

TECHNICAL EXHIBIT
MINOR AMENDMENT TO THE APPLICATION
FOR CONSTRUCTION PERMIT
STATION WDTV-DT (FACILITY ID 70592)
WESTON, WEST VIRGINIA

JUNE 1, 2001

CH 6 10 KW (MAX-DA) 248 M

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Technical Narrative

This Technical Exhibit supports a minor amendment to the application for construction permit for digital television (DTV) station WDTV-DT at Weston, West Virginia. Station WDTV-DT has an application pending to operate on channel 58 with a directional antenna maximum effective radiated power (ERP) of 751.6 kW and an antenna height above average terrain (HAAT) of 268 meters (BPCDT-19991029AFO).

In MM Docket No. 00-242, RM-9998, the FCC substituted DTV channel 6 for channel 58 for WDTV-DT. The FCC assigned a directional antenna maximum ERP of 10 kilowatts (kW) and an antenna HAAT of 253 meters for the channel 6 DTV allotment.

Proposed Facilities

This amendment proposes to (1) change to the newly allotted channel 6, (2) reduce ERP to comply with the (VHF) limit, (3) reduce HAAT and (4) change directional antenna from the application on file. Changes are being made to FCC form 301, Section III-D, questions 1 (channel), 3 (revise site coordinates), 5-8 (antenna/tower height data), 9 (ERP), 10 (antenna), 12 (coverage map) and 13 (RFR analysis). Operation at the current site (coordinates: 39-04-29 N, 80-25-28 W) with a directional antenna maximum ERP of 10 kW and antenna HAAT of 248 meters is hereby proposed.

The proposed transmitter site is approximately 334 kilometers from the closest point of the Canadian border. The proposal meets the minimum separation requirements to all Canadian NTSC and DTV stations, as defined in the recently adopted U.S./Canada Letter on Understanding (LOU). It is not believed that coordination with Canada is required.

The site is more than 2,000 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Laurel, Maryland, approximately 311 kilometers to the east. The closest point of the Table Mountain Radio Quiet Zone (CO) is more than 2,100 kilometers to the west. The transmitter site is located within the boundaries of the National Radio Quiet Zone (VA/WV). The closest radio astronomy site operating on TV channel 37 is at Green Bank, West Virginia, approximately 88 kilometers to the southeast. The Green Bank radio astronomy site has been notified and supports the proposed WDTV-DT allotment change.

Allocation Study

Interference calculations have been made using the procedures outlined in the FCC's OET-69 bulletin, using a 2 kilometer grid spacing. The proposed WDTV-DT operation does not cause excessive (greater than 2%, up to 10% total) calculated interference to any analog or DTV assignment and therefore complies with the FCC's 2%/10% interference standard. Below is the list of stations considered in the OET-69 analysis.

Channel		Proposed Station				
	Call	City/State				
06	WDTV-DT	WESTON WV				
Stations Potentially Affected by Proposed Station						
Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WDTV	WESTON WV	0.1	LIC	BLCT	-1745
06	WSYX	COLUMBUS OH	242.5	LIC	BLCT	-19931022KE
06	WJAC-TV	JOHNSTOWN PA	189.6	LIC	BLCT	-19880502KE
06	WTVR-TV	RICHMOND VA	306.9	LIC	BRET	-193
06	WVVA	BLUEFIELD WV	212.7	LIC	BMLCT	-19880907KE

Class A Consideration

The FCC's CDBS and its list of low power television (LPTV) assignments eligible for Class A status has been reviewed for potential impact. Interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin. The proposed WDTV-DT operation does not cause any calculated interference to any current or potential Class A station. If necessary, a waiver of the FCC rules is requested based on use of the FCC's OET-69 procedures to demonstrate no interference to LPTV assignments requesting Class A status.

Radiofrequency Electromagnetic Field Exposure

The proposed WDTV-DT facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna is located 129.8 meters above ground level. The maximum DTV ERP is 10 kW. A conservative relative field of 0.3 was used for the calculation (see Figure 2B). Therefore, the "worst-case" calculated power density at a point 2 meters above ground level is 0.0018 mW/cm^2 . This is less than 1% of the FCC's recommended limit of 0.2 mW/cm^2 for channel 10 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down. The proposed WDTV-DT operation appears to be otherwise categorically excluded from environmental processing.

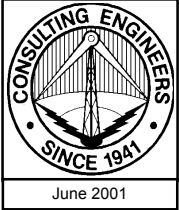
If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

Jonathan N. Edwards

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201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

June 1, 2001

Figure 1



Tower Reg. No. 1049793

655.0 m AMSL
(2149 ft AMSL)

Proposed DTV-6 Antenna

Radiation Center
629.7 m AMSL
(2066 ft AMSL)

155.1 m
(509 ft)

129.8 m
(426 ft)

NAD 27
Site Coordinates:
39° 04' 29" N
80° 25' 28" W

499.9 m AMSL
(1640 ft AMSL)

Not to Scale

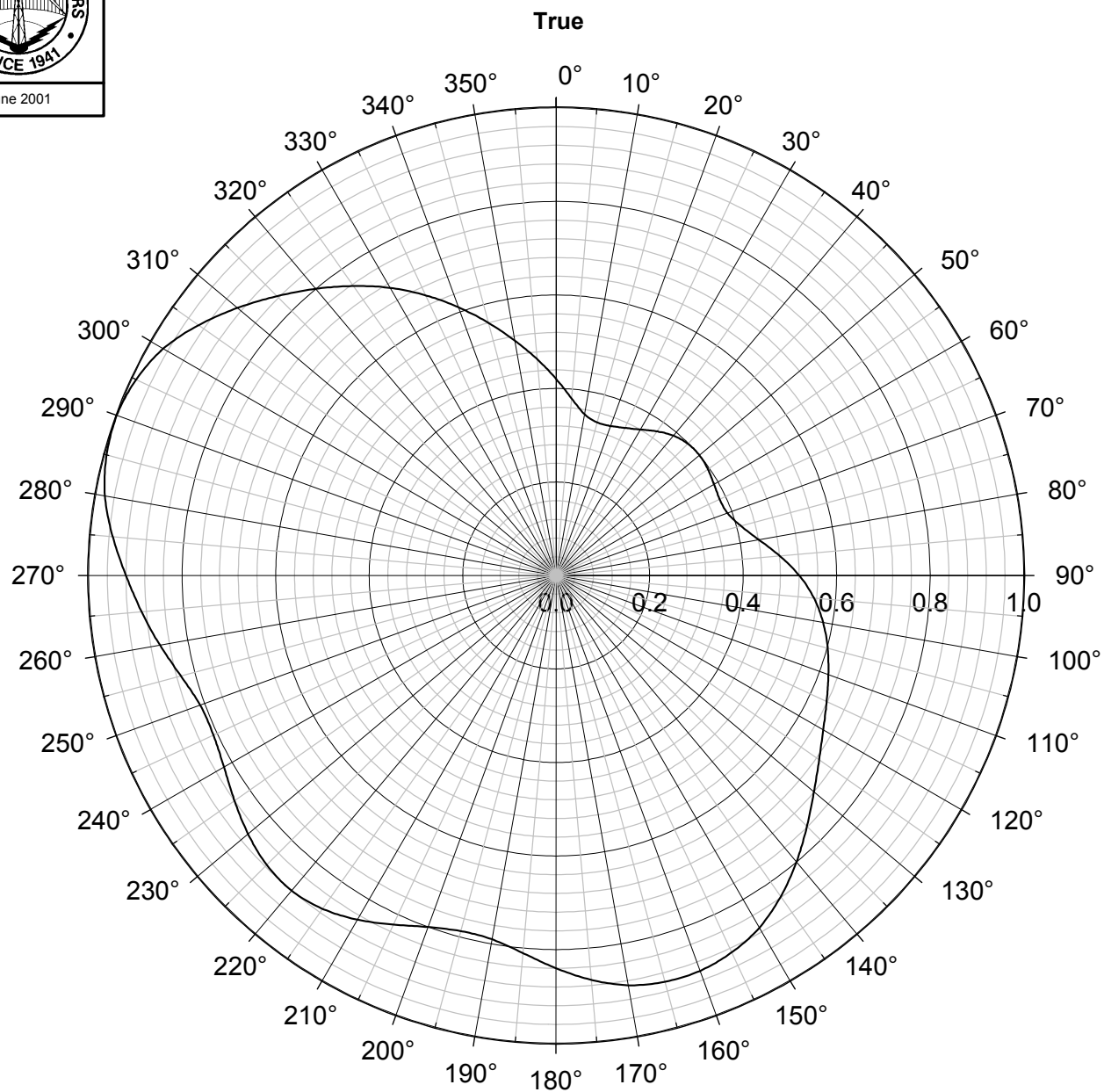
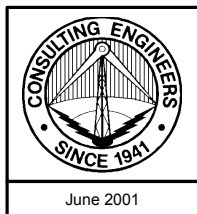
ANTENNA AND SUPPORTING STRUCTURE

STATION WDTV-DT

WESTON, WEST VIRGINIA

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



RFS 607L-9C

HORIZONTAL RELATIVE FIELD PATTERN

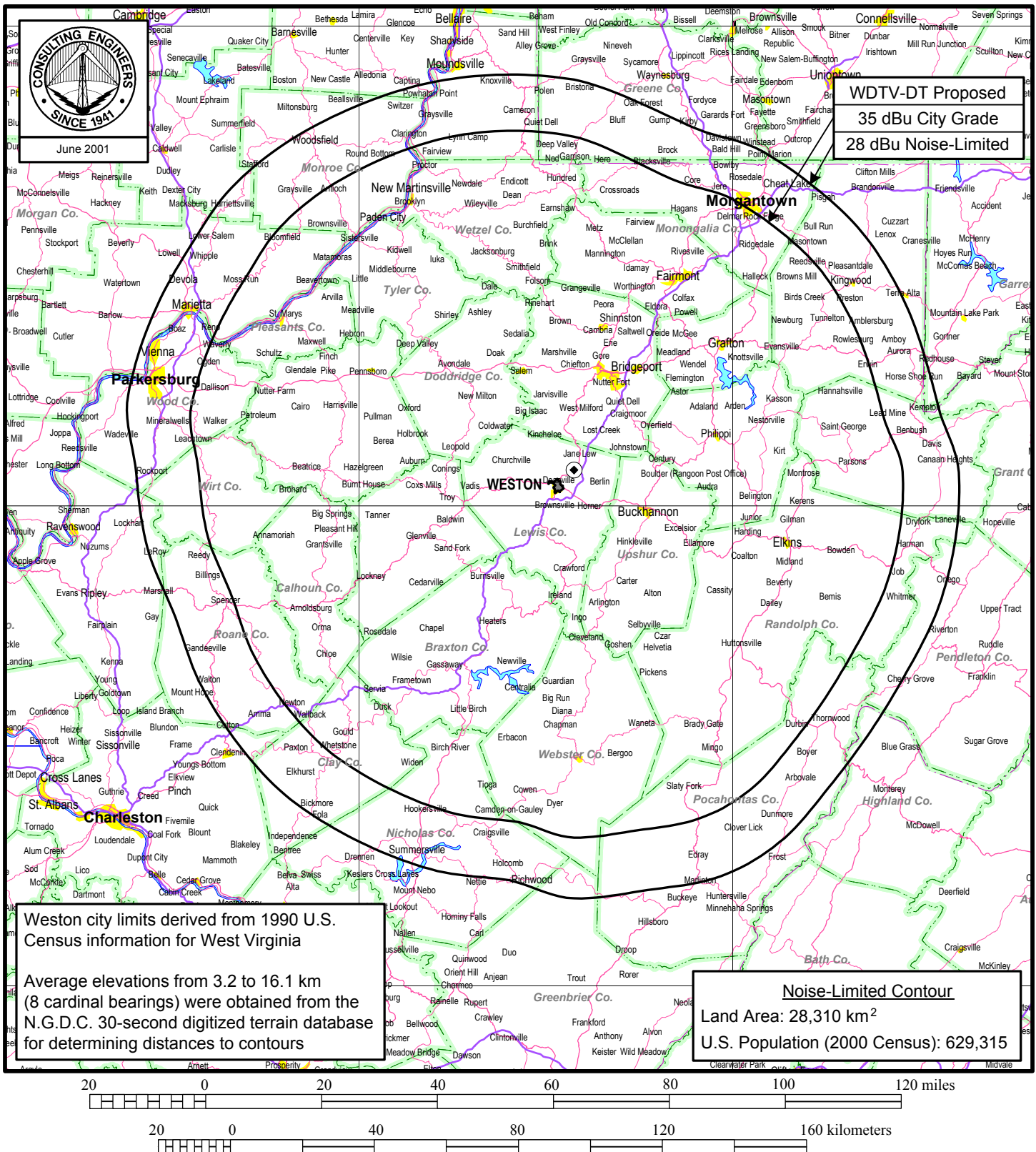
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Figure 3



PREDICTED F(50,90) COVERAGE CONTOURS

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