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**FCC FORM 301, EXHIBIT 43**  
**ENVIRONMENTAL ASSESSMENT**  
**APPLICATION FOR MODIFICATION OF**  
**DTV STATION CONSTRUCTION PERMIT**  
**(FCC FILE NUMBER BPCDT-19991029ABP)**  
**PREPARED FOR**  
**WTOV HOLDINGS, INC.**  
**STATION WTOV-DT**  
**STEUBENVILLE, OHIO**  
**CH 57      1,000 KW (MAX-BT)      284 METERS**

This engineering exhibit was prepared on behalf of WTOV Holdings, Inc. (hereinafter WTOV), permittee of station WTOV-DT, Steubenville, Ohio, in support of an application for modification of construction permit (FCC File Number BPCDT-19991029ABP). The instant application proposes operation on channel 57 (728 to 734 megahertz (MHz)), with 1,000 kilowatts (kW) maximum average effective radiated power (ERP), horizontally polarized, 284 meters antenna radiation center height above average terrain (HAAT), from a site located at geographic coordinates 40° 20' 33" North Latitude, 80° 37' 14" West Longitude, referenced to 1927 North American Datum. The proposed WTOV-DT antenna radiation center is 266 meters above ground level (AGL).

Public access to the communications site in which the WTOV-DT antenna and supporting structure are located is limited by a gate across the road leading to the site. Public access to the WTOV-DT antenna and supporting structure is restricted further by a three-meter chain link fence, topped with barbed wire, which encircles the WTOV-DT supporting structure. There is no casual or inadvertent access to the WTOV-DT transmitter site by the general public.

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 0.11, obtained from the manufacturer's theoretical vertical plane radiation pattern for the WTOV-DT Dielectric Communications, type TFU-26DSC-R 04, transmitting antenna, was used in the calculation of the WTOV-DT power density. The WTOV-DT maximum average ERP of 1,000 kW was used in the calculation of the WTOV-DT power density. To account for ground reflections, a coefficient of 1.6 was included in the calculation. The WTOV-DT power density calculations reported herein were made at 728 MHz, the lower edge of the WTOV-DT channel.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.49 milliwatt per square centimeter (mW/cm<sup>2</sup>) at 728 MHz. The FCC MPE limit for occupational/controlled exposure is 2.43 mW/cm<sup>2</sup> at 728 MHz. At a reference point two meters AGL at the base of the WTOV-DT supporting structure, the calculated WTOV-DT power density is 0.0058 mW/cm<sup>2</sup>, which is 1.18 percent of the FCC MPE limit for general population/uncontrolled exposure, and 0.24 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 WTOV-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, WTOV-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of WTOV-DT were not taken into account in this analysis.

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While not a “significant contributor” to the exposure levels at any location on the ground, the WTOV-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WTOV-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, WTOV will take action necessary to prevent the overexposure of workers on the tower, including reducing WTOV-DT transmitter power or ceasing WTOV-DT operation completely. Additionally, WTOV 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 WTOV-DT channel 57 DTV facility utilizes a proposed supporting structure that will replace the existing WTOV-TV supporting structure at the same location. The proposed supporting structure is not in or near any location referenced in Section 1.1306(b)(1) of the FCC Rules as being of environmental interest.

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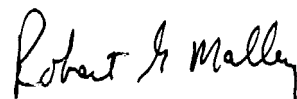
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2. The provision of Section 1.1306(b)(2) of the FCC Rules relating to the use of high-intensity strobe lighting does not apply since proposed WTOV-DT supporting structure is not located in a residential neighborhood as defined by applicable zoning law.

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 April 3, 2002.



Robert G. Mallery