

TECHNICAL EXHIBIT
DIGITAL FLASH-CUT APPLICATION FOR
CLASS A STATION WBPI-CA (FACILITY ID 17464)
AUGUSTA, GEORGIA
CH 49 1.1 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports a flash-cut application for Class A television station WBPI-CA. Station WBPI-LP is licensed to operate on analog channel 49 with a directional antenna maximum (visual) effective radiated power (ERP) of 150 kW and an antenna height above mean sea level (RCAMSL) of 283 meters (BLTTA-20011220AAM).

Proposed Facilities

This application proposes digital operation on the current channel (49), at the current transmitter site and with the same antenna. The transmitter site coordinates remain (NAD27): 33-30-53 N, 81-56-23 W. A Superior Broadcast Products (SPB), model UP-6-WL, with a maximum ERP of 1.1 kW and antenna RCAMSL of 283 meters is proposed.

Figure 1 is a map showing the licensed 74 dBu (analog-150 kW) and proposed 51 dBu (digital-1.1 kW) coverage contours. As can be seen on the map, there is common area where both contours overlap.

It is noted that the proposed 51 dBu contour results in some minor extension of service beyond the currently licensed analog 74 dBu contour (less than a 2% increase in area). The power reduction necessary to avoid any extension is 0.5 kW. The 51 dBu contour based on this 0.5 kW ERP operation is also shown in Figure 1. This significant reduction is due to

the null regions of the directional pattern and the difference in calculating the analog F(50,50) contours versus the F(50,90) contours. This reduced 0.5 kW ERP facility will result in a loss of 410 square miles of coverage and population of 21,100 persons from the analog service. A waiver of the FCC Filing Freeze for television stations¹ is respectfully requested for the proposed WBPI-CA flashcut LD operation to avoid the loss of service. If the FCC determines that WBPI-CA's waiver request is not justified, the reduced 0.5 kW ERP facility is requested as an alternative.

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 1.1 kW 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 understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed WBPI-CA 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 146 meters above ground level. The proposed maximum ERP is 1.1 kW. Based on a conservative downward relative field value of 0.5, the calculated power density at a point 2 meters (6.6 feet) above ground level will not exceed

¹ See August 2004 Filing Freeze PN, DA 04-2446 (MB rel. Aug. 3, 2004).

0.0005 mW/cm², which is less than 5% of the FCC's recommended limit of 0.46 mW/cm² for channel 49 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, 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

