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FCC FORM 301, EXHIBIT 44
ENVIRONMENTAL ANALYSIS
APPLICATION FOR CONSTRUCTION PERMIT
NEWSCHANNEL 5 NETWORK, L.P.
STATION WTVF-DT
NASHVILLE, TENNESSEE
CH 56 1,000 KW (MAX- BT) 406 METERS

This environmental analysis was prepared on behalf NewsChannel 5 Network, L.P. (hereinafter NewsChannel), licensee of station WTVF-DT, Nashville, Tennessee, in support of an FCC Form 301 application for construction permit to increase effective radiated power (ERP) of a licensed digital television (DTV) facility.

WTVF-DT is licensed (FCC File Number BLCDDT-20011113ADM) for DTV operation on channel 56 (722 to 728 megahertz (MHz)) with 405 kilowatts (kW) average ERP, horizontally polarized, 405 meters antenna radiation center height above average terrain (HAAT), from a site located at geographic coordinates 36° 16' 05" North Latitude, 86° 47' 16" West Longitude, referenced to the 1927 North American Datum. The WTVF-DT antenna radiation center is 325 meters above ground level (AGL).

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The instant application proposes to increase the WTVF-DT average ERP from 405 kW to 1,000 kW and to increase the WTVF-DT antenna radiation center HAAT from 405 meters to 406 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 WTVF-DT facilities are proposed.

Public access to the communications site in which the WTVF-DT antenna and supporting structure are located is limited by a locking gate across the road leading to the site. Public access to the existing WTVF-DT antenna and supporting structure is restricted further by a gated and locked, two-meter chain link fence, topped with barbed wire, which encircles the WTVF-DT supporting structure and transmitter building.

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 0.034, obtained from the manufacturer's theoretical vertical plane radiation pattern for the existing WTVF-DT Andrew Corporation, type ATW28HS4-HSO-56S, transmitting antenna was used in the calculation of the WTVF-DT power density. The WTVF-DT average ERP of 1,000 kW was used in

the calculation of the WTVF-DT power density. To account for ground reflections, a coefficient of 1.6 was included in the calculation. The WTVF-DT power density calculations reported herein were made at 722 MHz, the lower edge of the WTVF-DT channel.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.48 milliwatt per square centimeter (mW/cm²) at 722 MHz. The FCC MPE limit for occupational/controlled exposure is 2.41 mW/cm² at 722 MHz. At a reference point two meters AGL at the base of the WTVF-DT supporting structure, the calculated WTVF-DT power density is 0.00037 mW/cm², which is 0.08 percent of the FCC MPE limit for general population/uncontrolled exposure, and 0.02 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 WTVF-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, WTVF-DT is not considered to be a “significant contributor” to the local RF exposure environment and contributions from other sources in the vicinity of WTVF-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 WTVF-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WTVF-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, NewsChannel will take action necessary to prevent the overexposure of workers on the tower, including reducing WTVF-DT transmitter power or ceasing WTVF-DT operation completely. Additionally, NewsChannel 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:

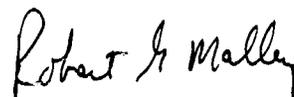
1. The WTVF-DT channel 56 DTV facility utilizes an existing antenna supporting structure located at a multiple use communications site.

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, compliance with applicable FCC MPE limits would be achieved.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on October 28, 2004.



Robert G. Mallery