

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

FCC FORM 301, EXHIBIT 43
ENVIRONMENTAL ASSESSMENT
APPLICATION FOR CONSTRUCTION PERMIT
PREPARED FOR
WPXI-TV HOLDINGS, INC.
STATION WPXI-DT
PITTSBURGH, PENNSYLVANIA
CH 48 1,000 KW (MAX-BT) 289 METERS

This engineering exhibit was prepared on behalf of WPXI-TV Holdings, Inc. (hereinafter WPXI-TV), licensee of station WPXI-DT, Pittsburgh, Pennsylvania, in support of an FCC Form 301 application for construction permit

WPXI-DT is licensed (FCC File Number BLCDT-19991222AAT) for digital television (DTV) operation on channel 48 (674 to 680 megahertz (MHz)) with 501 kilowatts (kW) average effective radiated power (ERP), horizontally polarized, 289 meters antenna radiation center height above average terrain (HAAT), from a site located at geographic coordinates 40° 27' 48" North Latitude, 80° 00' 16" West Longitude, referenced to the 1927 North American Datum. The WPXI-DT antenna radiation center is 233 meters above ground level (AGL).

The instant application proposes to increase the WPXI-DT maximum average ERP from 501 kW to 1,000 kW. No other changes to the licensed WPXI-DT facilities are proposed.

Public access to the existing WPXI-DT antenna and supporting structure is restricted by a two-meter chain link fence, topped with barbed wire, which encircles the WPXI-DT supporting structure.

An analysis has been made of the human exposure to RFR using the calculation methodology described in *OET Bulletin 65, Edition 97-01*, prepared by the FCC Office of Engineering and technology. A conservative vertical plane relative field factor of 0.1, obtained from the manufacturer's theoretical vertical plane radiation pattern for the existing WPXI-DT Dielectric Communications, type TFU-30GBH-R06, transmitting antenna, was used in the calculation of the WPXI-DT power density. The WPXI-DT maximum average ERP of 1,000 kW was used in the calculation of the WPXI-DT power density. To account for ground reflections, a coefficient of 1.6 was included in the calculation. The WPXI-DT power density calculations reported herein were made at 674 MHz, the lower edge of the WPXI-DT channel.

The FCC maximum permissible exposure (MPE) for general population/uncontrolled exposure is 0.45 milliwatt per square centimeter (mW/cm²) at 674 MHz. The FCC MPE limit for occupational/controlled exposure is 2.25 mW/cm² at 674 MHz. At a reference point two meters AGL at the base of the WPXI-DT supporting structure, the calculated WPXI-DT power density is 0.0063 mW/cm², which is 1.40 percent of the FCC MPE limit for general population/uncontrolled exposure, and 0.28 percent of the FCC MPE limit for occupational/controlled exposure.

Pursuant to the provisions of *OET Bulletin 65, edition 97-01*, at multiple-user sites, only those licensees whose transmitters produce power density levels in excess of 5.0 percent of the applicable exposure limit are considered “significant contributors” and share responsibility for actions necessary to bring the local RFR environment into compliance with FCC exposure limits. Since the WPXI-DT operation will contribute less than 5.0 percent of the most restrictive permissible exposure at any location on the ground at the multiple-user site, WPXI-DT is not considered a “significant contributor” to the local RF exposure environment and contributions to exposure from other sources in the vicinity of WPXI-DT were not taken into account in this analysis.

While not a “significant contributor” to the exposure levels at any location on the ground, the WPXI-DT operation will be a “significant contributor” to exposure at locations on the supporting structure near the WPXI-DT transmitting antenna. If work is done on the tower in an area where overexposure could occur, WPXI-TV will take action necessary to prevent the overexposure of workers on the tower, including reducing WPXI-DT transmitter power or ceasing WPXI-DT operation completely. Additionally, WPXI-TV will cooperate with other site users to assure that work is performed at the site without exceeding the FCC MPEs for occupational/controlled exposure.

The instant proposal is categorically excluded from environmental processing since none of the conditions of Sections 1.1306(b)(1), (2), or (3) of the FCC Rules would be involved for the following reasons:

1. The WPXI-DT channel 48 DTV facility utilizes a existing antenna supporting structure located at a multiple use communications site.
2. The provision of Section 1.1306(b)(2) of the FCC Rules pertaining to the use of high-intensity strobe lighting does not apply as an existing supporting

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FCC Form 301, Exhibit 43
Station WPXI-DT, Pittsburgh, Pennsylvania

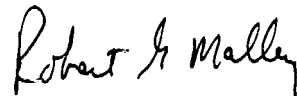
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structure will be used, and no change in the existing obstruction lighting is proposed.

3. Finally, with regard to RFR exposure concerns, the instant application complies with applicable FCC MPE limits.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 27, 2004.



Robert G. Mallery