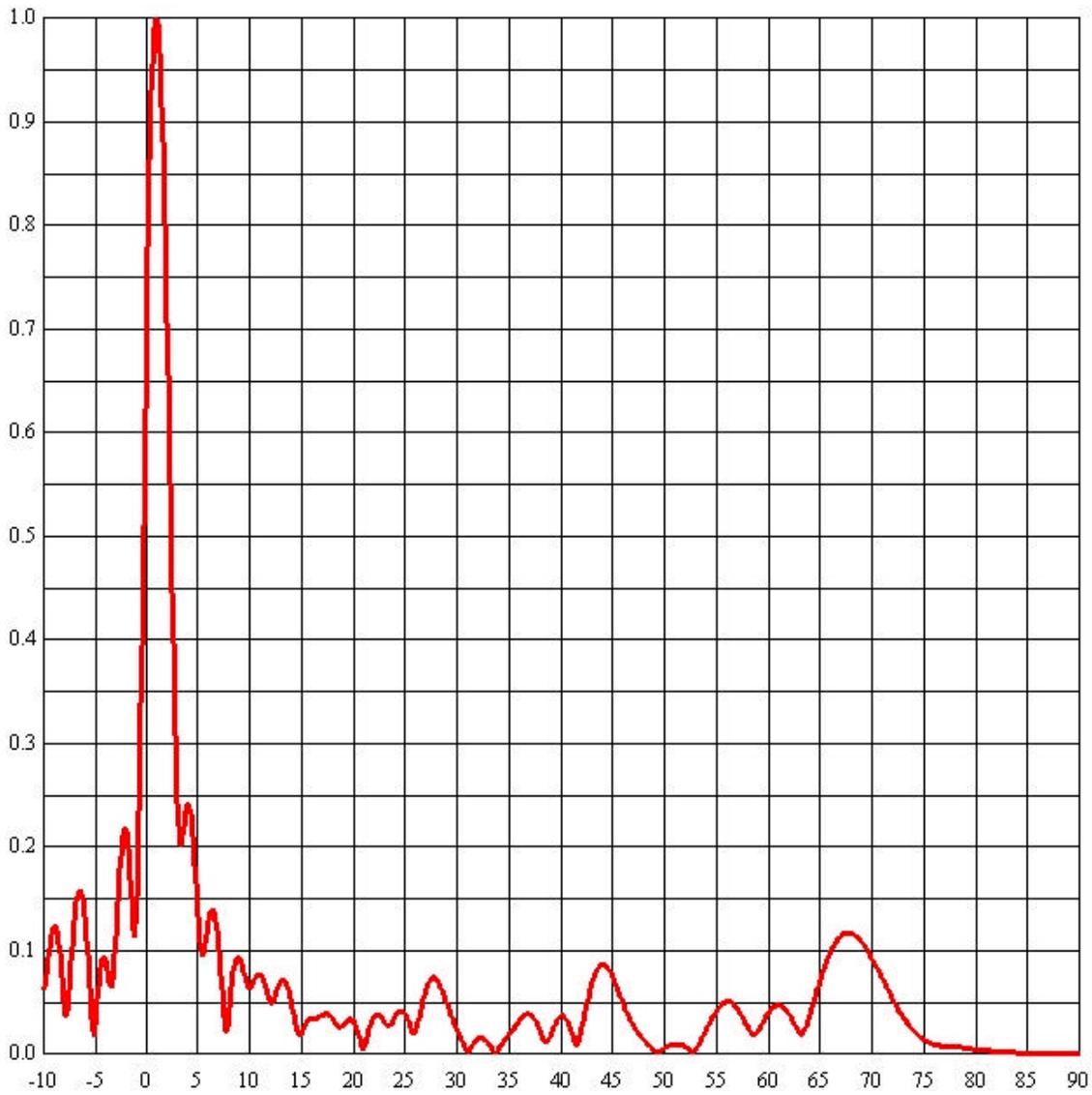


Exhibit Number
Date
Call Letters
Channel
Location
Antenna Type

FOUR - B
December, 2004
WICS
DT42
Springfield, IL
TFU-24DSB-I (C)

Elevation Pattern

RMS Gain at Main Lobe	24.0	13.80 dB	Beam Tilt	1 degrees
RMS Gain at Horizontal	11.8	10.72 dB	Frequency	641 MHz
Calculated / Measured	Calculated		Drawing#	24B240100-90



Degrees below horizontal.

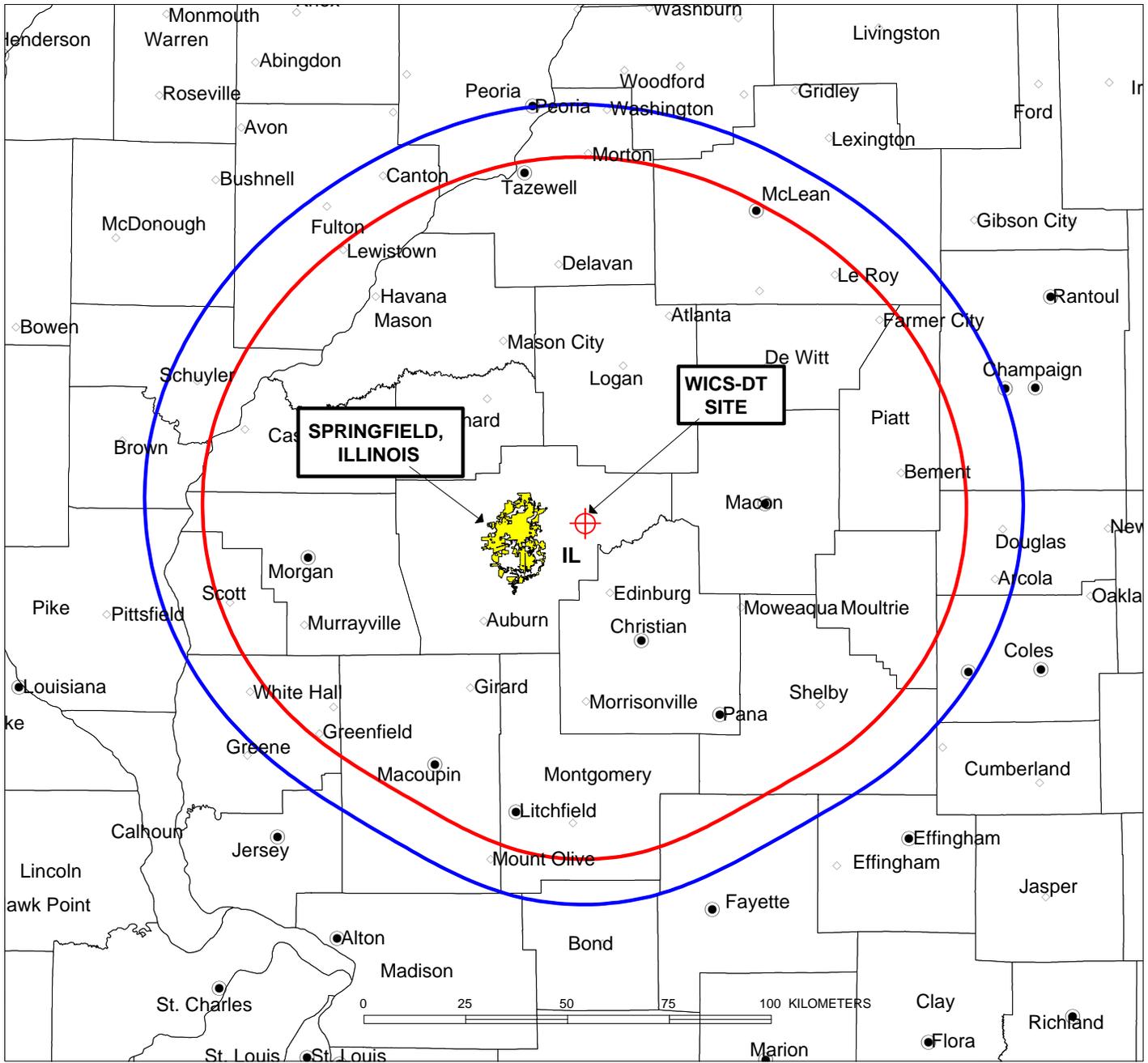


Exhibit Number
Date
Call Letters
Channel
Location
Antenna Type

FIVE
December, 2004
WICS
DT42
Springfield, IL
TFU-24DSB-I (C)

TABULATION OF ELEVATION PATTERN

Angle	Field										
-10.0	0.063	2.4	0.524	10.6	0.075	30.5	0.012	51.0	0.010	71.5	0.063
-9.5	0.099	2.6	0.420	10.8	0.077	31.0	0.002	51.5	0.010	72.0	0.053
-9.0	0.123	2.8	0.327	11.0	0.077	31.5	0.009	52.0	0.008	72.5	0.044
-8.5	0.101	3.0	0.254	11.5	0.066	32.0	0.015	52.5	0.004	73.0	0.036
-8.0	0.045	3.2	0.211	12.0	0.051	32.5	0.016	53.0	0.004	73.5	0.029
-7.5	0.069	3.4	0.203	12.5	0.057	33.0	0.011	53.5	0.013	74.0	0.023
-7.0	0.134	3.6	0.215	13.0	0.070	33.5	0.003	54.0	0.023	74.5	0.018
-6.5	0.158	3.8	0.231	13.5	0.069	34.0	0.005	54.5	0.033	75.0	0.014
-6.0	0.127	4.0	0.241	14.0	0.051	34.5	0.013	55.0	0.042	75.5	0.011
-5.5	0.056	4.2	0.240	14.5	0.026	35.0	0.019	55.5	0.048	76.0	0.010
-5.0	0.035	4.4	0.227	15.0	0.020	35.5	0.025	56.0	0.051	76.5	0.009
-4.5	0.087	4.6	0.203	15.5	0.031	36.0	0.032	56.5	0.050	77.0	0.008
-4.0	0.088	4.8	0.173	16.0	0.035	36.5	0.038	57.0	0.045	77.5	0.008
-3.5	0.065	5.0	0.141	16.5	0.035	37.0	0.038	57.5	0.036	78.0	0.007
-3.0	0.122	5.2	0.112	17.0	0.037	37.5	0.033	58.0	0.027	78.5	0.007
-2.8	0.156	5.4	0.096	17.5	0.039	38.0	0.023	58.5	0.020	79.0	0.006
-2.6	0.186	5.6	0.098	18.0	0.034	38.5	0.012	59.0	0.022	79.5	0.006
-2.4	0.208	5.8	0.111	18.5	0.027	39.0	0.018	59.5	0.031	80.0	0.005
-2.2	0.217	6.0	0.126	19.0	0.028	39.5	0.030	60.0	0.040	80.5	0.005
-2.0	0.212	6.2	0.137	19.5	0.033	40.0	0.037	60.5	0.046	81.0	0.004
-1.8	0.192	6.4	0.140	20.0	0.032	40.5	0.034	61.0	0.048	81.5	0.003
-1.6	0.159	6.6	0.136	20.5	0.019	41.0	0.023	61.5	0.045	82.0	0.003
-1.4	0.124	6.8	0.124	21.0	0.004	41.5	0.009	62.0	0.039	82.5	0.002
-1.2	0.117	7.0	0.105	21.5	0.022	42.0	0.025	62.5	0.029	83.0	0.002
-1.0	0.169	7.2	0.081	22.0	0.035	42.5	0.048	63.0	0.021	83.5	0.002
-0.8	0.259	7.4	0.055	22.5	0.037	43.0	0.068	63.5	0.024	84.0	0.001
-0.6	0.366	7.6	0.030	23.0	0.031	43.5	0.082	64.0	0.037	84.5	0.001
-0.4	0.481	7.8	0.022	23.5	0.028	44.0	0.087	64.5	0.054	85.0	0.001
-0.2	0.595	8.0	0.040	24.0	0.036	44.5	0.084	65.0	0.070	85.5	0.001
0.0	0.704	8.2	0.060	24.5	0.042	45.0	0.075	65.5	0.086	86.0	0.001
0.2	0.802	8.4	0.077	25.0	0.039	45.5	0.062	66.0	0.098	86.5	0.000
0.4	0.884	8.6	0.088	25.5	0.026	46.0	0.049	66.5	0.108	87.0	0.000
0.6	0.946	8.8	0.093	26.0	0.023	46.5	0.037	67.0	0.114	87.5	0.000
0.8	0.985	9.0	0.093	26.5	0.042	47.0	0.027	67.5	0.117	88.0	0.000
1.0	1.000	9.2	0.088	27.0	0.062	47.5	0.020	68.0	0.117	88.5	0.000
1.2	0.990	9.4	0.081	27.5	0.073	48.0	0.014	68.5	0.114	89.0	0.000
1.4	0.956	9.6	0.073	28.0	0.072	48.5	0.009	69.0	0.108	89.5	0.000
1.6	0.899	9.8	0.067	28.5	0.063	49.0	0.004	69.5	0.101	90.0	0.000
1.8	0.823	10.0	0.065	29.0	0.049	49.5	0.003	70.0	0.092		
2.0	0.731	10.2	0.066	29.5	0.036	50.0	0.006	70.5	0.083		
2.2	0.630	10.4	0.071	30.0	0.023	50.5	0.009	71.0	0.073		

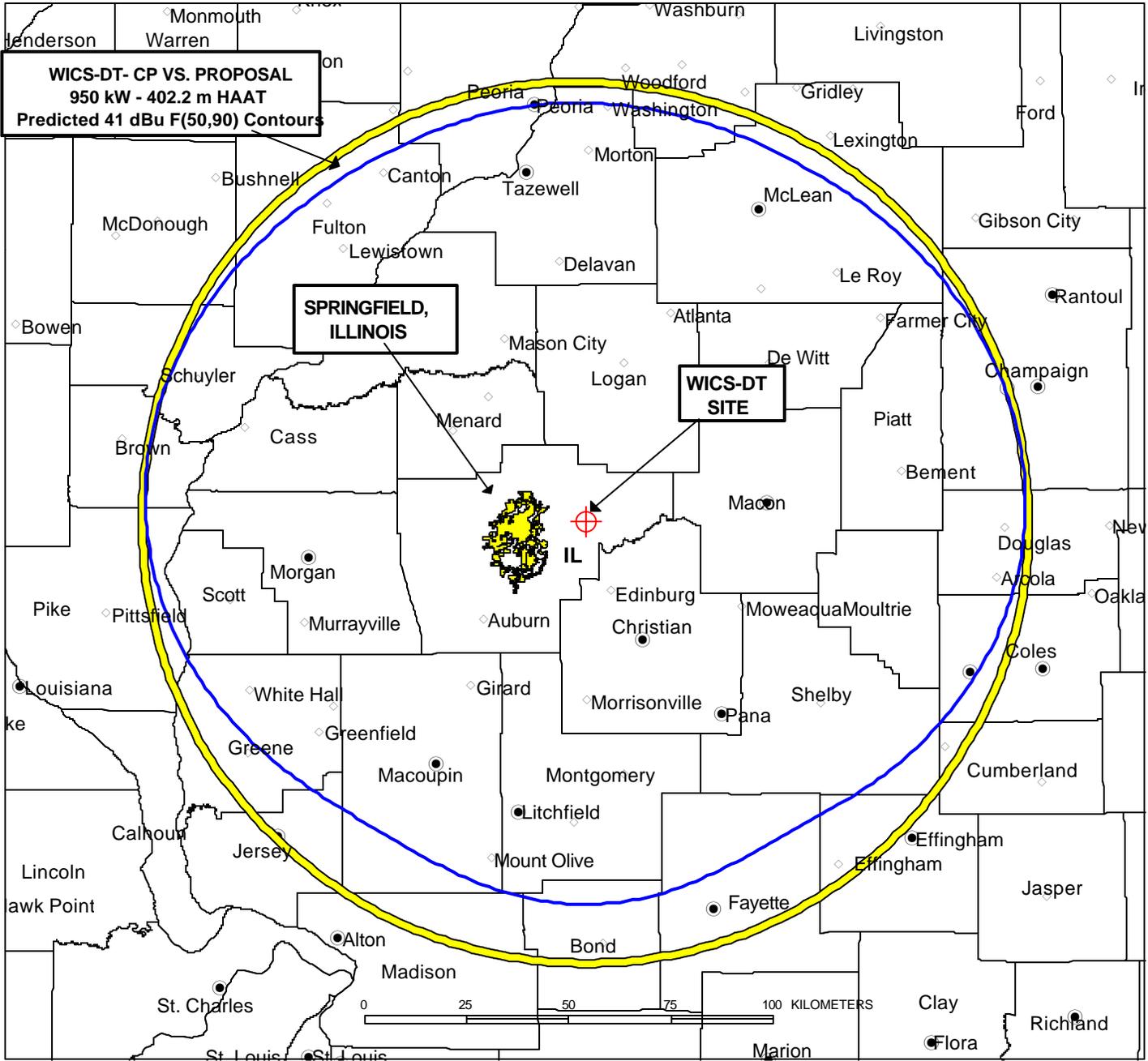


PROPOSED COVERAGE CONTOURS

WICS-DT, SPRINGFIELD, ILLINOIS
950 kW ERP; 402.2 m HAAT; DIRECTIONAL
DECEMBER, 2004

 Predicted "Grade B Equivalent" Contour
F(50,90) - 41 dBu

 Predicted "City Grade Equivalent" Contour
F(50,90) - 48 dBu



COMPARISON OF COVERAGE CONTOURS

WICS-DT, SPRINGFIELD, ILLINOIS
950 kW ERP; 402.2 m HAAT; DIRECTIONAL
DECEMBER, 2004

- **Proposed Facility**
 950 kW ERP; 402.2 m HAAT; Directional
 Predicted "Grade B Equivalent" Contour
 F(50,90) - 41 dBu
- **Authorized Construction Permit Facility**
 725 kW ERP; 436 m HAAT; Non-directional
 Predicted "Grade B Equivalent" Contour
 F(50,90) - 41 dBu

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WICS-DT, SPRINGFIELD, ILLINOIS
CHANNEL 42, 950 kW ERP, 402.2 m HAAT
DECEMBER, 2004

<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>
WICS-DT	DT	42	641	H	396.4	950.000	0.300	0.01817	0.427	4.25%
WICS(TV)	TV	20	509	H	430.2	1510.000	0.300	0.01227	0.339	3.61%
TOTAL PERCENTAGE OF ANSI VALUE=										7.87%

*** 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.*