

TECHNICAL EXHIBIT  
APPLICATION FOR CONSTRUCTION PERMIT  
DIGITAL COMPANION CHANNEL FOR W55BJ  
JASPER, ALABAMA

February 27, 2007

CHANNEL 16 15 KW

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Technical Statement

This Technical Exhibit was prepared in response to the FCC *Letter* dated February 12, 2007 regarding Applications for Low Power Digital Companion Channels, Combs Broadcasting, Inc., File No. BSFDTL-20060630AIL, FIN: 166986; Ettie Clark, File No. BSFDTL-20060630CZC, FIN: 168770, which approved the settlement agreement between these entities. This exhibit was prepared in support of a complete FCC Form 346 as required by the FCC *Letter* for the proposed digital companion channel operation for W55BJ on Channel 16 at Jasper, Alabama.

Figure 1 depicts the 74 dBu (analog) protected contour for W55BJ's licensed analog operation along with the 51 dBu protected contour for W55BJ's proposed digital operation. As indicated, the proposal complies with the FCC requirement that there be protected contour overlap between the current analog and proposed digital operations.

Proposed Facilities

It is proposed to operate on Channel 16 (482-488 MHz) using a non-directional antenna. The nominal non-directional ERP will be 15 kW. The antenna radiation center height above ground level will be 161 m (528 ft). The transmitter will employ a "stringent" out-of-channel emission mask.

The proposed antenna structure is registered with an FCC antenna structure registration number of 1050552. There will be no change in the overall height of the existing antenna structure as a result of the instant proposal.

Response to Paragraph 13 (Interference)

The proposed facility complies with the following applicable FCC rule Sections: 74.709, 74.793(e), 74.793(f), 74.793(g), 74.794(b) and 73.1030. However, with respect to Section 74.793(h), the proposal fails the normal interference analysis prepared according to FCC Office of Engineering and Technology Bulletin No. 69 (OET-69) with respect to the low power digital companion application for WSSF-LP, Berry, AL on Channel 15 (File No. BSFDTL-20060630CZC). As indicated above, the applicant has a settlement agreement with the licensee of WSSF-LP (Ettie Clark) which allows for acceptance of predicted interference that is caused by the proposed W55BJ digital facility on Channel 16 and vice versa. The settlement agreement was approved by the FCC as indicated in the FCC *Letter* of February 12, 2007. The proposal complies with Section 74.793(h) of the FCC Rules with respect to all other pertinent facilities. A summary of the interference analysis for the proposed facility is included herein at Appendix 1.

Environmental Considerations

An evaluation was conducted for the proposed facility concerning compliance with Section 1.1307(b) of the FCC Rules regarding human exposure to radio frequency (RF) energy.\*

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\* See FCC Office of Engineering and Technology Bulletin No. 56 for background information on non-ionizing RF energy of the type discussed here. Internet web reference:  
[http://www.fcc.gov/Bureaus/Engineering\\_Technology/Documents/bulletins/oet56/oet56e4.pdf](http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf)

With respect to the potential for human exposure to radio frequency (RF) radiation, calculations prepared in accordance with FCC Bulletin OET-65 (Edition 97-01) indicate that the proposal will not result in human exposure to RF radiation at ground level in excess of FCC standards. Power density calculations were conducted at 2-m above ground<sup>†</sup> based on the following conservative assumptions, with the following results:

Call Sign	Channel	Average ERP (kW)	Distance (m)	Relative Field Factor <sup>‡</sup>	FCC Limit <sup>§</sup> (mW/cm <sup>2</sup> )	Percentage of Limit
W55BJ	16	15	159	0.2	0.323	0.3%

As indicated above, the exposure to RF radiation at 2-m above ground level will not exceed 0.3% of the FCC limit for general population / uncontrolled exposure. Therefore, the proposal complies with the FCC limits for human exposure to RF radiation and it is categorically excluded from environmental processing. The applicant, in coordination with other users of the transmission facility, shall reduce power or cease operation as necessary to protect persons having access to the tower or antenna from radio frequency radiation in excess of the FCC guidelines.



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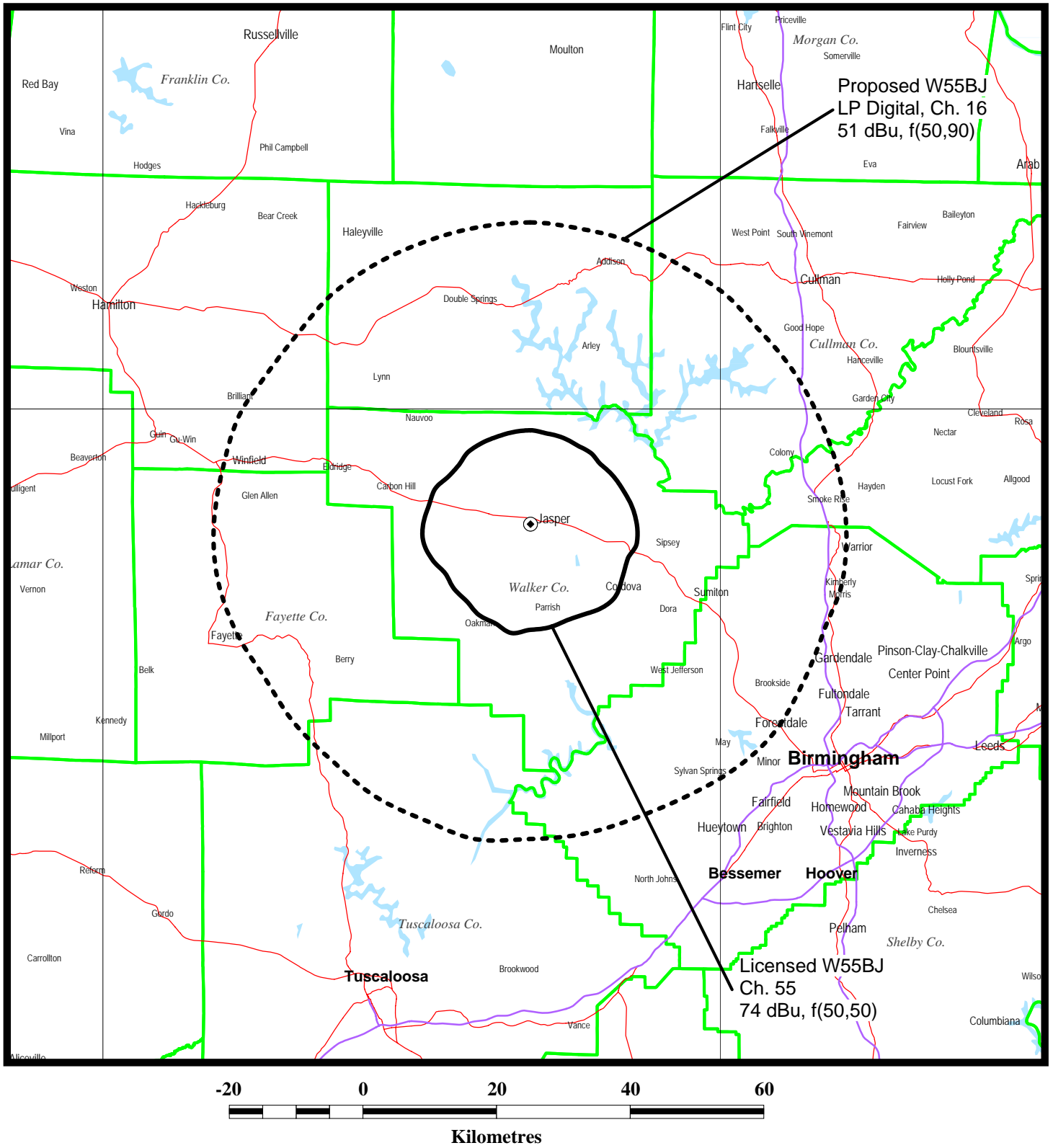
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<sup>†</sup> The radiation center height above ground is 161 m.

<sup>‡</sup> This is a conservative estimate of the downward relative field factor at steep elevation angles.

<sup>§</sup> for general population/uncontrolled environments



## PREDICTED COVERAGE COMPARISON

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

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Summary of OET-69 Interference Analysis

Channel	Callsign	File Number	Status	City	State	Baseline	Net Change	Percent Change
15	W15AZ	BLTTL-19940809IB	LIC	ALABASTER	AL	--	0	0
15	WSSF-LP	BSFDTL-20060630CZC	APP	BERRY	AL	86577	32349	37.364*
15	WHDF	BLCT-20050902ABG	LIC	FLORENCE	AL	714093	0	0
15	W15AP	BLTTL-19901210JQ	LIC	GADSDEN	AL	--	0	0
15	W15CG	BLTTL-20050308ABV	LIC	PONTOTOC	MS	370042	84	0.023
16	WCOV-TV	BPCDT-19991021ACM	CP	MONTGOMERY	AL	--	0	0
16	WYGA-CA	BDCCDTL-20060928AGS	CP	ATLANTA	GA	--	0	0
16	WYBU-CA	BLTTL-19980527JD	LIC	COLUMBUS	GA	--	0	0
16	WYBU-CA	BDFCDTA-20060331BKI	CP	COLUMBUS	GA	--	0	0
16	WELF-TV	BLCDDT-20060301ADC	LIC	DALTON	GA	705738	111	0.016
16	WGXA	BPCDT-19991029AFU	CP	MACON	GA	--	0	0
16	WGXA	BMPCDT-20070131AIP	APP	MACON	GA	--	0	0
16	WNKY	BMPCDT-20041105AZO	CP MOD	BOWLING GREEN	KY	--	0	0
16	WMAH-TV	BLEDT-20030630AAJ	LIC	BILOXI	MS	--	0	0
16	WAPT	BMLCT-20021008ABL	LIC	JACKSON	MS	--	0	0
16	WLOV-TV	BPCDT-19991022ABH	CP	WEST POINT	MS	421667	1459	0.346
16	WJKT	BLCT-19920224KF	LIC	JACKSON	TN	--	0	0
16	NEW	BSFDTL-20060630AIM	APP	KNOXVILLE	TN	--	0	0
16	NEW	BSFDTL-20060630CXG	APP	KNOXVILLE	TN	--	0	0
16	W25BY	BPTTL-20020925ABY	APP	MEMPHIS	TN	--	0	0
17	WDBB	BLCT-20030304AAA	LIC	BESSEMER	AL	1279295	2506	0.196
17	NEW	BNPTT-20000831BRU	APP	CORINTH	MS	--	0	0
19	WHNT-TV	BLCT-20011116ABY	LIC	HUNTSVILLE	AL	--	0	0
19	WOTM-LP	BLTTL-19970514JI	LIC	MONTEVALLO	AL	--	0	0
23	W23AK	BSTA-20020722ABZ	STA	JASPER	AL	--	0	0
23	W23AK	BLTTL-19900102IH	LIC	JASPER	AL	--	0	0
23	WUOA	BLCT-20011109ACV	LIC	TUSCALOOSA	AL	--	0	0
24	W24DC	BLTTL-20051214ACZ	LIC	HAMILTON	AL	--	0	0
24	WJXS-CA	BLTTL-19970508JF	LIC	SYLACAUGA	AL	--	0	0
24	W24CY	BNPTT-20000830BCM	CP	STARKVILLE	MS	--	0	0

Notes:

\* WSSF-LP consents to the predicted interference from the proposed facility pursuant to settlement agreement.