

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 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.

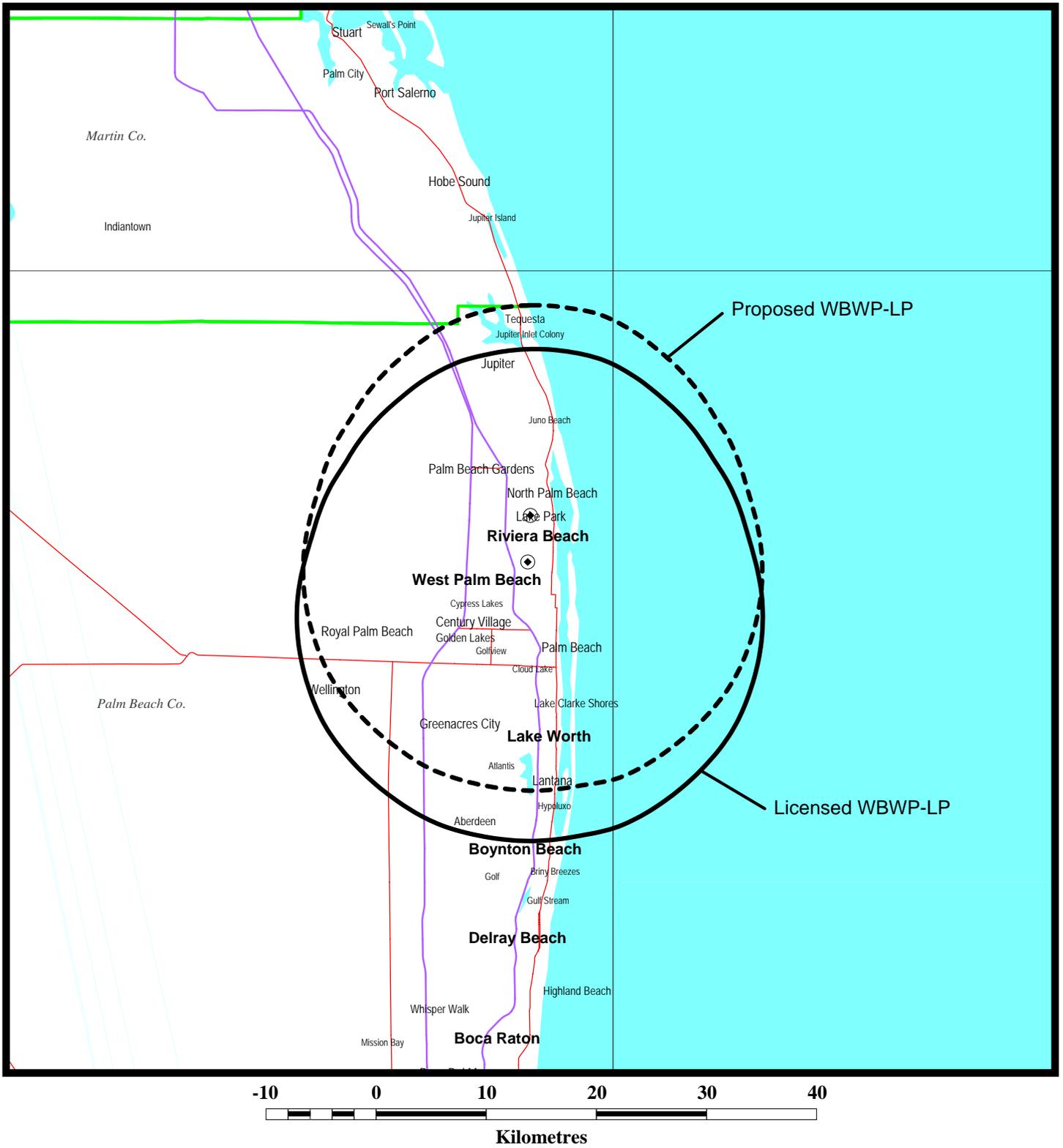


Louis Robert du Treil, Jr.

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)

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)

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	Proposed Station	ARN
57	Call City/State 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)

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	WPXP-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

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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	WGCU	FORT MYERS FL	124.4	PLN	DTVPLN	-NPLN1378
31	WGCU-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	BLCDT	-20010515ABB
58	WCPX-DT	ORLANDO FL	142.3	PLN	DTVPLN	-DTVP1622

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

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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