



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN
APPLICATION FOR MODIFICATION OF
A DTV CONSTRUCTION PERMIT
BPCDT-20080317AGK
WTVZ-DT - NORFOLK, VIRGINIA
DTV - CH. 33 - 1000 kW - 375.6 m HAAT**

Prepared for: WTVZ Licensee, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WTVZ Licensee, LLC, licensee of WTVZ-TV, channel 33, Norfolk, Virginia, and permittee of WTVZ-DT, on post-transition channel 33, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application for modification of its post-transition construction permit BPCDT-20080317AGK. The permittee proposes to construct its post-transition DTV facility according to its current post-transition authorization with three exceptions. It is herein proposed to substitute the existing analog channel 33 non-directional antenna for the currently authorized directional antenna, consequently increasing the HAAT and increase the effective radiated power (ERP) from the currently authorized 905 kW to 1000 kW. No other changes are proposed.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 4 contains the predicted DTV Noise Limited (41 dBu) contour and the predicted principal community (48 dBu) contour. The 48 dBu contour entirely encompasses the principal community of license, Norfolk, Virginia.

DTV Allocation Considerations

A study was performed utilizing the Commission's application processing software to determine compliance with the post-transition limitations contained in §73.616 of the Commission's rules. Results indicate that the instant proposal to substitute a non-directional antenna and increase WTVZ-DT's ERP from 905 kW to 1000 kW is predicted to cause no unacceptable level (0.5%) of new interference to the populations served by any DTV station, expansion construction permit or allotment.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, the interference contour overlap analysis which is provided by TV_Process was considered, based on the proposed WTVZ-DT facility, to establish compliance with the protection requirements contained therein. The

study results indicate that no prohibited contour overlap exists with any Class A LPTV stations.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WTVZ-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, $(\text{frequency}/1500)$. The MPE level for "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm^2) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, $(\text{frequency}/300)$. The predicted emissions of WTVZ-DT must be considered, along with the predicted emissions from other proposed stations at the site, and within 315 meters of the site. For WTVZ-DT, which will operate on DTV Channel 33 (584-590 MHz), the MPE is 0.391 milliwatts per centimeter squared (mW/cm^2) in an "uncontrolled" environment and 1.985 mW/cm^2 in a "controlled" environment. The proposed WTVZ-DT facility will operate with a maximum ERP of 1000 kW using a horizontally polarized transmitting antenna at a centerline height of 371.6 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WTVZ-DT facility is predicted to produce a power density at two meters above ground level of 0.02208 mW/cm^2 , which is 5.64% of the FCC guideline value for "uncontrolled" environments, and 1.128% of the FCC guideline value for "controlled" environments (see Appendix A). The total percentage of the ANSI value including all stations at the proposed site is 29.71% of the limit for "uncontrolled" environments, and 5.94% of the limit for "controlled" environments.

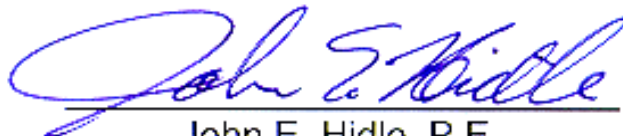
OCCUPATIONAL SAFETY

The permittee for WTVZ-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the proposed WTVZ-DT antenna. The applicant is committed to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel.

SUMMARY

It is submitted that the instant application for modification of construction permit for WTVZ-DT seeking to utilize its existing analog antenna, increase its HAAT from 360.5 meters to 375.6 meters, and increase its effective radiated power from 905 kW to 1000 kW, as described herein complies with the Rules, Regulations and Policies of the Federal Communications Commission. This statement, FCC Form 301, Section III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: June 18, 2008

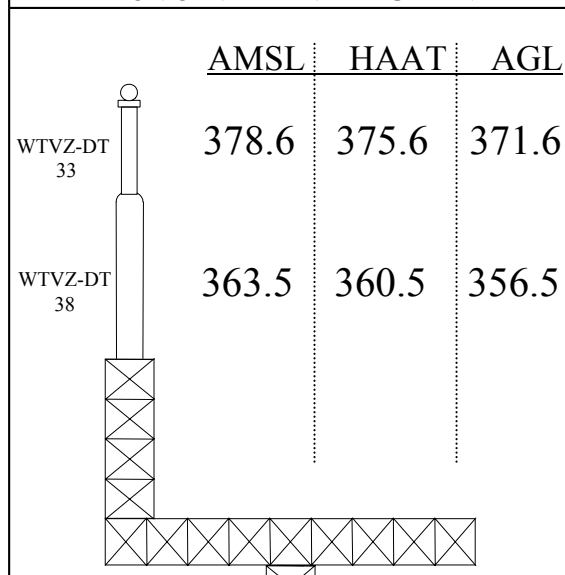
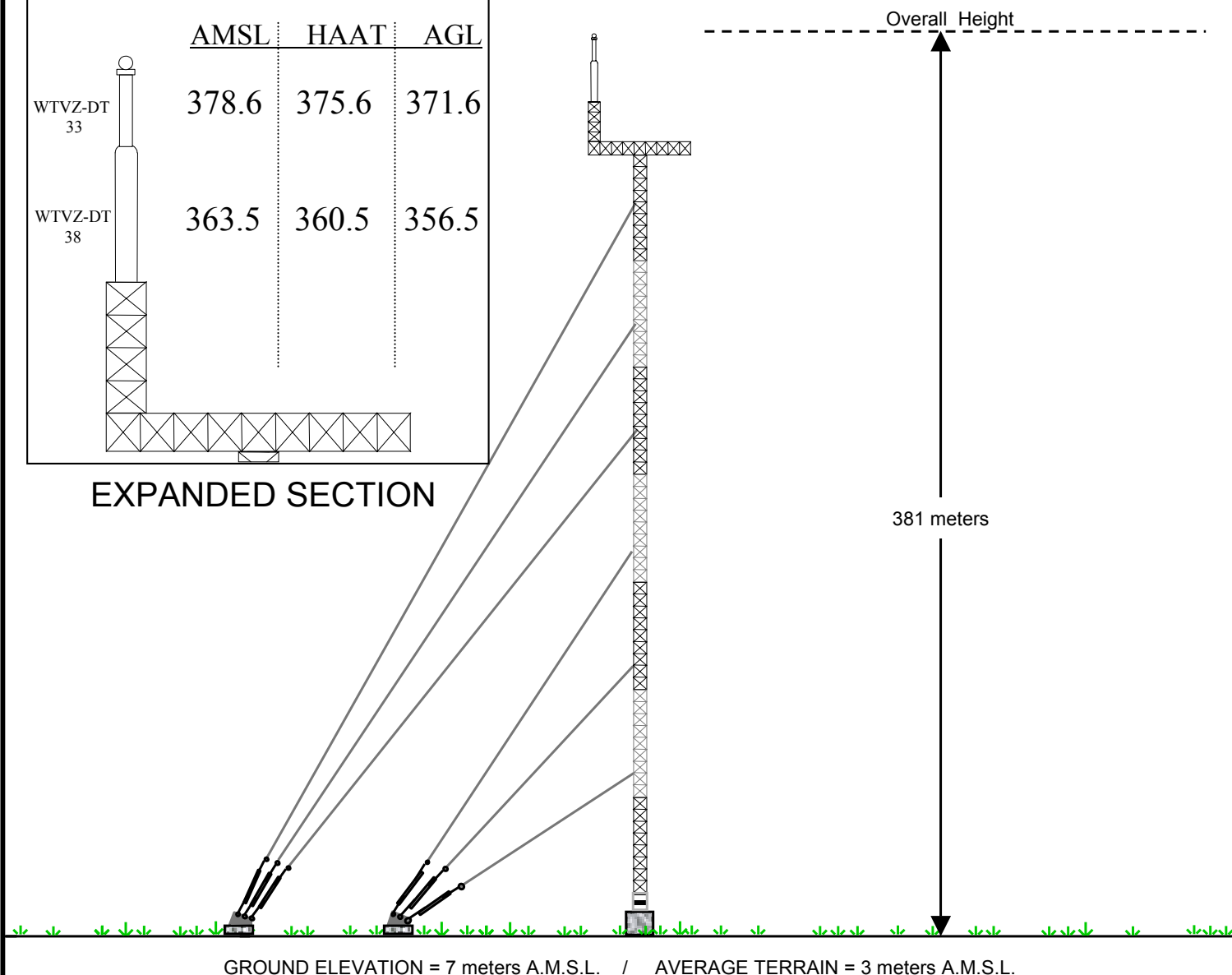

John E. Hidle, P.E.



COORDINATES NAD-27

NORTH LATITUDE: 36° 48' 31"

WEST LONGITUDE: 76° 30' 13"

RADIATION CENTERLINE HEIGHT IN METERS**EXPANDED SECTION****VERTICAL PLAN ANTENNA SKETCH**

STATION WTVZ-DT - NORFOLK, VIRGINIA

Ch. 33 - 1000 kW ERP - 375.6 HAAT

JUNE, 2008

CARL T. JONES
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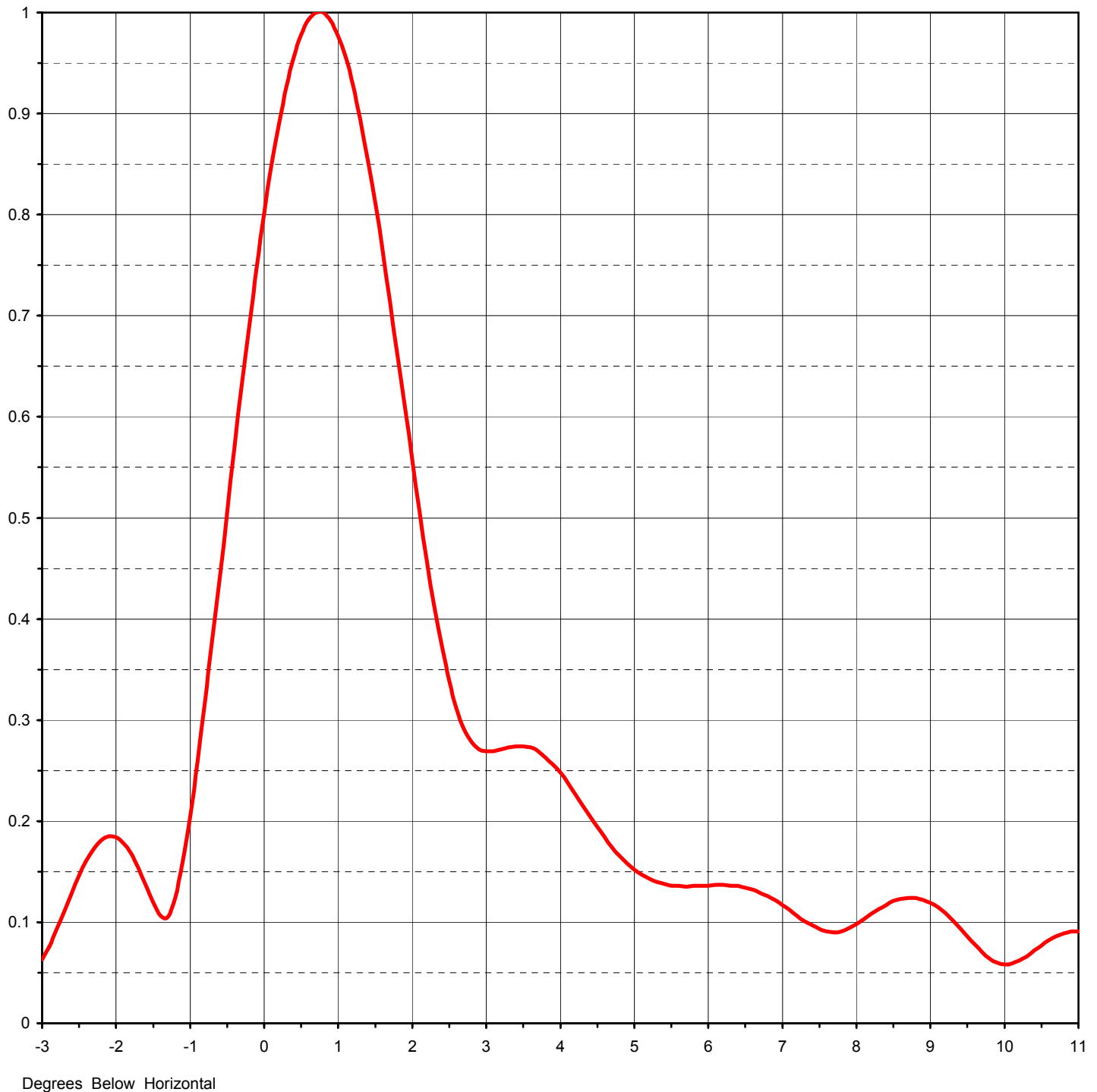
NOTE : NOT DRAWN TO SCALE



Proposal Number	DCA-8747	Exhibit 2A
Date	6-Mar-03	Channel 33
Call Letters	WTVZ	
Location	Norfolk, VA	
Customer	Sinclair	
Antenna Type	TFU-30JTH-R 04	

ELEVATION PATTERN

RMS Gain at Main Lobe	27.00 (14.31 dB)	Beam Tilt	0.75 deg
RMS Gain at Horizontal	17.30 (12.38 dB)	Frequency	587.00 MHz
Calculated / Measured	Calculated	Drawing #	30J270075

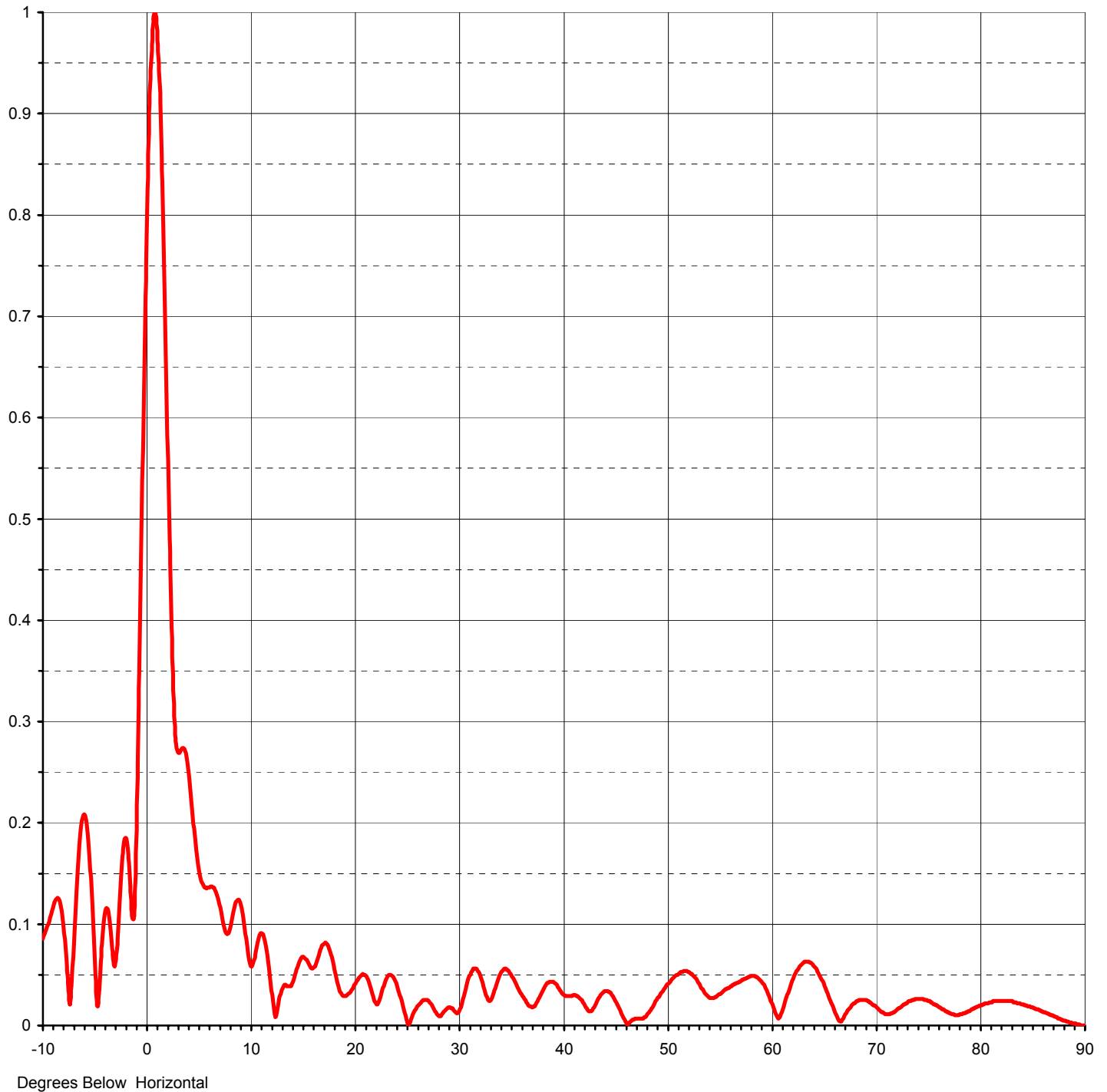




Proposal Number	DCA-8747	Exhibit 2B
Date	6-Mar-03	Channel 33
Call Letters	WTVZ	
Location	Norfolk, VA	
Customer	Sinclair	
Antenna Type	TFU-30JTH-R 04	

ELEVATION PATTERN

RMS Gain at Main Lobe	27.00 (14.31 dB)	Beam Tilt	0.75 deg
RMS Gain at Horizontal	17.30 (12.38 dB)	Frequency	587.00 MHz
Calculated / Measured	Calculated	Drawing #	30J270075-90





Proposal Number **DCA-8747**

Date **6-Mar-03**

Call Letters **WTVZ**

Location **Norfolk, VA**

Customer **Sinclair**

Antenna Type **TFU-30JTH-R O4**

Exhibit 3

Channel **33**

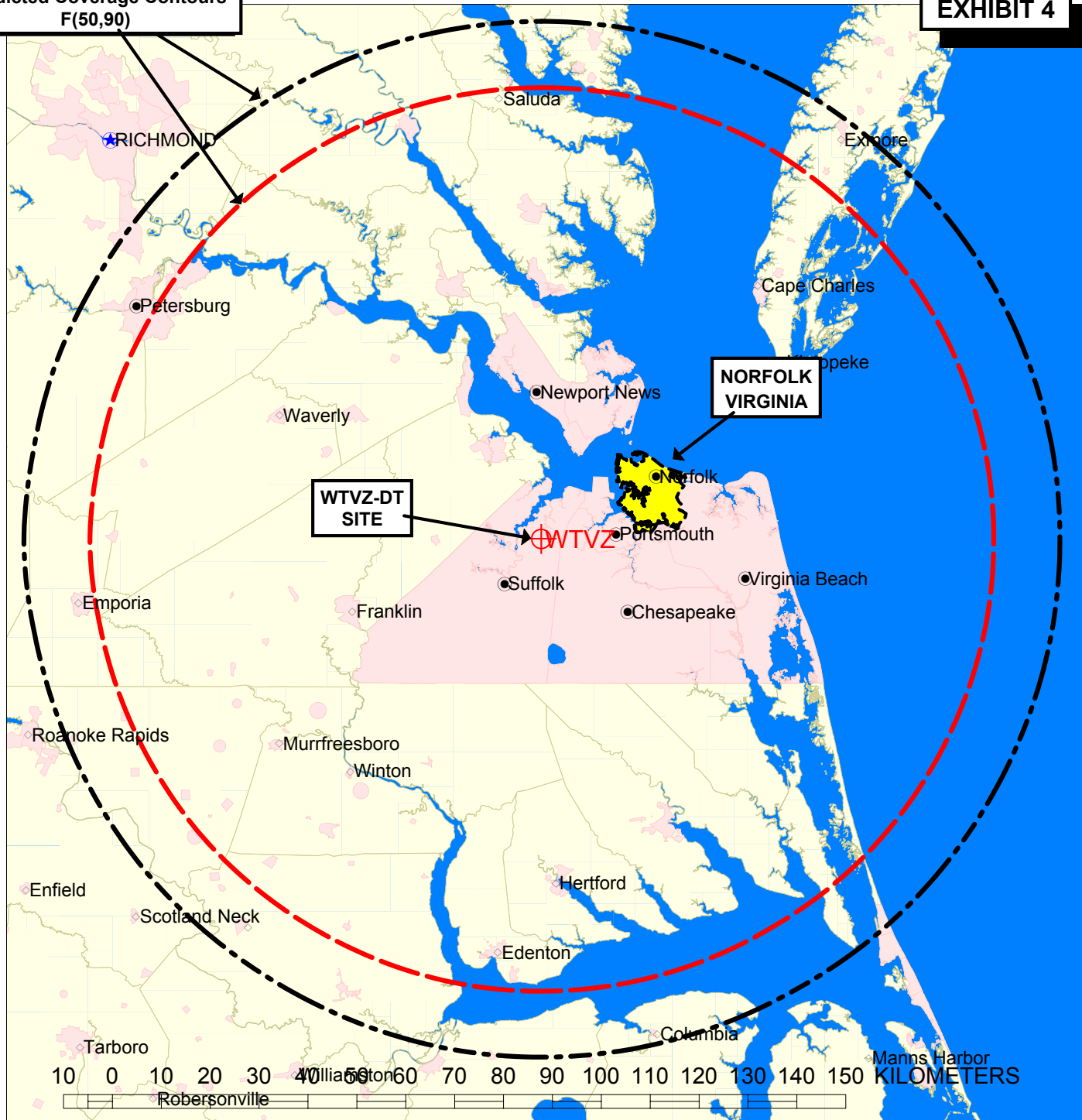
TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **30J270075-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.086	2.4	0.373	10.6	0.077	30.5	0.029	51.0	0.050	71.5	0.012
-9.5	0.100	2.6	0.311	10.8	0.086	31.0	0.048	51.5	0.053	72.0	0.016
-9.0	0.117	2.8	0.278	11.0	0.091	31.5	0.056	52.0	0.053	72.5	0.020
-8.5	0.125	3.0	0.269	11.5	0.078	32.0	0.051	52.5	0.049	73.0	0.023
-8.0	0.097	3.2	0.271	12.0	0.039	32.5	0.035	53.0	0.042	73.5	0.025
-7.5	0.028	3.4	0.274	12.5	0.010	33.0	0.024	53.5	0.034	74.0	0.026
-7.0	0.088	3.6	0.273	13.0	0.035	33.5	0.037	54.0	0.028	74.5	0.026
-6.5	0.177	3.8	0.263	13.5	0.039	34.0	0.051	54.5	0.027	75.0	0.024
-6.0	0.208	4.0	0.248	14.0	0.041	34.5	0.056	55.0	0.031	75.5	0.021
-5.5	0.163	4.2	0.227	14.5	0.057	35.0	0.051	55.5	0.035	76.0	0.018
-5.0	0.061	4.4	0.205	15.0	0.068	35.5	0.041	56.0	0.038	76.5	0.015
-4.5	0.054	4.6	0.184	15.5	0.063	36.0	0.031	56.5	0.041	77.0	0.012
-4.0	0.113	4.8	0.166	16.0	0.056	36.5	0.023	57.0	0.043	77.5	0.010
-3.5	0.093	5.0	0.152	16.5	0.067	37.0	0.018	57.5	0.046	78.0	0.011
-3.0	0.063	5.2	0.143	17.0	0.080	37.5	0.023	58.0	0.049	78.5	0.012
-2.8	0.093	5.4	0.138	17.5	0.078	38.0	0.033	58.5	0.048	79.0	0.015
-2.6	0.129	5.6	0.136	18.0	0.059	38.5	0.042	59.0	0.044	79.5	0.018
-2.4	0.161	5.8	0.136	18.5	0.038	39.0	0.043	59.5	0.036	80.0	0.020
-2.2	0.181	6.0	0.136	19.0	0.029	39.5	0.038	60.0	0.023	80.5	0.022
-2.0	0.184	6.2	0.137	19.5	0.032	40.0	0.031	60.5	0.010	81.0	0.023
-1.8	0.168	6.4	0.136	20.0	0.040	40.5	0.029	61.0	0.013	81.5	0.024
-1.6	0.137	6.6	0.132	20.5	0.048	41.0	0.030	61.5	0.029	82.0	0.024
-1.4	0.106	6.8	0.126	21.0	0.050	41.5	0.028	62.0	0.044	82.5	0.024
-1.2	0.124	7.0	0.117	21.5	0.039	42.0	0.022	62.5	0.055	83.0	0.024
-1.0	0.205	7.2	0.106	22.0	0.023	42.5	0.014	63.0	0.061	83.5	0.022
-0.8	0.317	7.4	0.097	22.5	0.028	43.0	0.018	63.5	0.063	84.0	0.021
-0.6	0.442	7.6	0.091	23.0	0.045	43.5	0.028	64.0	0.060	84.5	0.019
-0.4	0.570	7.8	0.091	23.5	0.050	44.0	0.034	64.5	0.050	85.0	0.018
-0.2	0.692	8.0	0.098	24.0	0.042	44.5	0.033	65.0	0.039	85.5	0.016
0.0	0.801	8.2	0.108	24.5	0.025	45.0	0.025	65.5	0.026	86.0	0.013
0.2	0.891	8.4	0.117	25.0	0.006	45.5	0.015	66.0	0.013	86.5	0.011
0.4	0.956	8.6	0.123	25.5	0.008	46.0	0.004	66.5	0.004	87.0	0.009
0.6	0.993	8.8	0.124	26.0	0.018	46.5	0.004	67.0	0.011	87.5	0.007
0.8	1.000	9.0	0.119	26.5	0.024	47.0	0.007	67.5	0.018	88.0	0.005
1.0	0.977	9.2	0.109	27.0	0.025	47.5	0.007	68.0	0.023	88.5	0.003
1.2	0.928	9.4	0.094	27.5	0.019	48.0	0.009	68.5	0.025	89.0	0.002
1.4	0.855	9.6	0.078	28.0	0.010	48.5	0.017	69.0	0.025	89.5	0.001
1.6	0.764	9.8	0.070	28.5	0.012	49.0	0.025	69.5	0.022	90.0	0.000
1.8	0.662	10.0	0.060	29.0	0.018	49.5	0.033	70.0	0.018		
2.0	0.557	10.2	0.059	29.5	0.015	50.0	0.040	70.5	0.013		
2.2	0.457	10.4	0.066	30.0	0.013	50.5	0.046	71.0	0.011		

WTVZ-TV - PROPOSED CP-MOD
Predicted Coverage Contours
F(50,90)

EXHIBIT 4



PREDICTED COVERAGE CONTOURS
WTVZ-DT, NORFOLK, VIRGINIA
PROPOSED CP MODIFICATION
CH. 33, 1000 kW - 375.6 m HAAT

Predicted Principal Community Contour
F(50,90) - 48 dBu

Predicted Noise Limited Contour
F(50,90) - 41 dBu

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WTVZ-DT, NORFOLK, VIRGINIA
CHANNEL 33, 1000 kW ERP, 371.6 m HAAT
JUNE, 2008

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WTVZ-DT	DT	33	587	H	369	1000.000	0.300	0.02208	0.391	5.64%
WHRO-DT	DT	16	485	H	354	950.000	0.300	0.02279	0.323	7.05%
WTKR-DT	DT	40	629	H	371	950.000	0.300	0.02075	0.419	4.95%
WPXV-DT	DT	46	665	H	354	1000.000	0.300	0.02399	0.443	5.41%
WHRV(FM)	FM	208	89.5	H & V	344	8.800	1.000	0.00497	0.200	2.48%
WHRO(FM)	FM	212	90.3	H & V	344	8.800	1.000	0.00497	0.200	2.48%
WJCD(FM)	FM	299	107.7	H & V	183	1.700	1.000	0.00339	0.200	1.70%

TOTAL PERCENTAGE OF ANSI VALUE= 29.71%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights*

so that the predicted power densities consider the 2 meter human height allowance.

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.

CARL T. JONES
CORPORATION