

EXHIBITS 6 AND 7
DISPLACEMENT APPLICATION FOR LPTV W68DN

W68DN
FCC File No. BLTTL-20020926ABO
Facility ID. No. 19586

This 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 W68DN (BLTTL-20020926ABO, Facility ID. 19586).

The proposed operational parameters for W68DN are as follows:

Frequency Offset:	MINUS OFFSET
Channel:	42
Antenna radiation center height above ground level:	97.5 meters (320 feet)
Maximum effective radiated power:	150 KW
Antenna type and model #:	SWR LP-4-0-42
Antenna Orientation	0 Degrees
Transmitter Site	40-57-39 N 73-55-21 W
Tower Registration #	1048672

Interference Analysis

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, 74.708 and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than the following:

NTSC Full-Power stations:

WEDW, 49-, Bridgeport, CT, Fac ID 13594, Licensed
WXTV, 41-, Paterson, NJ, Fac ID 74215, Licensed
WXTV, 41-, Paterson, NJ, Fac ID 74215, Construction Permit
WNJN, 50+, Montclair, NJ, Fac ID 48477, Licensed
WNJN, 50+, Montclair, NJ, Fac ID 48477, Construction Permit

DTV Full-Power stations:

WTFX-TV, 42, Philadelphia, PA, Fac ID 51568, Allotment
WTFX-DT, 42, Philadelphia, PA, Fac ID 51568, Application
WTFX-DT, 42, Philadelphia, PA, Fac, ID 51568, Application
WTFX-DT, 42, Philadelphia, PA, Fac ID 51568, Construction Permit
WSKG-TV, 42, Binghamton, NY, Fac ID 74034, Allotment
WSKG-DT, 42, Binghamton, NY, Fac ID 74034, Application
WSKG-DT, 42, Binghamton, NY, Fac ID 74034, Construction Permit

WSAH, 42, Bridgeport, CT, Fac ID 70493, Allotment
 WSAH-DT, 42, Bridgeport, CT, Fac ID 70493, Application

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 and Section 74.706, based upon the results of the OET 69 analysis with regard to the aforementioned stations.**

Full Service NTSC Facilities

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
WEDW, CH 49- Bridgeport, CT FILE NO. BLET-19870908KE License	2,623,291	0 (0.0%)
WXTV, CH 41- Paterson, NJ FILE NO. BLCT-19920218KE License	16,068,104	700 (0.004%)
WXTV, CH 41- Paterson, NJ FILE NO. BPCT-20000202AAJ Construction Permit	16,063,072	700 (0.004%)
WNJN CH 50+ Montclair, NJ FILE NO. BPET-19891219KE Construction Permit	15,033,906	11,708 (0.07%)
WNJN CH 50+ Montclair, NJ FILE NO. BLET-19860805KG License	14,482,545	0 (0.0%)

As shown by the table above, the facility proposed by this application will cause less than 0.1% interference to existing NTSC facilities, applications, or construction permits, a level of interference that is far below the 0.5% level permitted for such calculations.

Full Service DTV Facilities

An interference analysis was conducted using 74.706 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the DTV full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study

DTV Full-Power	FCC Service Population	Proposed Interference Population
WTXF-TV, CH 42 Philadelphia, PA Digital Allotment	7,731,416	7,114 (0.09%)
WTXF-DT, CH 42 Philadelphia, PA FILE NO. BPCDT-19991101ADX Application	6,772,858	9,944 (0.14%)
WTXF-DT, CH 42 Philadelphia, PA FILE NO. BPCDT-20020424AAZ Application	7,382,779	2,690 (0.03%)
WTXF-DT, CH 42 Philadelphia, PA FILE NO. BPCDT-19980319KE License	6,354,386	14,672 (0.23%)
WSKG-TV, CH 42 Binghamton, NY Digital Allotment	502,483	0 (0.0%)
WSKG-DT, CH 42 Binghamton, NY FILE NO. BMPEDT-20030110ACX Application	530,904	0 (0.0%)
WSKG-DT, CH 42 Binghamton, NY FILE NO. BPEDT-20000307AAB Construction Permit	502,375	0 (0.0%)
WSAH, CH 42 Bridgeport, CT Digital Allotment	2,702,931	227 (0.008%)
WSAH-DT, CH 42 Bridgeport, CT FILE NO. BPCDT-19991101AFE Application	4,985,585	4,010 (0.08%)

As indicated above, the operation of the proposed facility is predicted to cause virtually no interference to existing, allotted, or proposed DTV facilities.

LPTV and Class A Protections

The proposed facility complies with all LPTV and Class A facility protections as contained in section 74.707 and 74.708 without reliance upon OET 69 standards.

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 42 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 150 kilowatts and 10 percent aural power, the calculated power density at 2 meters above ground level at the base of the tower is 0.011 milliwatt per square centimeter (MW/CM²), or 2.3% of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.426 MW/CM² for TV channel 42). 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.