

ENGINEERING STATEMENT
SUPPLEMENTAL REQUEST TO THE
APPLICATION FOR CONSTRUCTION PERMIT
FCC FILE NO. BMPCDT-20080619AFS
WJCL-DT, SAVANNAH, GEORGIA
CHANNEL 22 1000 KW MAX ERP 436 METERS HAAT

AUGUST 2008

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

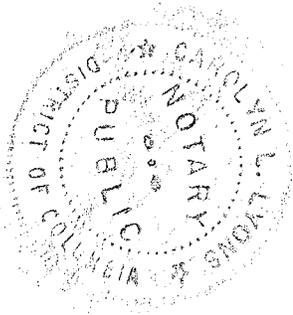
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 20th day of August, 2008.


Notary Public

My Commission Expires: 2/28/2013

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Martin R. Doczkat being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University, and is a staff engineer at Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

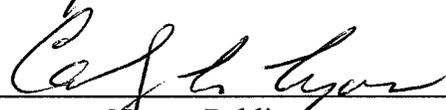
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



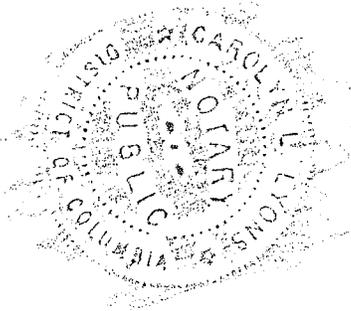
Martin R. Doczkat

Subscribed and sworn to before me this 22nd day of August, 2008.



Notary Public

My Commission Expires: 2/28/2013



This supplemental engineering statement has been prepared in support of the pending application¹ (FCC File No. BMPCDT-20080619AFS) for modification of construction permit on behalf of NVT Savannah Licensee, L.L.C., licensee of WJCL(TV), Savannah, Georgia. The purpose of this pending application is to maximize the WJCL-DT service area in accordance with the FCC Public Notice dated May 30, 2008.²

WJCL(TV) is licensed to operate on NTSC television Channel 22 with a maximum visual ERP of 3800 kW (directional) and an antenna height above average terrain (“HAAT”) of 436 meters (1430 feet). WJCL-DT has been allocated DTV Channel 22 with facilities of 166.17 kW (directional) ERP and 436 meters HAAT in the revised DTV Table of Allotments³ and is authorized to construct post-transition facilities of 85 kW directional and 436 meters HAAT (FCC File No. BPCDT-20080515ACT). WJCL-DT proposes to construct further post-transition DTV facilities with 1000 kW directional ERP and 436 meters HAAT in this pending application (FCC File No. BMPCDT-20080619AFS). The purpose of this engineering statement is in response to a FCC staff member’s informal request with reference to compliance with Section 73.622(f)(5) of the FCC Rules.

¹“Engineering Statement, Re DTV Broadcast Engineering Data, Application for Modification of Construction Permit, WJCL-DT, Savannah, Georgia, Channel 22, 1000 kW Max ERP, 436 Meters HAAT, June 2008”.

²FCC Public Notice, DA 08-1213, Released May 30, 2008, “Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitution, Effective Immediately”.

³“In the Matter of Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television”, MB Docket No. 07-91, Report & Order (FCC 07-228), Released December 31, 2007.

Section 73.622(f)(5) permits a station to increase its facilities to have a service area equal to or less than that already authorized in the market. Station WSAV-DT, licensed to Savannah, Georgia, Channel 39, operates with 1000 kW non-directional ERP and 442 meters HAAT. WSAV-DT possesses a slightly larger F(50,90) 41 dBu DTV noise-limited service area than that requested by WJCL-DT. The licensed WSAV-DT service area is predicted to encompass 834,328 persons and the proposed WJCL-DT service area is predicted to encompass 833,859 persons based on the contour method for predicting population within a noise-limited service area and 2000 U.S. census data. Attached is Exhibit E-1 which provides a service area comparison.

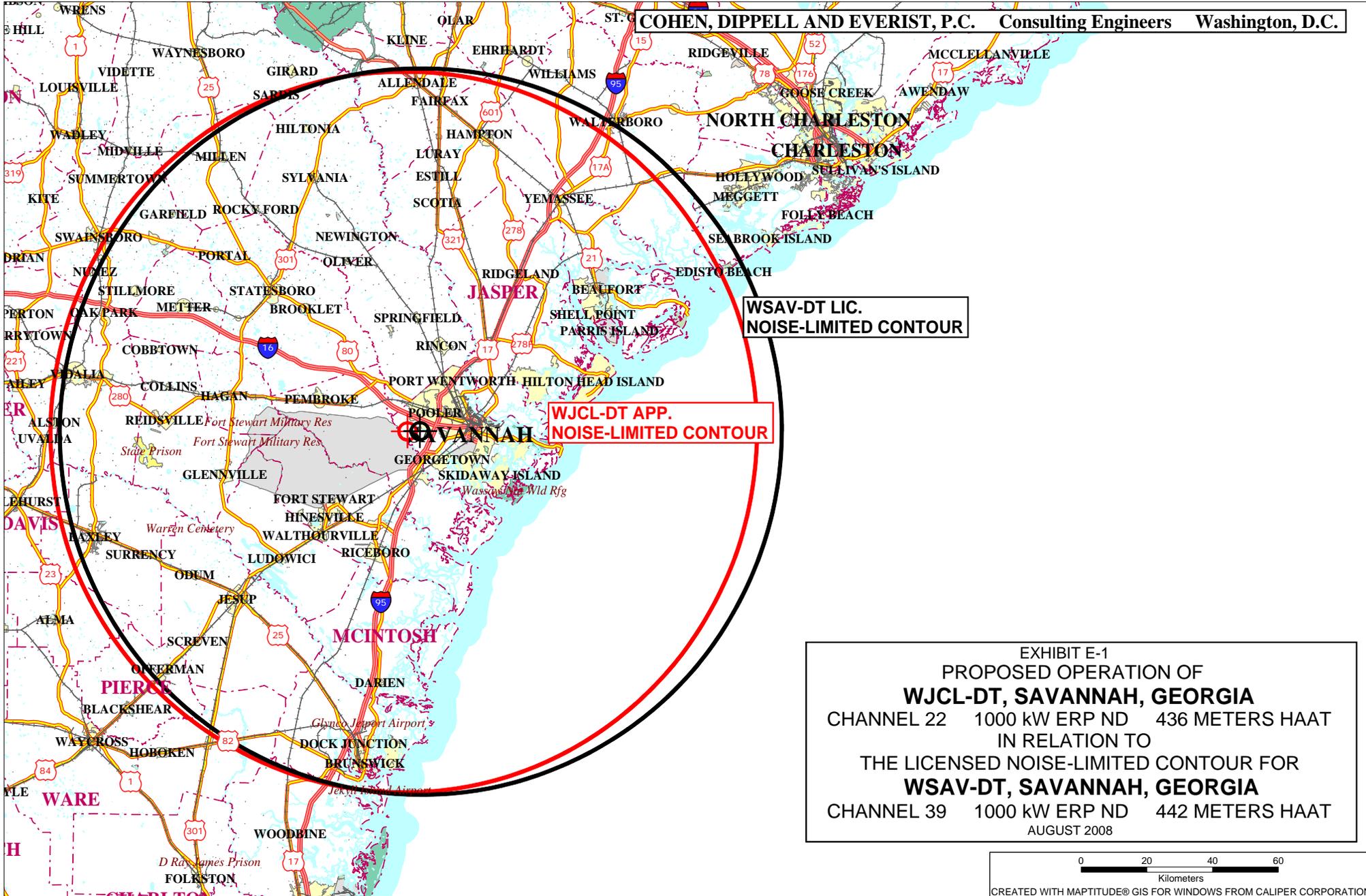


EXHIBIT E-1
PROPOSED OPERATION OF
WJCL-DT, SAVANNAH, GEORGIA
CHANNEL 22 1000 kW ERP ND 436 METERS HAAT
IN RELATION TO
THE LICENSED NOISE-LIMITED CONTOUR FOR
WSAV-DT, SAVANNAH, GEORGIA
CHANNEL 39 1000 kW ERP ND 442 METERS HAAT
AUGUST 2008

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

Yes No N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in 'good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

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).

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 Donald G. Everist	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date August 22, 2008	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, NW, Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

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