

ENGINEERING STATEMENT

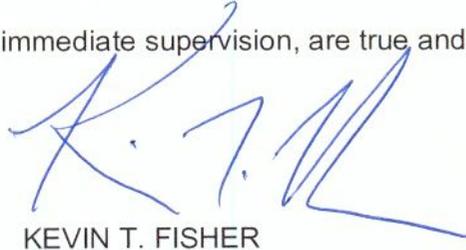
The engineering data contained herein have been prepared on behalf of TCT OF MICHIGAN, INC., licensee of Class A Television Station WDWO-CA, Channel 18 in Detroit, Michigan, in support of this amendment to its pending Application for Construction Permit BPTTA-20080801BAL, which specifies operation with maximized analog facilities from the licensed WDWO-CA site.

The purpose of this amendment is to specify a reduction in effective radiated power from 150 kw to 125 kw, as well as specify a directional antenna, in order to satisfy the Commission's interference concerns to WHTV, Channel 18 in Jackson, Michigan, and WHIZ-TV, Channel 18 in Zanesville, Ohio. No change in site location or antenna height is proposed herein.

It is now intended to mount a standard Andrew directional antenna at the 88-meter level of the existing 106-meter communications tower on which the present WDWO-Ca antenna is mounted. Exhibit B is a map upon which the revised service contours are plotted. It is important to note that the newly proposed 74 dBu contour completely encompasses that which obtains from the licensed WDWO-DT facility. A contour overlap analysis and interference study is provided in Exhibit C, and a new power density calculation follows as Exhibit D.

Because no change in the overall height or location of the existing tower is proposed, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1004893 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KEVIN T. FISHER

December 5, 2008

CONTOUR POPULATION

74 DBU : 2,161,765

64 DBU : 3,480,237

Smith and Fisher



EXHIBIT B

CONTOUR OVERLAP AND
LONGLY-RICE INTERFERENCE STUDIES
PROPOSED WDWO-CA
CHANNEL 18 – DETROIT, MICHIGAN
[AMENDMENT TO BPTTA-20080801BAL]

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit C-2. The study is based on contour protection requirements of Sections 74.705, 74.706, 74.707, 74.708, 74.709 and 74.710 of the FCC's Rules with respect to analog and digital full-power, analog and digital low power television stations, and Land Mobile allotments. It concludes that the facility proposed herein meets these requirements except to three stations listed in Exhibit C-2 with a negative number shown in the "margin" column.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed WDWO-CA) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit C-3. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

EXHIBIT C-1

With regard to the facilities of concern, waivers of Section 74.706 of the Commission's Rules with respect to interference WDCP-DT, WTOL-DT, and WTVG-DT, and Section 74.707 with regard to W22CO, are requested and believed to be justified based on the aforementioned Longley-Rice studies.

PROPOSED WDWO-CA
 CH. 18 - DETROIT, MI

REFERENCE

42 22 40.0N
 83 14 37.0W

LPTV Pwr = 20 kW, HANSL COR= 279 M

DISPLAY DATES
 DATA 11-22-08
 SEARCH 12-04-08

..... Channel 18-, 494 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin
WDCP-TV	CP 18	University Cente	MI 144.63	335.7	> 264.79	-120.16
WHTV	LI 18+	Jackson	MI 105.49	273.0	> 124.68	-19.19
W22CO	CP 18G	Toledo	OH 81.87	191.8	> 098.38	-16.51
WEYI-TV	LI 25-	Saginaw	MI 101.08	337.5	> 100.00	1.08
WTOL	LI 17	Toledo	OH 79.11	188.2	> 076.99	2.12
WTVG	LI 19	Toledo	OH 78.41	190.4	> 072.64	5.77
W32AR	AP 18G	Lexington	OH 186.69	163.6	> 172.62	14.07
CHCH-DT	GR 18	Hamilton	ON 298.36	70.8	> 272.53	25.83
CICOTV18	LI 18Z	London	ON 167.53	66.8	> 130.48	37.05
WDCP-TV	AP 19+	University Cente	MI 144.63	335.7	> 107.43	37.20
WISE-DR	APR 18	Fort Wayne	IN 214.82	229.3	> 176.52	38.30
WHIZ-TV	LI 18-	Zanesville	OH 291.81	158.4	> 248.94	42.87
303302	AP 17+	Sarnia	ON 94.78	51.1	> 025.25	69.53
WVIZ	CP 25+	Cleveland	OH 169.82	132.3	> 100.00	69.82
WVIZ	LI 25+	Cleveland	OH 169.84	132.3	> 100.00	69.84
WOIO	LI 19Z	Shaker Heights	OH 169.16	130.1	> 097.56	71.60
WKYC-TV	CP 17	Cleveland	OH 169.65	130.1	> 096.07	73.58
WDCP-TV	LI 19+	University Cente	MI 144.63	335.7	> 070.10	74.53

* Actual radials antenna height and directional patterns used (if any)

Summary Study

1990 Census data selected
 TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 12-03-2008 Time: 15:24:07

Record Selected for Analysis

WDWO-CA. USERRECORD-01 DETROIT MI US
 Channel 18 ERP 125. kW HAAT 99. m RCAMSL 00279 m
 Latitude 042-22-40 Longitude 0083-14-37
 Status APP Zone 1 Border Offset -
 Dir Antenna Make usr Model USRPAT01 Beam tilt N Ref Azimuth
 65.
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	118.463	76.0	24.1
45.0	112.812	81.2	24.5
90.0	118.463	86.3	25.5
135.0	94.613	99.2	25.9
180.0	27.203	96.2	18.8
225.0	1.540	88.2	8.6
270.0	27.203	79.9	16.8
315.0	94.613	76.6	22.9

Evaluation from Class A Station

Station inside contour of station
 WTOL-DT 17 TOLEDO OH DTVPLN DTVP0276

Contour overlap to station
 WTOL 17 TOLEDO OH BLCDT 20031103ABR
 Offset Proposed - Offset Protected Required D/U ratio: -49.0

Contour overlap to station
 WISE-DR 18 FORT WAYNE IN BPRM 20080820AHU
 Offset Proposed - Offset Protected Required D/U ratio: 21.0

Contour overlap to station
 WHTV 18 JACKSON MI BLCT 20001023ADV

Offset Proposed - Offset Protected + Required D/U ratio: 28.0

Contour overlap to station
 WDCP-TV 18 UNIVERSITY CENTER MI BPEDT 20000217ABB
 Offset Proposed - Offset Protected Required D/U ratio: 21.0

Contour overlap to station
 WUCM-DT 18 UNIVERSITY CENTER MI DTVPLN DTVP0309
 Offset Proposed - Offset Protected Required D/U ratio: 21.0

Contour overlap to station
 WHIZ-TV 18 ZANESVILLE OH BMLCT 20030715ACX
 Offset Proposed - Offset Protected - Required D/U ratio: 45.0

Station inside contour of station
 WPXD-DR 19 ANN ARBOR MI BPRM 20080619ALV

Contour overlap to station
 WTVG-DT 19 TOLEDO OH DTVPLN DTVP0367
 Offset Proposed - Offset Protected Required D/U ratio: -48.0

Spacing violation to station
 WMYD 20 DETROIT MI BLCT 20040810AAC
 Site-to-site distance 9.7km

Contour Overlap Evaluation from Class A Complete

Contour Overlap Evaluation from LPTV Station to LPTV Stations

No Spacing violations or contour overlap from LPTV station

Contour Overlap Evaluation from LPTV to LPTV Stations Complete

Contour Overlap to Proposed Station

Station
 WHTV 18 JACKSON MI BLCT20001023ADV causes

Contour overlap to Class A station
 WDWO-CA. 18 DETROIT MI USERRECORD01
 Offset Proposed + Offset Class A - Required D/U ratio: 28.0

Station
 WDCP-TV 18 UNIVERSITY CENTER MI BPEDT20000217ABB causes

Contour overlap to Class A station
 WDWO-CA. 18 DETROIT MI USERRECORD01
 Offset Proposed Offset Class A - Required D/U ratio: 34.0

Station

EXHIBIT D

POWER DENSITY CALCULATION

PROPOSED WDWO-CA
CHANNEL 18 – DETROIT, MICHIGAN
[AMENDMENT TO BPTTA-20080801BAL]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Detroit facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 125 kw, an antenna radiation center 88 meters above ground, and the vertical pattern of the Andrew antenna, maximum power density two meters above ground of 0.017 mw/cm^2 is calculated to occur 33 meters northeast of the base of the tower. Since this is only 5.1 percent of the 0.33 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 18 (494-500 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.