

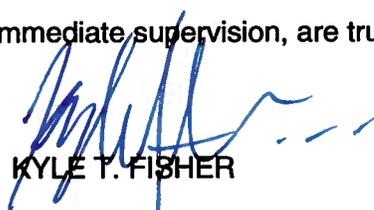
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAGING SYSTEMS, INC., licensee of digital low power television station, WLMF-LD, Channel 51 in Miami, Florida, in support of this Application for Construction Permit to specify digital operation on Channel 39 from the licensed WLMF-LD site. This proposal is being submitted in response to the Commission's voluntary reclamation of Channel 51 spectrum as a guard band for wireless services, thereby placing WLMF-LD in a displacement situation.

It is proposed to mount a standard ERI (Andrew) directional antenna at the 241-meter level of the existing 318-meter communications tower on which the current WLMF-LD antenna is mounted. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the proposed 51 dBu contour encompasses a significant portion of that which obtains from the licensed WLMF-LD facility. Operating parameters for the proposed facility are tabulated in Exhibit C. An interference study is provided in Exhibit D, and a power density calculation follows as Exhibit E.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1027529 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.


KYLE T. FISHER

August 31, 2011

CONTOUR POPULATIONS

51 DBU : 3,986,644

41 DBU : 4,246,040

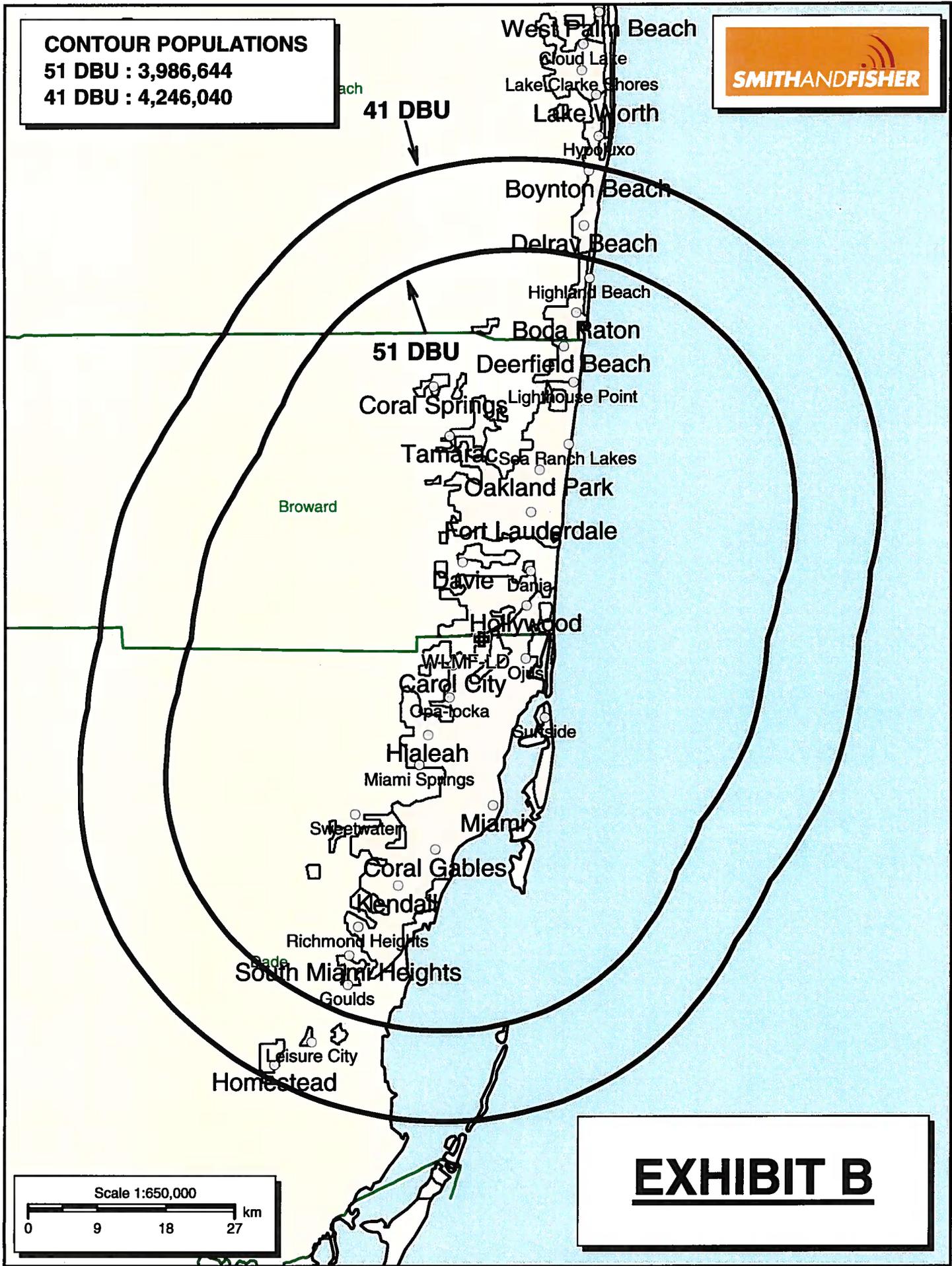


EXHIBIT B

EXHIBIT C

PROPOSED OPERATING PARAMETERS

**PROPOSED WLMF-LD
CHANNEL 39 – MIAMI, FLORIDA**

Transmitter Power Output:	1.1 kw
Transmission Line Efficiency:	42.7%
Antenna Power Gain – Toward Horizon:	31.09
Antenna Power Gain – Main Lobe:	31.09
Effective Radiated Power – Toward Horizon:	15.0 kw
Effective Radiated Power – Main Lobe:	15.0 kw
Transmitter Make and Model:	Type-accepted
Rated Output	1.5 kw
Transmission Line Make and Model:	Andrew HJ12-50
Size and Type:	2-1/4" air heliax
Length:	900 feet
Antenna Make and Model:	ERI ALP12L2-HSH
Orientation	110 degrees true
Beam Tilt	0.5 degrees
Radiation Center Above Ground:	241 meters
Radiation Center Above Mean Sea Level:	242 meters

**LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED WLMF-LD
CHANNEL 39 – MIAMI, FLORIDA**

We conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed WLMF-LD) already is predicted to exist (also known as "masking").

It is important to note that the applicant has specified use of a "full-service" out-of-channel emission mask in order to take advantage of the d/u ratios that pertain to adjacent-channel interference relationships. A revised LPTV DTV elevation pattern, based on the new FCC Rules, has been applied to proposed facility for the referenced studies. The results of these studies are provided in Exhibit D-2. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed Channel 39 facility complies with the interference requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

INTERFERENCE SUMMARY

PROPOSED WLMF-LD
CHANNEL 39 – MIAMI, FLORIDA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>	.
WPMF-LD BDFCDTA-20100726AKA	CP	Miami, FL	38	2,368,710	2,832	0.1	

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED WLMF-LD
CHANNEL 39 – MIAMI, FLORIDA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Miami facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kw, an antenna radiation center 241 meters above ground, and the specific elevation pattern for the proposed ERI antenna, maximum power density two meters above ground of 0.00035 mw/cm^2 is calculated to occur 73 meters north-northeast and south-southwest of the base of the tower. Since this is only 0.1 percent of the 0.42 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 39 (620-626 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.