

MODIFY BDCCDTL-20061023AHQ
THOMAS B. DANIELS
WJNI-LP LPTV STATION
CH 31 - 572-578 MHZ - 15.0 KW (DA)
NORTH CHARLESTON, SOUTH CAROLINA
May 2010

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Thomas B. Daniels ("Daniels"), permittee of digital companion station WJNI-LP, Channel 31, North Charleston, South Carolina.¹ This application seeks to modify the outstanding permit to change the height above ground, increase power to 15.0 kilowatts and specify a directional antenna system.

The antenna system for the proposed WJNI-LP will be located on an existing structure. Therefore, the Federal Aviation Administration was not apprised of this proposal. The antenna supporting structure has been registered with the Commission and assigned Antenna Structure Registration Number 1054307. The proposed WJNI-LP operation on Channel 31 complies with the Commission's interference rules, based on the use of the Longley-Rice OET-69 Bulletin.² It is noted that the terrain was sampled at 0.1 kilometer, and a signal cell size of 1.0 kilometer was used, with 2000 Census population reviews. Attached as Exhibit A is a tabulation of the results of the Longley-Rice review showing that the proposed facility causes no interference to any other existing, applied for or proposed facility, based on the database used on the indicated study date.

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- 1) This instant modification does not consider the dismissed application for Channel 29 at Charleston, South Carolina (W47BX, BPTTL-20020627AAN) which remains in the FCC database despite being dismissed.
 - 2) The Longley-Rice model was implemented on the Probe 3 computer model from V-Soft Communications. This model has been found to closely replicate the results provided by the Commission's computer model.

No full service station receives predicted interference above 0.5% of its population, caused by this instant proposal. No secondary LPTV station receives predicted interference above 2.0% of its population, caused by this instant proposal. Attached as Exhibit B is a review which shows the proposed WJNI-LP facility is in compliance with the Commission's RF exposure limits.

All other data used to certify compliance with the Commission's rules has been forwarded to Daniels and is available for submission to the Commission on request.³

3) The undersigned is certifying only the radiofrequency exposure portion of the environmental analysis. All data regarding TV facilities was extracted from the CDBS database on the date of the interference study included herein. We assume no liability for errors or omissions in that database which may be adverse to the request made herein.