EXHIBITS 6 AND 7
AMENDED DISPLACEMENT APPLICATION FOR LPTV W61AI

W61AI
FCC File No. BLTT-19890620IF
Facility ID. No. 4330

This Amended Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for displacement relief and the grant of a construction permit for W61AI (BLTT-19890620IF, Facility ID. 4330).

Station W61AI is presently licensed to operate on NTSC Channel 61, and, as such, is located on an out of core channel. Accordingly, W61AI files this displacement relief application seeking to move to an in core channel, namely 27.

THE COMMISSION HAS INDICATED CONCERNS REGARDING THIS PROPOSALS EFFECT ON LPTV W27EA, SEBRING, FLORIDA (FILE NO. BLTT-19840117ID). THIS TECHNICAL ANALYSIS HAS BEEN AMENDED TO SHOW THAT ALL INTERFERENCE PROTECTIONS ARE MET WITH REGARD TO THIS PROPOSALS EFFECT ON W27EA (Facility ID. 18179).

The proposed operational parameters for W61AI are as follows:

Frequency Offset:	MINUS OFFSET
Antenna radiation center height above ground level:	87 meters
Maximum effective radiated power:	25 KW
Antenna type and model #:	AND ALP8L1-HSNR-27
Antenna Orientation	290 Degrees
Transmitter Site	27-47-41 N 82-40-06 W

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, Class A, or Land Mobile facilities other than NTSC Full-Power stations WFTS-TV, Channel 28, Tampa, Florida, and WRDQ, Channel 27, Orlando, Florida, and Class A station WXAX-LP, Channel 26, Clearwater, Florida. However, based upon the provisions of OET 69, the proposed station's operation complies with the FCC's interference criteria towards the aforementioned stations. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no prohibited interference will be caused by the operation of the proposed facility. **Accordingly, applicant requests a waiver of Section 74.705, based upon the results of the OET 69 analysis with regard to the aforementioned NTSC Full Power station.**

In addition an OET 69 analysis has been conducted on the effect of this proposal on LPTV W27EA, Channel 27, Sebring, Florida. This analysis indicates that absolutely no interference will be caused by this proposal to W27EA.

Full Service NTSC Facility

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	**FCC Service Population**	**Proposed Interference Population**
WFTS-TV TAMPA, FL BPCT-19960702KP CONSTRUCTION PERMIT	3,156,502	0 (0.0%)
WFTS-TV TAMPA, FL BLCT-19880303KE LICENSE	3,072,098	0 (0.0%)
WRDQ ORLANDO, FL BLCT-20000504AAT LICENSE	2,406,427	103(0.004%)

As shown by the table above, the facility proposed by this application will cause zero interference to WFTS-TV existing facility or its construction permit and virtually zero interference, only .004%, to WRDQ, an amount of predicted interference that is far below the .5% rounding tolerance allowed for such calculations .

CLASS A and LPTV Facilities

The Commission has expressed concern regarding the effect of this proposal on LPTV W27EA, Channel 27 Sebring, Florida (Facility ID. 18179). W27EA is co-channel to this proposal, both being on channel 27. W27EA's protected contour is its 74 dBu FCC calculated contour. This contour and all other contours discussed below are depicted on the attached map. Pursuant to Section 74.707(c)(1), co-channel protection for W27EA is calculated using (F(50,10)) at 29 dBu. Based upon these protection standards, the proposed facility meets all protection requirements of Section 74.707. Furthermore, the proposed facility, has 44.8 km of spacing clearance with W27EA. This clearance is depicted on the attached map. In addition, an OET 69 analysis was conducted with regard to the effect of the proposed facility on W27EA. This analysis is shown below and indicated that the proposed facility will cause absolutely zero interference to W27EA.

In addition, an interference analysis was conducted using OET 69 Bulletin standards with regard to the effect of the proposed station on the Class A facility listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

Protected Class A Station	FCC Service Population	Proposed Interference Population
WXAX-LP CLEARWATER, FL BLTTL-19940920JH LICENSE	581,368	0 (0.0%)
WXAX-LP CLEARWATER, FL BPTTL-20010116AFW CONSTRUCTION PERMIT	605,873	0(0.0%)
W27EA SEBRING, FL BLTT-19840117ID LICENSE	31,796	0(0.0%)

As the above table indicates, there will be absolutely ZERO interference caused to W27EA or to WXAX-LP's existing facility or construction permit by the proposed facility.

Land Mobile

There are no co-channel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.

Environmental Considerations

The proposed Channel 27 facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level at the base of the tower in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation." The calculated power density at 2 meters above ground level at the base of the tower was calculated using the appropriate equation on Page 13 of the Bulletin. Using a greater than expected vertical relative field value of 0.2, a maximum visual effective radiated power of 25 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.002 milliwatt per square centimeter (MW/CM2), or .5% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.366 MW/CM2 for TV channel 27). However, as this is a multi-user site, measurements will be made to substantiate compliance with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

In addition, it appears that the existing tower is otherwise excluded from environmental processing as it complies with all the criteria for such an exclusion in Section 1.1306.