

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS TELECASTING OF OPELIKA, A CALIFORNIA LIMITED PARTNERSHIP, permittee of WSWO-DT, Channel 31 in Opelika, Alabama, in support of this amendment to its pending application for modification of Construction Permit BMPCDT-20040514ACJ, to specify a reduction in transmitter power.

The Commission believes that the WSWO-DT facility proposed in its pending application causes interference to 2.6 percent of the service population of WFXL(TV), Channel 31 in Albany, Georgia. Since the *de minimis* interference limit for such situations is only 2.0 percent, the FCC cannot grant the WSWO-DT proposal. Accordingly, it is proposed herein to reduce the WSWO-DT effective radiated power from 150 kw to 100 kw. Based on our interference analysis (the methodology of which is contained in the referenced application), WSWO-DT, as authorized under BPCDT-19991101AGV, causes interference to 5,961 people within the WFXL service area. With an amended ERP of 100 kw, proposed WSWO-DT causes interference to only 5,708 people in the WFXL service area. Therefore, a grant of the instant proposal would result in less interference to WFXL than that from the outstanding WSWO-DT authorization.

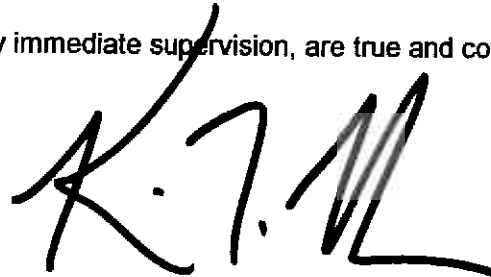
Exhibit B provides directional pattern data for the authorized antenna. Exhibit C is a map upon which the revised service contours are plotted. As shown, the city of license

EXHIBIT A

continues to be completely contained within the proposed 48 dBu service contour. A new power density calculation is provided in Exhibit D.

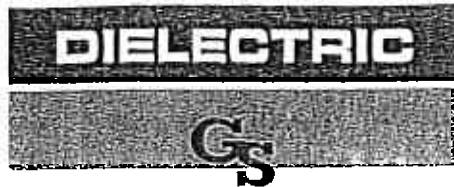
Since no change in the overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. In addition, the FCC has issued Antenna Structure Registration Number 1243417 to the tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a stylized flourish at the end.

KEVIN T. FISHER

June 28, 2004



Date 28 Mar 1997
Call Letters
Location
Customer
Antenna Type TUP-12
Channel 30

ELEVATION PATTERN

RMS Gain at Main Lobe	26.1 (14.17 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	22.2 (13.46 dB)	Frequency	569.00 MHz
Calculated / Measured	Calculated	Drawing #	12U261050

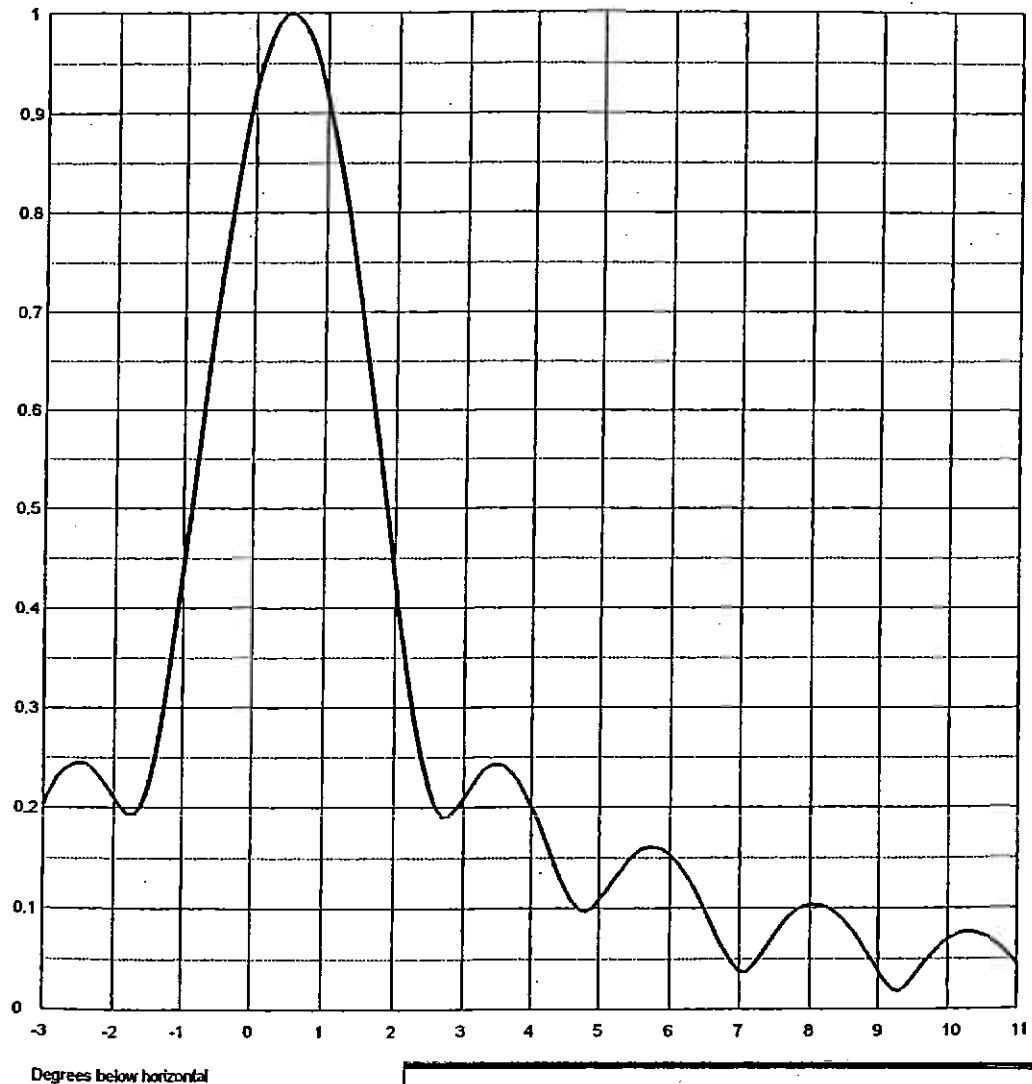
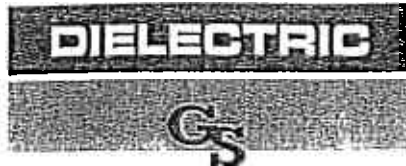


EXHIBIT B-1

ANTENNA ELEVATION PATTERN

PROPOSED WSWS-DT
CHANNEL 31 – OPELIKA, ALABAMA
[AMENDMENT TO BMPCDT-20040514ACJ]

SMITH AND FISHER



Date 28 Mar 1997
Call Letters Channel 30
Location
Customer
Antenna Type TUP-C3

AZIMUTH PATTERN

RMS Gain at Main Lobe
Calculated / Measured

1.90 (2.79 dB)
Calculated

Frequency 569.00 MHz
Drawing # TUP-C3-30

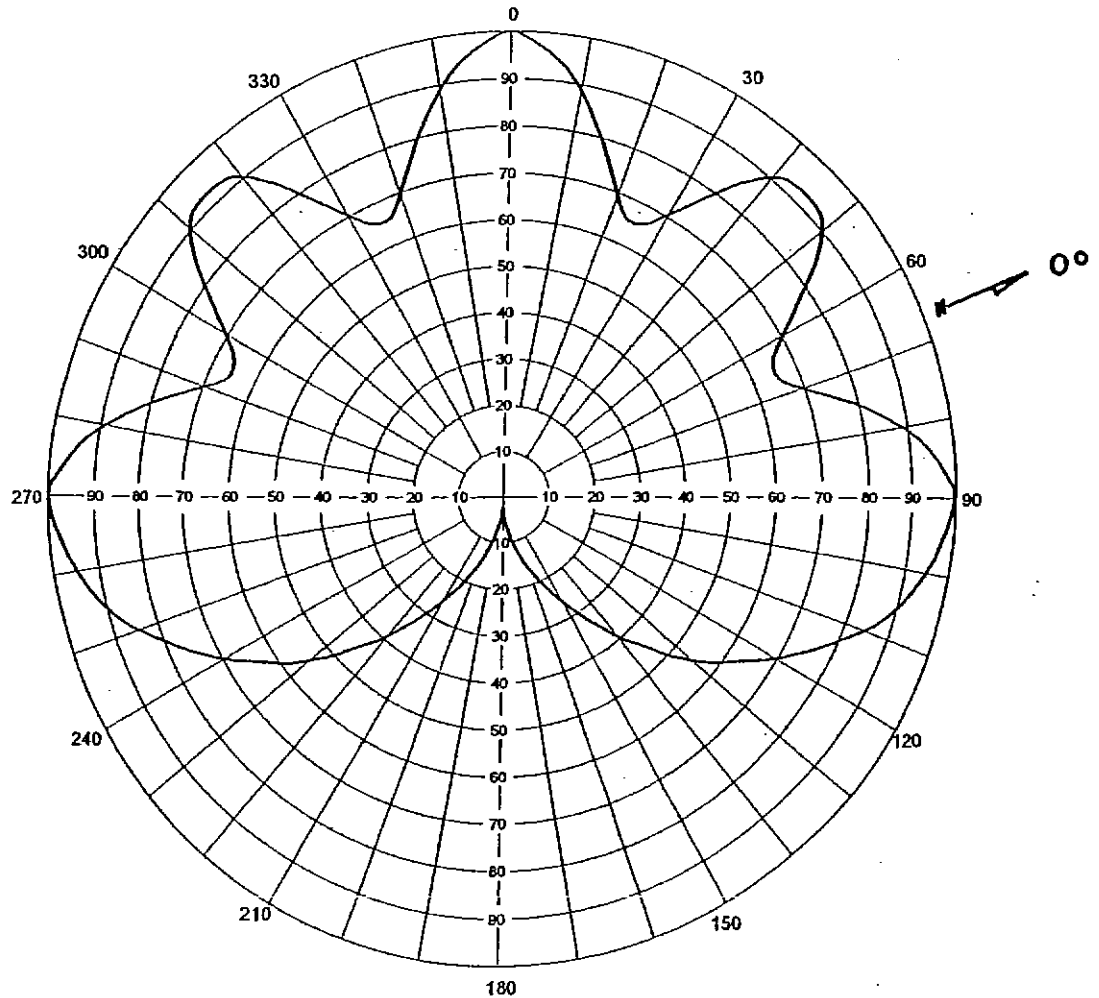


EXHIBIT B-2

ANTENNA AZMUTH PATTERN

PROPOSED WSWs-DT
CHANNEL 31 - OPELIKA, ALABAMA
[AMENDMENT TO BMPCDT-20040514ACJ]

SMITH AND FISHER

HORIZONTAL RELATIVE FIELD PATTERN

PROPOSED WWSW-DT
CHANNEL 31 - OPELIKA, ALABAMA

[AMENDMENT TO BMPCDT-20040514ACJ]

<u>Azimuth</u> <u>(° T)</u>	<u>Relative</u> <u>Field</u>	<u>ERP</u> <u>(dbk)</u>	<u>Azimuth</u> <u>(° T)</u>	<u>Relative</u> <u>Field</u>	<u>ERP</u> <u>(dbk)</u>
0	0.658	16.4	180	0.798	18.0
10	0.831	18.4	190	0.926	19.4
20	0.980	19.8	200	0.989	19.9
30	0.969	19.7	210	0.937	19.4
40	0.885	18.9	220	0.751	17.5
50	0.741	17.4	230	0.663	16.4
60	0.595	15.5	240	0.850	18.6
70	0.433	12.7	250	0.926	19.3
80	0.297	9.5	260	0.761	17.6
90	0.186	5.4	270	0.658	16.4
100	0.104	0.3	280	0.831	18.4
110	0.040	-8.0	290	0.980	19.8
120	0.059	-4.6	300	0.937	19.4
130	0.134	2.5	310	0.751	17.5
140	0.228	7.2	320	0.683	16.7
150	0.348	10.8	330	0.850	18.6
160	0.499	14.0	340	0.926	19.3
170	0.649	16.2	350	0.761	17.6

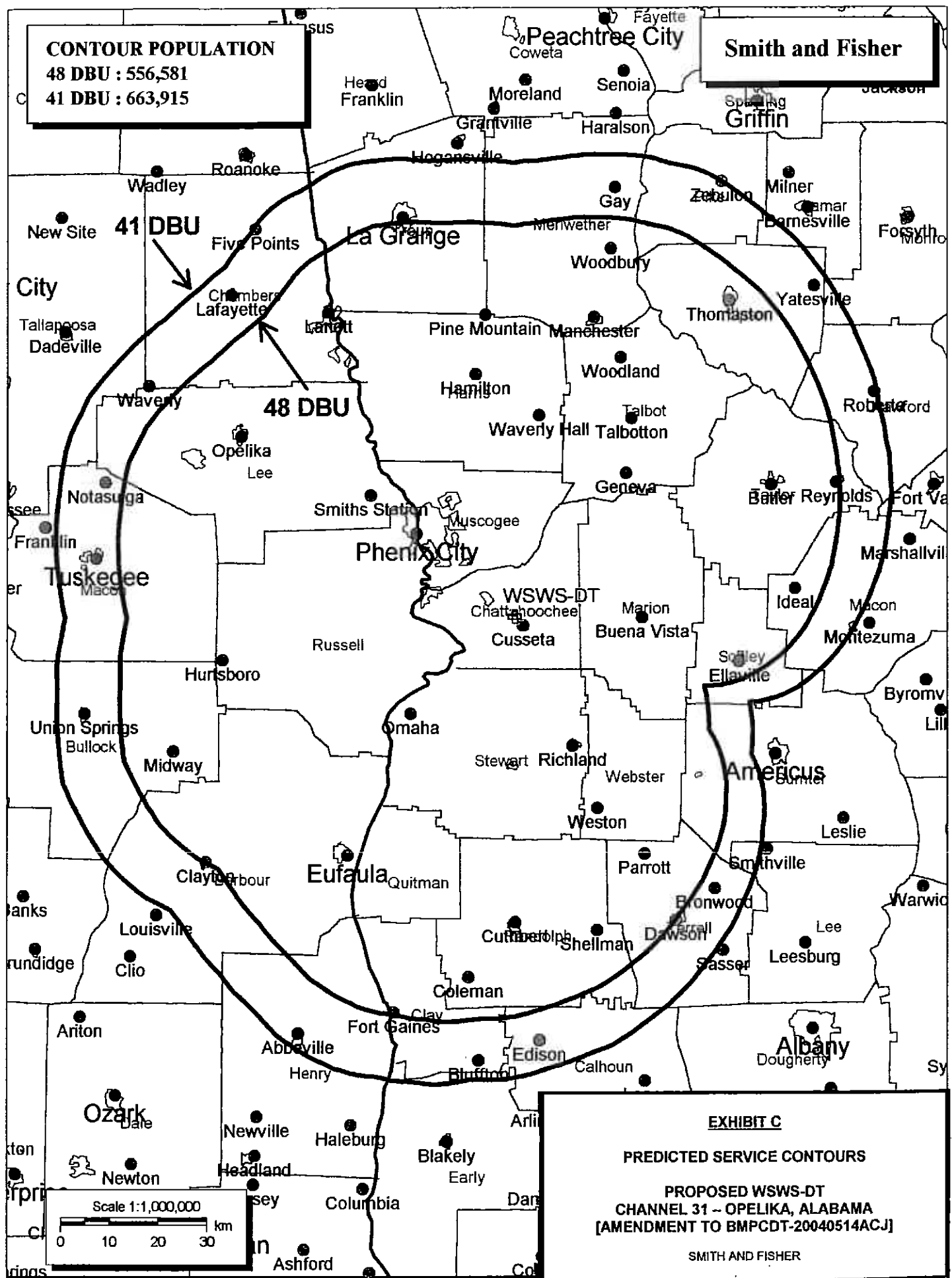


EXHIBIT D

POWER DENSITY CALCULATION

PROPOSED WSWS-DT
CHANNEL 31 – OPELIKA, ALABAMA

[AMENDMENT TO BMPCDT-20040514ACJ]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Opelika facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 100 kw, an effective antenna height of 513 meters above ground, and assuming a vertical relative field value of 20 percent at the steeper elevation angles for the proposed Dielectric antenna, maximum power density two meters above ground of 0.00051 mw/cm^2 is calculated to occur near the base of the tower. Since this is only 0.2 percent of the 0.1 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 31 (572-578 MHz), a grant of this proposal may be considered a minor environmental action with respect to public and occupational ground-level exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.