

ENGINEERING STATEMENT  
RE APPLICATION TO AMEND PENDING APPLICATION  
BMPCDT-20020221AAC  
WBBH-DT, FORT MYERS, FLORIDA  
CHANNEL 15 950 KW ERP 453 METERS HAAT

JUNE 2002

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Waterman Broadcasting Corporation of Florida, licensee of WBBH-DT, Channel 15, Fort Myers, Florida. The purpose of this engineering statement is to amend a pending application BMPCDT-20020221AAC. WBBH-DT is proposing a facility of 950 kilowatts and a height above average terrain of 453 meters.

#### ERP and Antenna Height

Based on FCC Rule Section 73.622(f)(5), WBBH-DT is requesting an increase in ERP that exceed the permissible limits on DTV power and antenna height set forth in Section 73.622(f)(8), based on the same geographic coverage area as the largest station within their market. WINK-DT is allotted to channel 53 with an effective radiated power of 1000 kW and a height above average terrain of 451 meters. The theoretical 41 dBu coverage contour of the WINK-DT allotment encompasses approximately 38,453 km<sup>2</sup>. The 41 dBu coverage contour of the proposed WBBH-DT facility encompasses 38,195 km<sup>2</sup>. Exhibit E-1 illustrates the 41 dBu contours of the proposed WBBH-DT facility and the allotted WINK-DT facility.

#### Interference Analysis

A study of predicted interference caused by the proposed WOWK-TV operation has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and population indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculation

identical to the FCC's program. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 2 sq. km. Using 3-second terrain data sampled approximately every 0.1 km at one-degree azimuth intervals with 1990 census centroids, all studies are based upon data in the current CDBS data base update of the FCC's engineering database.

WBBH-DT is requesting a waiver of Section 73.623(a) based on Section 73.623(c)(5)(iii). Based on Longley-Rice terrain dependent propagation methods, the proposed WBBH-DT facility will not cause interference to licensed facility of WTCN-CA, Stuart, Florida. Exhibit E-2 shows the Longley-Rice study between the proposed WBBH-DT facility and the licensed facility of WTCN-CA. From the CDBS database, there is a rescinded construction permit for WTCN-CA specifying 142.6 kilowatts and a radiation center of 135 meters above mean sea level.

#### Computed Principal Community Contour

The predicted F(50,90) 41 dBu and 48 dBu contours were computed according to Section 73.625(b) of the Commission's rules. The average elevation data from eight cardinal and other radials between 3.2 and 16.1 km is based on the 3-second computerized terrain database.

Exhibit E-1 indicates the proposed 48 dBu contour will serve all of Fort Myers, Florida, the principal community of WBBH-DT.

#### Antenna Site

(unchanged from BMPCDT-20020221AAC)

#### Antenna and Elevation Data

(unchanged from BMPCDT-20020221AAC)

Environmental Statement

(unchanged from BMPCDT-20020221AAC)

PROPOSED WBBH-DT
48 dBu
41 dBu

WINK-DT, FORT MYERS, FL CH53 ALLOTMENT 1000 KW 451 M HAAT 41 dBu
---

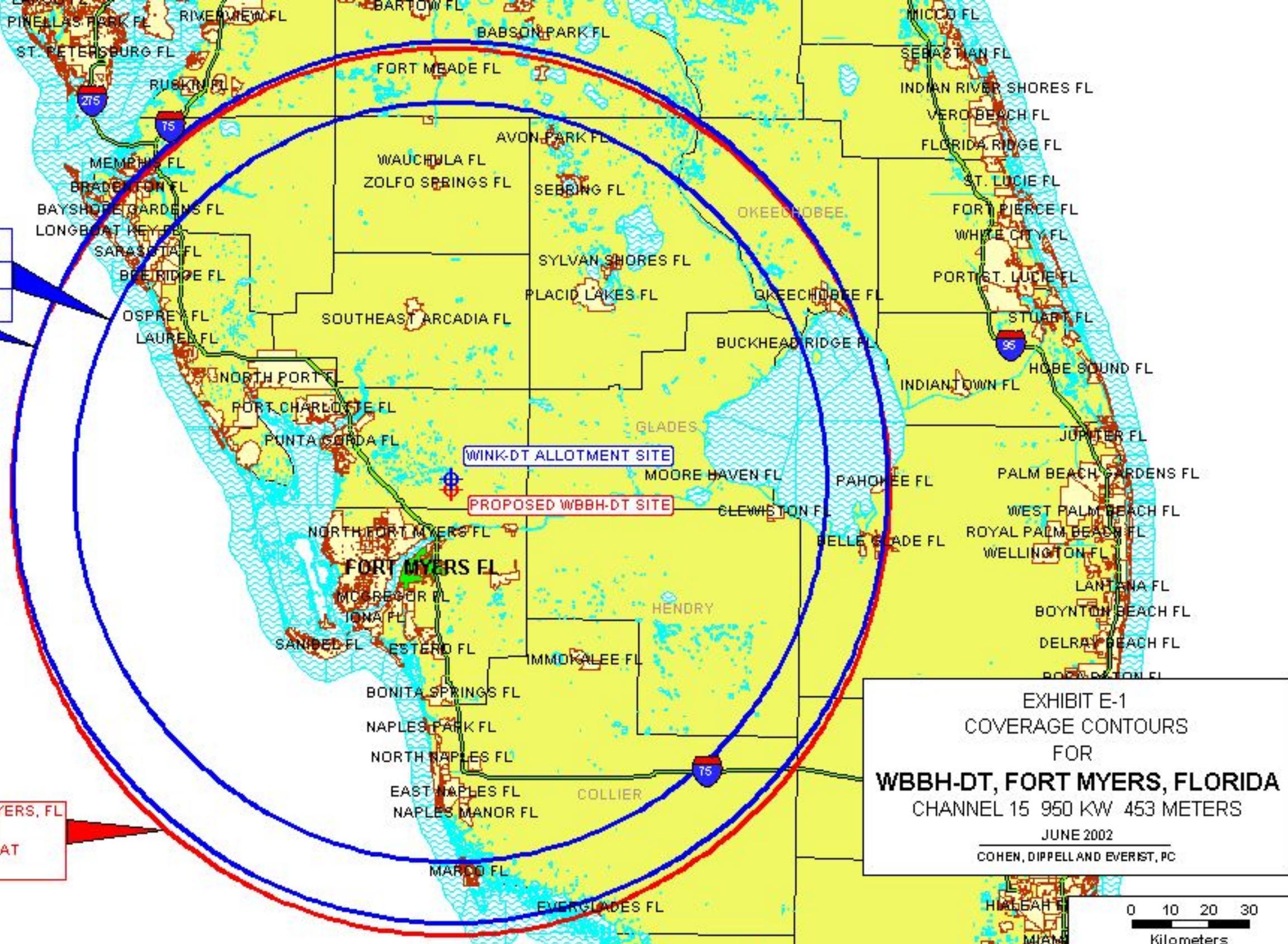


EXHIBIT E-1  
 COVERAGE CONTOURS  
 FOR  
**WBBH-DT, FORT MYERS, FLORIDA**  
 CHANNEL 15 950 KW 453 METERS  
 JUNE 2002  
 COHEN, DIPPELL AND EVERIST, PC

950kw-vs-wtcn-ca-results.txt  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-10-2002 Time: 15:29:02

Record Selected for Analysis

WBBH-950 OTHER -RMG466 FORT MYERS FL US  
Channel 15 ERP 950 kw HAAT 0 m RCAMSL 00461 m  
Latitude 26 -49-21 Longitude 81 -45-47  
Status APP Zone 3 Border  
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

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kw)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	950.000	449.6	110.1
45.0	950.000	446.8	109.8
90.0	950.000	450.1	110.1
135.0	950.000	454.3	110.5
180.0	950.000	455.9	110.6
225.0	950.000	453.3	110.4
270.0	950.000	453.9	110.4
315.0	950.000	449.7	110.1

Evaluation toward Class A Stations

Contour overlap to Class A station  
WTCN-CA 15 STUART FL BLTTL 20000818ADJ  
D/U ratio at contour 20.3 dB  
Offset Proposed Offset Class A + Required D/U ratio: 34.0  
Radial 0.0 degrees  
Bearing to point on contour 72.6 degrees  
D/U ratio at contour 20.6 dB  
Radial 10.0 degrees  
Bearing to point on contour 72.9 degrees  
D/U ratio at contour 21.0 dB  
Radial 20.0 degrees  
Bearing to point on contour 73.4 degrees  
D/U ratio at contour 21.3 dB  
Radial 30.0 degrees  
Bearing to point on contour 74.0 degrees  
D/U ratio at contour 21.5 dB  
Radial 40.0 degrees  
Bearing to point on contour 74.6 degrees  
D/U ratio at contour 21.8 dB  
Radial 50.0 degrees  
Bearing to point on contour 75.2 degrees  
D/U ratio at contour 21.9 dB  
Radial 60.0 degrees  
Bearing to point on contour 76.0 degrees  
D/U ratio at contour 22.0 dB

Radial 70.0 degrees  
Bearing to point on contour 76.7 degrees  
D/U ratio at contour 22.0 dB  
Radial 80.0 degrees  
Bearing to point on contour 77.5 degrees  
D/U ratio at contour 21.9 dB  
Radial 90.0 degrees  
Bearing to point on contour 78.3 degrees  
D/U ratio at contour 21.8 dB  
Radial 100.0 degrees  
Bearing to point on contour 79.0 degrees  
D/U ratio at contour 21.6 dB  
Radial 110.0 degrees  
Bearing to point on contour 79.7 degrees  
D/U ratio at contour 21.4 dB  
Radial 120.0 degrees  
Bearing to point on contour 80.4 degrees  
D/U ratio at contour 21.2 dB  
Radial 130.0 degrees  
Bearing to point on contour 81.1 degrees  
D/U ratio at contour 20.9 dB  
Radial 140.0 degrees  
Bearing to point on contour 81.6 degrees  
D/U ratio at contour 20.5 dB  
Radial 150.0 degrees  
Bearing to point on contour 81.9 degrees  
D/U ratio at contour 20.0 dB  
Radial 160.0 degrees  
Bearing to point on contour 82.0 degrees  
D/U ratio at contour 19.6 dB  
Radial 170.0 degrees  
Bearing to point on contour 81.9 degrees  
D/U ratio at contour 19.2 dB  
Radial 180.0 degrees  
Bearing to point on contour 81.7 degrees  
D/U ratio at contour 18.9 dB  
Radial 190.0 degrees  
Bearing to point on contour 81.3 degrees  
D/U ratio at contour 18.6 dB  
Radial 200.0 degrees  
Bearing to point on contour 80.8 degrees  
D/U ratio at contour 18.4 dB  
Radial 210.0 degrees  
Bearing to point on contour 80.1 degrees  
D/U ratio at contour 18.3 dB  
Radial 220.0 degrees  
Bearing to point on contour 79.4 degrees  
D/U ratio at contour 18.3 dB  
Radial 230.0 degrees  
Bearing to point on contour 78.7 degrees  
D/U ratio at contour 18.3 dB  
Radial 240.0 degrees  
Bearing to point on contour 78.2 degrees  
D/U ratio at contour 18.3 dB  
Radial 250.0 degrees  
Bearing to point on contour 77.7 degrees  
D/U ratio at contour 18.3 dB  
Radial 260.0 degrees  
Bearing to point on contour 77.3 degrees  
D/U ratio at contour 18.2 dB  
Radial 270.0 degrees  
Bearing to point on contour 76.8 degrees  
D/U ratio at contour 18.1 dB  
Radial 280.0 degrees  
Bearing to point on contour 76.2 degrees  
D/U ratio at contour 18.0 dB

Radial 290.0 degrees
Bearing to point on contour 75.4 degrees
D/U ratio at contour 18.1 dB
Radial 300.0 degrees
Bearing to point on contour 74.7 degrees
D/U ratio at contour 18.3 dB
Radial 310.0 degrees
Bearing to point on contour 74.1 degrees
D/U ratio at contour 18.6 dB
Radial 320.0 degrees
Bearing to point on contour 73.5 degrees
D/U ratio at contour 19.0 dB
Radial 330.0 degrees
Bearing to point on contour 73.0 degrees
D/U ratio at contour 19.4 dB
Radial 340.0 degrees
Bearing to point on contour 72.6 degrees
D/U ratio at contour 19.8 dB
Radial 350.0 degrees
Bearing to point on contour 72.5 degrees

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quiet zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel 15 Proposed Station Call WBBH-950 City/State FORT MYERS FL ARN OTHER RMG466

Stations Potentially Affected by Proposed Station

Chan 15 Call WTCN-CA City/State STUART FL Dist(km) 147.0 Status LIC Application Ref. No. BLTTL -20000818ADJ

Separator line of percent signs

Analysis of Interference to Affected Station 1

Analysis of current record

Channel 15 Call WTCN-CA City/State STUART FL Application Ref. No. BLTTL -20000818ADJ

Stations Potentially Affecting This Station

Chan 14 Call WRDQ City/State ORLANDO FL Dist(km) 178.3 Status CP Application Ref. No. BPCDT -19991029AGT
Chan 15 Call WBBH-DT City/State FORT MYERS FL Dist(km) 147.1 Status PLN Application Ref. No. DTVPLN -DTV0157
Chan 15 Call WBBH-950 City/State FORT MYERS FL Dist(km) 147.0 Status APP Application Ref. No. OTHER -RMG466

950kw-vs-wtcn-ca-results.txt

15	WCEU	NEW SMYRNA BEACH FL	244.4	LIC	BLCT	-19880129KF
16	WPBF-DT	TEQUESTA FL	8.3	PLN	DTVPLN	-DTVP0201
16	WPBF	WEST PALM BEACH FL	8.3	CP	BPCDT	-19991101AEG
17	WLRN-TV	MIAMI FL	127.8	LIC	BLET	-19930216KG
18	WPBT	MIAMI FL	127.8	LIC	BLEDT	-20010712AGD
18	WPBT-DT	MIAMI FL	127.8	PLN	DTVPLN	-DTVP0284
19	WBZL	MIAMI FL	126.5	CP	BPCDT	-19990625KH
19	WDZL-DT	MIAMI FL	126.5	PLN	DTVPLN	-DTVP0329
22	WFOR-TV	MIAMI FL	126.5	LIC	BLCDT	-20011023ABS
22	WFOR-TV	MIAMI FL	126.5	CP MOD	BMPCDT	-20010416AAH
22	WFOR-DT	MIAMI FL	126.5	PLN	DTVPLN	-DTVP0448
23	WLTV	MIAMI FL	126.5	LIC	BLCT	-19950710KF
29	WFLX	WEST PALM BEACH FL	59.0	CP	BPCT	-19990910AAA
30	WGPU	FORT MYERS FL	147.1	LIC	BLET	-19830630KG

Proposal causes no interference

#####

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED