

TECHNICAL EXHIBIT  
RFR STATEMENT STATION  
WNYA-DT, CH 13  
PITTSFIELD, MASSACHUSETTS

**Technical Statement**

Reason for Modification

The proposed modification of the facility is requested because ERI, the manufacturer of the antenna in our currently authorized facility has not been able to guarantee that they would be able to deliver the antenna specified in the construction permit for WNYA before the February 17, 2009 transition date. In September 2008, immediately after the grant of the current CP for WNYA, we executed a purchase order for the ERI antenna. Only at that time did ERI let us know that because they have never manufactured the proposed antenna (it is a new design released only at the NAB convention in April 2008) and that they had not yet even designed the radomes that is required for that antenna in a climate with inclement weather that is present at the WNYA transmitter site.

By modifying to the proposed PSI antenna, we would be making very minor changes in the facility. The transmitter location is identical to the currently authorized site, as is the ERP of the station. Both the authorized ERI antenna and the proposed PSI antenna are considered generic “omnidirectional” antennas. With the proposed modification, the population within the WNYA coverage area would shrink a *de minimus* amount – 6,833 persons – or about 0.5%. However, all persons within this small area of lost coverage are served by several other television stations, and almost all of the area is actually located outside of the WNYA home DMA.

PSI, however, is committed to delivering the proposed antenna within six weeks of ordering the antenna. Because of the historically bad weather at the WNYA transmitter site in winter, we request expedited action on this application in order to complete construction in early December 2008. (Our new transmitter will be delivered in December 2008.)

## RF Energy Exposure

The proposed 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 75 meters above ground level. The maximum DTV ERP is 12.7 Kw. A conservative vertical plane relative field value of 0.2 was presumed for the antenna's downward radiation. The calculated power density at a point 2 meters above ground level is 0.0032 mW/cm<sup>2</sup>. This is 1.58% of the FCC's recommended limit of 0.2 mW/cm<sup>2</sup> for channel 13 for an "uncontrolled" environment. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with RFR warning signs. As this is a multi-user site, an agreement will be in effect with the other stations in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that 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.

Finally, it is noted that this technical exhibit only addresses reason for the modification and the potential for radio frequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner as part of the tower registration process.

