

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
FOR POST-TRANSITION
“APPENDIX B CHECKLIST” FACILITIES
WTWC-DT – TALLAHASSEE, FLORIDA
DTV - CH. 40, 1000 kW, 600 M HAAT**

Prepared for: WTWC LICENSEE, LLC

MARCH, 2008

TABLE OF CONTENTS

FCC FORM 301 SECTIONS III AND III-D

	<u>PAGE</u>
APPLICATION FOR CONSTRUCTION PERMIT FOR "APPENDIX B CHECKLIST" FACILITIES.....	1
Exhibit 1 - Vertical Plan Antenna Sketch.....	7
Exhibit 2 - Horizontal Plane Antenna Pattern.....	8
Exhibit 3 - Horizontal Plane Antenna Pattern Tabulation.....	9
Exhibit 4 - Vertical Plane Antenna Pattern to 11°.....	10
Exhibit 5 - Vertical Plane Antenna Pattern to 90°.....	11
Exhibit 6 - Vertical Plane Antenna Pattern Tabulation.....	12
Exhibit 7 - Comparison of Coverage Contours & Community Coverage.....	13
Appendix A - Radiofrequency Radiation Study.....	14



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WTWC-DT - TALLAHASSEE, FLORIDA
DTV - CH. 40, 1000 kW, 600 M HAAT**

Prepared for: WTWC 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

WTWC Licensee, LLC, licensee of WTWC(TV), Channel 40, Tallahassee, Florida, and applicant for a Construction Permit for the paired Digital Television Allotment for WTWC-DT, to operate on the current analog Channel 40 after the digital transition, has authorized this office to prepare this statement, FCC Form 301, Sections III and III-D and associated exhibits to be made a part of an Application for Construction Permit for it post-transition DTV Facility, on its current analog channel 40 as reflected in “Appendix B” of the SEVENTH FURTHER NOTICE OF PROPOSED RULEMAKING, adopted October 10, 2006 (MB Docket 87-268).

PROPOSED TECHNICAL FACILITIES

It is proposed herein to implement the post-transition facilities of WTWC-DT on channel 40 utilizing a directional transmitting antenna, a Dielectric Model TFU-24DSB-M (C) utilizing a “cardioid” directional azimuth pattern, a HAAT of 600 meters and an ERP of 1000 kW, top-mounted on the existing antenna support structure, FCC antenna structure registration number 1054890, with the antenna radiation centerline at 601.0 meters above ground level (AGL). A Vertical Plan Antenna Sketch is shown in 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 existing antenna's radiation characteristics above and below the horizontal plane, is shown in Exhibits 4 and 5 and tabulated in Exhibit 6.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625 of the FCC's Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699), 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 13 kilometers from the site, the antenna site elevation and coordinates were determined from those reflected in FCC antenna structure registration number 1054890. As shown in Exhibit 7, the predicted 48 dBu, (F50,90) principal community contour completely encompasses the principal community of license as required

by the Commission's rules. The predicted 41 dBu (F 50,90) "protected coverage contour" is also shown in Exhibit 7. Exhibit 7 also shows that the 41 dBu F(50,90) contour of the instant proposed facility does not exceed that of the Appendix B Facility. This proposal therefore meets the requirements for expedited processing.

ALLOCATION CONSIDERATIONS

The Seventh Report and Order and Eighth Further NPRM (MB Docket 87-268) includes the recently adopted DTV Table of Allotments that identifies the specific technical facilities at which the Commission has proposed to allow DTV stations to operate after the DTV transition. In the sense that the instant proposed technical facility for which authorization is being sought is essentially identical to the technical facility as outlined in the Final DTV Table of Allotments, it is presumed that this request will be treated in similar fashion to a "checklist application" for facilities as reflected in the initial DTV Table.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WTWC-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

Effective October 15, 1997, the FCC adopted guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. 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 WTWC-DT channel 40 must be considered, along with the predicted emissions of other stations that will operate from its site and within 315 km after the digital transition. For WTWC-DT, which will operate on channel 40 (629 MHz), the MPE level for “uncontrolled” environments is $0.419 \text{ mW}/\text{cm}^2$, and for “controlled” environments is $2.095 \text{ mW}/\text{cm}^2$.

The proposed WTWC-DT facility, channel 40, will operate with a maximum ERP of 1000 kW from a horizontally polarized directional transmitting antenna with a centerline height of 601 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WTWC-DT facility produces a predicted power density at two meters above ground level of $0.00838 \text{ mW}/\text{cm}^2$, which is 2.00% of the FCC guideline value for “uncontrolled” environments, and 0.5% of the FCC guideline value for “controlled” environments, making it a minor contributor to radiofrequency radiation at the site, thus excluded from environmental processing under the FCC’s Maximum Permitted Exposure guidelines.

As shown in Appendix A, the total predicted percentage of the MPE value at WTWC’s site, considering the cumulative predicted radiation of all broadcast facilities at the site, is only 2.42% of the limit for “uncontrolled” environments, and 0.484% of the limit for

"controlled" environments. The site is therefore in compliance with the FCC's Maximum Permitted Exposure guidelines.

OCCUPATIONAL SAFETY

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

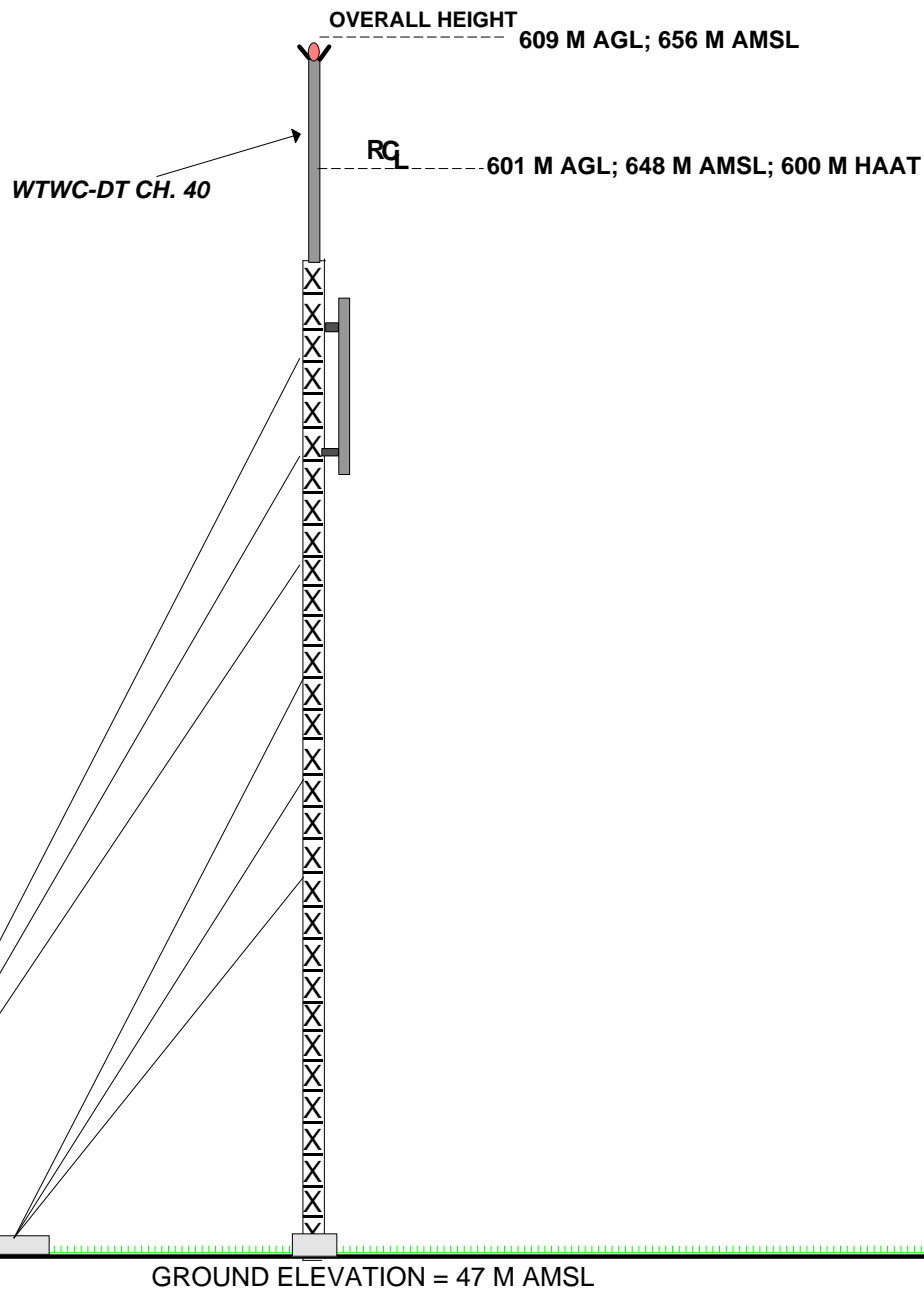
Dated: March 12, 2008



John E. Hidle, Jr.

30° 40' 51" NL
083° 58' 21" WL

EXHIBIT 1



VERTICAL PLAN ANTENNA SKETCH

WTWC-DT, TALLAHASSEE, FLORIDA

CH. 40, 1000 kW - 600 m HAAT

MARCH, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



Exhibit No.

2

Date
Call Letters
Location
Customer
Antenna Type

06 Mar 2008
WTWC-DT Channel 40
Tallahassee, FL
WTWC Licensee, LLC
TFU-24DSB-M (C)

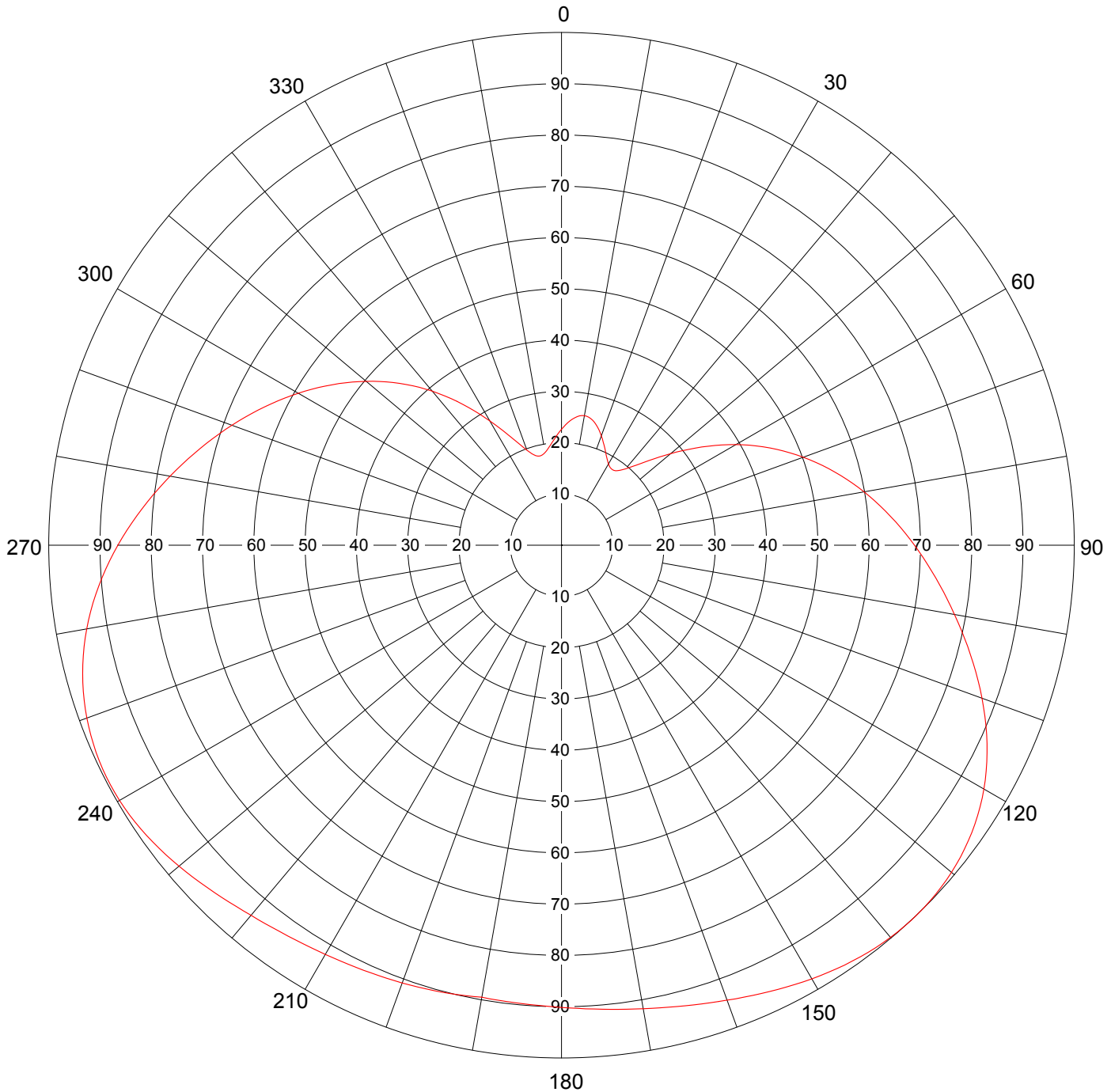
AZIMUTH PATTERN

Gain
Calculated / Measured

1.90 (2.79 dB)
Calculated

Frequency
Drawing #

629 MHz
DSB-M



Remarks:



Date **06 Mar 2008**
Call Letters **WTWC-DT** Channel **40**
Location **Tallahassee, FL**
Customer **WTWC Licensee, LLC**
Antenna Type **TFU-24DSB-M (C)**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **DSB-M**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.226	45	0.229	90	0.688	135	1.000	180	0.901	225	0.958	270	0.865	315	0.446
1	0.231	46	0.238	91	0.697	136	1.000	181	0.900	226	0.961	271	0.857	316	0.436
2	0.235	47	0.248	92	0.706	137	1.000	182	0.899	227	0.964	272	0.848	317	0.425
3	0.240	48	0.257	93	0.715	138	1.000	183	0.899	228	0.967	273	0.839	318	0.414
4	0.244	49	0.267	94	0.724	139	0.999	184	0.898	229	0.971	274	0.830	319	0.403
5	0.247	50	0.278	95	0.733	140	0.998	185	0.897	230	0.974	275	0.821	320	0.392
6	0.250	51	0.289	96	0.742	141	0.997	186	0.897	231	0.977	276	0.812	321	0.381
7	0.253	52	0.300	97	0.751	142	0.996	187	0.896	232	0.980	277	0.803	322	0.370
8	0.255	53	0.311	98	0.760	143	0.994	188	0.896	233	0.983	278	0.794	323	0.358
9	0.256	54	0.322	99	0.769	144	0.992	189	0.896	234	0.985	279	0.784	324	0.347
10	0.257	55	0.334	100	0.778	145	0.990	190	0.895	235	0.988	280	0.775	325	0.335
11	0.256	56	0.346	101	0.788	146	0.987	191	0.897	236	0.990	281	0.766	326	0.324
12	0.255	57	0.357	102	0.797	147	0.985	192	0.898	237	0.992	282	0.757	327	0.313
13	0.253	58	0.369	103	0.807	148	0.982	193	0.900	238	0.993	283	0.748	328	0.302
14	0.251	59	0.381	104	0.816	149	0.979	194	0.901	239	0.994	284	0.739	329	0.291
15	0.248	60	0.393	105	0.826	150	0.976	195	0.902	240	0.995	285	0.730	330	0.280
16	0.245	61	0.404	106	0.835	151	0.973	196	0.904	241	0.996	286	0.720	331	0.270
17	0.241	62	0.415	107	0.845	152	0.970	197	0.905	242	0.996	287	0.711	332	0.260
18	0.236	63	0.427	108	0.854	153	0.967	198	0.906	243	0.996	288	0.702	333	0.250
19	0.232	64	0.438	109	0.863	154	0.964	199	0.907	244	0.996	289	0.693	334	0.241
20	0.227	65	0.449	110	0.873	155	0.960	200	0.908	245	0.995	290	0.684	335	0.232
21	0.222	66	0.460	111	0.882	156	0.957	201	0.910	246	0.993	291	0.675	336	0.224
22	0.217	67	0.470	112	0.890	157	0.954	202	0.911	247	0.992	292	0.666	337	0.216
23	0.212	68	0.481	113	0.899	158	0.951	203	0.912	248	0.990	293	0.657	338	0.209
24	0.207	69	0.491	114	0.907	159	0.947	204	0.913	249	0.988	294	0.648	339	0.203
25	0.202	70	0.502	115	0.916	160	0.944	205	0.914	250	0.985	295	0.639	340	0.197
26	0.198	71	0.512	116	0.923	161	0.941	206	0.916	251	0.982	296	0.630	341	0.192
27	0.194	72	0.522	117	0.931	162	0.938	207	0.917	252	0.979	297	0.620	342	0.188
28	0.190	73	0.532	118	0.938	163	0.935	208	0.918	253	0.975	298	0.611	343	0.184
29	0.186	74	0.542	119	0.945	164	0.933	209	0.920	254	0.971	299	0.602	344	0.182
30	0.183	75	0.552	120	0.951	165	0.930	210	0.921	255	0.967	300	0.593	345	0.180
31	0.181	76	0.561	121	0.957	166	0.927	211	0.923	256	0.962	301	0.583	346	0.179
32	0.179	77	0.571	122	0.963	167	0.925	212	0.925	257	0.957	302	0.574	347	0.179
33	0.178	78	0.580	123	0.968	168	0.922	213	0.926	258	0.952	303	0.565	348	0.180
34	0.178	79	0.590	124	0.972	169	0.920	214	0.928	259	0.946	304	0.555	349	0.182
35	0.178	80	0.599	125	0.977	170	0.918	215	0.930	260	0.940	305	0.546	350	0.184
36	0.180	81	0.608	126	0.981	171	0.916	216	0.932	261	0.934	306	0.536	351	0.187
37	0.182	82	0.617	127	0.984	172	0.914	217	0.935	262	0.927	307	0.527	352	0.190
38	0.185	83	0.626	128	0.987	173	0.912	218	0.937	263	0.920	308	0.517	353	0.194
39	0.189	84	0.635	129	0.990	174	0.910	219	0.940	264	0.913	309	0.507	354	0.198
40	0.194	85	0.644	130	0.993	175	0.908	220	0.942	265	0.906	310	0.497	355	0.202
41	0.200	86	0.653	131	0.995	176	0.907	221	0.945	266	0.898	311	0.487	356	0.207
42	0.206	87	0.662	132	0.996	177	0.905	222	0.948	267	0.890	312	0.477	357	0.211
43	0.214	88	0.671	133	0.998	178	0.904	223	0.951	268	0.882	313	0.467	358	0.216
44	0.221	89	0.680	134	0.999	179	0.903	224	0.954	269	0.874	314	0.457	359	0.221

Remarks:



Exhibit No.

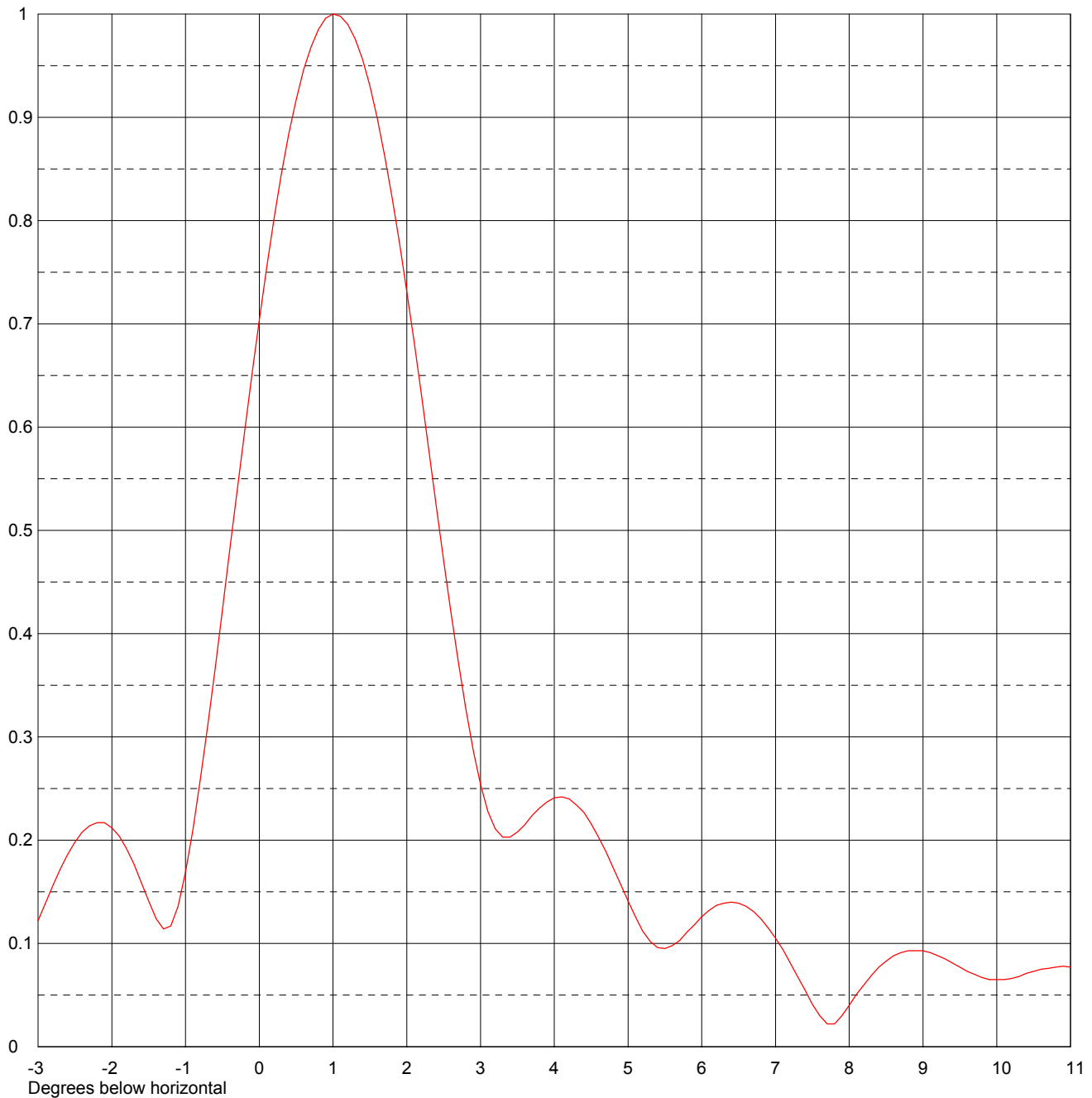
4

Date
Call Letters
Location
Customer
Antenna Type

06 Mar 2008
WTWC-DT Channel 40
Tallahassee, FL
WTWC Licensee, LLC
TFU-24DSB-M (C)

ELEVATION PATTERN

RMS Gain at Main Lobe	24.0 (13.80 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	11.9 (10.76 dB)	Frequency	629.00 MHz
Calculated / Measured	Calculated	Drawing #	24B240100



Remarks:



Date
Call Letters
Location
Customer
Antenna Type

06 Mar 2008
WTWC-DT Channel 40
Tallahassee, FL
WTWC Licensee, LLC
TFU-24DSB-M (C)

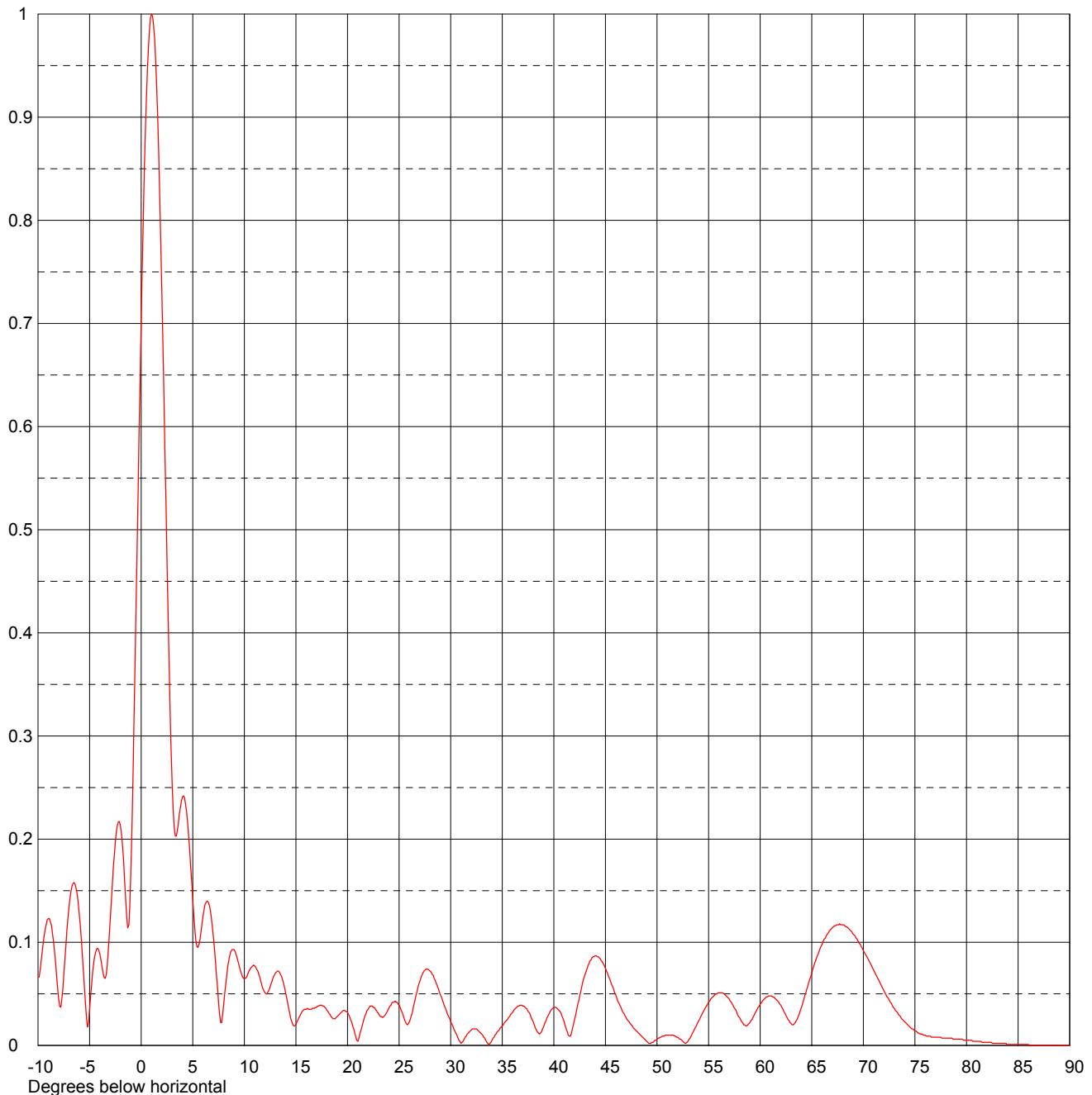
ELEVATION PATTERN

RMS Gain at Main Lobe
RMS Gain at Horizontal
Calculated / Measured

24.0 (13.80 dB)
11.9 (10.76 dB)
Calculated

Beam Tilt
Frequency
Drawing #

1.00 Degrees
629.00 MHz
24B240100-90



Remarks:



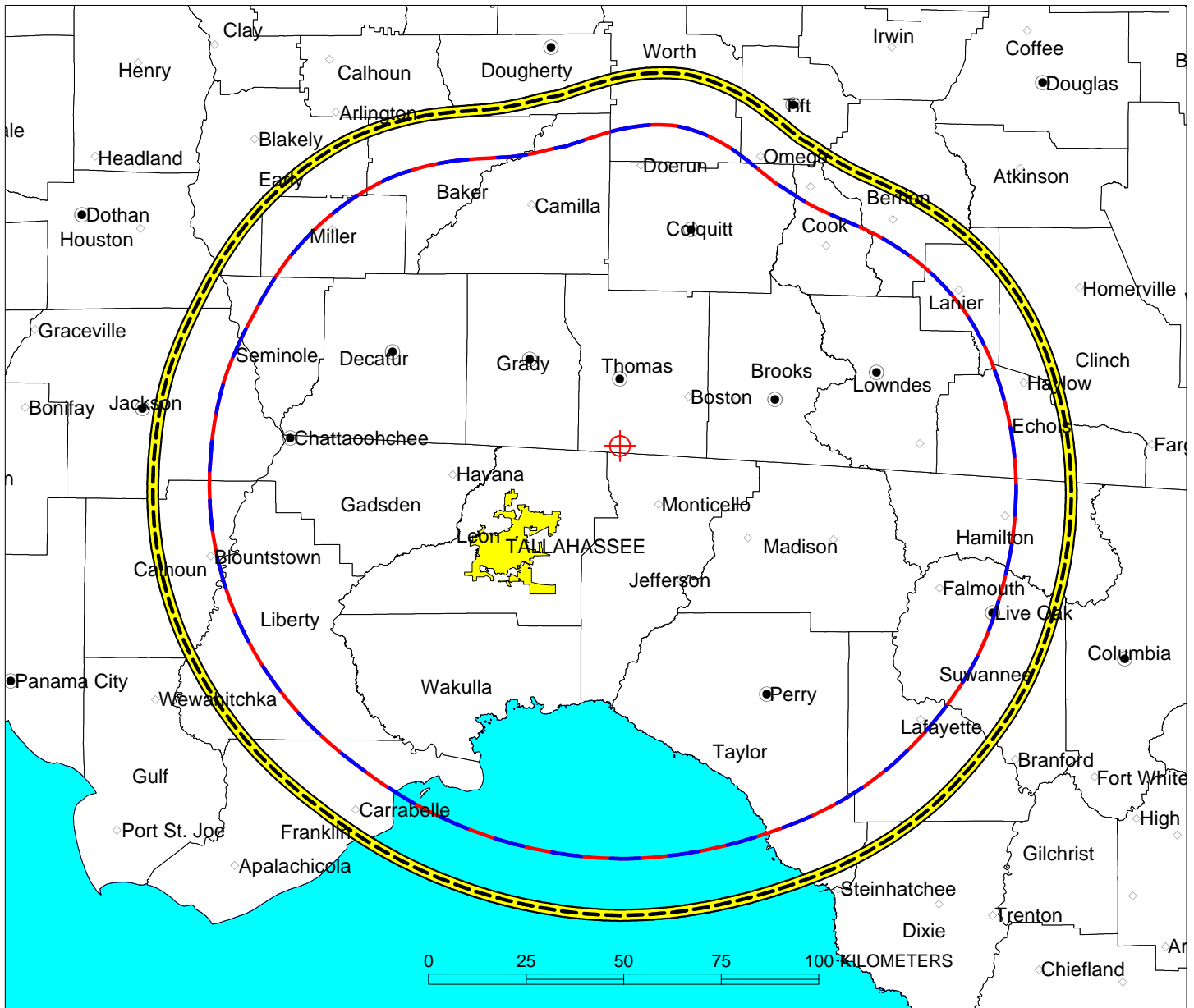
Date **06 Mar 2008**
 Call Letters **WTWC-DT** Channel **40**
 Location **Tallahassee, FL**
 Customer **WTWC Licensee, LLC**
 Antenna Type **TFU-24DSB-M (C)**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **24B240100-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	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		

Remarks:



WTWC-DT Channel 40, DTV Proposed Facility
 Protected Coverage Contour
 1000 kW ERP, 600 m HAAT, 41 dBu, F(50,90)
 Directional Antenna; Dielectric TFU-24DSB-M (C)

WTWC-DT Channel 40, DTV Proposed Facility
 Community Coverage Contour
 1000 kW ERP, 600 m HAAT, 48 dBu, F(50,90)
 Directional Antenna; Dielectric TFU-24DSB-M (C)

WTWC-DT Channel 40, DTV Table Facility
 Protected Coverage Contour
 1000 kW ERP, 600 m HAAT, 41 dBu, F(50,90)
 Directional Antenna; Dielectric TFU-24DSB-M (C)

WTWC-DT Channel 40, DTV Table Facility
 Community Coverage Contour
 1000 kW ERP, 600 m HAAT, 48 dBu, F(50,90)
 Directional Antenna; Dielectric TFU-24DSB-M (C)

PREDICTED COVERAGE CONTOURS

WTWC-DT, TALLAHASSEE, FLORIDA
COMMUNITY COVERAGE CONTOUR
OF DTV TABLE OF ALLOTMENTS FACILITY
VS. PROPOSED CHECKLIST FACILITY
MARCH, 2008

CARL T. JONES
CORPORATION

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WTWC-DT, TALLAHASSEE, FLORIDA
CHANNEL 40, 1000 kW ERP, 600 m HAAT
MARCH, 2008

<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>
WTWC-DT	DT	40	629	H	599	1000.000	0.300	0.00838	0.419	2.00%
WTLH-DT	DT	50	689	H	596	230.000	0.300	0.00195	0.459	0.42%

TOTAL PERCENTAGE OF ANSI VALUE= 2.42%

*** 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.*

****Includes the proposed station and all stations within 315 meters.*