

**EXHIBIT 43
ENGINEERING STATEMENT
IN SUPPORT OF AN AMENDMENT
APPLICATION BPCDT-19991101AII
WVVA-DT 1,000 KW 361 M AAT CH. 46
BLUEFIELD, WEST VIRGINIA**

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Prepared by
Lohnes and Culver Washington, D.C.
May, 2001

**EXHIBIT 43
ENGINEERING STATEMENT
IN SUPPORT OF AN AMENDMENT
TO APPLICATION BPCDT-19991101All
WVVA-DT 1,000 KW 361 M AAT CH. 46
BLUEFIELD, WEST VIRGINIA**

INTRODUCTION

WVVA Television, Inc. is amending application BPCDT-19991101All for the purpose of co-locating the DTV Channel 46 antenna with licensed analog TV Channel 6 facilities of WVVA. The structure currently employed to support the analog TV Channel 6 antenna is referenced by ASR No. 1011420. The proposal involves replacing the existing Channel 6 antenna, RCA Superturnstile Model TF-6BM, with a custom antenna stack comprised of Dielectric Models TF-3MT (top) and TFU-22GBH-R O8 (bottom). The overall height of the antenna structure will not be increased as a result of this custom antenna stack since the length of the stack is essentially the same as the antenna being replaced. The bottom stack antenna (TFU-22GBH-R O8) will be used for DTV Channel 46 and the top antenna will be used for analog TV Channel 6. A subsequent application will be filed to modify the analog TV Channel 6 license for the proposed stacked antennas.

Accordingly, notice of the proposed construction to the Federal Aviation Administration is not necessary since the overall height of the existing antenna structure will not change.

ENVIRONMENTAL CONSIDERATIONS

The application as amended remains categorically excluded from environmental processing by Section 1.1306 of the FCC Rules. It is excluded since the application does not

involve a site location as described in Section 1.1307(a) and does not exceed the safety standards for human exposure to radio-frequency (RF) energy in Section 1.1307(b) as described below. Since the application is considered not to have a significant effect on the quality of the human environment under Section 1.1307(a) and (b), environmental processing is not required.

The proposal to co-locate the DTV and analog TV antennas of WVVA will not subject workers or the general population to levels of radiofrequency energy in excess of the *Radiofrequency Radiation Exposure Limits* contained in Section 1.1310 of the FCC Rules. As stated above, WVVA's existing Channel 6 tower will be used to support the stacked antennas. This tower is located at a remote mountaintop site where it is isolated from the general population and the only access to the site is by way of a private unpaved mountain road. This tower is self-supporting and located near the top of the mountain at an elevation of 1,113 meters AMSL. One side of the tower is within 7 meters of the mountain's peak elevation of 1,129 meters where a cat walk is available for workers to access the structure. The entrance to the cat walk is controlled by a locked gate and there is a suitable warning sign posted. The base facilities are similarly equipped with warning signs to control general access at the site. In addition, there are no other active broadcast facilities operating at the site or within the general vicinity.


The antenna radiation center height for UHF Channel 46 (662-668 MHz) and VHF Channel 6 (82-88 MHz) will be 36 and 49 meters above ground level (AGL), respectively. Channel 6 will continue to operate with an effective radiated peak visual power of 50.1 kW and 12.5% aural power, while Channel 46 will have an average effective radiated power (ERP) of 1,000 kW. An evaluation of the cumulative effect of the collocated antennas was conducted in accordance with the methodology outlined in *OET Bulletin 65, Version 97-01* and the

results are believed to be in full compliance with the Commission's rules concerning RF exposure.

The EPA model for predicting ground-level power density contained in the Commission's bulletin was used to determine the "worst case" power density level at all points 2 meters above the mountain's highest elevation. Based on the attached antenna elevation patterns for Channel 46 and Channel 6, Figures 1 and 2 respectively, the combined worst case power density is estimated to be 123.5% of the general MPE limit and 24.7% of the occupational MPE limit at a horizontal distance of 15.3 meters from the tower. Since the site is not openly accessible to the general population and considering that ground elevations are actually decreasing with distance, the proposal is believed to be in full compliance with the Commission's exposure limits.

As indicated above, occupational exposure in excess of the guideline is not possible at any ground-level location. WVVA Television, Inc. has adopted a work policy that is designed to avoid harmful exposure. Workers are currently protected from excessive exposure to radiofrequency fields in areas of close proximity to the radiofrequency source in accordance with the methods recommended in *OET Bulletin No. 65, Version 97-01*. Preventive steps to avoid excessive exposure include the scheduling of work when the facility is shut down or operating at reduced power or by time averaging.

Respectfully submitted,
Lohnes and Culver



D. Scott Turpie

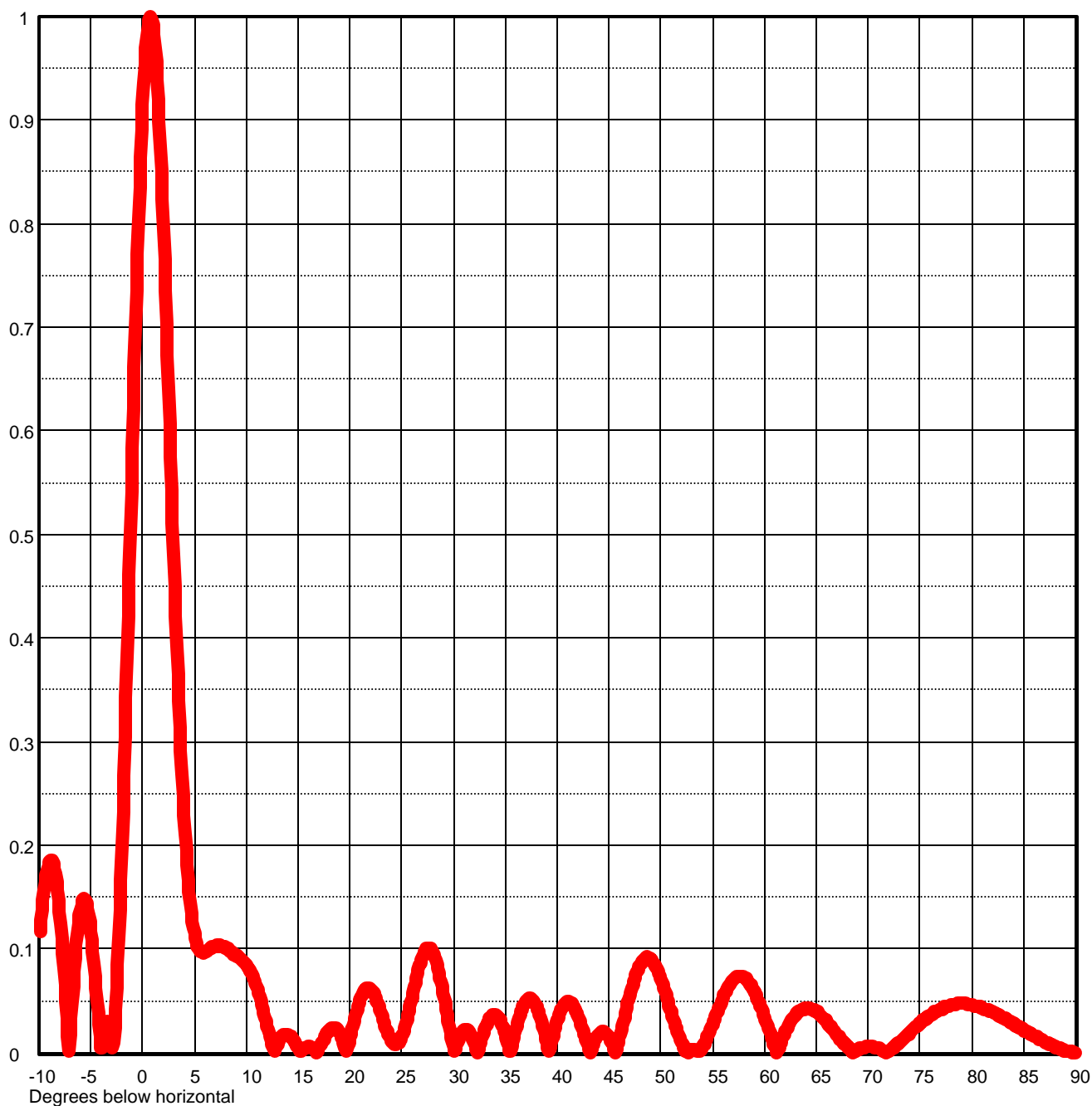
May, 2001



Date	09 May 2001	Channel	46
Call Letters	WVVA-DT		
Location	Bluefield, WV		
Customer	WVVA Television, Inc.		
Antenna Type	TFU-22GBH-R 08		

ELEVATION PATTERN

RMS Gain at Main Lobe	19.0 (12.79 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	15.9 (12.01 dB)	Frequency	665.00 MHz
Calculated / Measured	Calculated	Drawing #	22G19007-90



Remarks:



Date
Call Letters
Location
Customer
Antenna Type

09 May 2001
WVVA Channel **6**
Bluefield, WV
WVVA Television, Inc.
TF-3MT

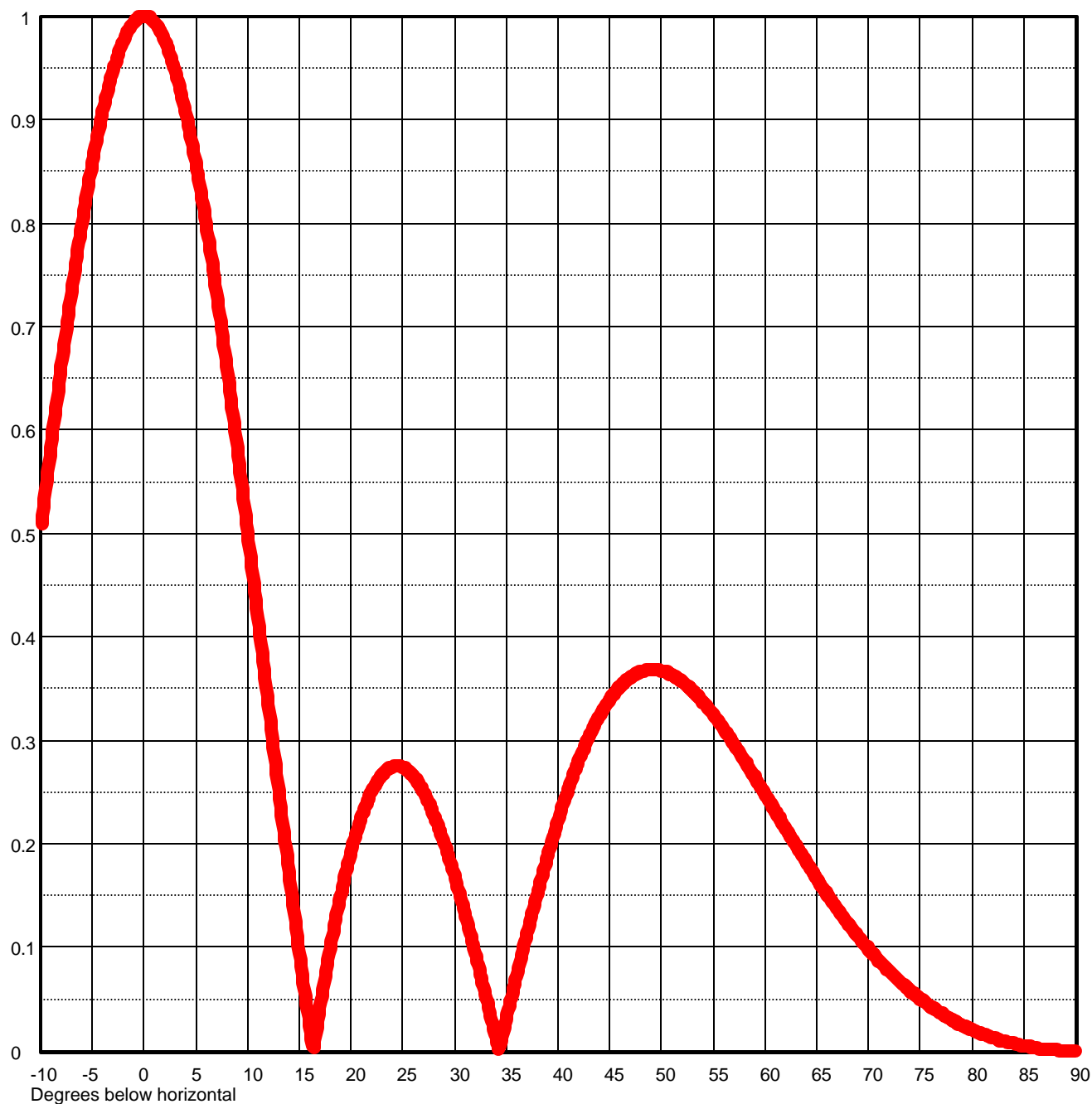
ELEVATION PATTERN

RMS Gain at Main Lobe
RMS Gain at Horizontal
Calculated / Measured

3.3 (5.19 dB)
3.3 (5.19 dB)
Calculated

Beam Tilt
Frequency
Drawing #

0.00 Degrees
85.00 MHz
03S03300



Remarks: