

TECHNICAL EXHIBIT
MINOR AMENDMENT TO THE APPLICATION
FOR CONSTRUCTION PERMIT
STATION WATL-DT (FACILITY ID 22819)
ATLANTA, GEORGIA

APRIL 24, 2001

CH 25 500 KW 332 M

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Table of Contents

	Technical Narrative
Figure 1	Tower Sketch
Figure 2	Vertical Antenna Pattern
Figure 3	Coverage Map

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Technical Narrative

This Technical Exhibit supports a minor amendment to the application for construction permit for digital television (DTV) station WATL-DT on channel 25 at Atlanta, Georgia. Station WATL-DT has an application pending to operate with a non-directional antenna effective radiated power (ERP) of 1000 kW and an antenna height above average terrain (HAAT) of 315 meters (BMPCDT-19991008ABB).

Proposed Facilities

This amendment proposes to (1) change transmitter site, (2) reduce ERP and (3) increase HAAT from the application on file. Changes are being made to FCC form 301, Section III-D, questions 3 (site coordinates), 4-8 (antenna/tower height data), 9 (ERP), 10 (antenna), 11 (interference protection agreement), 12 (coverage map) and 13 (RFR analysis). Operation at the Richland Tower site (coordinates: 33-48-26 N, 84-20-22 W) with a non-directional ERP of 500 kW and antenna HAAT of 332 meters is hereby proposed.

The proposed transmitter site is more than 800 kilometers from the closest point of the Canadian border. The site is more than 1,300 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Powder Springs, Georgia, approximately 36 kilometers to the west. Coordination with Powder Springs may be necessary.

The closest point of the National Radio Quiet Zone (VA/WV) is more than 500 kilometers to the northeast. The closest point of the Table Mountain Radio Quiet Zone (CO) is more than 1,900 kilometers to the west-northwest. The closest radio astronomy site operating on TV channel 37 is at Green Bank, West Virginia, more than 600 kilometers to the northeast. These separations are sufficient to not be a concern for coordination purposes.

AM stations WGKA, WNIV, WQXI and WAFS are all located in excess of the assumed potential impact distance (1 kilometer for non-directional stations, 3.2 kilometers for directional stations). Therefore, no adverse impact to any AM station is expected to occur from the proposed WATL-DT operation.

Allocation Study

Interference calculations have been made using the procedures outlined in the FCC's OET-69 bulletin, using a 2 kilometer grid spacing. The pending application appears to cause excessive interference to stations WHIQ(TV) and WACS-TV. As shown in the table below, this proposal will reduce the interference caused to WHIQ(TV) to acceptable levels.

NTSC/DTV Station	Baseline	Proposed UNIQUE Interference
WHIQ(TV), NTSC-25, Huntsville, AL	739,292	11,057 (1.5%)
WACS-TV, NTSC-25, Dawson, GA	306,101	24,153 (7.9%) ¹

The proposed WATL-DT operation does not cause prohibitive interference to any other analog or DTV assignments and therefore complies with the FCC's 2%/10% interference standard to all stations with the exception of WACS-TV. WATL-DT intends to operate under an interference agreement with station WACS-TV.

Class A Consideration

The FCC's CDBS and its list of low power television (LPTV) assignments eligible for Class A status has been reviewed for potential impact. Interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin. The proposed WATL-DT operation does not cause any new calculated interference to any current or potential Class A station over that already predicted to be caused by the current WATL-DT application (filed prior to the FCC's May 1, 2001 DTV maximization deadline). If necessary, a waiver of the FCC rules is requested based on use of the FCC's OET-69 procedures to demonstrate no interference to LPTV assignments requesting Class A status.

¹ See interference agreement attached elsewhere to this application.

Radiofrequency Electromagnetic Field Exposure

The proposed WATL-DT facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna is located 350.7 meters above ground level. The DTV ERP is 500 kW. A conservative relative field of 0.11 was used for the calculation (see Figure 2B). Therefore, the “worst-case” calculated power density at a point 2 meters (6.6 feet) above ground level is 0.0017 mW/cm^2 . This is less than 0.5% of the FCC's recommended limit of 0.36 mW/cm^2 for channel 25 for an “uncontrolled” environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this is a multi-user site an agreement will control access. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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. The proposed WATL-DT operation appears to be otherwise categorically excluded from environmental processing.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

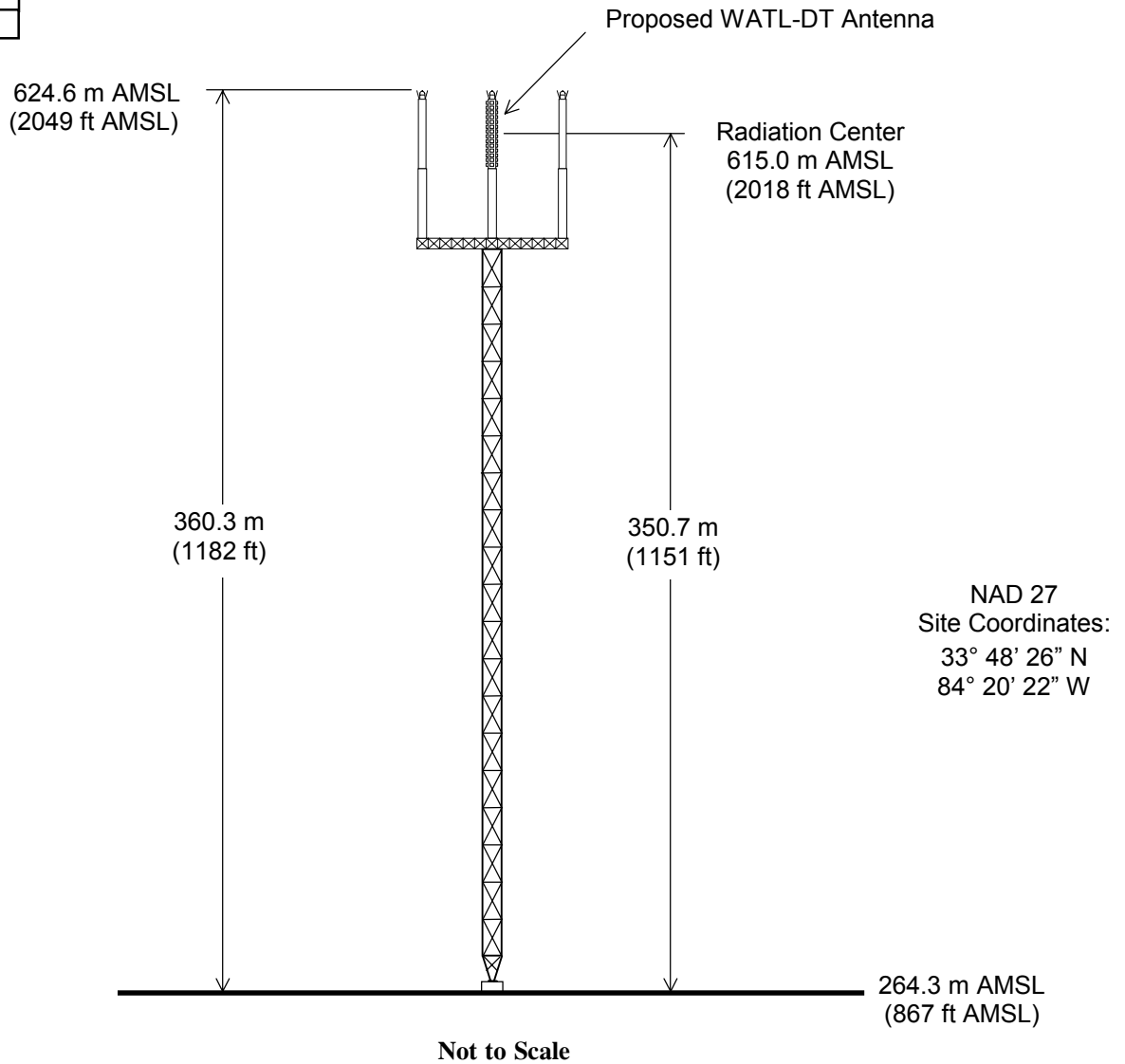
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April 24, 2001

Tower Reg. No. 1223132

Richland Tower

**PROPOSED ANTENNA AND SUPPORTING STRUCTURE**

STATION WATL-DT

ATLANTA, GEORGIA

CH 25 500 KW 332 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Dielectric

Proposal Number **DCA-9045**Date **9-Nov-00**

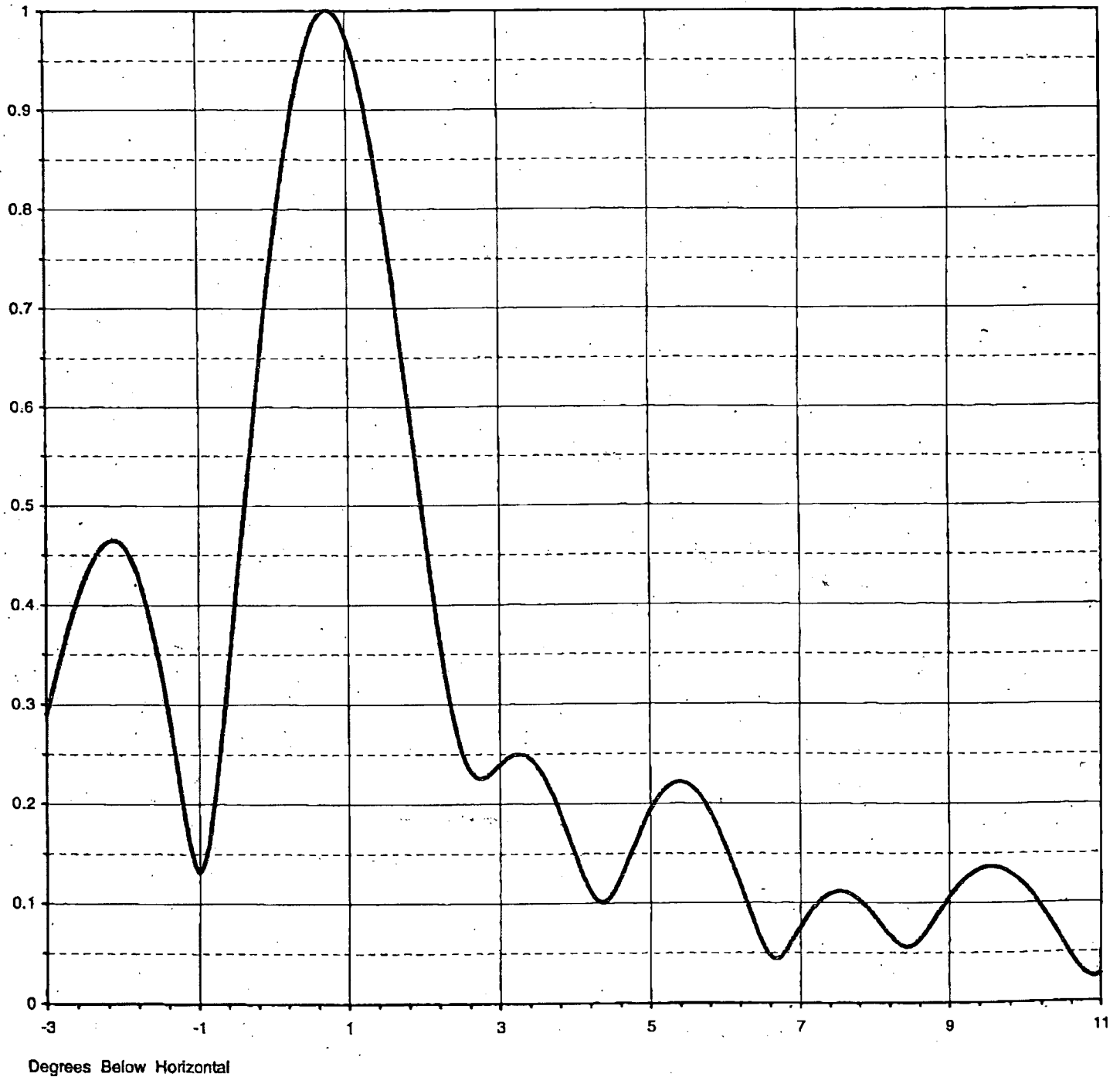
Call Letters

Channel **25**Location **Atlanta, GA**

Customer

Antenna Type **TUC-O5-14/70H-1-T**

ELEVATION PATTERN

RMS Gain at Main Lobe **24.80 (13.94 dB)**Beam Tilt **0.75 deg**RMS Gain at Horizontal **14.40 (11.58 dB)**Frequency **539.00 MHz**Calculated / Measured **Calculated**Drawing # **14U248075**

Dielectric

Proposal Number **DCA-9045**Date **9-Nov-00**

Call Letters

Channel **25**

Location

Atlanta, GA

Customer

Antenna Type

TUC-O5-14/70H-1-T

ELEVATION PATTERN

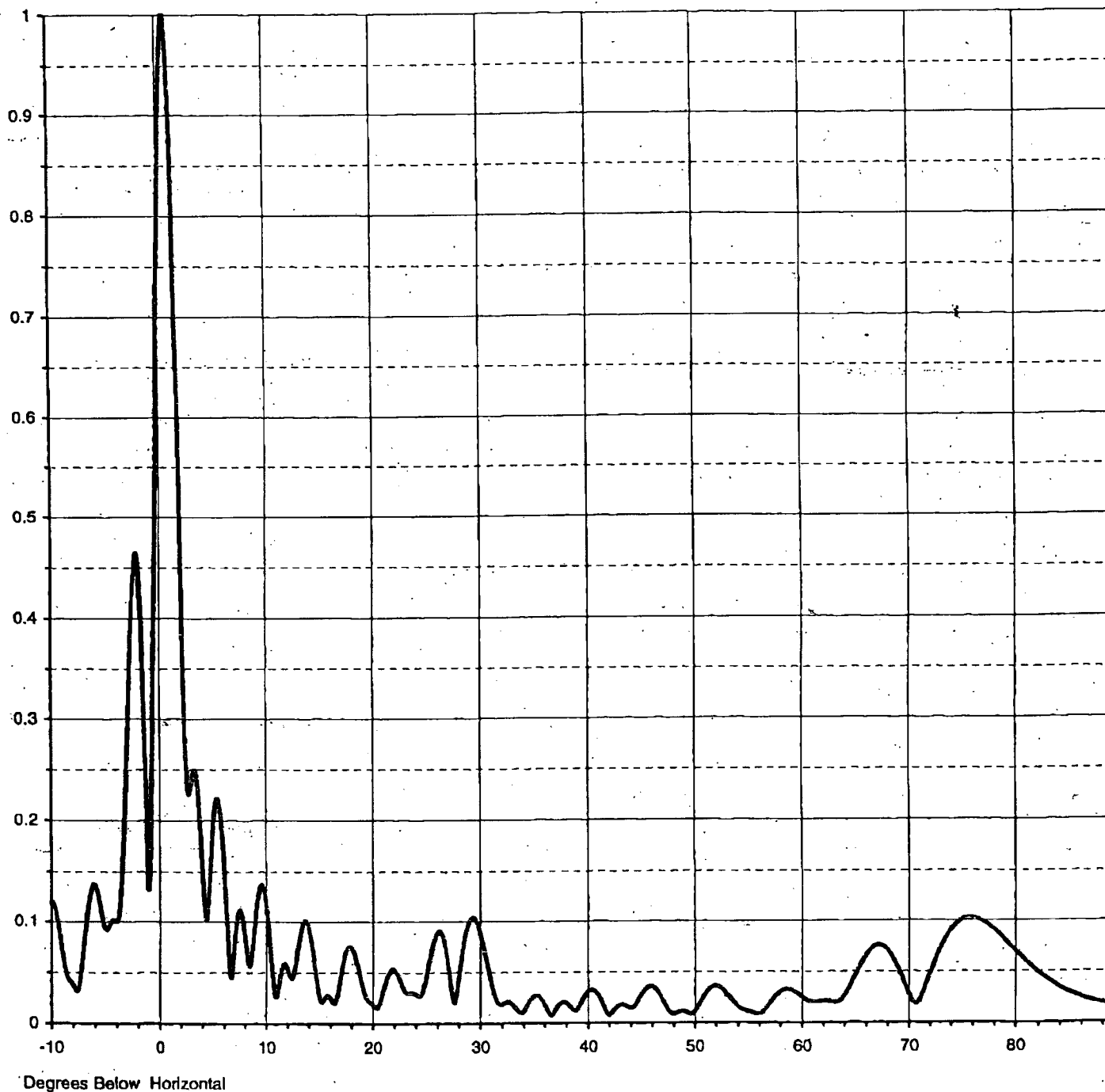
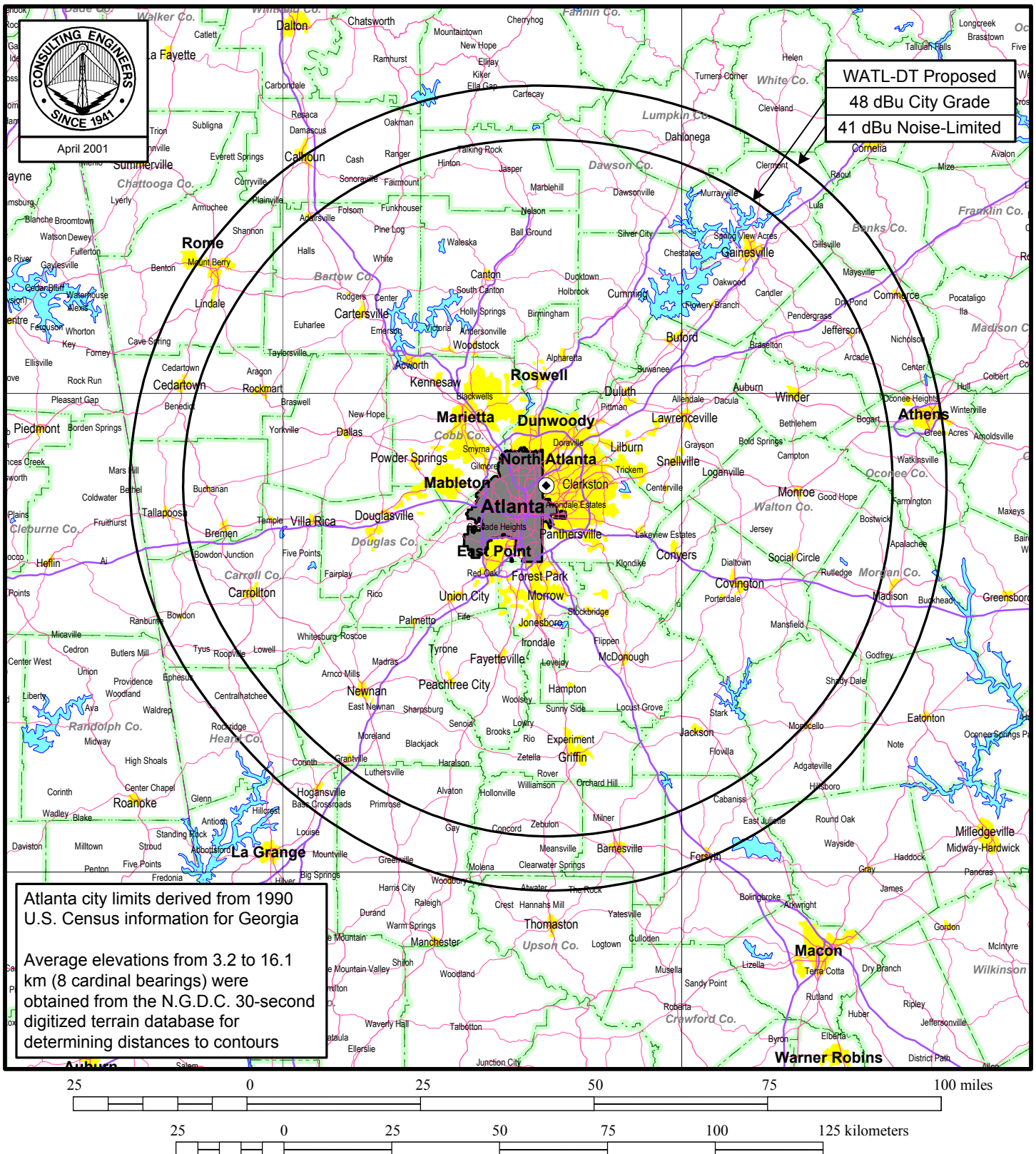
RMS Gain at Main Lobe **24.80 (13.94 dB)**Beam Tilt **0.75 deg**RMS Gain at Horizontal **14.40 (11.58 dB)**Frequency **539.00 MHz**Calculated / Measured **Calculated**Drawing # **14U248075-90**

Figure 3



PREDICTED F(50,90) COVERAGE CONTOURS

STATION WATL-DT
ATLANTA, GEORGIA

CH 25 500 KW 332 M

du Treil, Lundin & Rackley, Inc Sarasota, Florida