

Exhibit 43 - Statement C  
**ENVIRONMENTAL CONSIDERATIONS**  
prepared for  
**Crossover Licenses, Ltd.**  
WNKY-DT Bowling Green, Kentucky  
Facility ID 61217  
Ch. 16 600 kW 224 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

**Nature of The Proposal**

*Crossover Licenses, Ltd.* ("*Crossover*") is the licensee of analog WNKY(TV), Channel 40, Bowling Green, Kentucky, (file number BLCT-19960813KE). The Commission's DTV Table of Allotment assigns WNKY-DT paired DTV Channel 16 for which an application is pending (BPCDT-19991101ADV). The WNKY-DT application appeared on the March 1, 2002 Public Notice listing mutually exclusive DTV Applications in Group #6 with WELF-DT(DTV Channel 16, Dalton, GA, BPCDT-19991013ABQ) and WZTV-DT (DTV Channel 15, Nashville, TN, BPCDT-19991101ADI). With the instant amendment, *Crossover* is proposing a substitute directional antenna for WNKY-DT which, according to the results of a detailed interference study utilizing a 1 km grid, appears to resolve the mutually exclusive situation between WNKY-DT and WELF-DT and between WNKY-DT and WZTV-DT.

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in overall structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

**Human Exposure to Radiofrequency Radiation**

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines

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adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The WNKY-DT antenna will be installed such that its center of radiation is 126 meters above ground level. An effective radiated power (“ERP”) of 600 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer, the proposed WNKY-DT antenna will have a relative field of 31 percent or less from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 31 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 16 (center frequency 485 MHz) is 323.3  $\mu\text{W}/\text{cm}^2$ .

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

$S$	=	power density in microwatts/cm <sup>2</sup>
$ERP$	=	total (average) ERP in Watts
$F$	=	relative field factor
$D$	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 125.3  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure, or 38.8 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is lower, due to the increasing distance from the transmitting antenna.

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The only other known broadcast facility on the tower or nearby is the paired NTSC Channel 40 facility for WNKY(TV). The authorized facility for WNKY(TV) with a pending application for license (file number BLCT-20011206ABG) has an ERP of 1640 kW at an antenna height of 142m AGL. According to elevation pattern data provided by the antenna manufacturer, the authorized WNKY(TV) Channel 40 antenna has a relative field of less than 10 percent from 10 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 10 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 40 (center frequency 629 MHz) is 419.3  $\mu\text{W}/\text{cm}^2$ .

Using formula 2 from OET 65, Supplement A, (assuming typical 10 percent aural carrier level), the formula for NTSC television transmitting antennas as used for calculating signal density in this analysis is:

$$S = \{(33.4098) (F^2) [(ERP_{Visual} \times 0.4) + ERP_{Aural}]\} / R^2$$

Where:

<b>S</b>	=	Plane Wave Power Density ( $\mu\text{W}/\text{cm}^2$ ) at specified point
<b>F</b>	=	Relative Field Factor for Horizontal and Vertical Planes
<b><math>ERP_{Visual}</math></b>	=	total visual ERP in Watts
<b><math>ERP_{Aural}</math></b>	=	total aural ERP in Watts
<b>R</b>	=	distance in meters from center of radiation to the specified point.

Using this formula, the WNKY(TV) Channel 40 facility contributes a power density of 13.98  $\mu\text{W}/\text{cm}^2$  at two meters above ground level near antenna support structure, or 3.3 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

The sum of the WNKY-DT 38.8% predicted contribution and the WNKY(TV) 3.3% calculated contribution is 42.1% of the Commission’s limit for general population exposure from radio frequency electromagnetic field. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

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**Safety of Tower Workers and the General Public**

As demonstrated herein, excessive levels of RF energy will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

**Conclusion**

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.

Exhibit 43 Statement C:  
prepared May 24, 2002 by  
Mark B. Peabody,  
Cavell, Mertz & Davis, Inc.  
7839 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

# ENGINEERING EXHIBIT

## Amendment to Application for Digital Television Station Construction Permit

prepared for

**Crossover Licenses, Ltd.**  
WNKY-DT Bowling Green, Kentucky

Facility ID 61217  
Ch. 16 600 kW 224 m

### Table of Contents

FCC Form 301, Section III-D

#### Exhibit 40

Statement A	Proposed Antenna System
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Figure 2, 2A	Antenna Vertical (Elevation) Plane Pattern

#### Exhibit 41

Statement B	Allocation Considerations - Interference Analysis
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#### Exhibit 43

Statement C	Environmental Considerations
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*This material supplies a "hard copy" of the engineering portions of this application as entered May 24, 2002 for filing electronically. Since the FCC's electronic filing system may be accessed by anyone with the applicant's name and password, and electronic data may otherwise be altered in an unauthorized fashion, we cannot be responsible for changes made subsequent to our entry of this data and related attachments.*

**SECTION III-D - DTV ENGINEERING DATA**

**Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.**

**Certification Checklist:** A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this location as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input checked="" type="radio"/> No
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must <b>submit the Exhibit</b> called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

**SECTION III-D - DTV Engineering**

**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 Number: DTV 16 Analog TV, if any 40
2.	Zone: I <input type="radio"/> II <input checked="" type="radio"/> III <input type="radio"/>
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 37 Minutes 2 Seconds 10 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 86 Minutes 10 Seconds 20 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1042998 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 293 meters
6.	Overall Tower Height Above Ground Level: 152 meters
7.	Height of Radiation Center Above Ground Level: 126 meters
8.	Height of Radiation Center Above Average Terrain : 224 meters

9. Maximum Effective Radiated Power : 600 kW

10. Antenna Specifications:

a. Manufacturer AND Model ALP16M2-HSH-16

b. Electrical Beam Tilt:  
0.5 degrees  Not Applicable

c. Mechanical Beam Tilt:  
degrees toward azimuth  
degrees True  Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. [Exhibit 39]

d. Polarization:  
 Horizontal  Circular  Elliptical

e. Directional Antenna Relative Field Values:  Not applicable (Nondirectional)

[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.]  
[Relative Field Values]

**10e. Directional Antenna Relative Field Values**

[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]

e. Directional Antenna Relative Field Values:

Rotation (Degrees):  No Rotation

Degrees	Value										
0	0.242	10	0.237	20	0.242	30	0.302	40	0.432	50	0.6
60	0.764	70	0.889	80	0.967	90	1	100	0.974	110	0.897
120	0.781	130	0.622	140	0.451	150	0.324	160	0.258	170	0.248
180	0.256	190	0.248	200	0.258	210	0.324	220	0.451	230	0.622
240	0.781	250	0.897	260	0.974	270	1	280	0.967	290	0.889
300	0.764	310	0.6	320	0.432	330	0.302	340	0.242	350	0.237

Additional Azimuths

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 40]

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** items 1(a), (b), or (c) are answered "No".)  Yes  No

If No, attach as an Exhibit justification therefore, including a summary of any previously granted waivers. [Exhibit 41]

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered "No".) [Exhibit 42]

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 43]  
If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, 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.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

**PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.**

### SECTION III - PREPARER'S CERTIFICATION

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 MARK B. PEABODY	Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature	Date 5/24/2002	
Mailing Address CAVELL, MERTZ & DAVIS, INC. 7839 ASHTON AVE.		
City MANASSASS	State or Country (if foreign address) VA	Zip Code 20109 -
Telephone Number (include area code) 7033929090	E-Mail Address (if available) MPEABODY@CMDCONSULTING.COM	

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).

#### Exhibits

##### Attachment 39

##### Exhibit 40

**Description:** EXHIBIT 40 - NATURE OF PROPOSAL AND PROPOSED ANTENNA SYSTEM

ATTACHED AS EXHIBIT 40

##### Attachment 40

Description	Type	Conversion	
		Status	File
<a href="#">Exhibit 40 - Nature of Proposal and Proposed Antenna System</a>	Adobe Acrobat File	not needed	PDF

##### Exhibit 41

**Description:** EXHIBIT 41 - ALLOCATIONS CONSIDERATIONS AND INTERFERENCE ANALYSIS

ATTACHED AS EXHIBIT 41

**Attachment 41**

Description	Type	Conversion	
		Status	File
<a href="#">Exhibit 41 - Allocations Considerations and Interference Analysis</a>	Adobe Acrobat File	not needed	PDF

**Attachment 42**

**Exhibit 43**  
**Description:** EXHIBIT 43 - ENVIRONMENTAL CONSIDERATIONS  
ATTACHED AS EXHIBIT 43

**Attachment 43**

Description	Type	Conversion	
		Status	File
<a href="#">Exhibit 43 - Environmental Considerations</a>	Adobe Acrobat File	not needed	PDF