

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF
A MODIFICATION OF CONSTRUCTION PERMIT
FCC FILE NUMBER: BPCDT-20080317AGU
WTTA-DT - ST. PETERSBURG, FLORIDA
DTV - CH. 38, 1000 kW, 438 M HAAT**

Prepared for: BAY TELEVISION, INC.

JUNE, 2008

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Prepared for: BAY TELEVISION, INC.

I am an Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

GENERAL

Bay Television, Inc., licensee of WTTA(TV), Channel 38, St. Petersburg, Florida, and petitioner for a Construction Permit for the paired Digital Television Allotment for WTTA-DT, to operate on the current analog Channel 38 after the digital transition, has authorized this office to prepare this statement, FCC Form 301, Sections III and III-D and associated exhibits to be made a part of an Application for Construction Permit for its post-transition DTV Facility, on its current analog channel 38 as reflected in "Appendix B" of the SEVENTH FURTHER NOTICE OF PROPOSED RULEMAKING, adopted October 10, 2006 (MB Docket 87-268).

PROPOSED TECHNICAL FACILITIES

This request differs from that in the outstanding Application for Construction Permit in that a new model directional antenna with a similar directional azimuth pattern is proposed. It is proposed herein to implement the post-transition facilities of WTTA-DT on channel 38 utilizing directional transmitting antenna, substituting a Dielectric model TFU-20DSC-R C170 utilizing a “cardioid” directional azimuth pattern, for the authorized Dielectric model TUA-C3-O6/18U-T. The radiation centerline of the antenna will be at a HAAT of 438 meters and ERP of 1000 kW, side-mounted on the existing antenna support structure, FCC antenna structure registration number 1028292, with the antenna radiation centerline at 435.0 meters above ground level (AGL). A Vertical Plan Antenna Sketch is shown in Exhibit 1. The antenna manufacturer's horizontal plane radiation pattern is shown in Exhibit 2 and tabulated in Exhibit 3. The antenna manufacturer's vertical plane radiation pattern, illustrating the existing antenna's radiation characteristics above and below the horizontal plane, is shown in Exhibits 4 and 5 and tabulated in Exhibit 6.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625 of the FCC's Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 38 kilometers from the site, the antenna site elevation and

coordinates were determined from those reflected in FCC antenna structure registration number 1028292. As shown in Exhibit 7, the predicted 48 dBu, (F50,90) principal community contour completely encompasses the principal community of license as required by the Commission's rules. The predicted 41 dBu (F 50,90) "protected coverage contour" is also shown in Exhibit 7.

ALLOCATION CONSIDERATIONS

The Seventh Report and Order and Eighth Further NPRM (MB Docket 87-268) includes the recently adopted DTV Table of Allotments, that identifies the specific technical facilities at which the Commission has proposed to allow DTV stations to operate after the DTV transition. In the sense that the instant proposed technical facility for which authorization is being sought is essentially identical to the technical facility as outlined in the Final DTV Table of Allotments, it is presumed this request will be treated in similar fashion to a "checklist application" for facilities as reflected in the initial DTV Table.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WTTA-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

ENVIRONMENTAL CONSIDERATIONS

RADIO FREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines provide a maximum permissible exposure (MPE) level for occupational or “controlled” situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology’s technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC’s policies and guidelines.

The FCC’s Maximum Permitted Exposure (MPE) level for “uncontrolled” environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating

between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, (frequency/1500). The MPE level for “controlled” environments is 1.0 milliwatts per centimeter squared (mW/cm²) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz in a “controlled” environment is derived from the formula, (frequency/300).

The predicted emissions of WTTA-DT channel 38 must be considered, along with the predicted emissions of other stations that will operate from its site and within 315 km after the digital transition. For WTTA-DT, which will operate on channel 38 (617 MHz), the MPE level for “uncontrolled” environments is 0.411 mW/cm², and for “controlled” environments is 2.055 mW/cm².

The proposed WTTA-DT facility, channel 38, will operate with a maximum ERP of 1000 kW from a horizontally polarized directional transmitting antenna with a centerline height of 435.0 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WTTA-DT facility produces a predicted power density at two meters above ground level of 0.01603 mW/cm², which is 3.90% of the FCC guideline value for “uncontrolled” environments, and 0.780% of the FCC guideline value for “controlled” environments.

As shown in Appendix A, the total predicted percentage of the MPE value at WTTA's site, considering the cumulative predicted radiation of all broadcast facilities at the site, is only 16.51% of the limit for “uncontrolled” environments, and 3.302% of the limit for

"controlled" environments. The site is therefore in compliance with the FCC's Maximum Permitted Exposure guidelines.

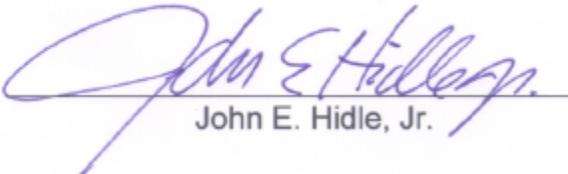
OCCUPATIONAL SAFETY

The permittee of WTTA-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WTTA-DT antenna. The applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel. In light of the above, the proposed modification of the WTTA-DT facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

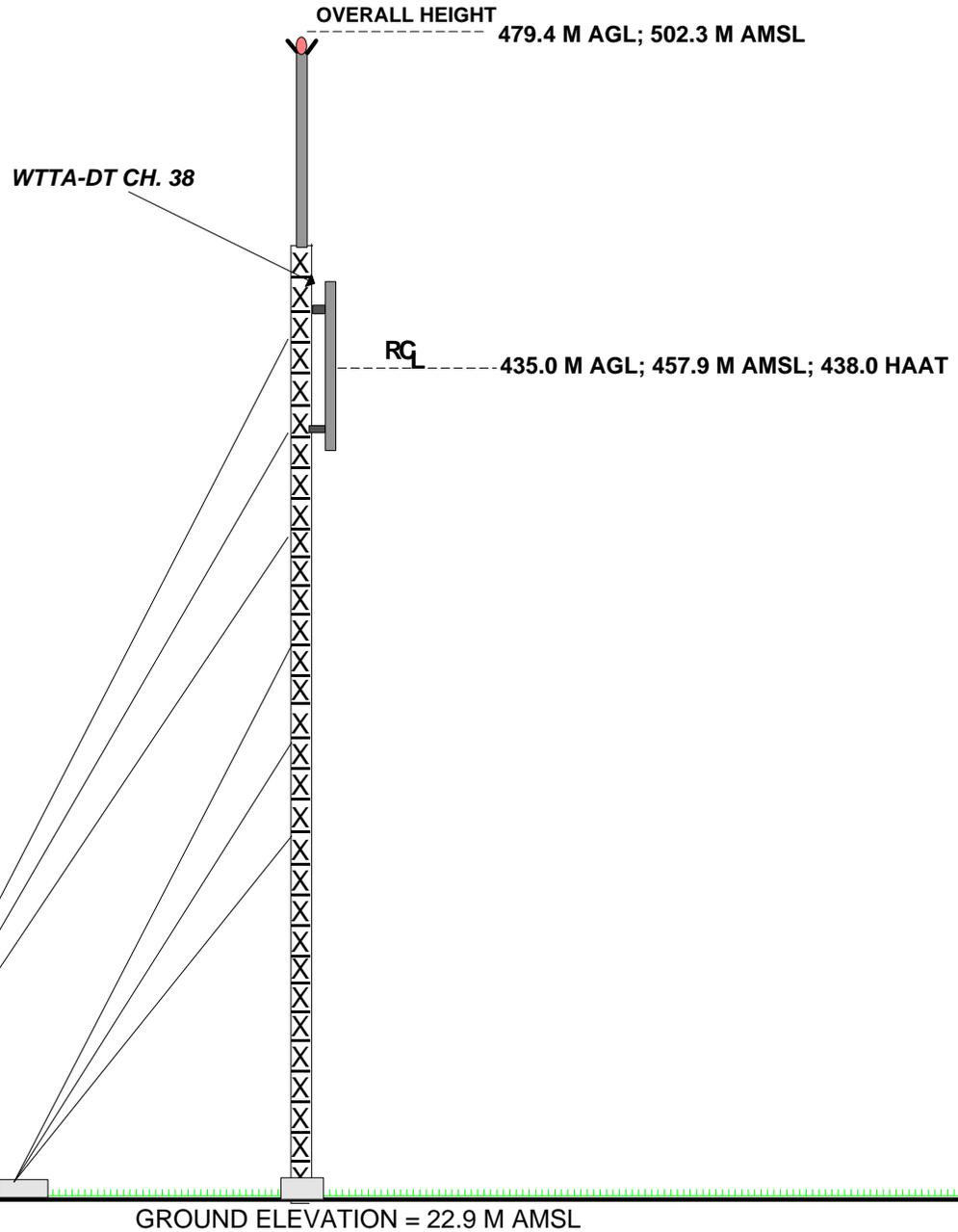
It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, Sections III and III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

Dated: June 16, 2008


John E. Hidle, Jr.

27° 50' 32" NL
082° 15' 46" WL

EXHIBIT 1



VERTICAL PLAN ANTENNA SKETCH

WTTA-DT ST. PETERSBURG, FLORIDA
CH. 38, 1000 kW ERP - 438 m HAAT

JUNE, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



Exhibit No.
TWO

Date **09 Jun 2008**
Call Letters **WTTA-DT** Channel **38**
Location **St. Petersburg, FL**
Customer **Bay Television**
Antenna Type **TFU-20DSC-R C170**

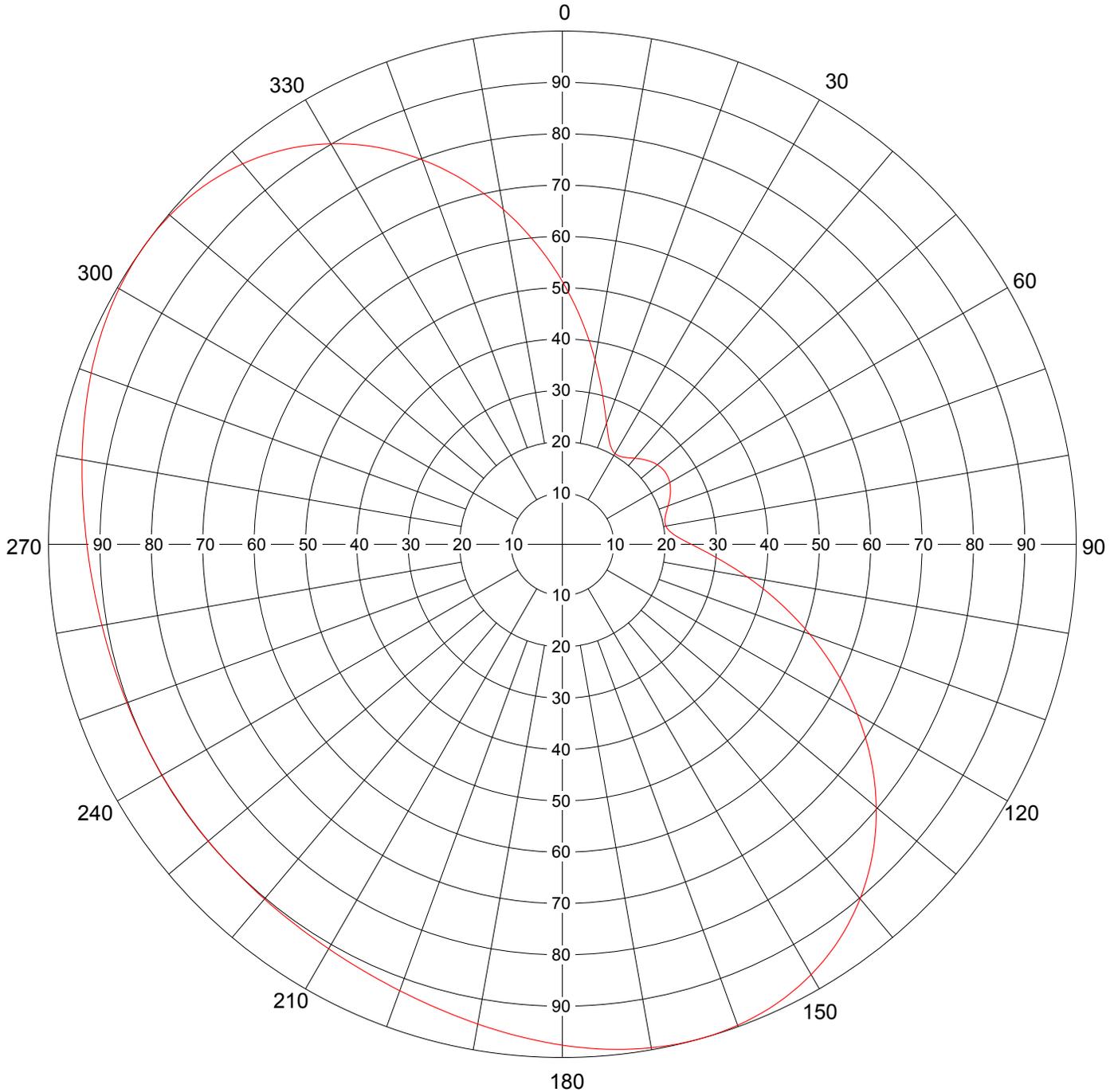
AZIMUTH PATTERN

Gain
Calculated / Measured

1.70 (2.30 dB)
Calculated

Frequency
Drawing #

617 MHz
TFU-C170



Remarks:



Exhibit No.
THREE

Date **09 Jun 2008**
 Call Letters **WTTA-DT** Channel **38**
 Location **St. Petersburg, FL**
 Customer **Bay Television**
 Antenna Type **TFU-20DSC-R C170**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # **TFU-C170**

Angle	Field														
0	0.512	45	0.232	90	0.251	135	0.854	180	0.976	225	0.900	270	0.926	315	0.987
1	0.497	46	0.234	91	0.260	136	0.864	181	0.973	226	0.900	271	0.928	316	0.984
2	0.482	47	0.236	92	0.269	137	0.874	182	0.971	227	0.900	272	0.930	317	0.981
3	0.466	48	0.238	93	0.280	138	0.883	183	0.968	228	0.900	273	0.932	318	0.977
4	0.451	49	0.240	94	0.290	139	0.893	184	0.965	229	0.900	274	0.934	319	0.973
5	0.437	50	0.241	95	0.302	140	0.901	185	0.963	230	0.900	275	0.936	320	0.968
6	0.422	51	0.242	96	0.313	141	0.910	186	0.960	231	0.899	276	0.939	321	0.963
7	0.407	52	0.243	97	0.326	142	0.918	187	0.957	232	0.899	277	0.941	322	0.958
8	0.393	53	0.244	98	0.338	143	0.925	188	0.954	233	0.899	278	0.944	323	0.952
9	0.379	54	0.244	99	0.352	144	0.933	189	0.952	234	0.899	279	0.946	324	0.946
10	0.365	55	0.245	100	0.365	145	0.940	190	0.949	235	0.899	280	0.949	325	0.940
11	0.352	56	0.244	101	0.379	146	0.946	191	0.946	236	0.899	281	0.952	326	0.933
12	0.338	57	0.244	102	0.393	147	0.952	192	0.944	237	0.899	282	0.954	327	0.925
13	0.326	58	0.243	103	0.407	148	0.958	193	0.941	238	0.899	283	0.957	328	0.918
14	0.313	59	0.242	104	0.422	149	0.963	194	0.939	239	0.899	284	0.960	329	0.910
15	0.302	60	0.241	105	0.437	150	0.968	195	0.936	240	0.900	285	0.963	330	0.901
16	0.290	61	0.240	106	0.451	151	0.973	196	0.934	241	0.900	286	0.965	331	0.893
17	0.280	62	0.238	107	0.466	152	0.977	197	0.932	242	0.900	287	0.968	332	0.883
18	0.269	63	0.236	108	0.482	153	0.981	198	0.930	243	0.900	288	0.971	333	0.874
19	0.260	64	0.234	109	0.497	154	0.984	199	0.928	244	0.900	289	0.973	334	0.864
20	0.251	65	0.232	110	0.512	155	0.987	200	0.926	245	0.900	290	0.976	335	0.854
21	0.243	66	0.229	111	0.527	156	0.990	201	0.924	246	0.901	291	0.978	336	0.843
22	0.235	67	0.227	112	0.543	157	0.992	202	0.922	247	0.901	292	0.981	337	0.832
23	0.229	68	0.224	113	0.558	158	0.994	203	0.920	248	0.901	293	0.983	338	0.821
24	0.223	69	0.222	114	0.573	159	0.996	204	0.918	249	0.902	294	0.986	339	0.809
25	0.218	70	0.219	115	0.588	160	0.997	205	0.917	250	0.902	295	0.988	340	0.797
26	0.214	71	0.216	116	0.604	161	0.998	206	0.915	251	0.903	296	0.990	341	0.785
27	0.210	72	0.214	117	0.619	162	0.999	207	0.914	252	0.903	297	0.992	342	0.773
28	0.207	73	0.211	118	0.634	163	1.000	208	0.912	253	0.904	298	0.993	343	0.760
29	0.206	74	0.209	119	0.648	164	1.000	209	0.911	254	0.905	299	0.995	344	0.747
30	0.204	75	0.207	120	0.663	165	1.000	210	0.910	255	0.905	300	0.996	345	0.733
31	0.204	76	0.206	121	0.677	166	1.000	211	0.909	256	0.906	301	0.997	346	0.720
32	0.204	77	0.205	122	0.692	167	0.999	212	0.908	257	0.907	302	0.998	347	0.706
33	0.205	78	0.204	123	0.706	168	0.998	213	0.907	258	0.908	303	0.999	348	0.692
34	0.206	79	0.204	124	0.720	169	0.997	214	0.906	259	0.909	304	1.000	349	0.677
35	0.207	80	0.204	125	0.733	170	0.996	215	0.905	260	0.910	305	1.000	350	0.663
36	0.209	81	0.206	126	0.747	171	0.995	216	0.905	261	0.911	306	1.000	351	0.648
37	0.211	82	0.207	127	0.760	172	0.993	217	0.904	262	0.912	307	1.000	352	0.634
38	0.214	83	0.210	128	0.773	173	0.992	218	0.903	263	0.914	308	0.999	353	0.619
39	0.216	84	0.214	129	0.785	174	0.990	219	0.903	264	0.915	309	0.998	354	0.604
40	0.219	85	0.218	130	0.797	175	0.988	220	0.902	265	0.917	310	0.997	355	0.588
41	0.222	86	0.223	131	0.809	176	0.986	221	0.902	266	0.918	311	0.996	356	0.573
42	0.224	87	0.229	132	0.821	177	0.983	222	0.901	267	0.920	312	0.994	357	0.558
43	0.227	88	0.235	133	0.832	178	0.981	223	0.901	268	0.922	313	0.992	358	0.543
44	0.229	89	0.243	134	0.843	179	0.978	224	0.901	269	0.924	314	0.990	359	0.527

Remarks:

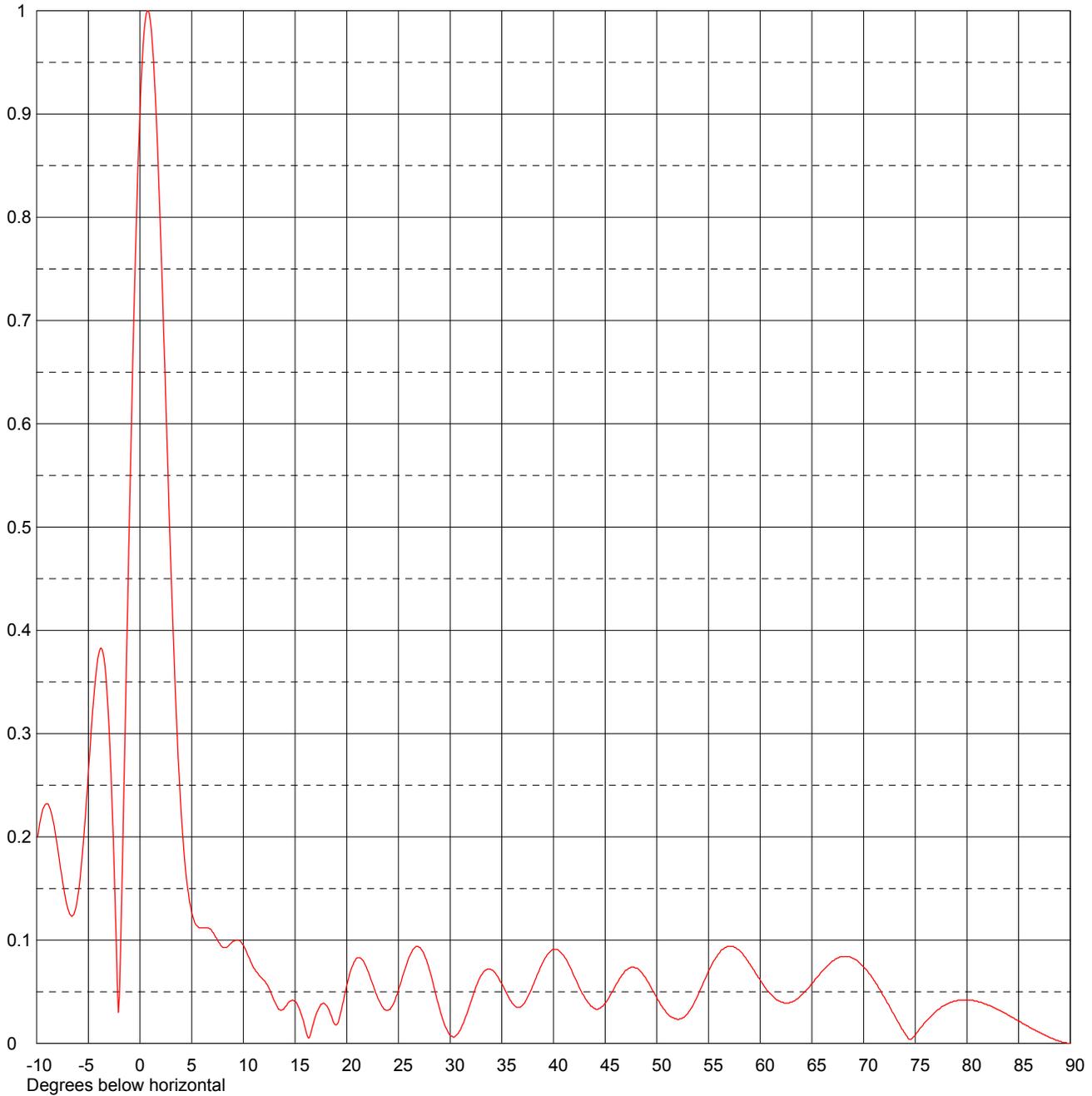


Exhibit No.
FOUR

Date **09 Jun 2008**
Call Letters **WTTA-DT** Channel **38**
Location **St. Petersburg, FL**
Customer **Bay Television**
Antenna Type **TFU-20DSC-R C170**

ELEVATION PATTERN

RMS Gain at Main Lobe	17.0 (12.30 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	13.9 (11.43 dB)	Frequency	617.00 MHz
Calculated / Measured	Calculated	Drawing #	20q170075-90



Remarks:

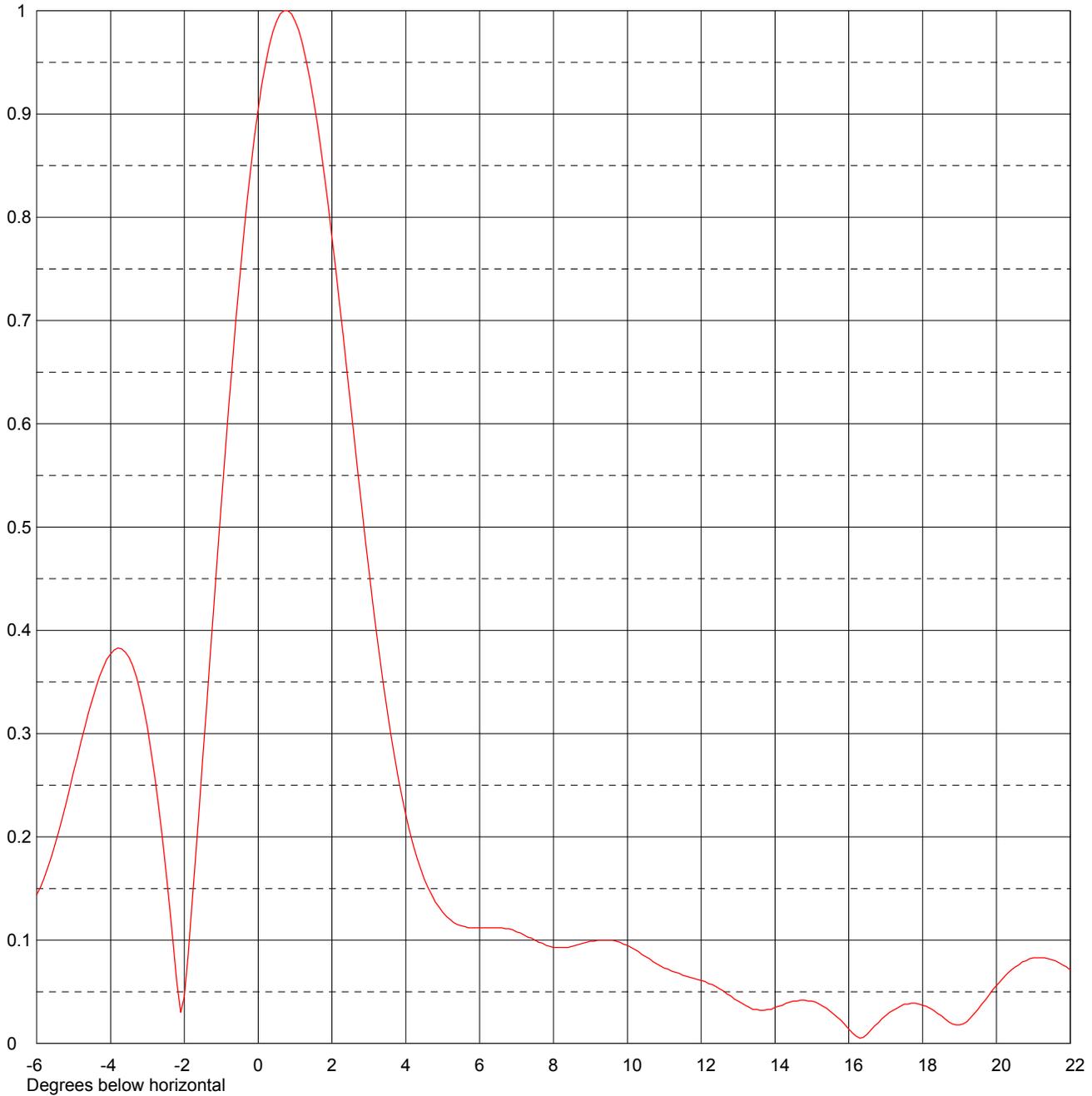


Exhibit No.
FIVE

Date **09 Jun 2008**
Call Letters **WTTA-DT** Channel **38**
Location **St. Petersburg, FL**
Customer **Bay Television**
Antenna Type **TFU-20DSC-R C170**

ELEVATION PATTERN

RMS Gain at Main Lobe	17.0 (12.30 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	13.9 (11.43 dB)	Frequency	617.00 MHz
Calculated / Measured	Calculated	Drawing #	20q170075



Remarks:



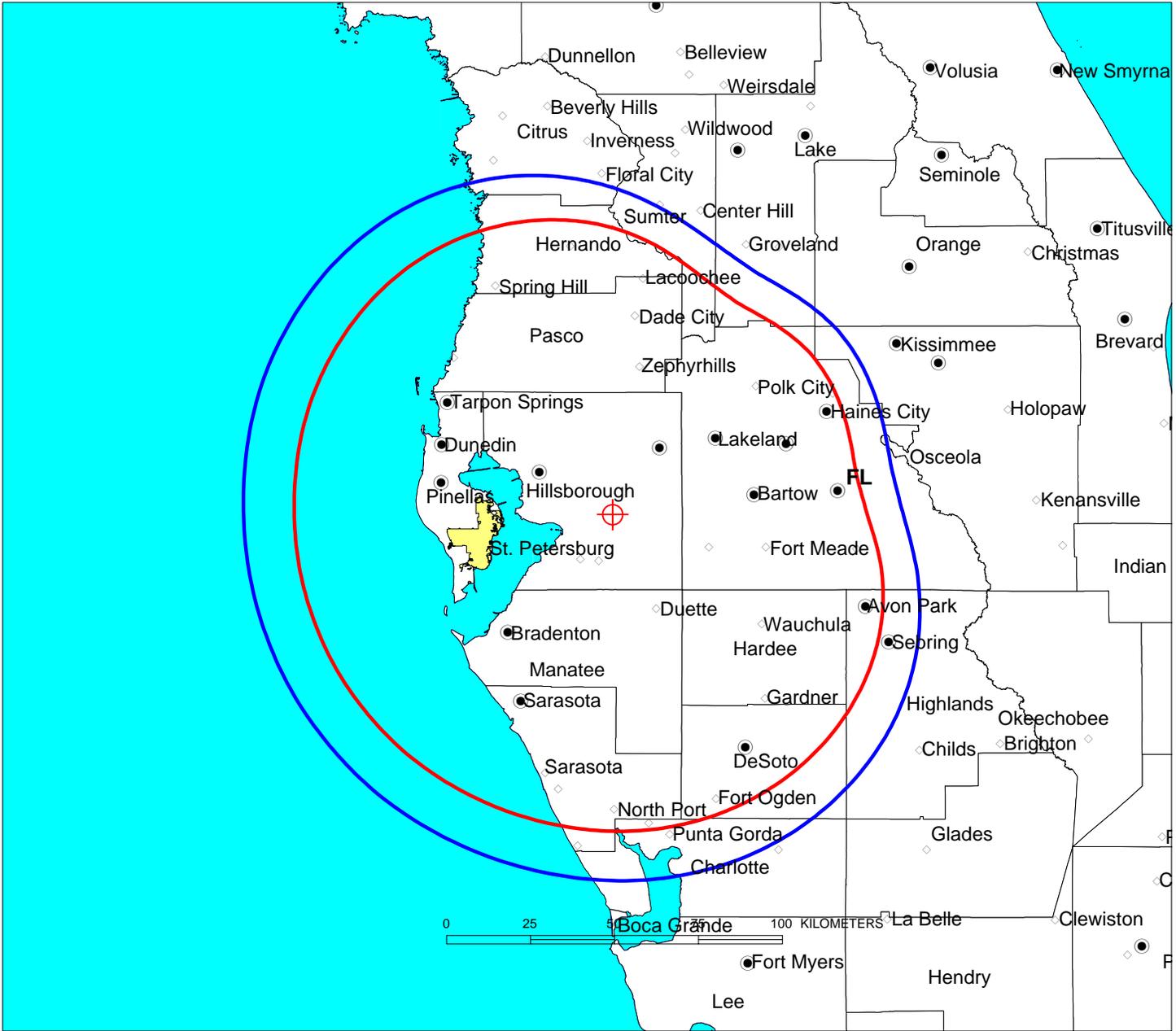
Date **09 Jun 2008**
 Call Letters **WTTA-DT** Channel **38**
 Location **St. Petersburg, FL**
 Customer **Bay Television**
 Antenna Type **TFU-20DSC-R C170**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # **20q170075**

Angle	Field										
-10.0	0.193	2.4	0.653	10.6	0.082	30.5	0.007	51.0	0.029	71.5	0.053
-9.5	0.223	2.6	0.587	10.8	0.077	31.0	0.013	51.5	0.025	72.0	0.045
-9.0	0.232	2.8	0.521	11.0	0.073	31.5	0.026	52.0	0.023	72.5	0.036
-8.5	0.220	3.0	0.458	11.5	0.066	32.0	0.040	52.5	0.025	73.0	0.027
-8.0	0.191	3.2	0.399	12.0	0.061	32.5	0.055	53.0	0.029	73.5	0.018
-7.5	0.157	3.4	0.346	12.5	0.053	33.0	0.066	53.5	0.037	74.0	0.010
-7.0	0.131	3.6	0.298	13.0	0.041	33.5	0.071	54.0	0.047	74.5	0.004
-6.5	0.124	3.8	0.256	13.5	0.033	34.0	0.071	54.5	0.059	75.0	0.008
-6.0	0.144	4.0	0.221	14.0	0.035	34.5	0.066	55.0	0.070	75.5	0.015
-5.5	0.193	4.2	0.192	14.5	0.041	35.0	0.058	55.5	0.080	76.0	0.021
-5.0	0.263	4.4	0.169	15.0	0.041	35.5	0.048	56.0	0.087	76.5	0.026
-4.5	0.332	4.6	0.151	15.5	0.031	36.0	0.039	56.5	0.092	77.0	0.031
-4.0	0.377	4.8	0.137	16.0	0.014	36.5	0.035	57.0	0.094	77.5	0.035
-3.5	0.374	5.0	0.127	16.5	0.009	37.0	0.037	57.5	0.093	78.0	0.038
-3.0	0.306	5.2	0.120	17.0	0.027	37.5	0.045	58.0	0.090	78.5	0.040
-2.8	0.258	5.4	0.115	17.5	0.038	38.0	0.056	58.5	0.084	79.0	0.041
-2.6	0.200	5.6	0.113	18.0	0.037	38.5	0.068	59.0	0.077	79.5	0.042
-2.4	0.133	5.8	0.112	18.5	0.027	39.0	0.079	59.5	0.069	80.0	0.042
-2.2	0.059	6.0	0.112	19.0	0.018	39.5	0.087	60.0	0.061	80.5	0.042
-2.0	0.045	6.2	0.112	19.5	0.033	40.0	0.091	60.5	0.054	81.0	0.041
-1.8	0.131	6.4	0.112	20.0	0.056	40.5	0.090	61.0	0.048	81.5	0.039
-1.6	0.226	6.6	0.112	20.5	0.074	41.0	0.085	61.5	0.043	82.0	0.037
-1.4	0.325	6.8	0.111	21.0	0.083	41.5	0.076	62.0	0.040	82.5	0.035
-1.2	0.425	7.0	0.108	21.5	0.081	42.0	0.065	62.5	0.039	83.0	0.033
-1.0	0.522	7.2	0.105	22.0	0.071	42.5	0.054	63.0	0.040	83.5	0.030
-0.8	0.615	7.4	0.102	22.5	0.058	43.0	0.045	63.5	0.043	84.0	0.027
-0.6	0.702	7.6	0.098	23.0	0.044	43.5	0.038	64.0	0.047	84.5	0.025
-0.4	0.780	7.8	0.095	23.5	0.035	44.0	0.034	64.5	0.052	85.0	0.022
-0.2	0.848	8.0	0.093	24.0	0.032	44.5	0.034	65.0	0.058	85.5	0.019
0.0	0.905	8.2	0.093	24.5	0.038	45.0	0.039	65.5	0.064	86.0	0.016
0.2	0.949	8.4	0.093	25.0	0.052	45.5	0.047	66.0	0.070	86.5	0.013
0.4	0.980	8.6	0.095	25.5	0.068	46.0	0.056	66.5	0.075	87.0	0.011
0.6	0.997	8.8	0.097	26.0	0.083	46.5	0.064	67.0	0.080	87.5	0.008
0.8	1.000	9.0	0.099	26.5	0.092	47.0	0.071	67.5	0.083	88.0	0.006
1.0	0.990	9.2	0.100	27.0	0.093	47.5	0.074	68.0	0.084	88.5	0.004
1.2	0.968	9.4	0.100	27.5	0.086	48.0	0.073	68.5	0.084	89.0	0.002
1.4	0.934	9.6	0.100	28.0	0.071	48.5	0.069	69.0	0.082	89.5	0.001
1.6	0.891	9.8	0.098	28.5	0.052	49.0	0.062	69.5	0.079	90.0	0.000
1.8	0.839	10.0	0.095	29.0	0.033	49.5	0.053	70.0	0.074		
2.0	0.781	10.2	0.091	29.5	0.017	50.0	0.044	70.5	0.068		
2.2	0.718	10.4	0.086	30.0	0.008	50.5	0.036	71.0	0.061		

Remarks:



- WSMH(TV) Channel 66, Proposed Facility**
 Grade B Coverage Contour; 64 dBu, F(50,50)
 Population Inside Contour = 1,606,604
 Coverage Area = 17,910 km²

- WSMH(TV) Channel 66, Proposed Facility**
 City Grade Coverage Contour; 80 dBu, F(50,50)
 Population Inside Contour = 832,718
 Coverage Area = 7,532 km²

PREDICTED COVERAGE CONTOURS
WTTA-DT ST. PETERSBURG, FLORIDA
CH. 38, 1000 KW ERP; 438 M HAAT
DIRECTIONAL ANTENNA
JUNE, 2008

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WTTA-DT, ST. PETERSBURG, FLORIDA
CHANNEL 38, 1000 kW ERP, 438 m HAAT
JUNE, 2008

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT **</u> mAGL	<u>ERP</u> (kW)	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY</u> (mW/cm ²)	<u>FCC UNCONTROLLED LIMIT</u> (mW/cm ²)	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WTTA-DT	DT	38	617	H	433	1000.000	0.300	0.01603	0.411	3.90%
WFLA-DT	DT	7	177	H	461	35.000	0.300	0.00050	0.200	0.25%
WFTS-DT	DT	29	563	H	471	987.000	0.300	0.01337	0.375	3.56%
WFTT-DT	DT	47	671	H	313	500.000	0.300	0.01534	0.447	3.43%
WFLZ-FM	FM	227	93.3	H & V	410	100.000	0.300	0.00358	0.200	1.79%
WMTX(FM)	FM	264	100.7	H & V	410	100.000	0.300	0.00358	0.200	1.79%
WFUS(FM)	FM	278	103.5	H & V	409	100.000	0.300	0.00360	0.200	1.80%

TOTAL PERCENTAGE OF ANSI VALUE= 16.51%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*

****Includes the proposed station and all stations within 315 meters.*