

TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF
CONSTRUCTION PERMIT
TELEVISION STATION WGNO-DT
NEW ORLEANS, LOUISIANA

June 28, 2005

CHANNEL 15 800 KW (MAX-DA) 132 M

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Technical Statement

This Technical Exhibit was prepared on behalf of digital television broadcast station WGNO-DT, New Orleans, Louisiana, in support of an application for modification of construction permit (See FCC File No. BPCDT-19990901AAE). WGNO-DT is authorized for operation on Channel 15 with a maximum directional effective radiated power (ERP) of 870 kW and an antenna height above average terrain of 309 m. The purpose of this application is to authorize the WGNO-DT facility now operating pursuant to FCC Special Temporary Authority (STA). This is required in order to meet the “use-it-or-lose-it” deadline imposed by the FCC in the recent *Report and Order* in the Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, Released: September 7, 2004.*

The proposed facility will not result in any extension of the predicted 41 dBu noise-limited contour relative to the WGNO-DT authorized construction permit facility.[†] Therefore, the proposal meets the terms of the FCC Filing Freeze for television stations.[‡] However, this proposal does not qualify as a DTV “checklist” facility.

* See also *Public Notice*, “DTV Channel Election Issues – Compliance with the July 1, 2005 Replication/Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline,” Federal Communications Commission, DA 05-1636, Released: June 15, 2005.

[†] See Figure 1.

[‡] See *August 2004 Filing Freeze PN*, DA 04-2446 (MB rel. Aug. 3, 2004).

Proposed Facilities

The proposed transmitting facility will employ an RFS, model RD32A antenna, which is side-mounted on the existing WGNO(TV) tower structure. The transmitter site elevation is 0 m AMSL. The antenna center of radiation is located at 132 m above ground level and 132 m AMSL. The proposed WGNO-DT facility will operate on Channel 15 with a maximum directional average ERP of 29.0 dBk (800 kW) and antenna radiation center height above average terrain of 132 m.

The proposed facility provides minimum 48 dBu, f(50,90), coverage of New Orleans in compliance with Section 73.625(a)(1) of the FCC Rules. Figure 1 herein is a map depicting the predicted coverage contours of the proposed facility.

Tower Registration

The proposed antenna structure has been registered with the FCC. The FCC antenna structure registration number is 1028290. There will be no change in the overall height of the antenna structure as a result of the instant proposal.

Domestic Allocation Considerations

The proposed WGNO-DT Channel 15 facility meets the requirements of Section 73.623 of the FCC Rules concerning predicted interference to other existing U.S. NTSC facilities and U.S. DTV allotments and assignments. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules; OET Bulletin No. 69 ("OET-69"); and published FCC guidelines for preparation of such interference analyses. The Longley-Rice interference analyses were conducted using the software maintained by du Treil, Lundin & Rackley, Inc. based on the FCC published

software routines.[§] Stations selected for analysis were determined pursuant to the distance requirements outlined in the FCC DTV Processing Guidelines Public Notice. Accordingly, co-channel DTV and NTSC stations within 429 km and 407 km, respectively, were examined for potential interference; and first-adjacent DTV and NTSC stations within 229 km and 207 km, respectively, were examined for potential interference. Analog taboo-related NTSC stations within 142 km were examined for potential interference. The results of the interference analyses for the proposed WGNO-DT facility are summarized herein at Figure 2. As indicated therein, the proposed facility will meet the 2%/10% criterion outlined in the FCC Rules and published guidelines with respect to all considered stations.

With respect to Class A TV station protection, the proposal has been evaluated according to the requirements of Section 73.623(c)(5) of the FCC Rules. The analysis reveals two potentially affected Class A TV stations:

- WBXN-CA, New Orleans, LA, Channel 18
- WTNO-LP, New Orleans, LA, Channel 22

An interference analysis prepared according to the provisions of OET-69 reveals zero predicted interference to WBXN-CA and WTNO-LP. Figure 2 summarizes the results of the interference analysis. Therefore, there is no interference issue regarding WBXN-CA and WTNO-LP.**

§ The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is a precise implementation of the procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed.

** Interference protection of WBXN-CA and WTNO-LP is only required to the extent that the WGNO-DT proposal exceeds its authorized DTV maximization facility. In this case, the predicted field strength contours of the WGNO-DT proposed facility are within those of the WGNO-DT maximization facility as described in FCC File No. BPCDT-19990901AAE.

Environmental Considerations

An evaluation of the potential for exposure to radio frequency electromagnetic energy for the WGNO tower site was conducted in December 2004. The resulting statement is attached hereto as Appendix 2. The statement evaluated all broadcast facilities on the WGNO tower including the WGNO-DT STA facility, which is identical to the facility proposed herein. As indicated in Appendix 2, the proposed facility meets the FCC RF exposure requirements at ground level at all locations.

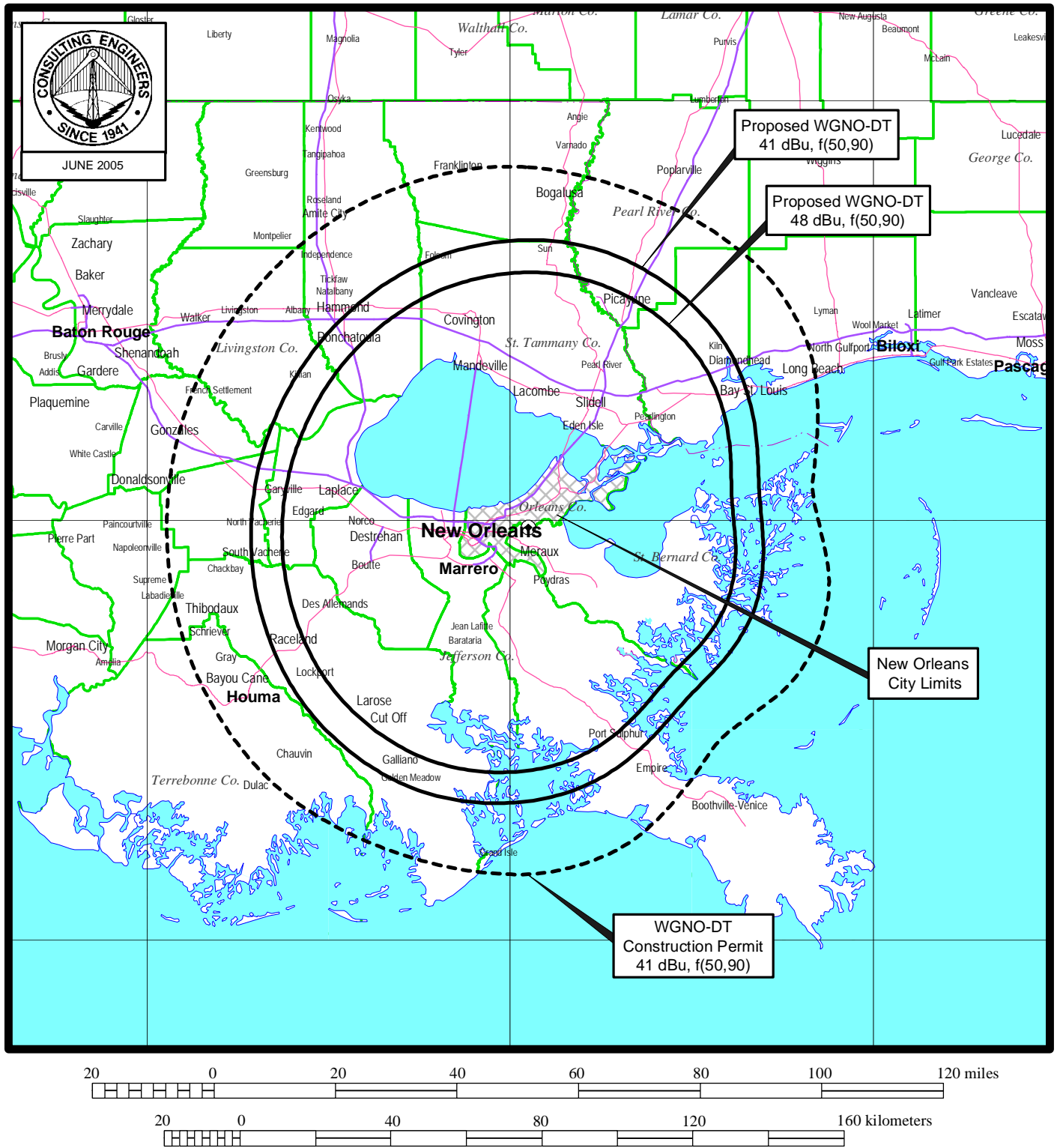


Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237-6019

June 28, 2005

Figure 1



PREDICTED COVERAGE CONTOURS

TELEVISION STATION WGNO-DT
NEW ORLEANS, LOUISIANA
CHANNEL 15 800 KW (MAX-DA) 132 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Summary of Allocation Analysis

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
1	38	WTTA	ST. PETERSBURG FL	33.3	LIC	BLCT	19910703KG
2	44	WTOG	ST. PETERSBURG FL	31.9	LIC	BLCT	19990415KI
3	45	WLCB-TV	LEESBURG FL	135.8	LIC	BLET	20001212AAT
4	49	WRXY-TV	TICE FL	102.5	LIC	BLCT	20050224AAF
5	50	WFTT-TV	TAMPA FL	33.3	LIC	BLCT	19880616KH
6	51	WTGL-DT	COCOA FL	165.1	PLN	DTVPLN	DTVP1473
7	51	WOGX	OCALA FL	200.4	LIC	BLCT	19831107KI
8	52	WTGL-TV	COCOA FL	165.1	LIC	BLCT	19821006KG
9	52	WTGL-TV	COCOA FL	170	CP MOD	BMPCT	20041201BGU
10	52	WSCV	FORT LAUDERDALE FL	277.2	LIC	BLCDT	20020805AAB

Stations Potentially Affected by Proposed Station							
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number
11	52	WSCV-DT	FORT LAUDERDALE FL	277.3	PLN	DTVPLN	DTVP1503
12	52	WCTV-DT	THOMASVILLE GA	378.5	PLN	DTVPLN	DTVP1505

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
1	--	--	--	*	0.000	--	pass
2	23937	28468	1089234	4531	0.416	2.0	pass
3	--	--	--	*	0.000	--	pass
4	--	--	--	*	0.000	--	pass
5	--	--	--	*	0.000	--	pass
6	--	--	--	*	0.000	--	pass
7	--	--	--	*	0.000	--	pass
8	--	--	--	*	0.000	--	pass
9	--	--	--	*	0.000	--	pass

* There is no interference predicted.

* There is no interference predicted.

Summary of Interference Analysis for Worst-Case Scenarios							
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result
10	--	--	--	*	0.000	--	pass
11	--	--	--	*	0.000	--	pass
12	--	--	--	*	0.000	--	pass

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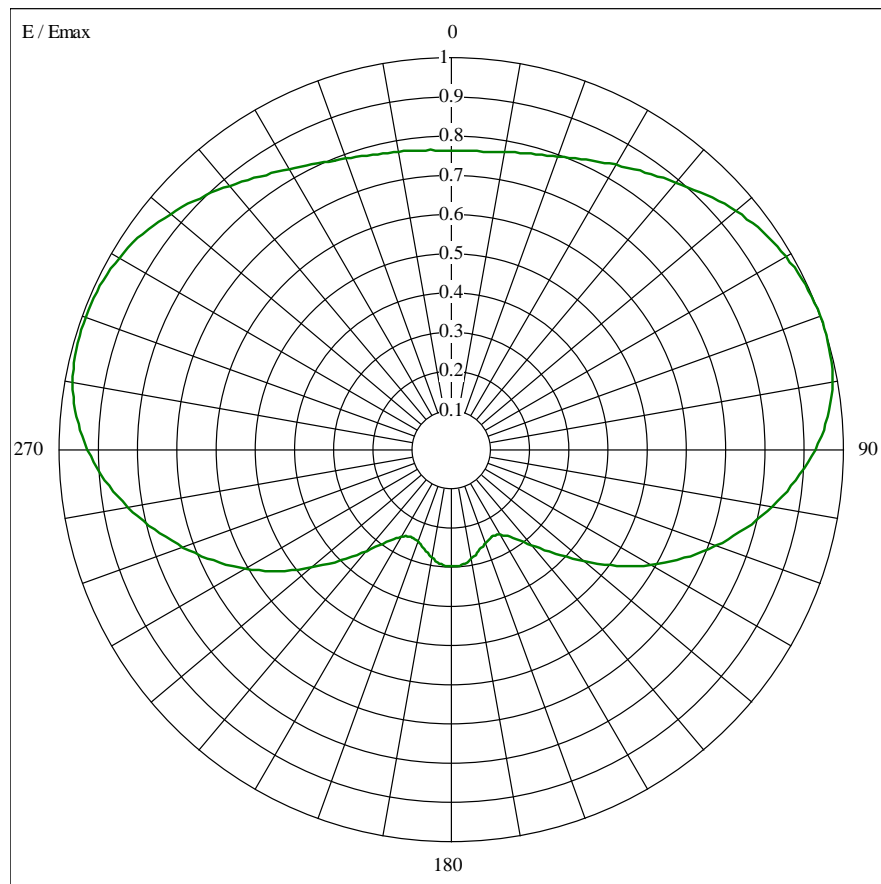
Transmitting Antenna
Manufacturer's Pattern Data

(two pages follow)



UHF AS479 Pattern (220°) Coverage

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.76	60	0.98	120	0.59	180	0.30	240	0.61	300	0.98
10	0.77	70	1.00	130	0.44	190	0.28	250	0.73	310	0.94
20	0.80	80	0.99	140	0.32	200	0.25	260	0.84	320	0.88
30	0.84	90	0.93	150	0.25	210	0.26	270	0.93	330	0.83
40	0.89	100	0.83	160	0.25	220	0.34	280	0.98	340	0.79
50	0.95	110	0.72	170	0.28	230	0.47	290	0.99	350	0.77

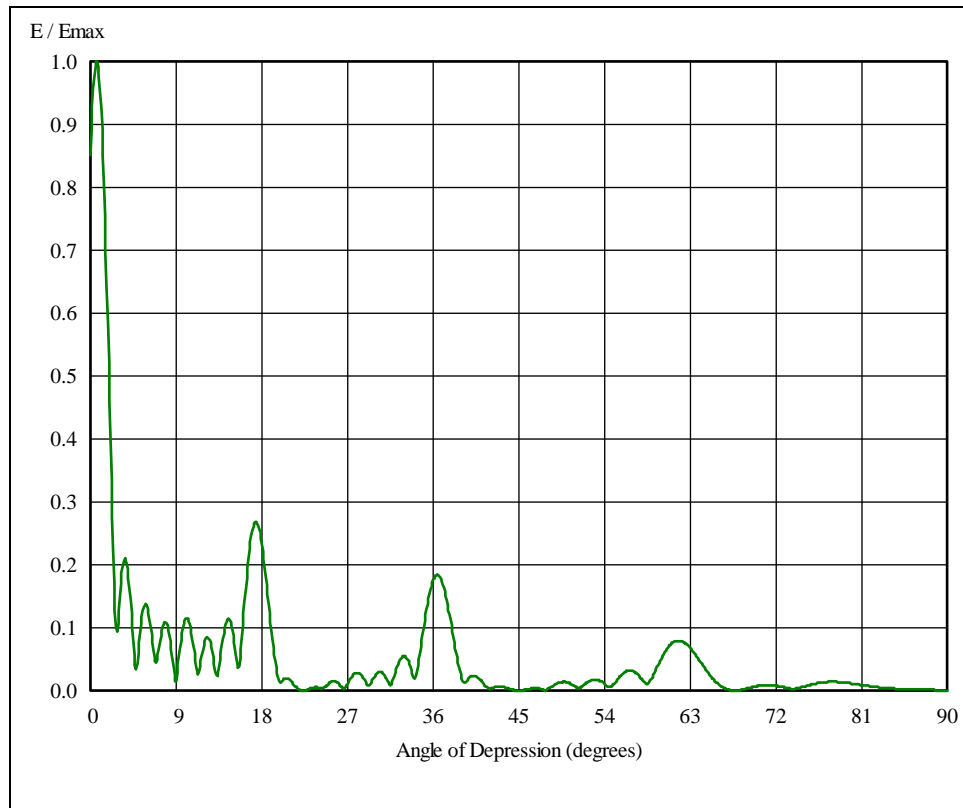


Pattern: AS479 (Side Mount)
Horizontal Gain: 1.84(2.65 dB)
FCC Data Format
CH 15 Freq. 479 MHz

Rev. 002
Date: 02/19/03

WGNO-WNOL Vertical Radiation Pattern

CH 15



Antenna Type: RD32A UHF
Antenna P/n: RD32A-SD-WGNO
Pattern Gain: 13.21 dBd
Freq. 479 MHz

Rev 001
Date: 02/19/03

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Statement Concerning Human Exposure to
Radio Frequency Electromagnetic Energy

(six pages follow)

ENGINEERING STATEMENT
CONCERNING HUMAN EXPOSURE TO RF ELECTROMAGNETIC ENERGY
PREPARED FOR
TRIBUNE TELEVISION NEW ORLEANS, INC.
WGNO TOWER SITE
NEW ORLEANS, LOUISIANA

This Engineering Statement was prepared on behalf of Tribune Television New Orleans, Inc. ("Tribune") concerning an evaluation of compliance with Section 1.1307(b) of the FCC Rules^{*} regarding human exposure to radio frequency (RF) energy for the Tribune stations located on the WGNO Tower in New Orleans, Louisiana.[†]

The WGNO Tower supporting structure is located at #2 Bayou Bienvenue, New Orleans, Louisiana (FCC Antenna Structure Registration No. 1028290).[‡] The tower supports the main transmitting antennas for the following broadcast stations: WGNO-DT(Channel 15)(STA), WGNO(TV)(26) and WNOL-DT(40)(STA). There are several other broadcast facilities located within 1 km of the subject tower as follows: WYLD-FM, WRNO-FM, WNOE-FM, WKZN(FM), WNOL-TV(38).

The following table summarizes the stations considered and the technical details and assumptions made as part this analysis:

^{*} See Rules of the United States Federal Communications Commission (FCC), generally at Title 47 of the Code of Federal Regulations (Telecommunication).

[†] 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

[‡] Geographic coordinates: 29-58-58N / 89-56-58W (NAD83).

Call Sign / Mode	Channel / Frequency	Effective Radiated Power (kW) [§]	Antenna Radiation Center Height Above Ground / Horizontal Distance (meters)	Transmitting Antenna Make and Model / Polarization
WYLD-FM / FM	253 / 98.5	100	275 / 990	Non-directional / Circular
WRNO-FM / FM	258 / 99.5	100	304 / 290	DCA, DCRM-12BCC75P / Circular
WNOE-FM / FM	266 / 101.1	100	304 / 290	DCA, DCRM-12BCC75P / Circular
WKZN(FM) / FM	287 / 105.3	96	304 / 290	DCA, DCRM-12BCC75P / Circular
WGNO-DT / DTV STA	15 / 479	800	132 / 0	RFS, RD32A / Horizontal
WGNO(TV) / TV	26 / 545	2690	310 / 0	RCA, Pylon / Horizontal
WLAE-TV / TV	32 / 581	2290	310 / 290	Andrew, Pylon / Horizontal
WNOL-TV / TV	38 / 617	5000	311 / 990	RCA, Pylon / Horizontal
WNOL-DT / DTV STA	40 / 629	500	132 / 0	RFS, RD32A / Horizontal

[§] Peak visual effective radiated power for analog TV stations and average effective radiated power for FM and digital stations. Analog stations are assumed to operate with an aural effective radiated power of 10% of peak visual.

The specifications for WRNO-FM, WNOE-FM and WKZN(FM) were taken from the recently filed applications for license for these stations, which reported the replacement of the master transmitting antenna for these stations.** The elevation pattern information contained in these filings demonstrated a downward relative field factor of less than 0.20 for downward angles greater than 10 degrees.

For WGNO-DT(STA) and WNOL-DT(STA), a broadband antenna is employed which exhibits a peak elevation pattern lobe approaching 0.30 at a downward angle of approximately 17 degrees. At downward angles greater than 20 degrees, the relative field factor is below 0.20. A downward relative field factor of 0.30 was employed as a conservative estimate for both the WGNO-DT(STA) and WNOL-DT(STA) facilities.

For the stations employing pylon antennas, the downward radiation is well below 0.20 at steep angles.††

Based on Section 73.1310 of the FCC Rules, the pertinent maximum permissible exposure (MPE) limits for the subject stations are as follows:

Call Sign	Frequency (MHz)	MPE for Uncontrolled Environment / Occupational Exposure ($\mu\text{W}/\text{cm}^2$)
FM Stations	88-108 MHz	200
WGNO-DT	479	319
WGNO(TV)	545	363
WLAE-TV	581	387

** See FCC File Nos. BMLH-20041207AAI (WRNO), BMLH-20041207AAH (WNOE) and BLH-20041008AAY (WKZN).

†† FCC Bulletin 65, Supplement A, indicates that the downward relative field factors for UHF antennas are typically in the range of 0.05 to 0.10.

Call Sign	Frequency (MHz)	MPE for Uncontrolled Environment / Occupational Exposure (uW/cm ²)
WNOL-TV	617	411
WNOL-DT	629	419

The subject facilities were evaluated for RF exposure at 2-m AGL using the procedures outlined in OET Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*.^{††} Since there are other stations located on nearby towers within 1 km of the WGNO Tower, conservative assumptions were made to estimate the maximum RF power density anywhere in the vicinity of the WGNO Tower. For example, stations WLAE-TV, WRNO-FM, WNOE-FM and WKZN(FM) are mounted on a tower located 290 m from the WGNO Tower. For the purposes of this study, these stations were assumed to be co-located on the WGNO Tower with conservative relative field factors in the downward direction of 0.20.^{§§}

Stations WNOL-TV and WYLD-FM are mounted on a tower located 990 m from the WGNO Tower. The depression angle from the WNOL-TV and WYLD-FM facilities anywhere in the vicinity of the WGNO Tower site is greater than 10 degrees, the relative field factor for the WYLD-FM facility was very conservatively assumed to be 1.00. The relative field factor for the WNOL-TV antenna was conservatively assumed to be 0.20. A distance of 990 m was assumed for both stations based on the horizontal distance from the WGNO Tower site. These assumptions result in a very conservative estimate of the maximum RF exposure anywhere on the ground in the vicinity of the WGNO Tower.

The table below summarizes the results of the analysis.

^{††} Federal Communications Commission, Office of Engineering and Technology, OET Bulletin No. 65, Edition 97-01, August, 1997.

^{§§} The depression angle from the FM station master antenna to the WGNO Tower site is 46°

Call Sign	Distance (m)	Assumed Antenna Downward Relative Field Factor ***	Calculated Power Density (uW/cm ²)	Percent of General Population / Uncontrolled MPE (%)
WYLD-FM	990	1.00	6.82	3.4
WRNO-FM	302	0.20	2.93	1.5
WNOE-FM	302	0.20	2.93	1.5
WKZN(FM)	302	0.20	2.93	1.5
WGNO-DT	130	0.30	142.3	44.6
WGNO(TV)	308	0.20	18.9	5.2
WLAE-TV	308	0.20	16.1	4.2
WNOL-TV	990	0.20	3.4	0.8
WNOL-DT	130	0.30	88.9	21.6
Total Percentage:				84.3

The calculations indicate that the combined RF energy at 2-m above ground level at locations in proximity to the WGNO Tower will not exceed 85.3% of the FCC general population / uncontrolled MPE based on a conservative calculation. Therefore, it is concluded that the WGNO(TV), WGNO-DT(STA) and WNOL-DT(STA) facilities meet the FCC RF exposure requirements at all ground level locations.

The transmitter site is restricted from access to the public. All licensees located at the transmitter site shall cooperate in the reduction of power or cessation of

*** Conservative estimates of downward relative field factors. See text.

operations as necessary to protect persons having access to the tower or antennas from RF radiation in excess of the FCC guidelines.

Louis Robert du Treil, Jr., P.E.

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

December 16, 2004