

TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
LPTV STATION WBWP-LP
WEST PALM BEACH, FLORIDA

September 27, 2006

CHANNEL 57+ 40 KW (MAX-DA)

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TECHNICAL EXHIBIT
APPLICATION FOR CONSTRUCTION PERMIT
LPTV STATION WBWP-LP
WEST PALM BEACH, FLORIDA
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Technical Statement

This Technical Exhibit was prepared in support of an application for construction permit for LPTV station WBWP-LP, to change its transmitter site and decrease its antenna height. There are no other changes proposed. This application is classified as a minor change. See 74 dBu coverage comparison at Figure 1 herein.

Proposed Facilities

It is proposed to operate on Channel 57 (728-734 MHz) with a "plus" carrier frequency offset using a directional antenna. The maximum directional ERP will be 40 kW. The antenna radiation center height above ground is proposed to be 141 m, with a radiation center height above mean sea level of 149 m.

TV Broadcast Analog Protection

An allocation study has been conducted pursuant to the provisions of Section 74.705 of the FCC Rules. The proposed facility meets the contour overlap and spacing requirements to all full-service analog television stations with the exception of WXEL-TV, West Palm Beach, Florida (Channel 42). The proposed facility meets the interference protection requirements to WXEL-TV based on a Longley-Rice

interference analysis prepared according to FCC Bulletin No. 69 (“OET-69”). The results of the analysis are summarized at Figure 2 herein.

DTV Station Protection

Calculations based on OET-69 indicate that the proposed WBWP-LP operation on Channel 57 complies with the FCC’s 0.5% interference threshold criteria to all authorized DTV operating facilities on Channels 56, 57 and 58. Figure 2 provides the output of study based on OET-69, which demonstrates that the proposed WBWP-LP operation complies with the FCC’s DTV interference protection criteria.

LPTV/TV Translator/Class A TV Protection

An allocation study was conducted pursuant to the provisions of Section 74.707 of the FCC Rules. The contour overlap requirements of the FCC Rules are met with respect to all pertinent LPTV, TV Translator and Class A Television stations. See Figure 2.

Environmental Considerations

An evaluation was conducted for the proposed facility concerning compliance with Section 1.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy.* Power density calculations were conducted at 2-m above ground based on the following conservative assumptions, with the following results:

* See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:
http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf

| Call Sign | Channel | Peak Visual ERP / Total Average ERP (with 10% aural) (kW) | Antenna Height above Ground (m) | Relative Field Factor [†] | FCC Limit [‡] (mW/cm ²) | Percentage of Limit |
|-----------|---------|---|---|--|---|------------------------|
| WBWP-LP | 57 | 40 / 20 | 141 | 0.2 | 0.4873 | 0.3% |

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 0.3% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing.

The transmitter site is to be restricted from access. In the event that personnel are required to enter the restricted area or climb the tower structure, the proposed transmissions shall be reduced or terminated as necessary to prevent RF exposure above the FCC recommended limits.

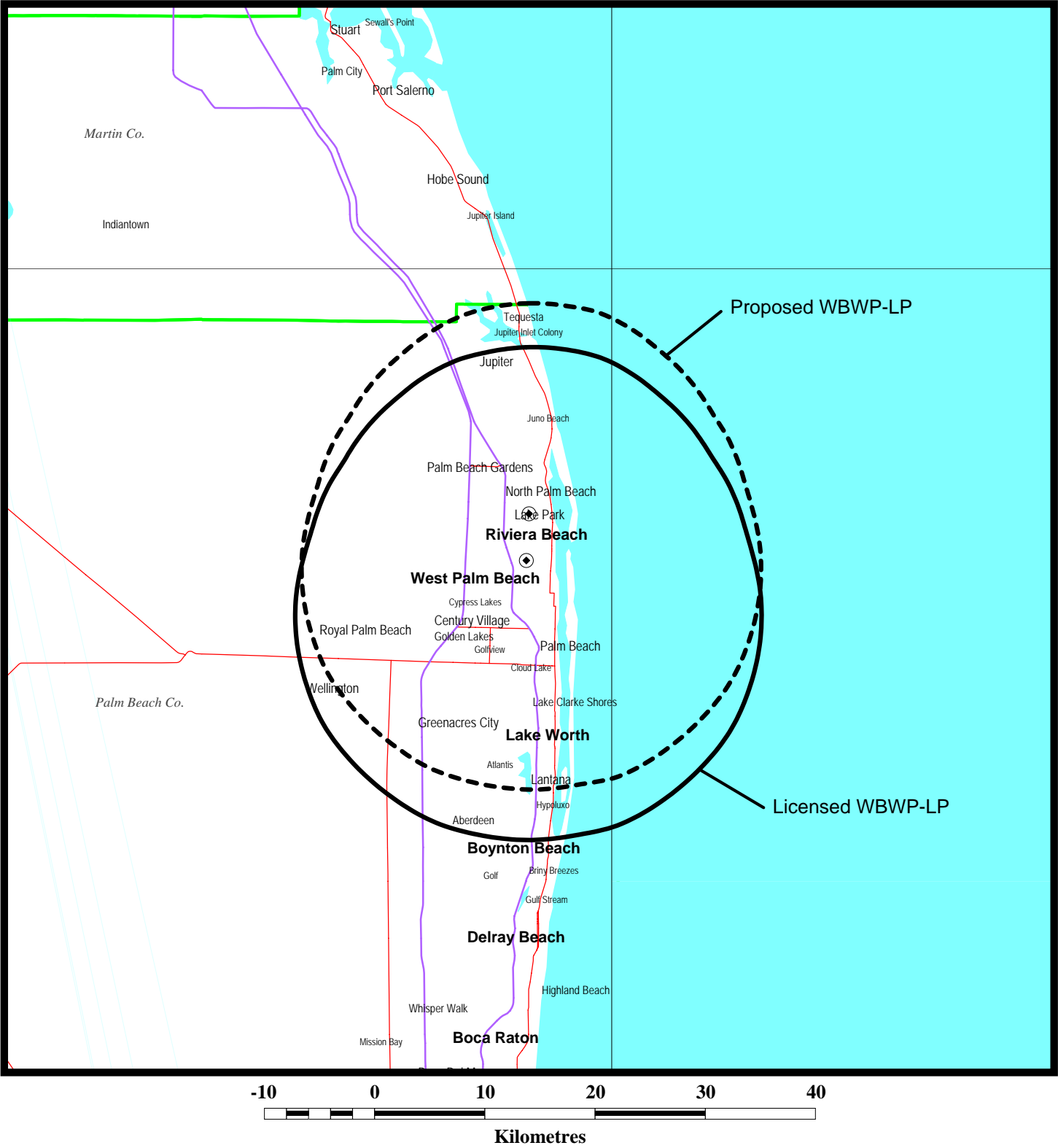


Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237

September 27, 2006

[†] This is a conservative estimate of the relative field factor in the downward direction.
[‡] for general population/uncontrolled environments



PREDICTED 74 DBU COVERAGE COMPARISON

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Summary of OET-69 Interference Analysis
(Worst-case Scenarios)

Figure 2
Sheet 1 of 5

Census data selected: 1990
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 09-27-2006

Record Selected for Analysis

WBWPLP USERRECORD-01 WEST PALM BEACH FL US
Channel 57 ERP 40. kW HAAT 149. m RCAMSL 00149 m
Latitude 026-47-59 Longitude 0080-04-32
Status APP Zone 3 Border Offset +
Dir Antenna Make CDB Model 00000000017730 Beam tilt N Ref Azimuth 180.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 1.0 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 | 12.544 | 145.7 | 19.1 |
| 45.0 | 11.664 | 149.0 | 19.0 |
| 90.0 | 15.376 | 149.0 | 20.4 |
| 135.0 | 30.976 | 149.0 | 24.1 |
| 180.0 | 40.000 | 143.3 | 25.0 |
| 225.0 | 30.976 | 143.4 | 23.6 |
| 270.0 | 15.376 | 143.0 | 19.9 |
| 315.0 | 11.664 | 143.0 | 18.5 |

Contour Overlap Evaluation from LPTV Station to Full Service TV & DTV

Station inside contour of station
WXEL-TV 42 WEST PALM BEACH FL BLET 20041005ACB

Contour overlap to station
WTTA 57 ST. PETERSBURG FL BMPCDT 20060629ABD

Contour Overlap Evaluation from LPTV to Full Service TV & DTV 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

Contour Overlap Evaluation to Proposed Station Complete

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Summary of OET-69 Interference Analysis
(Worst-case Scenarios)

Figure 2
Sheet 2 of 5

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 0.03km from AM station

NORTH PALM BEACH FL WGGT Status: Antenna: DAD

Start of Interference Analysis

| Channel | Call | City/State | ARN |
|---------|--------|--------------------|--------------|
| 57 | WBWPLP | WEST PALM BEACH FL | USERRECORD01 |

Stations Potentially Affected by Proposed Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|--------------------|----------|--------|-------------|--------------|
| 42 | WXEL-TV | WEST PALM BEACH FL | 29.8 | LIC | BLET | -20041005ACB |
| 57 | WTTA | ST. PETERSBURG FL | 245.1 | CP MOD | BMPCDT | -20060629ABD |

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

| Channel | Call | City/State | Application | Ref. No. |
|---------|--------|--------------------|-------------|-----------|
| 42 | WXELTV | WEST PALM BEACH FL | DTVPLN | -NPLN1619 |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|----------------|----------|--------|-------------|-----------|
| 34 | WTVX | FORT PIERCE FL | 62.3 | PLN | DTVPLN | -NPLN1470 |
| 35 | WCTD | MIAMI FL | 99.4 | PLN | DTVPLN | -NPLN1492 |
| 38 | WTCE-DT | FORT PIERCE FL | 96.1 | PLN | DTVPLN | -DTVP1042 |
| 39 | WDZL | MIAMI FL | 67.6 | PLN | DTVPLN | -NPLN1560 |
| 41 | WZVN-DT | NAPLES FL | 139.1 | PLN | DTVPLN | -DTVP1153 |
| 42 | WFCT-DT | BRADENTON FL | 219.3 | PLN | DTVPLN | -DTVP1186 |
| 43 | WBSF | MELBOURNE FL | 203.4 | PLN | DTVPLN | -NPLN1637 |
| 44 | WPPB-DT | BOCA RATON FL | 65.3 | PLN | DTVPLN | -DTVP1257 |
| 45 | WHFT | MIAMI FL | 65.3 | PLN | DTVPLN | -NPLN1680 |
| 45 | WTVK-DT | NAPLES FL | 139.1 | PLN | DTVPLN | -DTVP1292 |
| 46 | WHFT-DT | MIAMI FL | 65.3 | PLN | DTVPLN | -DTVP1323 |
| 46 | WTVK | NAPLES FL | 139.1 | PLN | DTVPLN | -NPLN1697 |
| 49 | WFGC-DT | PALM BEACH FL | 21.0 | PLN | DTVPLN | -DTVP1415 |
| 49 | WRXYTV | TICE FL | 155.9 | PLN | DTVPLN | -NPLN1749 |
| 50 | WTVX-DT | FORT PIERCE FL | 62.3 | PLN | DTVPLN | -DTVP1442 |
| 56 | WIRB | MELBOURNE FL | 189.8 | PLN | DTVPLN | -NPLN1862 |

Results for: 42N FL WEST PALM BEACH DTVPLN NPLN1619 PLN

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2453591 | 19165.3 |
| not affected by terrain losses | 2453591 | 19165.3 |
| lost to NTSC IX | 1420 | 4.9 |
| lost to additional IX by ATV | 0 | 0.0 |
| lost to all IX | 1420 | 4.9 |

Analysis of current record

| Channel | Call | City/State | Application | Ref. No. |
|---------|---------|--------------------|-------------|--------------|
| 42 | WXEL-TV | WEST PALM BEACH FL | BLET | -20041005ACB |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|----------------|----------|--------|-------------|--------------|
| 34 | WTVX | FORT PIERCE FL | 62.3 | LIC | BLCT | -19800624KF |
| 35 | WPXM | MIAMI FL | 99.4 | LIC | BLCT | -19921026KE |
| 38 | WTCE-DT | FORT PIERCE FL | 96.1 | PLN | DTVPLN | -DTVP1042 |
| 38 | WTCE-TV | FORT PIERCE FL | 50.3 | CP MOD | BMPEDT | -20060125ADR |

Summary of OET-69 Interference Analysis
(Worst-case Scenarios)

Figure 2
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| | | | | | | |
|----|---------|--------------------|-------|-----|---------------|--------------|
| 39 | WSFL-TV | MIAMI FL | 67.6 | LIC | BLCT | -19970401LW |
| 40 | WPPB-DR | BOCA RATON FL | 65.3 | APP | BPRM | -20000328AAE |
| 40 | WPPB-TV | BOCA RATON FL | 65.9 | APP | BMPEDT | -20060705ACF |
| 41 | WZVN-TV | NAPLES FL | 153.7 | LIC | BLCDDT | -20030619AAM |
| 41 | WZVN-DT | NAPLES FL | 139.1 | PLN | DTVPLN | -DTVP1153 |
| 42 | WXPX | BRADENTON FL | 242.7 | LIC | BLCDDT | -20030109AEP |
| 42 | WFCT-DT | BRADENTON FL | 219.3 | PLN | DTVPLN | -DTVP1186 |
| 42 | WXPX | BRADENTON FL | 242.7 | APP | BPCT | -20020215AAZ |
| 42 | WXPX | BRADENTON FL | 242.7 | APP | BPCT | -19980708KH |
| 44 | WPPB-TV | BOCA RATON FL | 65.3 | CP | BPEDT | -19991028ACM |
| 44 | WPPB-DT | BOCA RATON FL | 65.3 | PLN | DTVPLN | -DTVP1257 |
| 45 | WHFT-TV | MIAMI FL | 65.3 | LIC | BLCT | -19951208KF |
| 45 | WHFT-TV | MIAMI FL | 65.3 | LIC | BMLCT | -20051007ACP |
| 45 | WTVK-DT | NAPLES FL | 139.1 | PLN | DTVPLN | -DTVP1292 |
| 46 | WHFT-TV | MIAMI FL | 65.3 | LIC | BLCDDT | -20060221ACH |
| 46 | WHFT-DT | MIAMI FL | 65.3 | PLN | DTVPLN | -DTVP1323 |
| 49 | WFGC-DT | PALM BEACH FL | 21.0 | PLN | DTVPLN | -DTVP1415 |
| 49 | WFGC | PALM BEACH FL | 21.0 | LIC | BLCDDT | -20060627ABB |
| 49 | WRXY-TV | TICE FL | 155.9 | LIC | BLCT | -20050224AAF |
| 50 | WTVX | FORT PIERCE FL | 62.3 | LIC | BLCDDT | -20021030AAN |
| 50 | WTVX-DT | FORT PIERCE FL | 62.3 | PLN | DTVPLN | -DTVP1442 |
| 56 | WXPX-TV | LAKE WORTH FL | 3.3 | APP | BPRM | -20020328ABF |
| 56 | WOPX | MELBOURNE FL | 189.8 | LIC | BLCT | -19980327KF |
| 57 | NEW | BOYNTON BEACH FL | 0.0 | APP | BPRM | -20000914AAV |
| 57 | WBWPLP | WEST PALM BEACH FL | 29.8 | APP | USERRECORD-01 | |

Total scenarios = 14

Result key: 4
Scenario 4 Affected station 1 WXEL-TV
Before Analysis

Results for: 42N FL WEST PALM BEACH BLET 20041005ACB LIC
POPULATION AREA (sq km)
within Noise Limited Contour 3127089 16934.8
not affected by terrain losses 3127089 16934.8
lost to NTSC IX 402 2.9
lost to additional IX by ATV 3821 2.0
lost to all IX 4223 4.9

Potential Interfering Stations Included in above Scenario 4

| | | | |
|-------------------|--------|-------------|-----|
| 45N FL MIAMI | BLCT | 19951208KF | LIC |
| 56N FL LAKE WORTH | BPRM | 20020328ABF | APP |
| 40A FL BOCA RATON | BMPEDT | 20060705ACF | APP |
| 44A FL BOCA RATON | BPEDT | 19991028ACM | CP |
| 46A FL MIAMI | BLCDDT | 20060221ACH | LIC |

After Analysis

Results for: 42N FL WEST PALM BEACH BLET 20041005ACB LIC
POPULATION AREA (sq km)
within Noise Limited Contour 3127089 16934.8
not affected by terrain losses 3127089 16934.8
lost to NTSC IX 2097 4.9
lost to additional IX by ATV 3821 2.0
lost to all IX 5918 6.9

Potential Interfering Stations Included in above Scenario 4

| | | | |
|------------------------|--------------|-------------|-----|
| 45N FL MIAMI | BLCT | 19951208KF | LIC |
| 56N FL LAKE WORTH | BPRM | 20020328ABF | APP |
| 40A FL BOCA RATON | BMPEDT | 20060705ACF | APP |
| 44A FL BOCA RATON | BPEDT | 19991028ACM | CP |
| 46A FL MIAMI | BLCDDT | 20060221ACH | LIC |
| 57N FL WEST PALM BEACH | USERRECORD01 | | APP |

Summary of OET-69 Interference Analysis
(Worst-case Scenarios)

Figure 2
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Analysis of Interference to Affected Station 2

DTV Baseline Analysis

| | | | | |
|---------|---------|-------------------|-------------|-----------|
| Channel | Call | City/State | Application | Ref. No. |
| 57 | WTTA-DT | ST. PETERSBURG FL | DTVPLN | -DTVP1602 |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|--------------|----------|--------|-------------|-----------|
| 56 | WIRB | MELBOURNE FL | 115.2 | PLN | DTVPLN | -NPLN1862 |
| 57 | WFXU | LIVE OAK FL | 309.8 | PLN | DTVPLN | -NPLN1877 |
| 58 | WCPX-DT | ORLANDO FL | 142.3 | PLN | DTVPLN | -DTVP1622 |

Results for: 57A FL ST. PETERSBURG DTVPLN DTVP1602 PLN
HAAT 438.0 m, ATV ERP 52.6 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2921113 | 21445.7 |
| not affected by terrain losses | 2920981 | 21441.7 |
| lost to NTSC IX | 1702 | 67.9 |
| lost to additional IX by ATV | 10881 | 363.3 |
| lost to ATV IX only | 11957 | 412.2 |
| lost to all IX | 12583 | 431.1 |

NTSC Baseline Analysis

| | | | | |
|---------|------|-------------------|-------------|-----------|
| Channel | Call | City/State | Application | Ref. No. |
| 38 | WTTA | ST. PETERSBURG FL | DTVPLN | -NPLN1538 |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|-----------------|----------|--------|-------------|-----------|
| 30 | WGPU | FORT MYERS FL | 124.4 | PLN | DTVPLN | -NPLN1378 |
| 31 | WGPU-DT | FORT MYERS FL | 124.4 | PLN | DTVPLN | -DTVP0816 |
| 34 | WUSF-DT | TAMPA FL | 0.7 | PLN | DTVPLN | -DTVP0933 |
| 35 | WFTX-DT | CAPE CORAL FL | 125.0 | PLN | DTVPLN | -DTVP0969 |
| 36 | WFTX | CAPE CORAL FL | 125.0 | PLN | DTVPLN | -NPLN1515 |
| 38 | WTCE-DT | FORT PIERCE FL | 192.6 | PLN | DTVPLN | -DTVP1042 |
| 38 | WJCT-DT | JACKSONVILLE FL | 279.3 | PLN | DTVPLN | -DTVP1043 |
| 39 | WFTV-DT | ORLANDO FL | 142.3 | PLN | DTVPLN | -DTVP1083 |
| 40 | WWSB | SARASOTA FL | 33.2 | PLN | DTVPLN | -NPLN1580 |
| 42 | WFCT-DT | BRADENTON FL | 48.2 | PLN | DTVPLN | -DTVP1186 |
| 45 | WLCBTV | LEESBURG FL | 122.8 | PLN | DTVPLN | -NPLN1679 |
| 46 | WLCB-DT | LEESBURG FL | 122.8 | PLN | DTVPLN | -DTVP1322 |
| 52 | WTGLTV | COCOA FL | 142.1 | PLN | DTVPLN | -NPLN1806 |
| 52 | WWSB-DT | SARASOTA FL | 33.2 | PLN | DTVPLN | -DTVP1504 |
| 53 | WINK-DT | FORT MYERS FL | 125.9 | PLN | DTVPLN | -DTVP1526 |
| 53 | WGFL | HIGH SPRINGS FL | 201.0 | PLN | DTVPLN | -NPLN1823 |

Results for: 38N FL ST. PETERSBURG DTVPLN NPLN1538 PLN

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 2921113 | 21449.7 |
| not affected by terrain losses | 2919668 | 21436.8 |
| lost to NTSC IX | 0 | 1.0 |
| lost to additional IX by ATV | 20956 | 575.8 |
| lost to all IX | 20956 | 576.8 |

Analysis of current record

| | | | | |
|---------|------|-------------------|-------------|--------------|
| Channel | Call | City/State | Application | Ref. No. |
| 57 | WTTA | ST. PETERSBURG FL | BMPCDT | -20060629ABD |

Stations Potentially Affecting This Station

| Chan | Call | City/State | Dist(km) | Status | Application | Ref. No. |
|------|---------|------------------|----------|--------|-------------|--------------|
| 56 | WOPX | MELBOURNE FL | 115.2 | LIC | BLCT | -19980327KF |
| 57 | NEW | BOYNTON BEACH FL | 244.3 | APP | BPRM | -20000914AAV |
| 57 | WFXU | LIVE OAK FL | 309.6 | LIC | BLCT | -19980715KE |
| 58 | WKMG-TV | ORLANDO FL | 145.5 | LIC | BLCDDT | -20010515ABB |
| 58 | WCPX-DT | ORLANDO FL | 142.3 | PLN | DTVPLN | -DTVP1622 |

Summary of OET-69 Interference Analysis
(Worst-case Scenarios)

Figure 2
Sheet 5 of 5

57 WBWPLP WEST PALM BEACH FL 245.1 APP USERRECORD-01

Total scenarios = 6

Result key: 15
Scenario 1 Affected station 2 WTTA
Before Analysis

Results for: 57A FL ST. PETERSBURG BMPCDT 20060629ABD CP
HAAT 443.0 m, ATV ERP 720.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 3084111 | 29203.9 |
| not affected by terrain losses | 3084097 | 29197.9 |
| lost to NTSC IX | 586 | 14.0 |
| lost to additional IX by ATV | 11770 | 334.3 |
| lost to ATV IX only | 12339 | 345.3 |
| lost to all IX | 12356 | 348.3 |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|------------------|--------|-------------|-----|
| 56N FL MELBOURNE | BLCT | 19980327KF | LIC |
| 57N FL LIVE OAK | BLCT | 19980715KE | LIC |
| 58A FL ORLANDO | BLCDDT | 20010515ABB | LIC |

After Analysis

Results for: 57A FL ST. PETERSBURG BMPCDT 20060629ABD CP
HAAT 443.0 m, ATV ERP 720.0 kW

| | POPULATION | AREA (sq km) |
|--------------------------------|------------|--------------|
| within Noise Limited Contour | 3084111 | 29203.9 |
| not affected by terrain losses | 3084097 | 29197.9 |
| lost to NTSC IX | 586 | 15.0 |
| lost to additional IX by ATV | 11770 | 334.3 |
| lost to ATV IX only | 12339 | 345.3 |
| lost to all IX | 12356 | 349.3 |

Potential Interfering Stations Included in above Scenario 1

| | | | |
|------------------------|--------------|-------------|-----|
| 56N FL MELBOURNE | BLCT | 19980327KF | LIC |
| 57N FL LIVE OAK | BLCT | 19980715KE | LIC |
| 58A FL ORLANDO | BLCDDT | 20010515ABB | LIC |
| 57N FL WEST PALM BEACH | USERRECORD01 | | APP |

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