TECHNICAL EXHIBIT
AMENDMENT TO THE PENDING
DTV DISPLACEMENT APPLICATION
(BDISTTL-20071206ACU)
LPTV STATION WIPX-LP
FACILITY ID 65121
INDIANAPOLIS, INDIANA
CH 34 150 KW

Technical Narrative

The technical exhibit of which this narrative is part was prepared in support of a digital television (DTV) displacement relief application for LPTV station WIPX-LP on channel 51 at Indianapolis, Indiana (Facility ID: 65121; File No. BLTTL-19970918JR). Station WMYO-DT has a construction permit (BPCDT-20060817ADN) to operate on co-channel 51 at a site 160 km from the WIPX-LP licensed site. Therefore, it is believed WIPX-LP qualifies for displacement relief.

Station WIPX-LP is currently licensed to operate on channel 51 with a zero(0) carrier frequency offset. An Antenna Concepts directional antenna (DA) antenna system is used. The antenna pattern is “cardioid” shaped with the major lobe oriented to the south (170 degrees True). The maximum visual effective radiated power (ERP) is 6.49 kilowatts (kW). The antenna center of radiation is 237.7 meters above ground level (AGL) and 456 meters above mean sea level (AMSL). The transmitter coordinates are 39-46-11, 86-09-26.

Specifically, WIPX-LP proposes to change channel, transmitter site, antenna system, antenna height, and ERP. Operation is proposed on channel 34 with a plus(+) carrier offset. It is proposed to install a non-directional antenna system on an existing 307.8 meter tower. The FCC Tower Registration Number is 1253064 and the coordinates are 39-53-40, 86-12-21 (NAD-27). Station WIPX-LP proposes to use a Dielectric TLP-16A(C) non-directional system. The proposed maximum visual ERP will be 150 kW. The proposed antenna center of radiation will be 289.3 meters AGL, and 543.8 meters AMSL. There is no proposed change in the city of license (Indianapolis, Indiana).

Minor Change Application

Figure 1 is a map showing the predicted 74 dBu contours for the WIPX-LP licensed operation (Ch. 51, 6.49 kW-DA),

and the operation proposed herein (Ch. 34, 150 kW Non-D). As shown, the proposed 74 dBu contour completely encompasses the licensed 74 dBu contour. Therefore, the proposed modification is considered a "minor" change in facilities pursuant to Section 73.3572.

NTSC Allocation Considerations

A study has been conducted using the provisions of Section 74.705, 74.707 and 74.709 of the FCC rules to assure that the proposal will not create prohibited interference with other authorized or pending analog (NTSC) full-power TV, LPTV and Class A TV stations. The proposed WIPX-LP operation complies with the FCC's allocation standards with respect to other analog assignments except as follows.

WDNI-LP, Ch. 19(z), Indianapolis, IN (BPTTL-20060323ABR)
WFYI(TV), Ch. 20(-) , Indianapolis, IN (BLET-19810825KE)
W57CQ, Ch. 34(+), Lafayette, IN (BPTTL-20020814ABB)
WNIT(TV), Ch. 34(-), South Bend, IN (BLET-19910307KE)
W34DD, CP Ch. 34(0), Terre Haute, IN, (BMPTTL-20040223ARP)
WBKI-TV, Ch. 34(-), Campbellsville, KY (BLCT-20001109ABF)

Interference calculations were made based on the FCC's OET-69 Bulletin and a 1 kilometer grid. It was determined that the proposal will not create any prohibited interference to any NTSC facilities except with respect to the W57CQ application. However, the FCC's CDBS database indicates that this application has been dismissed and is therefore no longer an issue.

DTV Station Protection

Calculations based on OET Bulletin No. 69 indicate that the proposed WIPX-LP operation on channel 34 complies with the FCC's 0.5% interference threshold criteria to all allotted, proposed or actual DTV operating facilities on channels 33, 34 and 35.

The proposed WIPX-LP site is located 343 kilometers form the nearest point of the U.S./Canada border. There are no Canadian TV and DTV allotments on pertinent channels that require consideration. The proposed 19 dBu F(50,10) contour does not extend beyond the Canadian border (see Figure 2). Therefore, it

is believed coordination of the proposed WIPX-LP operation with Canada is not required.

The closest point of the Mexican border is more than 1780 kilometers to the southwest. The closest FCC monitoring station is at Allegan, Michigan, approximately 302 kilometers to the north. The closest point of the National Radio Quiet Zone (VA/WV) is more than 495 kilometers to the east. The Table Mountain Radio Quiet Zone (CO) is more than 1620 kilometers to the west. The closest radio astronomy site using channel 37 is at North Liberty, Iowa, approximately 498 to the west-northwest. These separations are sufficient to not be a coordination concern.

Response to Paragraph 14 - Environmental Protection Act

The proposed WIPX-LP facilities were evaluated in terms of potential radiofrequency radiation exposure at ground level in accordance with OST Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation."[1] The calculated power density at the base of the tower was calculated using the appropriate equation in the Bulletin. As shown on Figure 3 (antenna vertical plane relative field pattern), the maximum vertical relative field for depression angles towards the tower base (-60° to -90°) is less than 0.2. Therefore, using a vertical relative field value of 0.2, a maximum effective radiated power of 150 kW, 10 percent aural power, and an antenna center of radiation height above ground level of 289.3 meters, the calculated power density at two meters above ground level at the base of the tower is 0.0012 mW/cm^2, or 0.31 percent of the Commission's recommended limit applicable to general population/uncontrolled exposure areas (0.4 mW/cm^2 for TV channel 34). Therefore, based on the responsibility threshold of 5%, the proposal will comply with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, an agreement will be in effect in the event that workers or other authorized personnel enter the restricted

[1] See *Report and Order* in ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 11 FCC Rcd 15123 (1997). See also *First Memorandum Opinion and Order*, ET Docket 93-62, FCC 96-487, adopted December 23, 1996, 11 FCC Rcd 17512 (1997), and *Second Memorandum Opinion and Order and Notice of Proposed Rulemaking*, ET Docket 93-62, FCC 97-303, adopted August 25, 1997.

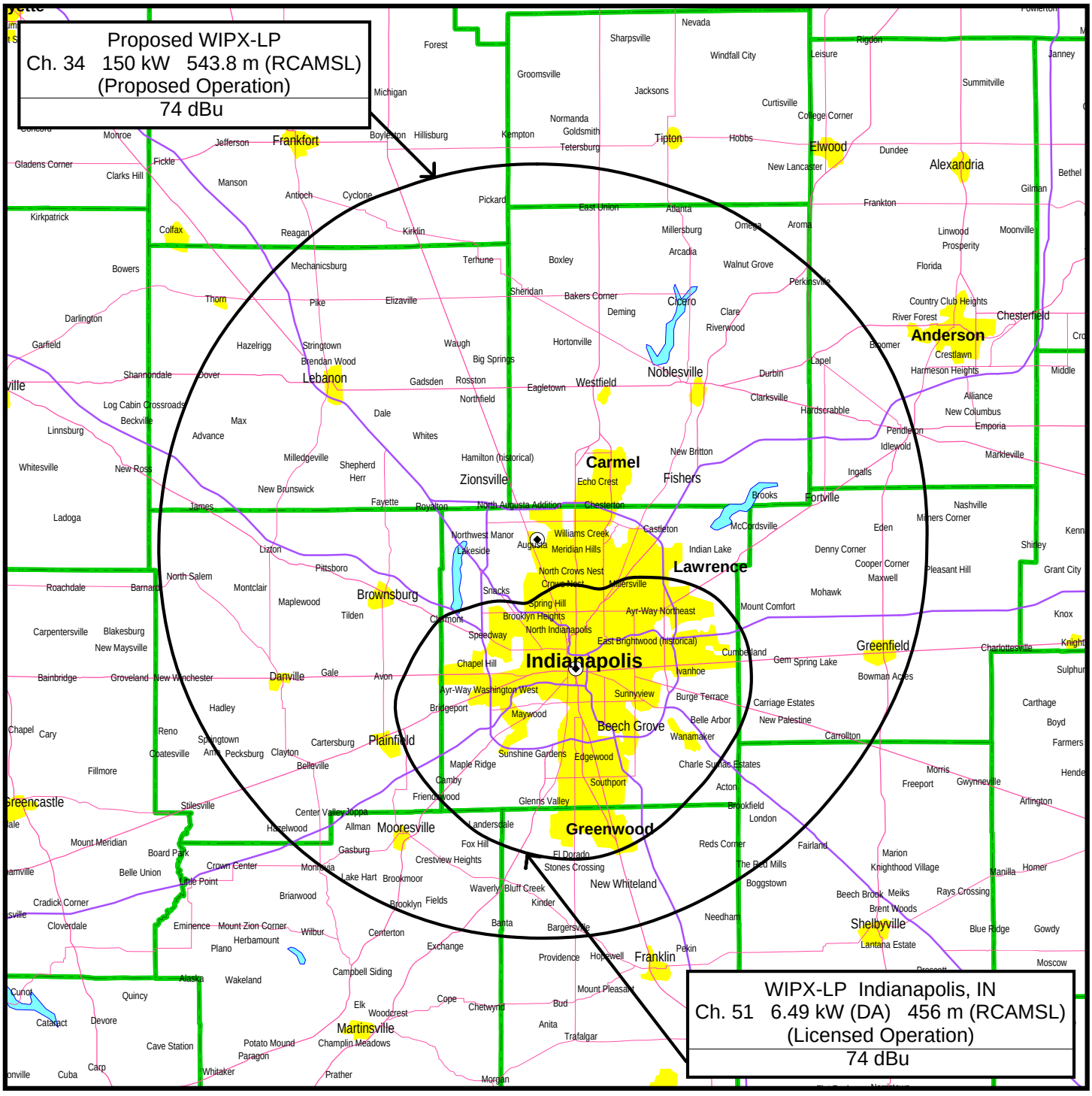
area or climb the tower to ensure that appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

Jerome J. Manarchuck

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

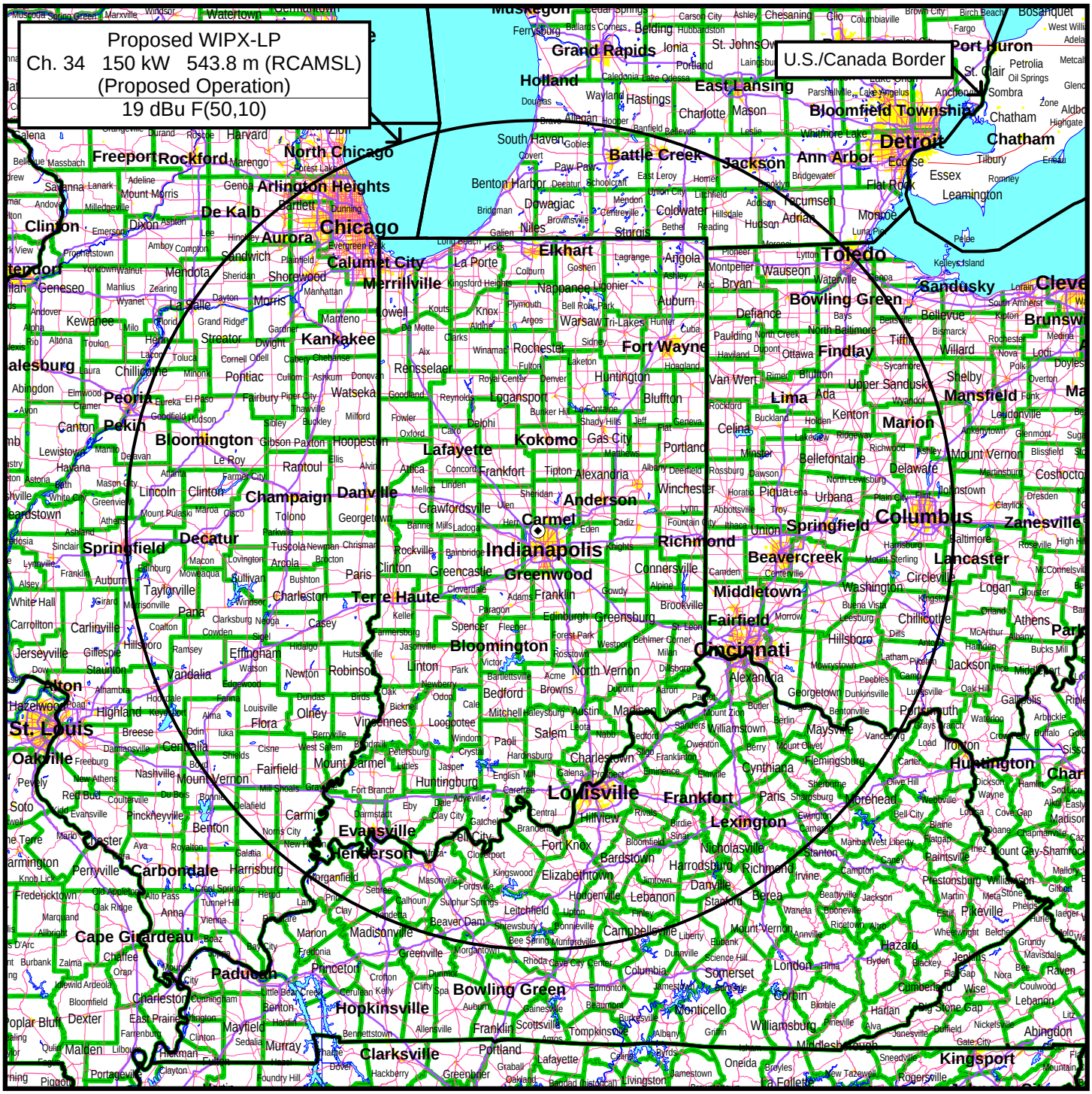
January 24, 2008



FCC PREDICTED COVERAGE CONTOURS

PROPOSED WIPX-LP
INDIANAPOLIS, INDIANA
CH 34 150 KW 543.8 M (RCAMSL)

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



PREDICTED 19 dBu CONTOUR

PROPOSED WIPX-LP
INDIANAPOLIS, INDIANA
CH 34 150 KW 543.8 M (RCAMSL)

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

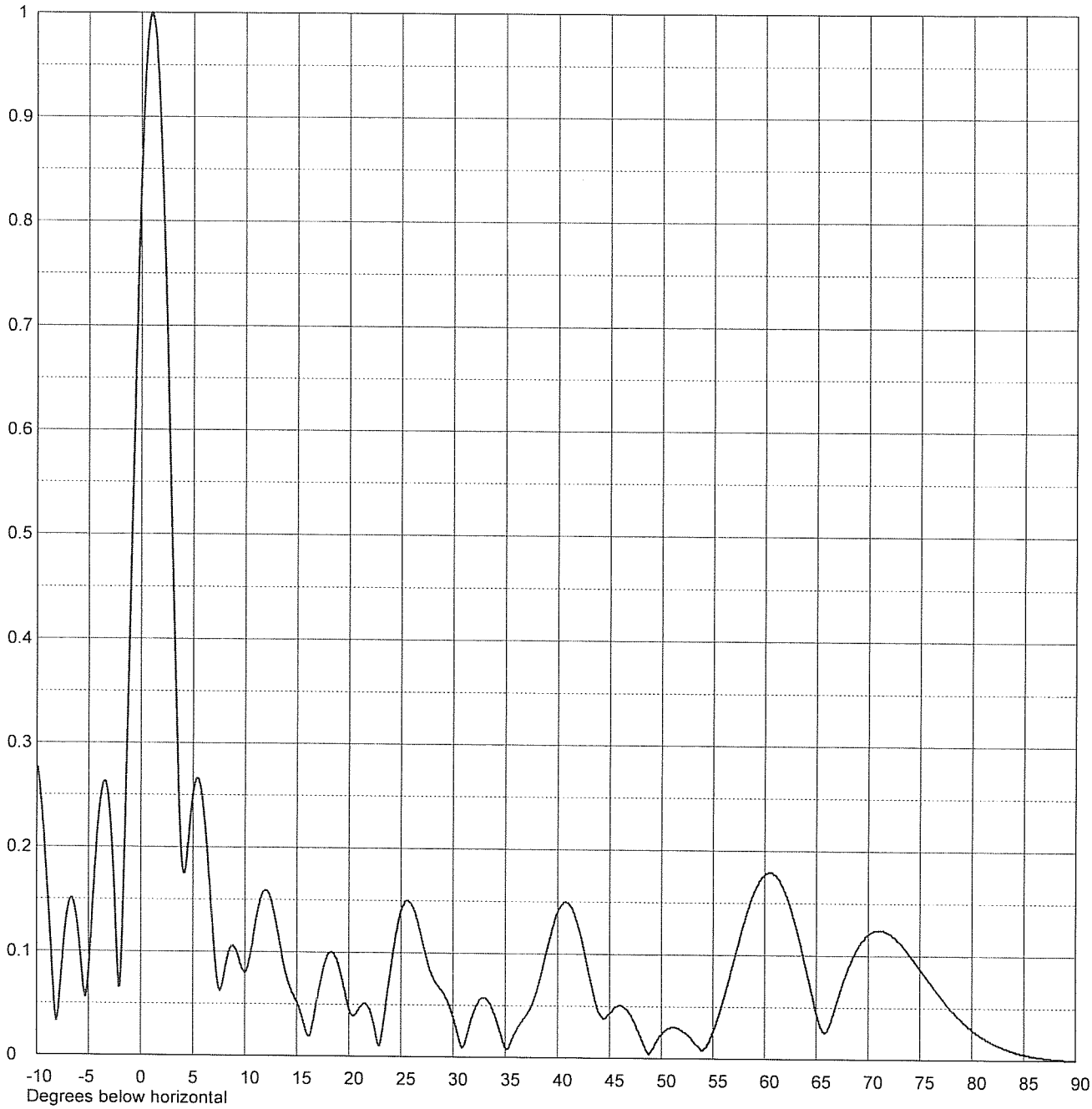
Exhibit No.
Figure 3

Dielectric

Date	**04 Dec 2007**		
Call Letters		Channel	**34**
Location			
Customer			
Antenna Type	**TLP-16A**		

ELEVATION PATTERN

RMS Gain at Main Lobe	**16.0 (12.04 dB)**	Beam Tilt	**1.00 Degrees**
RMS Gain at Horizontal	**11.3 (10.53 dB)**	Frequency	**593.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**16L160100-90**



Remarks: