

ENGINEERING EXHIBIT

Application for Post-Transition Digital Television Station Construction Permit

prepared for

Gray Television Licensee, Inc.

WIBW-DT Topeka, KS

Facility ID 63160

Ch. 13 18.1 kW 413 m

Gray Television Licensee, Inc. (“Gray”) is the licensee of television station WIBW-TV, analog Channel 13 and digital Channel 44, Topeka, KS. Gray herein proposes construction of the WIBW-DT post-transition digital facility on Channel 13. This channel was established in Appendix B of the Seventh Report and Order in MB Docket 87-278.

The instant proposal specifies an effective radiated power (“ERP”) of 18.1 kW at 413 meters antenna height above average terrain (“HAAT”), with a nondirectional antenna. The proposed coverage contour extends beyond that of the Appendix B parameters of 18.1 kW ERP and 421 meters HAAT. The Appendix B facility incorporates a theoretical directional antenna pattern due to the impact of non-uniform terrain and the differences in the F(50,50) and F(50,90) propagation curves.

The proposed digital Channel 13 operation will employ the existing non-directional antenna system licensed for WIBW-TV’s analog Channel 13. The antenna HAAT is changed to 413 meters (from 421 meters as currently licensed), however there is no change in antenna height above mean sea level. The HAAT was recalculated from the USGS 3-arc second terrain database due to a geographic coordinate correction of three seconds Latitude and one second Longitude.

The antenna is a horizontally polarized RCA model TW-18A13-P. The Channel 13 antenna is top-mounted on the existing WIBW-TV antenna supporting structure, having FCC Antenna Structure Registration (“ASR”) number 1032648. No change to the overall structure height and no tower work are required to carry out this proposal.

A map is supplied as **Figure 1**, which depicts the standard predicted coverage contours. This map includes the location of Topeka, WIBW-DT’s principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 43 dBμ contour.

The proposed WIBW-DT facility’s predicted service population provides a 100.5 percent match of the Appendix B facility, as detailed in the table below.

Post-Transition Population Summary		
Population Summary (2000 Census) OET Bulletin 69 method	Appendix B	Proposed
Within Noise Limited Contour	719,564	724,115
Not affected by terrain losses	677,668	681,243
Lost to all interference	3,099	3,383
Net DTV Service	674,569	677,860
Match of Appendix B	---	100.49%

Freeze Waiver Request

A waiver of the Commission’s August 3, 2004 “freeze” concerning expansion in service area¹ is requested. The proposal complies with the criteria for a freeze waiver request outlined in the Report and Order in the Third Periodic Review.² WIBW-DT will change channel for post-transition operation and will employ its existing analog antenna.

The map attached as **Figure 2** supplies a comparison of the 36 dBμ digital service contour corresponding to the proposed WIBW-DT facility and the Appendix B parameters. As shown thereon, the amount of contour extension does not exceed five miles at any azimuth.

Absent the waiver, the WIBW-DT non-directional ERP would have to be reduced to 15.6 kW to avoid a contour extension. At this power level, the resulting DTV service contour would not

¹Public Notice “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes,” DA 04-2446, released August 3, 2004.

²Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, MB Docket No. 07-91, FCC 07-228, released December 31, 2007.

cover 19,324 persons within an area of 546.4 sq. km that are presently within the WIBW-TV analog Grade B contour. The potential loss area is depicted in **Figure 2A**.

A detailed interference study per OET Bulletin 69³ shows that the proposal complies with the 0.5 percent limit of new interference caused to other stations' Appendix B facilities, as summarized below. Protection requirements towards authorized Class A stations are also satisfied.

Post-Transition Interference Analysis Summary

Ch	Call Sign	State/City Facility ID	Power (kW) HAAT (m)	Dist (km) Bear (°T)	Appendix B Baseline Population (2000 Census)	New Interference From Proposal Population	Percent
12	KSQA-DT	KS TOPEKA 166546	3.2 225	25.5 75.3	420,257	258	0.06%
12	KWCH-DT	KS HUTCHINSON 66413	18.5 463	182.6 235.4	--- no interference caused ---		
13	KFJX-DT	KS PITTSBURG 83992	0.167 302	230.5 149.0	289,019	45	0.02%
13	WHO-DT	IA DES MOINES 66221	36.1 609	375.5 32.5	1,038,528	-1	n/a
13	KETA-DT	OK OKLAHOMA CITY 50205	26.4 465	399.2 199.0	1,456,121	0	0.00%

Other Allocation Considerations

The nearest FCC monitoring station is 294 km distant at Grand Island, NE. This exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The site is not located within the areas requiring coordination with “quiet” zones specified in §73.1030(a) and (b). There are no AM stations within 3.2 kilometers of the site, based

³FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission’s implementation of OET-69 show excellent correlation.

on information contained within the Commission's database. The site location is beyond the border areas requiring international coordination.

Human Exposure to Radiofrequency Electromagnetic Field (Environmental)

The proposal will involve use of an existing transmitting antenna. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No tower construction or change in structure height is proposed. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. Based on OET-65 equation (10), and assuming the worst-case of 100% antenna relative field in downward elevations, the calculated power density attributable to the proposed facility at locations near the transmitter site at a height of two meters above ground level is $4.6 \mu\text{W}/\text{cm}^2$, which is 2.3 percent of the "uncontrolled / general public" maximum permissible exposure limit. This is below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent. When the antenna's elevation pattern is considered, the calculated RF exposure level will be even lower.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from RF electromagnetic field exposure in excess of FCC guidelines.

Certification

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.

Joseph M. Davis, P.E.
April 6, 2008

Chesapeake RF Consultants, LLC
11993 Kahns Road
Manassas, VA 20112
703-650-9600

List of Attachments

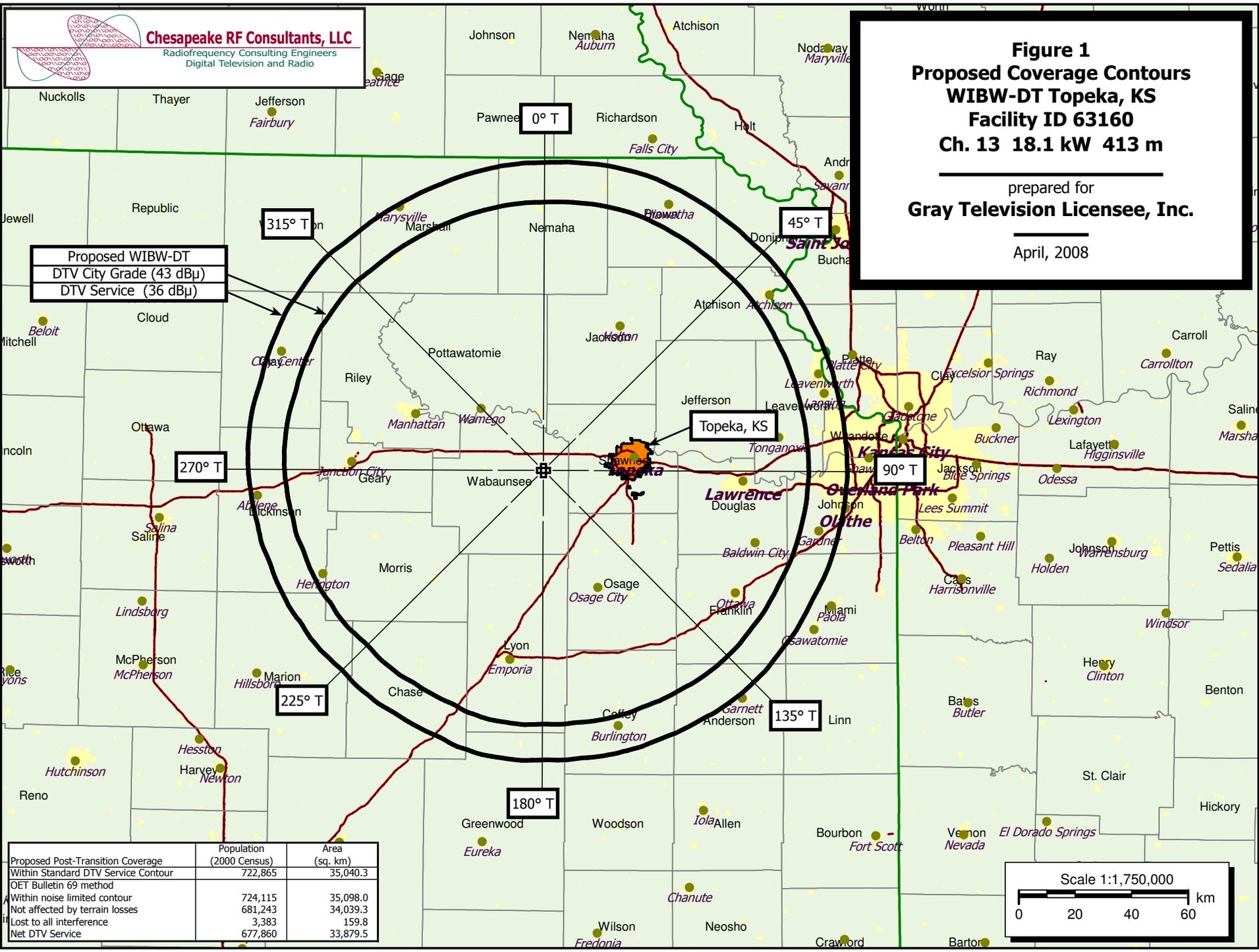
Figure 1	Proposed Coverage Contours
Figure 2	Coverage Contour Comparison
Figure 2A	Potential Loss Area Without Waiver
Form 301	Saved Version of Engineering Sections from FCC Form at Time of Upload

This material was entered April 6, 2008 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.

Figure 1
Proposed Coverage Contours
WIBW-DT Topeka, KS
Facility ID 63160
Ch. 13 18.1 kW 413 m

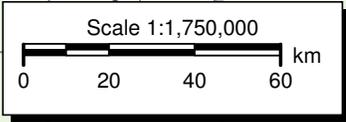
prepared for
Gray Television Licensee, Inc.

April, 2008



Proposed WIBW-DT
 DTV City Grade (43 dBμ)
 DTV Service (36 dBμ)

Proposed Post-Transition Coverage	Population (2000 Census)	Area (sq. km)
Within Standard DTV Service Contour	722,865	35,040.3
OET Bulletin 69 method		
Within noise limited contour	724,115	35,098.0
Not affected by terrain losses	681,243	34,039.3
Lost to all interference	3,383	159.8
Net DTV Service	677,860	33,879.5



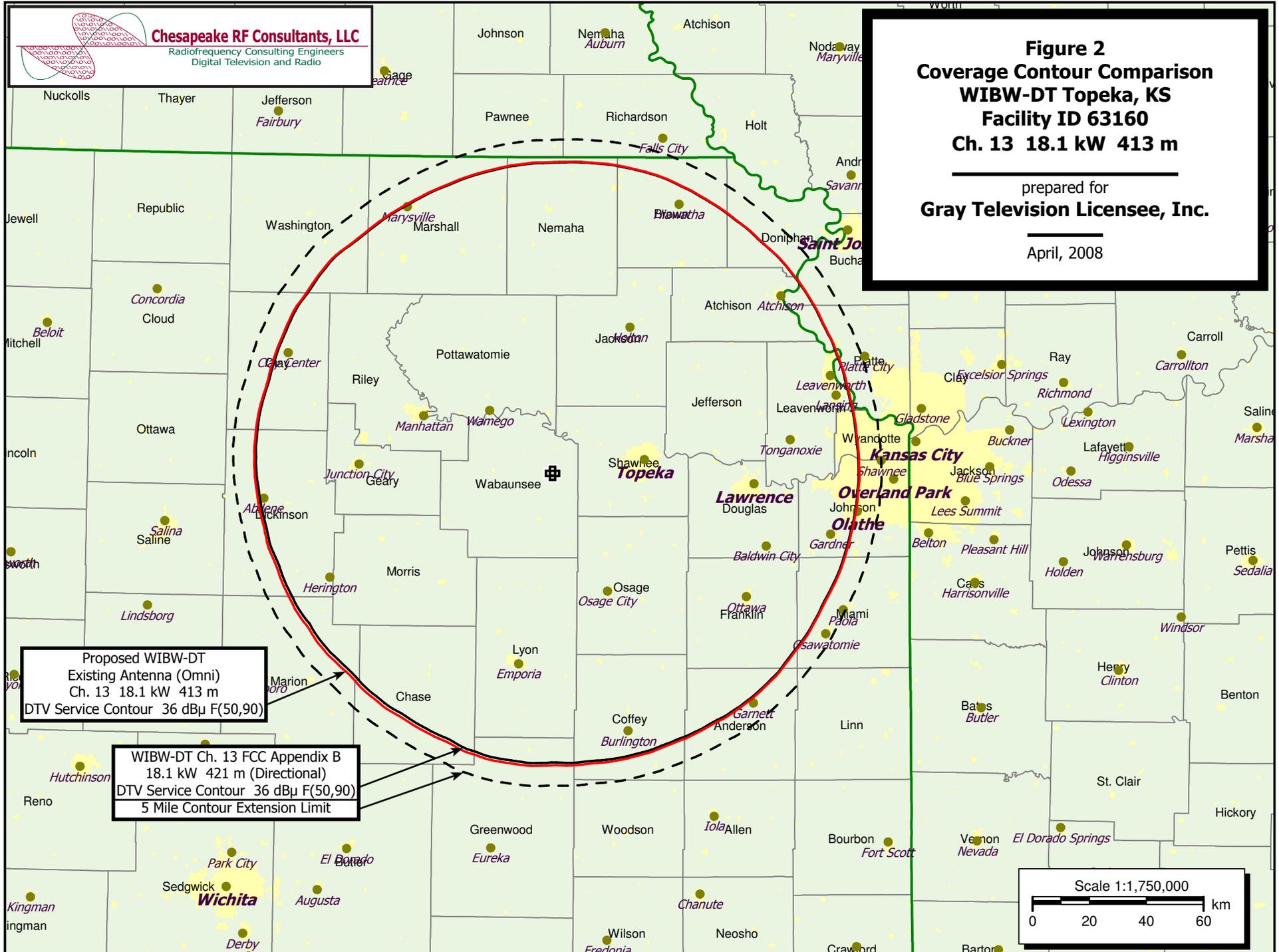


Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Figure 2
Coverage Contour Comparison
WIBW-DT Topeka, KS
Facility ID 63160
Ch. 13 18.1 kW 413 m

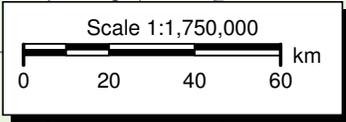
prepared for
Gray Television Licensee, Inc.

April, 2008



Proposed WIBW-DT
 Existing Antenna (Omni)
 Ch. 13 18.1 kW 413 m
 DTV Service Contour 36 dBμ F(50,90)

WIBW-DT Ch. 13 FCC Appendix B
 18.1 kW 421 m (Directional)
 DTV Service Contour 36 dBμ F(50,90)
 5 Mile Contour Extension Limit





Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 2A
Potential Loss Area Without Waiver
WIBW-DT Topeka, KS
Facility ID 63160
Ch. 13 18.1 kW 413 m

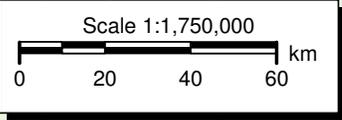
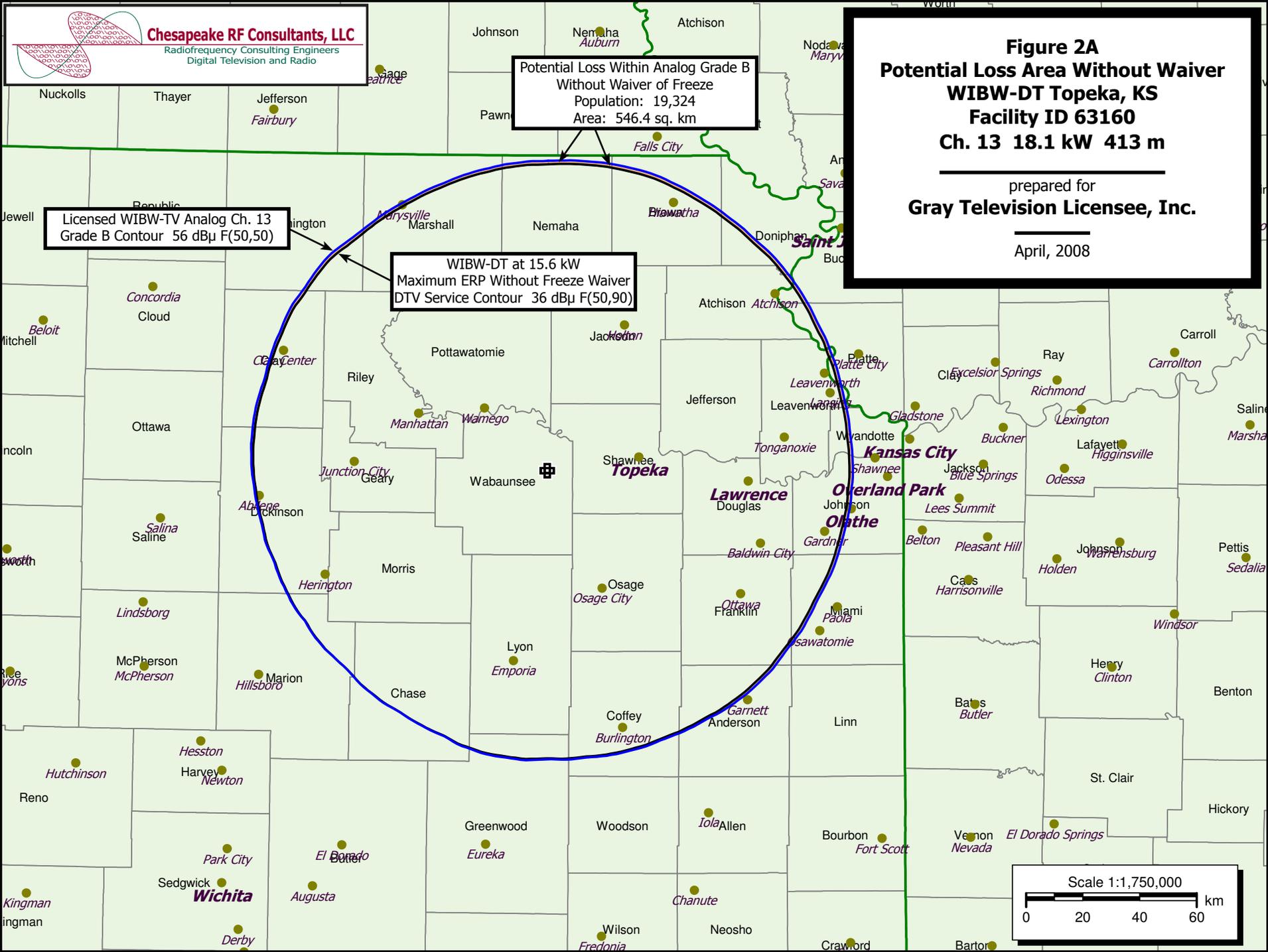
prepared for
Gray Television Licensee, Inc.

April, 2008

Potential Loss Within Analog Grade B
Without Waiver of Freeze
Population: 19,324
Area: 546.4 sq. km

Licensed WIBW-TV Analog Ch. 13
Grade B Contour 56 dBμ F(50,50)

WIBW-DT at 15.6 kW
Maximum ERP Without Freeze Waiver
DTV Service Contour 36 dBμ F(50,90)



SECTION III-D - DTV Engineering	
Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p>Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to change pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.</p> <p>Post-Transition Expedited Processing: An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed within 45 days of the effective date of Section 73.616 of the rules adopted in the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91.</p>	
1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input type="radio"/> No
(d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
(e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

SECTION III-D - DTV Engineering	
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:	DTV 13 Analog TV, if any 13
2. Zone:	<input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
3. Antenna Location Coordinates: (NAD 27)	Latitude: Degrees 39 Minutes 00 Seconds 22 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 96 Minutes 02 Seconds 57 <input checked="" type="radio"/> West <input type="radio"/> East
4. Antenna Structure Registration Number: 1032648	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level:	396.2 meters
6. Overall Tower Height Above Ground Level:	380.7 meters
7. Height of Radiation Center Above Ground Level:	364 meters
8. Height of Radiation Center Above Average Terrain :	413 meters
9. Maximum Effective Radiated Power (average power):	18.1 kW
10. Antenna Specifications:	

a. Manufacturer RCA Model TW-18A13-P

b. Electrical Beam Tilt:
1 degrees Not Applicable

c. Mechanical Beam Tilt:
degrees toward azimuth
degrees True Not Applicable
Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). [Exhibit 42]

d. Polarization:
 Horizontal Circular Elliptical

e. Directional Antenna Relative Field Values: Not applicable (Nondirectional)

[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.]
[Relative Field Values]

If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. **Exhibit required.** [Exhibit 43]

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? Yes No [Exhibit 44]
If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered "No.") [Exhibit 45]

13. **Environmental Protection Act. Submit in an Exhibit** the following: [Exhibit 46]
If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, 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.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.

PREPARERS CERTIFICATION ON SECTION III 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 JOSEPH M. DAVIS, P.E.	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature	Date 4/6/2008	
Mailing Address CHESAPEAKE RF CONSULTANTS, LLC 11993 KAHNS ROAD		
City MANASSAS	State or Country (if foreign address) VA	Zip Code 20112 -
Telephone Number (include area code) 7036509600	E-Mail Address (if available) JOSEPH.DAVIS@RF-CONSULTANTS.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).