

ENGINEERING EXHIBIT

Application for Digital Television Station Construction Permit

prepared for

Gannett River States Publishing Corporation
WJXX-DT Orange Park, Florida

Facility ID 11893
Ch. 10 11.1 kW 307 m

Table of Contents

FCC Form 301, Section III-D

Exhibit 41

Statement A	Nature of the Proposal - Allocation Considerations
Figure 1	Proposed Coverage Contours
Table 1	Interference Analysis Results Summary
Table 2	Class A Station Interference Analysis Results Summary

Exhibit 43

Statement B	Environmental Considerations
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This material supplies a "hard copy" of the engineering portions of this application as entered September 30, 2004 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.

SECTION III-D - DTV ENGINEERING DATA	
Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.	
<p>Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. 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>	
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 from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this location as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input checked="" type="radio"/> No
(c) It will operate 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 checked="" type="radio"/> No
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 10 Analog TV, if any 25
2.	Zone: <input type="radio"/> I <input type="radio"/> II <input checked="" type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 30 Minutes 16 Seconds 24 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 81 Minutes 33 Seconds 13 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1017604 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
5.	Antenna Location Site Elevation Above Mean Sea Level: 15.2 meters
6.	Overall Tower Height Above Ground Level: 300.4 meters
7.	Height of Radiation Center Above Ground Level: 297.4 meters
8.	

	Height of Radiation Center Above Average Terrain :	306.8 meters																																																																																																																								
9.	Maximum Effective Radiated Power :	11.1 kW																																																																																																																								
10.	<p>Antenna Specifications:</p> <p>a. Manufacturer DIE Model TF-2CH</p> <p>b. Electrical Beam Tilt: degrees <input checked="" type="checkbox"/> Not Applicable</p> <p>c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable</p> <p>Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685. [Exhibit 39]</p> <p>d. Polarization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical</p> <p>e. Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional)</p> <p>[For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.] [Relative Field Values]</p> <div style="text-align: center; padding: 10px;"> <p>10e. Directional Antenna Relative Field Values</p> <p>[Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]</p> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="12">e. Directional Antenna Relative Field Values:</td> </tr> <tr> <td colspan="12">Rotation (Degrees): <input type="checkbox"/> No Rotation</td> </tr> <tr> <td>Degrees</td><td>Value</td><td>Degrees</td><td>Value</td><td>Degrees</td><td>Value</td><td>Degrees</td><td>Value</td><td>Degrees</td><td>Value</td><td>Degrees</td><td>Value</td> </tr> <tr><td>0</td><td></td><td>10</td><td></td><td>20</td><td></td><td>30</td><td></td><td>40</td><td></td><td>50</td><td></td></tr> <tr><td>60</td><td></td><td>70</td><td></td><td>80</td><td></td><td>90</td><td></td><td>100</td><td></td><td>110</td><td></td></tr> <tr><td>120</td><td></td><td>130</td><td></td><td>140</td><td></td><td>150</td><td></td><td>160</td><td></td><td>170</td><td></td></tr> <tr><td>180</td><td></td><td>190</td><td></td><td>200</td><td></td><td>210</td><td></td><td>220</td><td></td><td>230</td><td></td></tr> <tr><td>240</td><td></td><td>250</td><td></td><td>260</td><td></td><td>270</td><td></td><td>280</td><td></td><td>290</td><td></td></tr> <tr><td>300</td><td></td><td>310</td><td></td><td>320</td><td></td><td>330</td><td></td><td>340</td><td></td><td>350</td><td></td></tr> <tr> <td colspan="2">Additional Azimuths</td><td colspan="10"></td> </tr> </table> <p style="text-align: center; color: blue;">Relative Field Polar Plot</p> <p>If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be satisfied. [Exhibit 40] Exhibit required.</p>		e. Directional Antenna Relative Field Values:												Rotation (Degrees): <input type="checkbox"/> No Rotation												Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0		10		20		30		40		50		60		70		80		90		100		110		120		130		140		150		160		170		180		190		200		210		220		230		240		250		260		270		280		290		300		310		320		330		340		350		Additional Azimuths											
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11.	<p>Does the proposed facility satisfy the 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".)</p> <p style="text-align: right;"><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>If No, attach as an Exhibit justification therefore, including a summary of any previously granted waivers. [Exhibit 41]</p>																																																																																																																									
12.	<p>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".)</p> <p style="text-align: right;">[Exhibit 42]</p>																																																																																																																									
13.	<p>Environmental Protection Act. Submit in an Exhibit the following: [Exhibit 43]</p>																																																																																																																									

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 9/30/2004	
Mailing Address CAVELL MERTZ & DAVIS, INC. 7839 ASHTON AVENUE			
City MANASSAS		State or Country (if foreign address) VA	Zip Code 20109 -
Telephone Number (include area code) 7033929090		E-Mail Address (if available) JDAVIS@CMDCONSULTING.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).

Exhibits

Exhibit 41

Description: EXHIBIT 41 - STATEMENT A

EXHIBIT 41 - STATEMENT A - ATTACHED AS A PDF FILE

Attachment 41

Description
Exhibit 41 - Statement A

Exhibit 43

Description: EXHIBIT 43 - STATEMENT B

EXHIBIT 43 - STATEMENT B - ATTACHED AS A PDF FILE

Attachment 43

Description
Exhibit 43 - Statement B

Exhibit 43 - Statement B
ENVIRONMENTAL CONSIDERATIONS
prepared for
Gannett River States Publishing Corporation
WJXX-DT Orange Park, Florida
Facility ID 11893
Ch. 10 11.1 kW 307 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

Nature of The Proposal

Gannett River States Publishing Corporation ("Gannett") herein proposes to correct the antenna height for WJXX-DT, a digital television ("DTV") station on Channel 10, paired with WJXX-TV analog Channel 25, Orange Park, Florida, to conform to the "as built" facility. In particular, *Gannett* proposes to increase the antenna height and decrease the effective radiated power ("ERP") at the licensed site. No change in antenna system is proposed. The proposed WJXX-DT facility will continue to employ an existing "common" antenna supporting structure (FCC Registration number 1017604) currently authorized for various other stations. No tower or antenna construction work is necessary to carry out this proposal.

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 physical change in antenna system or overall structure height¹ is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

¹The "as-built" overall structure height is slightly shorter (by 3.3 meters) from that as authorized on the associated Antenna Structure Registration ("ASR", number 1017604). Separately, the structure owner will take the necessary steps to revise the ASR with the corrected overall height. This change is not expected to alter the structure's marking and lighting requirements.

Exhibit 43 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 2 of 4)

Human Exposure to Radiofrequency Radiation

The proposed operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission's OET Bulletin No. 65 ("OET 65"). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The proposed WJXX-DT antenna's center of radiation is 297.4 meters above ground level. An ERP of 11.1 kilowatts, horizontally polarized, will be employed. According to elevation pattern data provided by the antenna manufacturer, the proposed WJXX-DT antenna has a relative field of less than 40 percent from 20 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 40 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for Channel 10 (center frequency 195 MHz) is 200 $\mu\text{W}/\text{cm}^2$.

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET-65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

S	=	power density in microwatts/cm ²
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Exhibit 43 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 3 of 4)

Using this formula, the proposed facility would contribute a power density of $0.68 \mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 0.3 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities contributing less than five percent of the exposure limit at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities near this site may be considered independently from this proposal. Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Tower Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level near the antenna supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will continue to be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will continue to be posted.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure

Exhibit 43 - Statement B
ENVIRONMENTAL CONSIDERATIONS
(page 4 of 4)

measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.