

## **ENGINEERING EXHIBIT**

### **APPLICATION FOR CONSTRUCTION PERMIT TO RELOCATE A DIGITAL LPTV TELEVISION STATION**

prepared for

**Polnet Communications, Ltd.**  
WPVN-LD Aurora, Illinois  
Facility ID 168237  
Ch. 20 (Digital) 15 kW (MAX-DA)

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FCC Form 346, Section III – Engineering Data (Digital)

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##### **Exhibit 12**

Statement B	Environmental Considerations
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*This material supplies a "hard copy" of the engineering portions of this application as entered August 8, 2011 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 - ENGINEERING DATA (Digital)****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: 20																																																																																																
2.	Translator Input Channel No. :																																																																																																
3.	Primary station proposed to be rebroadcast: <table border="1"><tr><td>Facility Identifier</td><td>Call Sign</td><td>City</td><td>State</td><td>Channel</td></tr></table>	Facility Identifier	Call Sign	City	State	Channel																																																																																											
Facility Identifier	Call Sign	City	State	Channel																																																																																													
4.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 41 Minutes 53 Seconds 21 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 87 Minutes 37 Seconds 36 <input checked="" type="radio"/> West <input type="radio"/> East																																																																																																
5.	Antenna Structure Registration Number: 1279395 <input type="checkbox"/> Not Applicable [Exhibit 10] <input type="checkbox"/> Notification filed with FAA																																																																																																
6.	Antenna Location Site Elevation Above Mean Sea Level: 182.3 meters																																																																																																
7.	Overall Tower Height Above Ground Level: 419.1 meters																																																																																																
8.	Height of Radiation Center Above Ground Level: 390.4 meters																																																																																																
9.	Maximum Effective Radiated Power (ERP): 15 kW																																																																																																
10.	Transmitter Output Power: 0.64 kW																																																																																																
11.	a. Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under <a href="http://licensing.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm">CDBS Public Access</a> (http://licensing.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search. <input type="radio"/> Nondirectional <input checked="" type="radio"/> Directional "Off-the-shelf" <input type="radio"/> Directional composite  Manufacturer DIE Model TLP-8E  b. Electrical Beam Tilt: 1.0 degrees <input type="checkbox"/> Not Applicable  c. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf") Rotation (Degrees): 270 <input type="checkbox"/> No Rotation <table border="1"><thead><tr><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th></tr></thead><tbody><tr><td>0</td><td></td><td>10</td><td></td><td>20</td><td></td><td>30</td><td></td><td>40</td><td></td><td>50</td><td></td></tr><tr><td>60</td><td></td><td>70</td><td></td><td>80</td><td></td><td>90</td><td></td><td>100</td><td></td><td>110</td><td></td></tr><tr><td>120</td><td></td><td>130</td><td></td><td>140</td><td></td><td>150</td><td></td><td>160</td><td></td><td>170</td><td></td></tr><tr><td>180</td><td></td><td>190</td><td></td><td>200</td><td></td><td>210</td><td></td><td>220</td><td></td><td>230</td><td></td></tr><tr><td>240</td><td></td><td>250</td><td></td><td>260</td><td></td><td>270</td><td></td><td>280</td><td></td><td>290</td><td></td></tr><tr><td>300</td><td></td><td>310</td><td></td><td>320</td><td></td><td>330</td><td></td><td>340</td><td></td><td>350</td><td></td></tr><tr><td>Additional Azimuths</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table>	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0		10		20		30		40		50		60		70		80		90		100		110		120		130		140		150		160		170		180		190		200		210		220		230		240		250		260		270		280		290		300		310		320		330		340		350		Additional Azimuths											
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**Relative Field Polar Plot**

	<b>NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.</b>
12.	<b>Out-of-channel Emission Mask:</b> <input type="radio"/> Simple <input checked="" type="radio"/> Stringent
<b>CERTIFICATION</b>	
13.	<b>Interference :</b> The proposed facility complies with all of the following applicable rule sections. 47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030. <span style="float: right;"><input checked="" type="radio"/> Yes <input type="radio"/> No</span> <div style="text-align: right;">See Explanation in [Exhibit 11]</div>
14.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine RF compliance, an <b>Exhibit is required.</b> <span style="float: right;"><input checked="" type="radio"/> Yes <input type="radio"/> No</span> <div style="text-align: right;">See Explanation in [Exhibit 12]</div> <p>By checking "Yes" above, 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.</p>
15.	<b>Channels 52-59.</b> If the proposed channel is within channels 52-59, the applicant certifies compliance with the following requirements, as applicable:  <input type="checkbox"/> The applicant is applying for a digital companion channel for which no suitable channel from channel 2-51 is available.  <input type="checkbox"/> Pursuant to Section 74.786(d), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.
16.	<b>Channels 60-69.</b> If the proposed channel is within channels 60-69, the applicant certifies compliance with the following requirements, as applicable:  <input type="checkbox"/> Pursuant to Section 74.786(e), the applicant has notified, within 30 days of filing this application, all commercial wireless licenses of the spectrum comprising the proposed TV channel and the first adjacent channels thereto, for which the proposed digital LPTV or TV translator antenna site lies inside the licensed geographic boundaries of the wireless licensees or within 75 miles and 50 miles, respectively, of the geographic boundaries of co-channel and adjacent-channel wireless licensees.

- ☐ Pursuant to Section 74.786(e), the applicant proposing operation on channel 63, 64, 68 and 69 ("public safety channels") has secured a coordinated spectrum use agreements(s) with 700 MHz public safety regional planning committee(s) and state administrator(s) of the region(s) and state(s) within which the antenna site of the digital LPTV or TV translator station is proposed to locate, and those adjoining regions and states with boundaries within 75 miles of the proposed station location.
- ☐ Pursuant to Section 74.786(e), the applicant for a channel adjacent to channel 63, 64, 68 or 69 has notified, within 30 days of filing this application, the 700 MHz public safety regional planning committee(s) and state administrator(s) of the region and state containing the proposed digital LPTV or TV translator antenna site and regions and states whose geographic boundaries lie within 50 miles of the proposed LPTV or TV translator antenna site.

**PREPARERS CERTIFICATION ON PAGE 3 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 RICHARD H. MERTZ	Relationship to Applicant (e.g., Consulting Engineer) CONSULTANT	
Signature	Date 08/08/2011	
Mailing Address CAVELL, MERTZ & ASSOCIATES, INC. 7732 DONEGAN DRIVE		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20109 -
Telephone Number (include area code) 7033929090	E-Mail Address (if available) RMERTZ@CAVELLMERTZ.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

#### Exhibit 11

**Description:** WPVN-LD EXHIBIT 11

EXHIBIT 11 CONTAINS STATEMENT A, NATURE OF THE PROPOSAL, ALLOCATIONS CONSIDERATIONS; FIGURES 1 THROUGH 4 AND; AND TABLE I.

#### Attachment 11

Description
<a href="#">WPVN-LD Exhibit 11</a>

#### Exhibit 12

**Description:** WPVN-LD EXHIBIT 12

EXHIBIT 12 CONTAINS STATEMENT B, ENVIRONMENTAL CONSIDERATIONS, TABLE OF CONTENTS, AND A COPY OF THE ENGINEERING PORTIONS OF THE FCC FORM.

#### Attachment 12

Description
<a href="#">WPVN-LD Exhibit 12</a>

Exhibit 12 - Statement B  
**ENVIRONMENTAL CONSIDERATIONS**

prepared for  
**Polnet Communications, Ltd.**  
WPVN-LD Aurora, Illinois  
Facility ID 168237  
Ch. 20 (Digital) 15 kW (MAX-DA)

**Introduction**

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

*Polnet Communications, Ltd.*, herein proposes to relocate the digital WPVN-LD facility to a different site. A directional transmitting antenna will be employed, to be located on an existing tower structure located atop a tall building. The building is the Trump Tower in Chicago which has been assigned the Antenna Structure Registration Number 1279395.

The use of existing building structure has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in 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 Electromagnetic Field**

The proposed operation was evaluated for human exposure to radiofrequency electromagnetic field using the procedures outlined in the Commission's OET Bulletin 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines 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 WPVN-LD Channel 20 antenna center of radiation will be 44.6 meters above the building roof level where the public might have easy access. An effective radiated power of

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**ENVIRONMENTAL CONSIDERATIONS**  
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15 kilowatts, horizontally polarized, will be employed utilizing a Dielectric model TLP8-E directional antenna. A “worst-case” relative field value of 23 percent is assumed for purposes of the calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 20 (center frequency 509 MHz) is  $339.3 \mu\text{W}/\text{cm}^2$ .

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 (10) 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 and the above assumptions, the proposed facility would contribute a power density of  $14.6 \mu\text{W}/\text{cm}^2$  at two meters above roof level near antenna support structure, or 4.3 percent of the general population/uncontrolled limit. At ground level locations away from the base of the building, the calculated RF power density is even lower,  $0.18 \mu\text{W}/\text{cm}^2$  or 0.05% of the general population/uncontrolled limit due to the increasing distance from the transmitting antenna. Based on building drawings provided by the applicant, there is an elevated structure on the roof that provides a guy anchor for the tower structure. This area is inaccessible to the public and the applicant considers this area to be an occupational/controlled access area. At this location, the calculated RF power density is  $18.2 \mu\text{W}/\text{cm}^2$  or 1.07 percent of the occupational/controlled limit of  $1,696.7 \mu\text{W}/\text{cm}^2$ .

§1.1307(b)(3) states that facilities are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent of the exposure limit. Since the instant situation meets the five percent exclusion test at all ground level and roof

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**ENVIRONMENTAL CONSIDERATIONS**  
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access areas, the impact of any other facilities near this site may be considered independently from this proposal. 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).

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

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level or near the base of 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, roof access will be restricted and controlled through the use of a locked door. 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 or at the base of the top mounted tower structure. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower or 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 §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.