

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
LPTV STATION W29DJ (FACILITY ID 67976)
SHEBOYGAN, WISCONSIN
CH 29 8.7 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a digital flash-cut application for LPTV station W29DJ. Station W29DJ is licensed to operate on analog channel 29 with a directional antenna maximum (visual) effective radiated power (ERP) of 43 kW and an antenna height above mean sea level (RCAMSL) of 320 meters (BLTTL-20080221AAP). In addition, W29DJ is also authorized by outstanding construction permit to change transmitter site and operate on analog channel 29 with a directional antenna maximum (visual) ERP of 127.9 kW and an RCAMSL of 426 meters (BPTTL-20080211ABX).

Proposed Facilities

This application proposes digital operation on the current channel (29) from the authorized transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 43-05-46 N, 87-54-15 W. An SWR model SWLP-CP24BRS/29, circularly polarized “cardioid” directional antenna oriented at 270 degrees true, with a maximum ERP of 8.7 kW and antenna RCAMSL of 426 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog) and proposed 51 dBu (digital) coverage contours. As can be seen on the map, there is common area where both contours overlap.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, a 1 kilometer cell size resolution and 1990 U.S. Census, the proposal complies with the current FCC policy (i.e., less than 0.5% new interference caused to other pertinent assignments). If necessary, a waiver of the FCC rules is respectfully requested based on use of the procedures outlined in the FCC's OET-69 Bulletin to the remaining LPTV/translator stations.

The applicant recognizes the proposal is secondary to authorized full-service analog and DTV operations. The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed W29DJ facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 235 meters above ground level. The proposed total ERP is 17.4 kW (circular polarization). Using a "worst-case" vertical plane relative field value of 1.0, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed 2.9% of the FCC's recommended limit of 0.38 mW/cm² for channel 29 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site, a protocol will be in place 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.

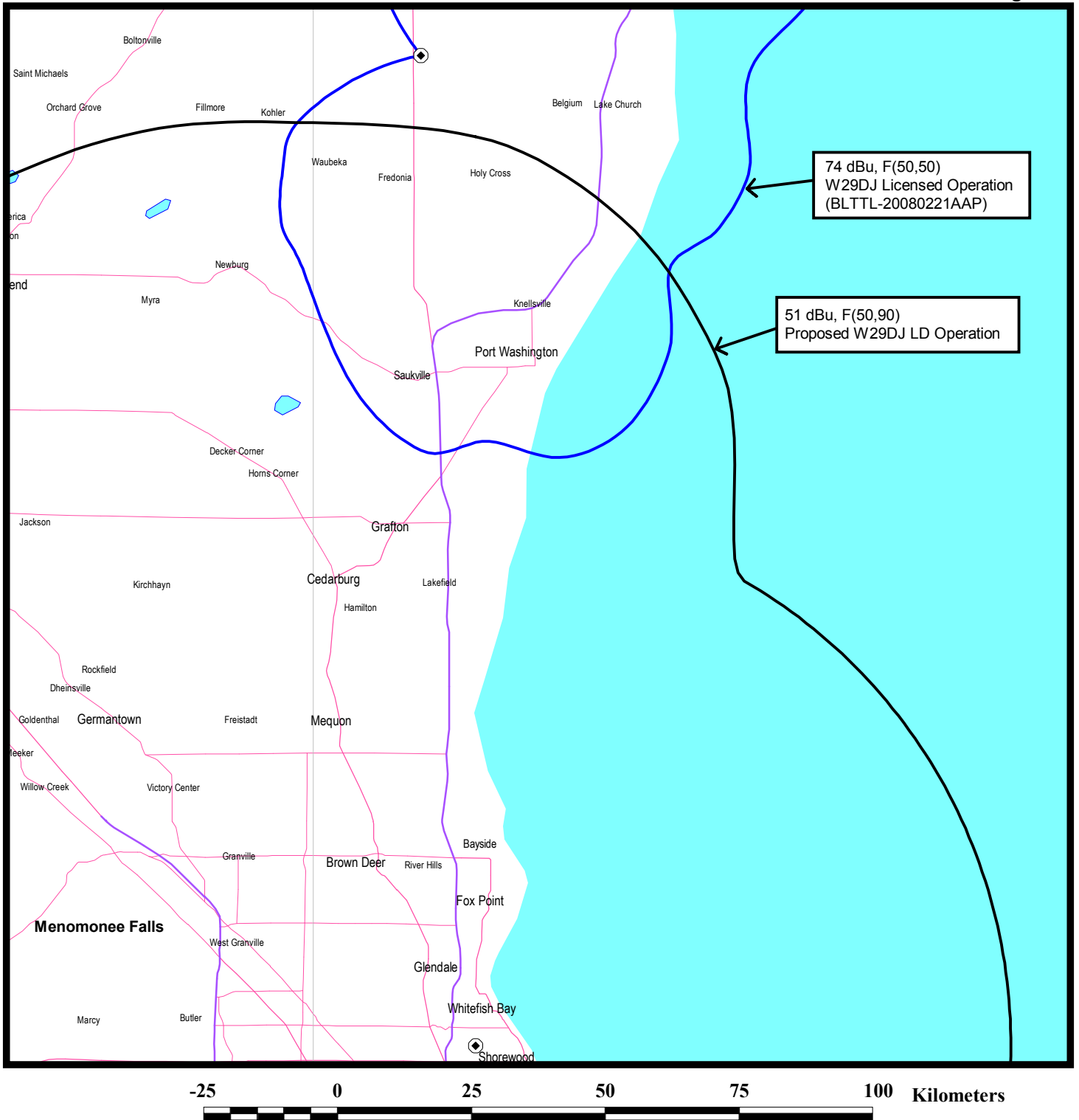


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Figure 1



PREDICTED COVERAGE CONTOURS

LD STATION W29DJ
SHEBOYGAN, WISCONSIN
CH 29 8.7 KW (MAX-DA)

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