

EXHIBIT 12
(Page 1 of 2)

NONIONIZING RADIATION COMPLIANCE

Local HDTV, Inc.
St. Petersburg, FL

The proposed W36CO digital facilities will fully comply with the current FCC Standard with regard to human exposure to nonionizing radiation. This facility will operate on Channel 36 with an average effective radiated power of 15 kilowatts using a Scala SL-8 antenna. This antenna will be mounted with its center of radiation located 85 meters above ground level on an existing 93.2 meter tower.

Equation (2), found on Page 30 of Supplement A to FCC OET Bulletin No. 65, details the calculation technique for determining the power density levels at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the proposed average DTV effective radiated power (15 kilowatts) for the expression $[0.4ERP_v + ERP_A]$ in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV signal. Based on information supplied by the antenna manufacturer, the maximum value of relative field for this antenna at any depression angle exceeding 10 degrees does not exceed 0.323. Assuming, as a worst case, a relative field of 0.323 at all depression angles in conjunction with this equation yields a predicted worst case maximum power density of $7.6 \mu\text{W}/\text{cm}^2$ at two meters above ground level. Since the permitted power density for uncontrolled exposure on Channel 36 is $401.3 \mu\text{W}/\text{cm}^2$, this amounts to only 1.9% of the permitted level for uncontrolled exposure. Since this value is less than 5% of the permitted level, the proposed W36CO digital facilities are excluded from environmental processing under this standard and need not be considered

EXHIBIT 12
(Page 2 of 2)

in conjunction with other co-located or nearby facilities in evaluating compliance with this standard.

W36CO, in conjunction with other co-located and nearby stations, will continue to take appropriate steps to insure that workers that must be on this tower will not be exposed to levels of nonionizing radiation that are in excess of the permitted level for controlled exposure. These steps will include the cessation of operation or a reduction in power, as appropriate, when work becomes necessary in areas on this tower where the total power density levels are in excess of the permitted level for controlled exposure.