

ENGINEERING STATEMENT
APPLICATION FOR A DTV CONSTRUCTION PERMIT
IN ACCORDANCE WITH FCC PUBLIC
COMMENCEMENT FOR NEW LOW POWER TELEVISION
AND TV TRANSLATORS
CHANNEL 24 15 KW MAX ERP 267.3 METERS RC/AMSL
WILMINGTON, NORTH CAROLINA

AUGUST 2009

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

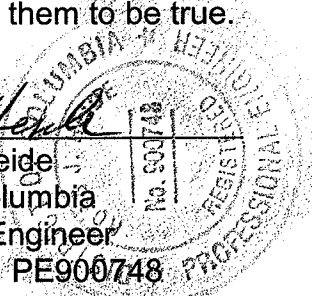
City of Washington)
) ss
District of Columbia)

Ross J. Heide, being duly sworn upon his oath, deposes and states that:

He is a graduate of the Massachusetts Institute of Technology in Operations Research and Management Science, a Registered Professional Engineer in the District of Columbia, and employed by Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Ross J. Heide
District of Columbia
Professional Engineer
Registration No. PE900748

Subscribed and sworn to before me this 21st day of August, 2009.



Notary Public

My Commission Expires: 7/28/2013

Introduction

This engineering statement has been prepared on behalf of Capitol Broadcasting Company, Inc. This statement supports the permittee's request for new DLPTV ("digital low power television") operation on Channel 24 with an effective radiated power ("ERP") of 15 kW at a radiation center above mean sea level ("RCAMSL") of 267.3 meters.

Transmitter Site

No significant alteration of the existing tower (ASRN 1014589) is proposed. The existing tower is located at the junction of Highways 76 and 87, approximately 32 km west-northwest of Wilmington, North Carolina. This site is more than 121 km (75 miles) from the reference coordinates of the cities listed in Appendix A of the Public Notice released 6/29/09 (DA 09-1487). The geographic coordinates of the site follow below.

North Latitude: 34° 19' 16"

West Longitude: 78° 13' 43"

NAD-27

Elevation Data

Elevation of site above mean sea level	8.8 meters (28.9 feet)
Center of radiation of antenna above ground level	258.5 meters (848.1 feet)
Center of radiation of antenna above mean sea level	267.3 meters (877 feet)
Overall height of the tower above ground with appurtenances	310.9 meters (1020 feet)

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WILMINGTON, NORTH CAROLINA

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Overall height of the tower above mean sea level with appurtenances	319.7 meters (1049 feet)
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The Antenna Structure Registration Number ("ASRN") for the existing tower is 1014589. There are no airports within 8 km (5 miles) of the site specified herein. A tower sketch has been included as Exhibit E-1.

Equipment Data

Transmitter:	Type-approved
Transmission Line:	ERI, Type HJ8-50B, 3", air dielectric, 289.5 meters (950 feet) with 0.377 dB loss/100 ft
Antenna:	ERI, ALP8L7-HSO-24 with maximum gain of 9.05 and -1.75° electrical beam tilt. Antenna pattern information is provided in Exhibit E-2
Transmission Mask:	Stringent

Power Data

Transmitter:	3.78 kW	5.77 dBk
Transmission Line Loss:	2.12 kW	3.58 dB
Input Into Antenna:	1.66 kW	2.14 dBk
Antenna Gain:	9.05	9.57 dB
ERP:	15.0 kW	11.76 dBk

As indicated above, the transmitter with typical power output of 3.78 kW (stringent mask) will deliver 1.66 kW to the input of the antenna. The antenna, having a maximum gain of 9.05 and an electrical beam tilt of 1.75° , will produce maximum ERP of 15 kW. A coverage map of the proposed facility has been included as Exhibit E-3 of this report.

Other Broadcast Facilities

An analysis was completed to determine the presence of stations in the vicinity of the existing tower using the 8/21/2009 data contained within the Commission's Consolidated Database System ("CDBS"). Within 500 meters of the proposed site, no authorized FM radio stations were identified. Two authorized DTV stations and one low power DTV station are located on the existing tower. There are no AM facilities within 3.2 km of the existing tower. Although no adverse technical affects are expected due to the proposed changes, the licensee will take measures to resolve any problems proven to be related to the changes proposed in this application.

Interference Analysis

A study of predicted interference caused by the proposed new Channel 24 low power digital operation has been performed using the Longley-Rice program for which the source data has been posted by the Commission on its website at http://www.fcc.gov/oet/dtv/dtv_apps.html. The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Microsoft Windows XP/Intel platform. Comparison of service/interference areas and population indicates this model closely matches the FCC's digital low-power TV/translator evaluation program. Best efforts have been made to

use data and calculation identical to the FCC's program. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 1 sq. km. Using 3-second terrain data sampled approximately every 1.0 km at one-degree azimuth intervals with 2000 census centroids, all studies are based upon data in the current CDBS database update of the FCC's engineering database. A Longley-Rice study was performed with the proposed new Channel 24 low power digital facilities and all relevant stations listed in the FCC data base as of 8/21/09. The study results and the included stations are listed in Table I.

Other Licensed and Broadcast Facilities

No adverse technical effect is anticipated by the proposed DTV operation to any other FCC licensed facility. If required, the licensee will install filters or take other measures as necessary to resolve the problem.

FCC Rule, Section 1.1307

The proposed 15 kW non-directional operation will utilize an ERI, Type ALP8L7-HSO-24 antenna (or equivalent) described above with a center of radiation above ground of 258.5 meters. The proposed antenna is side-mounted on a steel lattice tower with an overall height of 310.9 meters above ground.

As previously indicated, there are no AM stations located within 3.2 km of the proposed tower site. Since there will be no change in height, the electrical characteristic at AM frequencies will be unchanged. According to the FCC database, there are no FM stations, two full-power stations, and one low power DTV station located within 100 meters of the existing tower. Access to the tower property is prevented by a security fence with a locked gate.

The proposed operation based upon the current OET Bulletin No. 65, Edition 97-01 dated August 1997 and Supplement A meets the provisions of the FCC radiofrequency field ("RFF") guidelines, and thus, complies with Section 1.1307 of the FCC Rules. The elevation pattern for the ERI, Type ALP8L7-HSO-24 antenna, Exhibit E-2, shows a maximum relative field of less than 0.24 toward the ground (30° to 90° below the horizontal). Calculation according to OET Bulletin 65 predicts a maximum RFF power density of less than $0.5 \mu\text{W}/\text{cm}^2$, 2 meters above ground or less than 0.15% of the controlled Maximum Permissible Exposure ("MPE") guideline.

For completeness, the contribution by facilities located within 100 meters to the electromagnetic field environment is considered herein, as there are multiple emitters in the area. The RFF study will also consider the following stations:

The RFF contribution of each station will be calculated using the following basic formula:

$$S = \frac{33.4(F^2) \text{ Total ERP}}{R^2}$$

where:

S = power density in $\mu\text{W}/\text{cm}^2$

F = relative field factor

Total ERP = ERP Horizontal Polarization + ERP Vertical Polarization

R = RCAGL - 2 meters

ERP = RMS ERP in watts for DTV Stations

ERP = $[0.4 \text{ ERP}_V + \text{ERP}_A]$ for NTSC Stations

ERP_V = peak visual ERP in watts

ERP_A = RMS aural ERP in watts

ERP = ERP (horizontally polarized) + ERP (vertically polarized)

WUNJ DTV Facility

Channel 29 Freq: 560-566 MHz range
 ERP = 1000 kW
 Polarization = Horizontal
 RCAGL -2 meters = 295 meters

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 1000 \text{ kW (Horizontal Only)} \\ R = 295 \text{ meters} \\ F = 0.2 \text{ (from manufacturer's data)} \end{array}$$

$$S = < 15.4 \mu\text{W}/\text{cm}^2$$

Therefore, WUNJ contributes less than $15.4 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment for this frequency is $373 \mu\text{W}/\text{cm}^2$.

WUNJ-DT contributes less than 4.2% RFF level for an uncontrolled environment two meters above the ground.

WECT DTV Facility

Channel 44 Freq: 650-656 MHz
 ERP = 575 kW
 Polarization = Horizontal
 RCAGL -2 meters = 278 meters

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \begin{array}{l} \text{Tot ERP} = 575,000 \text{ watts (horizontal only)} \\ R = 278 \text{ meters (antenna height above ground -2 meters)} \\ F = 0.2 \text{ (assumed value for Dielectric Model No. TFU-24DSB-M)} \end{array}$$

$$S = < 10 \mu\text{W}/\text{cm}^2$$

Therefore, WECT-DT contributes less than $10 \mu\text{W}/\text{cm}^2$ at 2 meters above the ground.

The limit for an uncontrolled environment is $f/1500$ for the 300-1500 MHz range.

$$(653 \text{ MHz})/1500 = 435 \mu\text{W}/\text{cm}^2$$

WECT-DT contributes less than 2.3% RFF level for an uncontrolled environment two meters above the ground.

WILM-LD Digital Low Power TV Facility

Channel 40	Freq:	626-632 MHz range
	ERP =	15 kW
	Polarization =	Horizontal
	RCAGL -2 meters =	256.5 meters

$$S = \frac{33.4 (F^2) \text{ Tot ERP}}{R^2} \quad \text{Tot ERP} = 15 \text{ kW (Horizontal Only)}$$
$$R = 256.5 \text{ meters}$$
$$F = 0.24 \text{ (from manufacturer's data)}$$

$$S = < 0.44 \mu\text{W}/\text{cm}^2$$

Therefore, WILM-LD contributes less than $0.44 \mu\text{W}/\text{cm}^2$ at 2 meters above ground.

The limit for an uncontrolled environment for this frequency is $417 \mu\text{W}/\text{cm}^2$.

WILM-LD contributes less than 0.12% RFF level for an uncontrolled environment two meters above the ground.

Total RFF contribution

$6.5\% \text{ (DTV)} + 0.15\% \text{ (proposed LPDTV translator)} + 0.12\% \text{ (LPDTV)} \leq 6.8\%$
for the uncontrolled environment two meters above ground including the proposed DTV translator operation.

Authorized personnel and rigging contractors will be alerted to the potential zone of high radiation on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or

contractors to perform work on or near the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

Environmental Assessment

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the permittee indicates:

- (a)(1) The existing tower is not located in an officially designated wilderness area.
- (a)(2) The existing tower is not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities located on a tower which was built prior to the adoption of WT Docket No. 03-128 and is grandfathered and has not affected any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The existing tower is not located near any known Indian religious sites.
- (a)(6) The existing tower is not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing guyed tower will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) It is not proposed to equip the tower with high intensity white lights unless required by the FAA.

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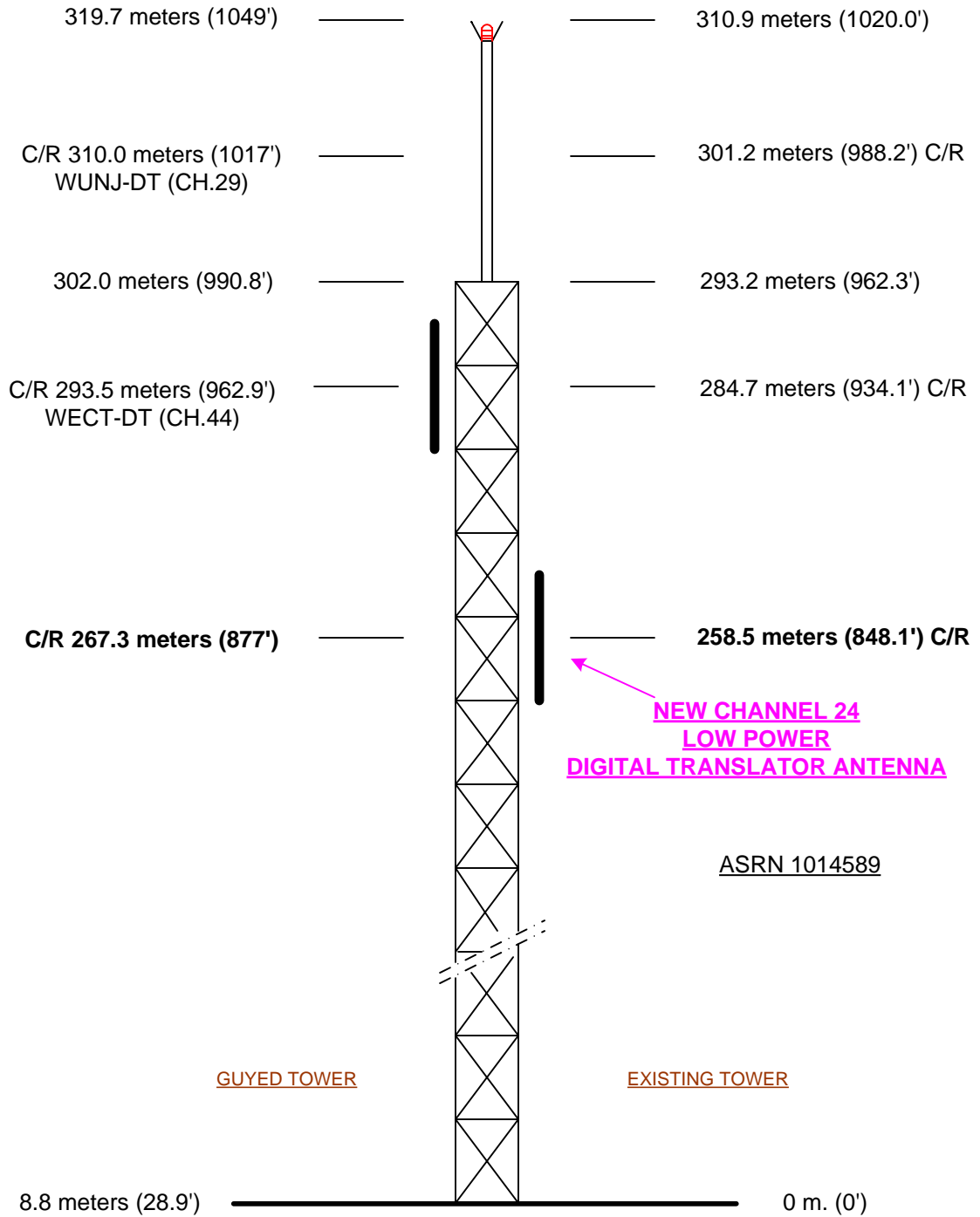
NEW DLPTV CHANNEL 24
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- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin No. 65, Edition 97-01, dated August 1997 and Supplement A.

ABOVE MEAN SEA LEVEL

ABOVE GROUND



NOT TO SCALE

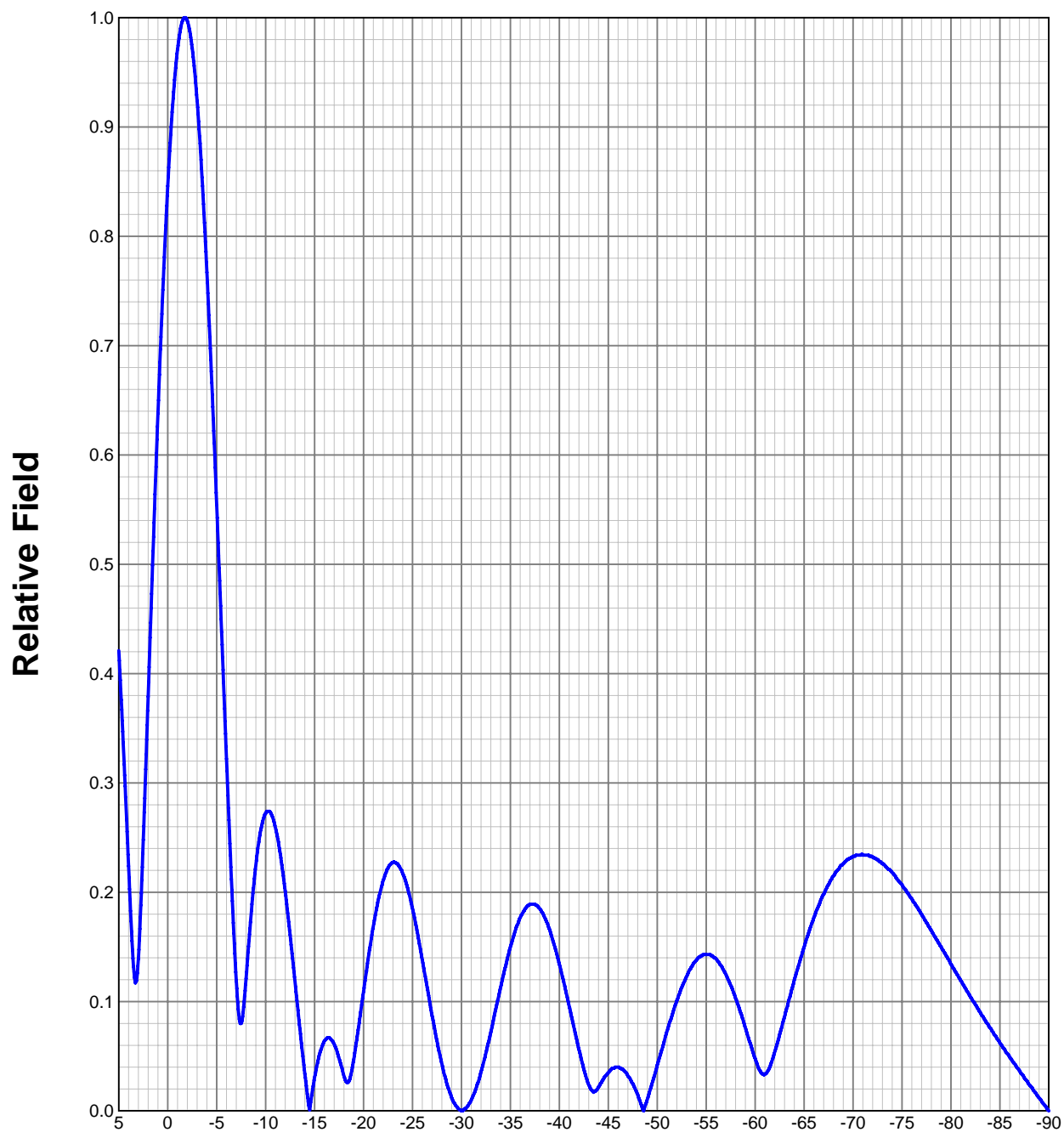
EXHIBIT E - 1
VERTICAL SKETCH
FOR THE NEW CHANNEL 24
LOW POWER DIGITAL TRANSLATOR OPERATION AT
WILMINGTON, NORTH CAROLINA
AUGUST 2009

COHEN, DIPPELL AND EVERIST, P.C.

EXHIBIT E-2

ANTENNA MANUFACTURER DATA

NEW DLPTV CHANNEL 24
WILMINGTON, NORTH CAROLINA

ELEVATION PATTERN**Type:****ALP8L7****Channel:****24****Directivity:****Numeric****dBd****Location:****Wilmington, NC****Main Lobe:****9.05****9.57****Beam Tilt:****-1.75****Horizontal:****6.48****8.11****Polarization:****Horizontal**

Preliminary, subject to final design and review.

TABULATED DATA FOR ELEVATION PATTERN

Type: ALP8L7

PolarizationHorizontal

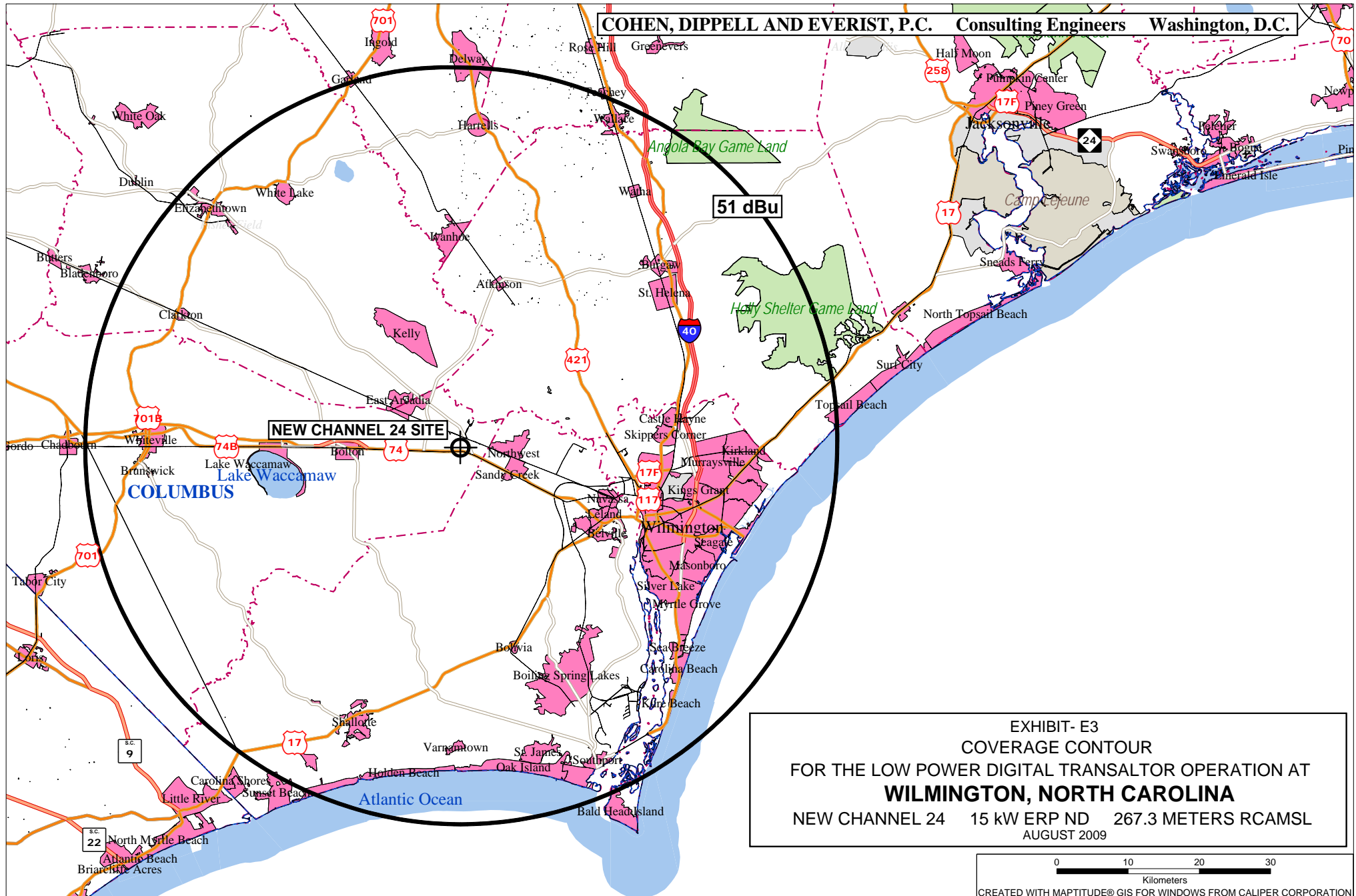
ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB
5.00	0.421	-7.51	-6.75	0.162	-15.78	-27.00	0.087	-21.21	-50.50
4.75	0.376	-8.50	-7.00	0.119	-18.49	-27.50	0.064	-23.88	-51.00
4.50	0.327	-9.71	-7.25	0.088	-21.06	-28.00	0.043	-27.33	-51.50
4.25	0.276	-11.17	-7.50	0.080	-21.94	-28.50	0.025	-32.04	-52.00
4.00	0.224	-13.00	-7.75	0.095	-20.45	-29.00	0.012	-38.42	-52.50
3.75	0.173	-15.21	-8.00	0.121	-18.34	-29.50	0.004	-47.96	-53.00
3.50	0.132	-17.59	-8.25	0.150	-16.45	-30.00	0.000	-40.00	-53.50
3.25	0.118	-18.56	-8.50	0.178	-14.99	-30.50	0.003	-50.46	-54.00
3.00	0.139	-17.14	-8.75	0.204	-13.83	-31.00	0.010	-40.00	-54.50
2.75	0.188	-14.52	-9.00	0.225	-12.96	-31.50	0.021	-33.56	-55.00
2.50	0.248	-12.11	-9.25	0.243	-12.29	-32.00	0.036	-28.87	-55.50
2.25	0.313	-10.10	-9.50	0.257	-11.80	-32.50	0.053	-25.51	-56.00
2.00	0.379	-8.43	-9.75	0.267	-11.49	-33.00	0.072	-22.85	-56.50
1.75	0.447	-7.00	-10.00	0.272	-11.31	-33.50	0.093	-20.63	-57.00
1.50	0.512	-5.81	-10.50	0.273	-11.28	-34.00	0.113	-18.94	-57.50
1.25	0.577	-4.78	-11.00	0.259	-11.73	-34.50	0.132	-17.59	-58.00
1.00	0.638	-3.90	-11.50	0.235	-12.58	-35.00	0.150	-16.48	-58.50
0.75	0.697	-3.14	-12.00	0.201	-13.94	-35.50	0.165	-15.65	-59.00
0.50	0.751	-2.49	-12.50	0.161	-15.86	-36.00	0.177	-15.04	-59.50
0.25	0.800	-1.93	-13.00	0.118	-18.56	-36.50	0.185	-14.66	-60.00
0.00	0.846	-1.45	-13.50	0.075	-22.50	-37.00	0.189	-14.47	-60.50
-0.25	0.885	-1.06	-14.00	0.034	-29.37	-37.50	0.189	-14.47	-61.00
-0.50	0.920	-0.72	-14.50	0.001	-60.00	-38.00	0.185	-14.66	-61.50
-0.75	0.948	-0.46	-15.00	0.031	-30.17	-38.50	0.177	-15.04	-62.00
-1.00	0.971	-0.26	-15.50	0.052	-25.68	-39.00	0.166	-15.60	-62.50
-1.25	0.987	-0.11	-16.00	0.064	-23.88	-39.50	0.151	-16.42	-63.00
-1.50	0.997	-0.03	-16.50	0.067	-23.48	-40.00	0.134	-17.46	-63.50
-1.75	1.000	0.00	-17.00	0.061	-24.29	-40.50	0.116	-18.71	-64.00
-2.00	0.997	-0.03	-17.50	0.048	-26.38	-41.00	0.096	-20.35	-64.50
-2.25	0.988	-0.11	-18.00	0.032	-29.90	-41.50	0.076	-22.38	-65.00
-2.50	0.972	-0.25	-18.50	0.027	-31.37	-42.00	0.056	-25.04	-65.50
-2.75	0.951	-0.44	-19.00	0.047	-26.56	-42.50	0.038	-28.40	-66.00
-3.00	0.924	-0.69	-19.50	0.077	-22.27	-43.00	0.024	-32.40	-66.50
-3.25	0.891	-1.00	-20.00	0.109	-19.25	-43.50	0.017	-35.39	-67.00
-3.50	0.854	-1.37	-20.50	0.141	-17.02	-44.00	0.022	-33.15	-67.50
-3.75	0.813	-1.80	-21.00	0.169	-15.44	-44.50	0.029	-30.75	-68.00
-4.00	0.767	-2.30	-21.50	0.193	-14.29	-45.00	0.035	-29.12	-68.50
-4.25	0.718	-2.88	-22.00	0.211	-13.51	-45.50	0.039	-28.18	-69.00
-4.50	0.666	-3.53	-22.50	0.222	-13.07	-46.00	0.040	-27.96	-69.50
-4.75	0.611	-4.28	-23.00	0.227	-12.88	-46.50	0.038	-28.40	-70.00
-5.00	0.554	-5.13	-23.50	0.226	-12.92	-47.00	0.032	-29.90	-70.50
-5.25	0.496	-6.08	-24.00	0.217	-13.27	-47.50	0.025	-32.04	-71.00
-5.50	0.438	-7.17	-24.50	0.204	-13.81	-48.00	0.015	-36.48	-71.50
-5.75	0.380	-8.40	-25.00	0.185	-14.66	-48.50	0.002	-53.98	-72.00
-6.00	0.322	-9.84	-25.50	0.163	-15.76	-49.00	0.011	-39.17	-72.50
-6.25	0.266	-11.50	-26.00	0.138	-17.20	-49.50	0.026	-31.70	-73.00
-6.50	0.212	-13.47	-26.50	0.113	-18.94	-50.00	0.042	-27.54	-73.50

Preliminary, subject to final design and review.

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
LONGLEY-RICE INTERFERENCE
FOR THE OPERATION OF
NEW24-LD, WILMINGTON, NORTH CAROLINA
CHANNEL 24 15 KW ND ERP 267.3 METERS HAAT
AUGUST 2009

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>FCC File No.</u>	<u>Result</u>
22	W22CJ	JACKSONVILLE NC	88.4	LIC	BLTT-19990629JD	0.00%
23	WUNK-TV	GREENVILLE NC	148.3	CP	BPEDT-20080617AAR	0.28%
23	WUNK-TV	GREENVILLE NC	148.3	LIC	BLEDT-20021007ABG	No interference
24	WLNN-LP	BOONE NC	380.6	LIC	BLTTL-19970516JB	No interference
24	W24CP	DURHAM NC	195	CP	BPTTA-20030207AAD	No interference
24	W24CP	DURHAM NC	197.4	CP	BDFCDTL-20081211ADV	No interference
24	W24AY	LILESVILLE+WADESBORO NC	175.2	LIC	BLTT-19900423JV	No interference
24	WTAT-TV	CHARLESTON SC	204.9	CP MO	BMPCDT-20080620ADZ	0.33%
24	WDRL-TV	DANVILLE VA	322.5	CP	BPCDT-20080317AIL	0.03%
24	W24OI	VIRGINIA BEACH VA	347.9	CP	BDFCDTT-20060329AKQ	No interference
24	W24OI	VIRGINIA BEACH VA	347.9	LIC	BLTT-19960603JA	No interference
25	WUNC-TV	CHAPEL HILL NC	191.8	APP	BDSTA-20080624AAH	No interference
25	WUNC-TV	CHAPEL HILL NC	191.8	CP MO	BMPEDT-20080617AAK	No interference
28	WWSC-LP	MYRTLE BEACH SC	95	LIC	BLTTL-20030605ADS	0.00%



Section III - Engineering (Digital)

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: _____
2. Translator Input Channel No. _____
3. Station proposed to be rebroadcast:

Call Sign	City	State	Channel
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4. Antenna Location Coordinates: (NAD 27)

____° ____' ____" ☐ N ☐ S Latitude
____° ____' ____" ☐ E ☐ W Longitude

5. Antenna Structure Registration Number: _____

☐ Not applicable ☐ See Explanation in Exhibit No. ☐ FAA Notification Filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: _____ meters
7. Overall Tower Height Above Ground Level: _____ meters
8. Height of Radiation Center Above Ground Level: _____ meters
9. Maximum Effective Radiated Power (ERP): _____ kW
10. Transmitter Output Power: _____ kW

11. a. Transmitting Antenna: ☐ Nondirectional ☐ Directional ☐ Directional composite

Manufacturer	Model
--------------	-------

- b. Electrical Beam Tilt: _____ degrees ☐ Not applicable

c. Directional Antenna Relative Field Values:

Rotation: _____ ° ☐ No rotation ☐ N/A (Nondirectional)

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

12. **Out-of-Channel Emission Mask:** Simple ☐ Stringent ☐

CERTIFICATION

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030. ☐ Yes ☐ No

See Explanation in Exhibit No.

14. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.*, the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance. An **Exhibit is required.** ☐ Yes ☐ No

See Explanation in Exhibit No.

Exhibit No.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

15. **Channels 52-59.** If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:

☐ The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.

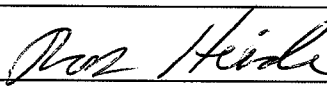
☐ Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licensees of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

16. **Channels 60-69.** If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable: WILMINGTON, NC

- ☐ Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licensees of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees,
- ☐ Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreement(s) with 700 MHz public safety regional planning committee(s) and state frequency administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.
- ☐ Pursuant to Section 74.786(e), an applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Ross J. Heide		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date August 21, 2009	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100			
City Washington	State or Country (if foreign address) DC		ZIP Code 20005
Telephone Number (include area code) (202) 898-0111		E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).