

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.622)
of the Commission's Rules)
Digital Television Table of Allotments)
(Birmingham, Alabama))

RM No. _____

MM Docket No. _____

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

Alabama Educational Television Commission ("AETC"), licensee of noncommercial television station WBIQ-TV, NTSC Channel 10, Birmingham, Alabama, by its attorneys, hereby respectfully petitions the Commission for a rulemaking to modify Commission's Digital Television Table of Allotments, as described in Section 73.622 of the Commission's Rules. Specifically, AETC requests that the Commission substitute Channel 5, Birmingham, Alabama, for Channel 53, Birmingham, Alabama, as the noncommercial digital television allotment to be used by the digital television station WBIQ-DT, and to take any other steps necessary to enable WBIQ-DT to apply to construct and ultimately operate its facilities on Channel 5, as described in the attached Engineering Statement (the "Proposal").

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In a series of orders, the Commission has specified Channels 2-51 as digital television core spectrum (the “Core Spectrum”). 1/ Television stations may operate outside the Core Spectrum during the period in which such stations are transitioning to digital broadcasts (the “Transition Period”). After the Transition Period, however, television stations broadcasting on channels outside the Core Spectrum must surrender their licenses for such channels and commence digital broadcast operations on some channel within the Core Spectrum. 2/ Accordingly, any station with a digital allotment outside the Core Spectrum would, in most cases, have to construct two digital facilities -- one to be used on the non-core channel during the Transition Period, and one to be used on a core channel after the Transition Period. *See id.*

In the *Reconsideration Order*, the Commission “recognize[d] the additional burden placed on licensees with out-of-core DTV allotments.” *Id.* at 7440. Moreover, the Commission emphasized that “the allotment of out-of-core channels may present a particular burden to noncommercial . . . licensees.” *Id.* at 7441. The Commission promised that “to the extent that in-core channels [are] available during the transition, [it] will attempt to further reduce the number of out-of-core allotments” through “future amendments to the Table.” *Id.* at 7440-41.

1/ See, e.g., *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, 13 FCC Rcd 7418, 7435-37 (1998) (“*Reconsideration Order*”); *Sixth Report and Order*, 12 FCC Rcd 14588 (1997) (“*Sixth Report and Order*”).

2/ See, e.g., *Reconsideration Order*, 13 FCC Rcd at 7439-42.

Adoption of the Proposal would enable the Commission to mitigate the burdens of the digital transition to one such noncommercial licensee. AETC is a public agency that provides noncommercial educational programs to residents throughout Alabama. It has a limited budget. Any funding that must be spent on technical matters is funding that AETC cannot dedicate to public programming. If the Commission adopts the Proposal, which would substitute a Core Spectrum digital allotment for WBIQ-DT for the current, non-core allotment, AETC would need to design and construct only one set of digital transmission facilities. Accordingly, the Proposal would reduce the construction costs AETC will incur in making WBIQ-TV's digital transition, which would enable more of AETC's limited funds to continue to be used to maintain and improve other aspects of its services.

A Technical Statement, attached as Exhibit 1 and incorporated by reference in this Petition, confirms that the proposed allotment change is consistent with the Commission's technical rules. *See* 47 C.F.R. § 73.623. For the convenience of the Commission, the Technical Statement includes all the information that would be necessary for AETC to apply for a construction permit for WBIQ-DT on Channel 5, as well as demonstrating that the proposed allotment change would not result in inappropriate levels of interference. A statement from AETC affirming that it will apply for the allotment if changed as proposed is also attached.

For all the foregoing reasons, the Commission should adopt the Petition, approve the proposed modification in WBIQ-DT's channel allotment, and make all other changes necessary and appropriate to enable AETC to apply to construct WBIQ-DT's transmission facilities on Channel 5.

Respectfully submitted,

ALABAMA EDUCATIONAL
TELEVISION COMMISSION

By: *J. William LeBeau*
Marissa G. Repp
F. William LeBeau

HOGAN & HARTSON L.L.P.
555 13th Street, N.W.
Washington, DC 20004-1106
(202) 637-5600
Its Attorneys

February 18, 1999

EXHIBIT 1
(Technical Statement)

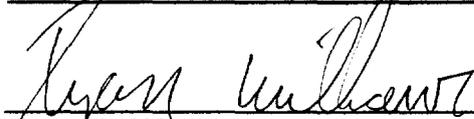
**ENGINEERING STATEMENT OF
RYAN WILHOUR
ON BEHALF OF
ALABAMA EDUCATIONAL TELEVISION COMMISSION
LICENSEE OF TV BROADCAST STATION
WBIQ-TV, BIRMINGHAM, AL**

The Alabama Educational Television Commission is licensed to operate WBIQ-TV on channel 10 with an ERP of 316 kW at an antenna height of 404 meters above average terrain ("AAT"). The FCC allocated channel 53 for DTV service using an ERP of 1,000 kW at an antenna height of 404 meters above average terrain ("AAT") to replicate the licensed channel 10 Grade B coverage contour. This will require the purchase of a new transmitting plant consisting of a high power UHF DTV transmitter, large coaxial transmission line or waveguide, and a medium gain transmitting antenna. The UHF DTV will consume substantially more power than the present VHF transmitter. Furthermore, DTV channel 53 is not within the "core" channels planned for television broadcasting after the transition from NTSC to DTV is complete. Therefore, at the end of the transition period WBIQ-TV would change to channel 10 for its permanent DTV operation requiring the purchase of another new DTV transmitter. At that time The Alabama Educational Television commission would be left with a relatively new UHF DTV transmitting plant which would be very costly to decommission, and for which it has absolutely no use.

As an alternative, I have completed studies that indicate that channel 5 with an ERP of 7 kW at an antenna effective height of 296 meters above average terrain could be used to achieve a similar coverage area as the DTV allocation and NTSC operation and would also eliminate the need for a future modification. Attached to this document is a sample application and engineering studies. The studies show that channel 5 can be allocated to Birmingham while meeting all of the interference criteria used in generating the DTV table included with the Sixth Report and Order. Therefore, it is respectfully requested that the DTV channel allotted to WBIQ-TV, Birmingham be changed from channel 53 to channel 5.

This engineering statement has been prepared by Ryan C. Wilhour who is a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering, and is an associate of Kessler and Gehman Associates, Inc., with offices in Gainesville, Florida.

KESSLER AND GEHMAN ASSOCIATES, INC.



Ryan C. Wilhour
Engineering consultant
January 8, 1999

**APPLICATION FOR CONSTRUCTION PERMIT
TELEVISION BROADCAST STATION WBIQ
DTV CHANNEL 5 ERP 7.0 kW AT 296 METERS
ABOVE AVERAGE TERRAIN ALABAMA
EDUCATIONAL TELEVISION COMMISSION
BIRMINGHAM, ALABAMA**

KESSLER AND GEHMAN ASSOCIATES, INC.
TELECOMMUNICATIONS CONSULTING ENGINEERS

KGA

507 NW 60th Street, Suite C
Gainesville, Florida 32607

SECTION V-D - DTV BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ SSB Referral Date _____ Referred By _____
Name of Applicant ALABAMA EDUCATIONAL TELEVISION COMMISSION	Call Letters (if issued) WBIQ - DT

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Items 1-22, below. If an item is not applicable, enter N/A.

Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1 The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

- (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. Yes No
- (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. Yes No
- (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. Yes No
- 2 The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Yes No
- 3 Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. Yes No
- 4 The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. Yes No
- 5 The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. Yes No

Application Data:

1. Channel

(a) DTV Channel No. 5

(b) Associated analog TV station channel no., if any 10

2. Principal community to be served:

City or Town BIRMINGHAM	State AL
-----------------------------------	--------------------

3. Effective radiated power (average power): (in the main lobe of radiation, if directional)

7.0 kw

4. Height of antenna radiation center above average terrain (HAAT): (to the nearest meter)

296 meters

Section V-D -D TV BROADCAST ENGINEERING DATA (Page 2)

5. Purpose of Application: (check appropriate boxes)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Construct a new (main) facility | <input type="checkbox"/> Construct a new auxiliary facility |
| <input type="checkbox"/> Modify construction permit for main facility | <input type="checkbox"/> Modify construction permit for auxiliary antenna |
| <input type="checkbox"/> Modify licensed main facility | <input type="checkbox"/> Modify licensed auxiliary antenna |

If purpose is to modify, indicate the nature of change(s) by checking appropriate box(es) and specify the file number(s) of the authorizations affected.

- | | |
|---|---|
| <input type="checkbox"/> Antenna supporting structure height | <input type="checkbox"/> Effective radiated power |
| <input type="checkbox"/> Antenna height above average terrain | <input type="checkbox"/> Channel |
| <input type="checkbox"/> Antenna location | <input type="checkbox"/> Antenna system |
| <input type="checkbox"/> Other (summarize) | |

File Number(s) _____

6. Exact location of transmitting antenna

(a) Give address, city/state or if no address, specify distance and bearing relative to the nearest town or landmark.

**1720 VALLEY VIEW DR
BIRMINGHAM, ALABAMA**

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates or center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed. (The Commission requires coordinates based on NAD 27.)

Latitude	33	°	29	'	19	"	Longitude	86	°	47	'	58	"
----------	----	---	----	---	----	---	-----------	----	---	----	---	----	---

7. (a) Elevation (to the nearest meter)

- | | |
|---|-------------------------------|
| (1) of site above mean sea level; | _____ 307 _____ meters |
| (2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and | _____ 318 _____ meters |
| (3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)]. | _____ 625 _____ meters |

(b) Height of radiation center: (to the nearest meter)

- | | |
|---|-------------------------------|
| (1) above ground; and | _____ 182 _____ meters |
| (2) above mean sea level [(a)(1) + (b)(1)]; | _____ 489 _____ meters |

8. Attach as an Exhibit sketch(es) of the supporting structure, labeling all elevations required in item 7 above. If mounted on an AM directional array element, specify heights and orientations of all array towers, as well as location of any FM radiator. * SEE ATTACHED ENGINEERING STATMENT

Exhibit No. EXHIBIT 2*

Section V-D -D TV BROADCAST ENGINEERING DATA (Page 3)

9. Antenna

(a) Manufacturer DIELECTRIC (b) Model No. THP-O-8-1

(c) Is a directional antenna proposed? Yes No

If Yes, specify major lobe azimuth(s) N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No. N/A

(d) Is electrical beam tilt proposed? Yes No

If Yes, specify N/A degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No. N/A

(e) Is mechanical beam tilt proposed? Yes No

If Yes, specify N/A degrees mechanical beam tilt toward azimuth N/A True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No. N/A

(f) The proposed antenna is: (check only one box)

Horizontally polarized Circularly polarized Elliptically polarized Other: N/A

10. Will the antenna be mounted on an antenna structure which has been registered with the Commission, to include the proposed antenna installation? Yes No

If Yes, provide the seven digit registration number and, unless item 11 also applies, proceed to item 15.

1007836

11. Has the owner of the antenna structure filed an application for registration with the Commission that will include the proposed facility? Yes No

If yes, provide the date FCC Form 854 was filed and proceed to item 15.

N/A

12. (if applicable) If the antenna structure is not yet registered but will be under the Commission's phased registration plan, has the FAA previously determined that the structure would not adversely affect safety in air navigation? Yes No

If Yes. proceed to item 15.

N/A

13. Antenna structure will be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and would be located in the congested area of a city, town or settlement where it is evident beyond all reasonable doubt that the structure is so shielded that it will not adversely affect safety in air navigation. and therefore does not require registration. Yes No

If yes, submit as an Exhibit a detailed explanation and/or diagram to support your claim and skip to item 15.

Exhibit No. N/A

* SEE ATTACHED ENGINEERING STATMENT

Section V-D -D TV BROADCAST ENGINEERING DATA (Page 4)

14. Antenna structure does not otherwise meet FAA Notification criteria as defined under 47 C.F.R. Section 17.7 and therefore does not require registration.

Yes No
N/A

If Yes, give reason below.

15. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)?

Yes No

If Yes, give call letter(s) or file number(s) or both,

WBIQ-TV, WBRC-TV, WBHM-FM

16 Does the application propose to correct previous site coordinates?

Yes No

If Yes, list old coordinates.

Latitude	N/A	°	N/A	'	N/A	"	Longitude	N/A	°	N/A	'	N/A	"
----------	-----	---	-----	---	-----	---	-----------	-----	---	-----	---	-----	---

17. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.625(b). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
EXHIBIT 5*

18. Attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent*) which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
EXHIBIT 6*

- (a) the proposed transmitting location, and the radials along which profile graphs have been prepared;
- (b) the DTV coverage contour as established in 47 C.F.R. Section 73.625(b); and
- (c) the legal boundaries of the principal community to be served.

19. Terrain and coverage data (to be calculated in accordance with 47 C.F.R. Section 73.625(b))

Source of terrain data: (*check only one box below*)

- Linearly interpolated 30-second database (Source: _____)
- Linearly interpolated 3-second database (Source: DEFENSE MAPING INDUSTRY)
- 7.5 minute topographic map
- Other (*briefly summarize*)

*** SEE ATTACHED ENGINEERING STATEMENT**

Section V-D -D TV BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted distance to the DTV Coverage Contour (kilometers)
*		
0	319	104
45	249	99
90	293	102
135	290	103
180	302	103
225	292	103
270	317	104
315	309	104

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of I MAT.

20. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if Certification Checklist items I (a), (b), or (c) are answered "No.") Yes No

If No, attach as an Exhibit justification therefore, including a summary of any related previously granted waivers.

Exhibit No.
N/A

21. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if Certification Checklist item 3 is answered

Exhibit No.
N/A

22. Environmental Statement. (See 47CF.R. Section 1.1301 et seq.)

- (a) If a Commission grant of this application comes within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

Exhibit No.
N/A

- (b) If No, explain briefly why not. **THE PROPOSED CONSTRUCTION WOULD HAVE NO SIGNIFICANT ENVIRONMENTAL IMPACT AS DEFINED IN §1.1307 OF THE FCC RULES. ***

- (c) Pursuant to OST Bulletin No. 65, the applicant must explain in an Exhibit what steps will be taken to limit the RF radiation exposure to the public and to persons authorized access to the tower site. In addition, where there are multiple contributors to radio frequency radiation, you must certify that the established RF radiation exposure procedures will be coordinated with all stations. .

***SEE ATTACHED ENGINEERING STATEMENT.**

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) RYAN C. WILHOUR	Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER
Signature	Address (include ZIP Code) 507 NW 60TH ST. SUITE C GAINESVILLE FL 32605
Date FEBRUARY 08, 1999	Telephone No. (include Area Code) 352-332-3157

ENGINEERING STATEMENT OF RYAN C. WILHOUR OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS IN CONNECTION WITH AN APPLICATION FOR THE ALABAMA EDUCATIONAL TELEVISION COMMISSION FOR A CONSTRUCTION PERMIT FOR TELEVISION BROADCAST STATION WBIQ-TV WHICH WOULD OPERATE ON DTV CHANNEL 5 WITH A MAXIMUM EFFECTIVE RADIATED POWER OF 7 KILOWATTS HORIZONTALLY POLARIZED AT AN EFFECTIVE ANTENNA HEIGHT OF 296 METERS ABOVE AVERAGE TERRAIN IN THE VICINITY OF BIRMINGHAM, ALABAMA

I, Ryan C. Wilhour, am an associate of Kessler and Gehman Associates, Inc. with offices in Gainesville, Florida. I am a graduate of the University of Florida with a Bachelor of Science Degree in electrical engineering.

This firm has been employed by the Alabama Educational Television Commission to make engineering studies and to prepare the engineering portion for construction permit for television broadcast station WBIQ-TV to operate on DTV channel 5 with a maximum effective radiated power of 7 kilowatts horizontally polarized at an effective antenna height of 296 meters above average terrain in the vicinity of Birmingham, Alabama.

The Alabama Educational Television Commission is the licensee, File No. BLET880308KG, of the television broadcast station WBIQ-TV that operates on NTSC channel 10 with an effective radiated power of 316.0 kW horizontally polarized at 404 meters above average terrain.

ATTACHED FIGURES

In carrying out the engineering studies the following attached figures were prepared by me or under my supervision:

1. Proposed engineering specifications (Exhibit 1)
2. Elevation drawing of the antenna system (Exhibit 2)
3. Antenna Elevation Pattern (Exhibit 3)
4. USGS 7.5 minute topographic quadrangle showing the proposed transmitter location and coordinate lines (Exhibit 5)
5. Map showing the predicted DTV coverage contour (Exhibit 6)
6. Maps showing the proposed de minimis interference to co-channel and adjacent channel TV stations (Exhibit 7A - Exhibit 7B)

TRANSMITTER LOCATION

It is proposed to use the existing support structure extending 318 meters above ground upon which the proposed Dielectric THP-O-2-1 horizontally polarized non-directional antenna will be side mounted at a height of 489m AMSL, 296m AAT, and 182m AGL. The proposed construction would have no significant environmental impact as defined in §1.1307 of the FCC Rules.

This tower has two NTSC TV stations, one FM station and one proposed DTV station. If the antenna for the NTSC station KBRC-TV were aimed so that the maximum lobe of radiation was directed to the ground below it, it will produce a power density on the ground of 0.018 mW/cm^2 , which is 1.78% of the maximum allowable limit for occupational or controlled exposure and 8.92% of the maximum allowable limit for general population or uncontrolled exposure. If the antenna for the NTSC station WBIQ-TV were aimed so that the maximum lobe of radiation was directed to the ground below it, it will produce a power density on the ground of 0.063 mW/cm^2 , which is 6.32% of the maximum allowable limit for occupational or controlled exposure and 31.6% of the maximum allowable limit for general population or uncontrolled exposure. If the antenna for the proposed DTV station WBIQ-DT were aimed so that the maximum lobe of radiation was directed to the ground below it, it will produce a power density on the ground of 0.007 mW/cm^2 , which is 0.72% of the maximum allowable limit for occupational or controlled exposure and 3.61% of the maximum allowable limit for general population or uncontrolled exposure. If the antenna for the FM station WBHM-FM were aimed so that the maximum lobe of radiation was directed to the ground below it, it will produce a power density on the ground of 0.016 mW/cm^2 , which is 1.62% of the maximum allowable limit for occupational or controlled exposure and 8.09% of the maximum allowable limit for general population or uncontrolled exposure. Therefore, the result of these four stations are a combined total of 9.79% of the maximum allowable limit for occupational or controlled exposure and 52.22% of the maximum allowable limit for general population or uncontrolled exposure. Thus the proposed DTV station would not increase the power density levels beyond the ANSI maximum permissible requirements.

The applicant accepts full responsibility for the elimination of any objectionable interference including that caused by intermodulation to facilities in existence or authorized prior to the grant of this application.

WBIQ-DT was initially allotted an ERP of 1000.0.kW on channel 53 at an antenna HAAT of 404 M. Channel 53 is not in the final DTV core spectrum (channels 2 - 51) and thus would require modification before December 31, 2006. As an alternative this application proposes to use channel 5 with a reduced ERP to achieve a similar coverage area.

The maps depicted in Exhibit 7 demonstrate the areas of interference based on Longley - Rice version 1.2.2 to DTV/NTSC stations within the limits specified by the FCC. Exhibit 7A demonstrates interference denoted by the "+" signs that are within the WAGA 47 dBuV/m contour. The interference areas constitute 0.36% of the total population within WAGA's coverage contour. As per §73.623(C)(2), the proposed station in Exhibit 7A demonstrates that the requested change in the instant application would not result in more than an additional 2 percent the population served by another station being subject to interference. It is noted that interference received from surrounding stations of WAGA do not exceed 10% of the total population within their 47 dBuV/m contour with the inclusion of the proposed station parameters. Exhibit 7B demonstrates that no harmful interference is predicted to be caused from the proposed WBIQ channel 5 facilities to WCBI.

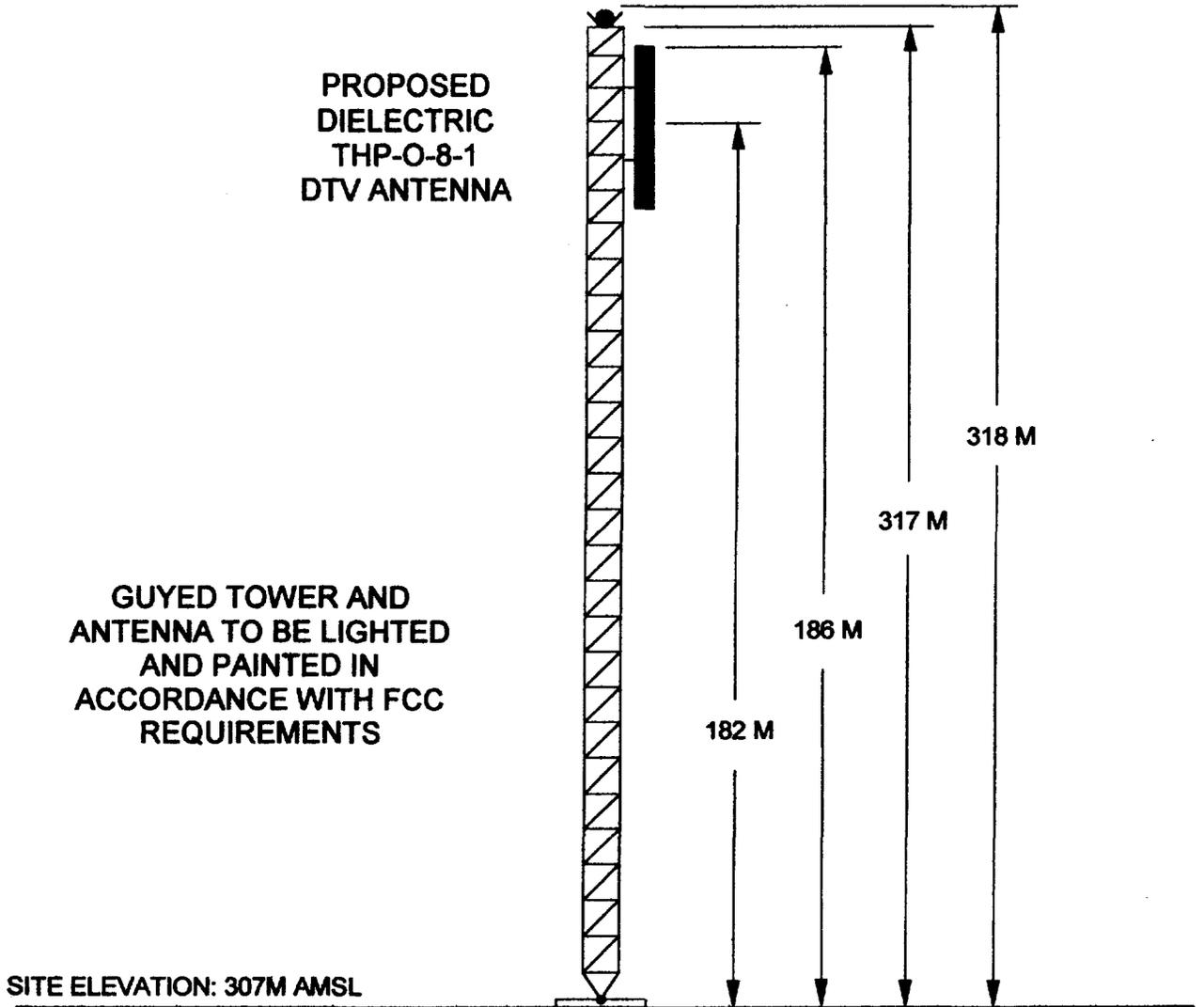
KESSLER AND GEHMAN ASSOCIATES, INC.

RYAN C. WILLOUR
Engineering Consultant

ELEVATION VIEW

PROPOSED
DIELECTRIC
THP-O-8-1
DTV ANTENNA

GUYED TOWER AND
ANTENNA TO BE LIGHTED
AND PAINTED IN
ACCORDANCE WITH FCC
REQUIREMENTS



OVERALL HEIGHT AGL:	318 M
OVERALL HEIGHT AMSL:	625 M
DTV RADIATION CENTER AGL:	182 M
DTV RADIATION CENTER AMSL:	489 M

COORDINATES:
N. LATITUDE 33° 29' 19"
W. LONGITUDE 86° 47' 58"

NOTE: NOT TO SCALE

KESSLER & GEHMAN
TELECOMMUNICATIONS CONSULTING ENGINEERS
507 N.W. 60th Street, Suite C
Gainesville, Florida 32607

WBIQ - DT
BIRMINGHAM, ALABAMA

990208

EXHIBIT 2

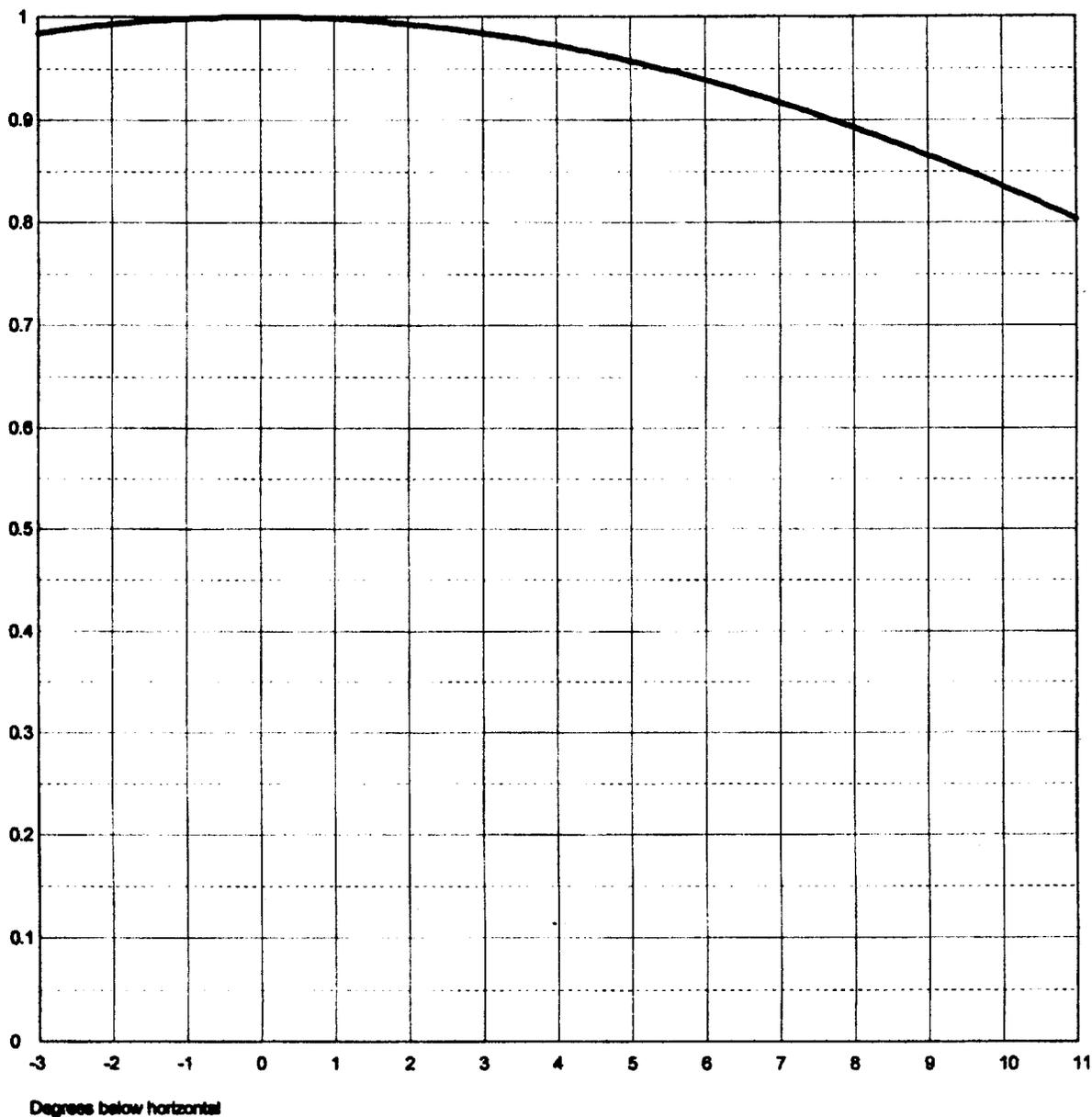
Dielectric

A Unit of General Signal

Date	990208	
Call Letters	WBIQ	Channel 5
Location	BIRMINGHAM	
Customer	ALA. EDU. TV COMM.	
Antenna Type	THP-O-2-1	

ELEVATION PATTERN

RMS Gain at Main Lobe	2.1 (3.22 dB)	Beam Tilt	0.00 Degrees
RMS Gain at Horizontal	2.1 (3.22 dB)	Frequency	79.00 MHz
Calculated / Measured	Calculated	Drawing #	02H02100



KESSLER & GEHMAN

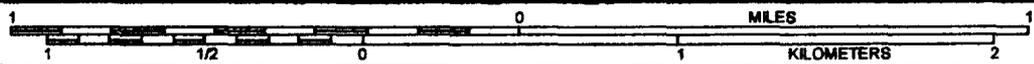
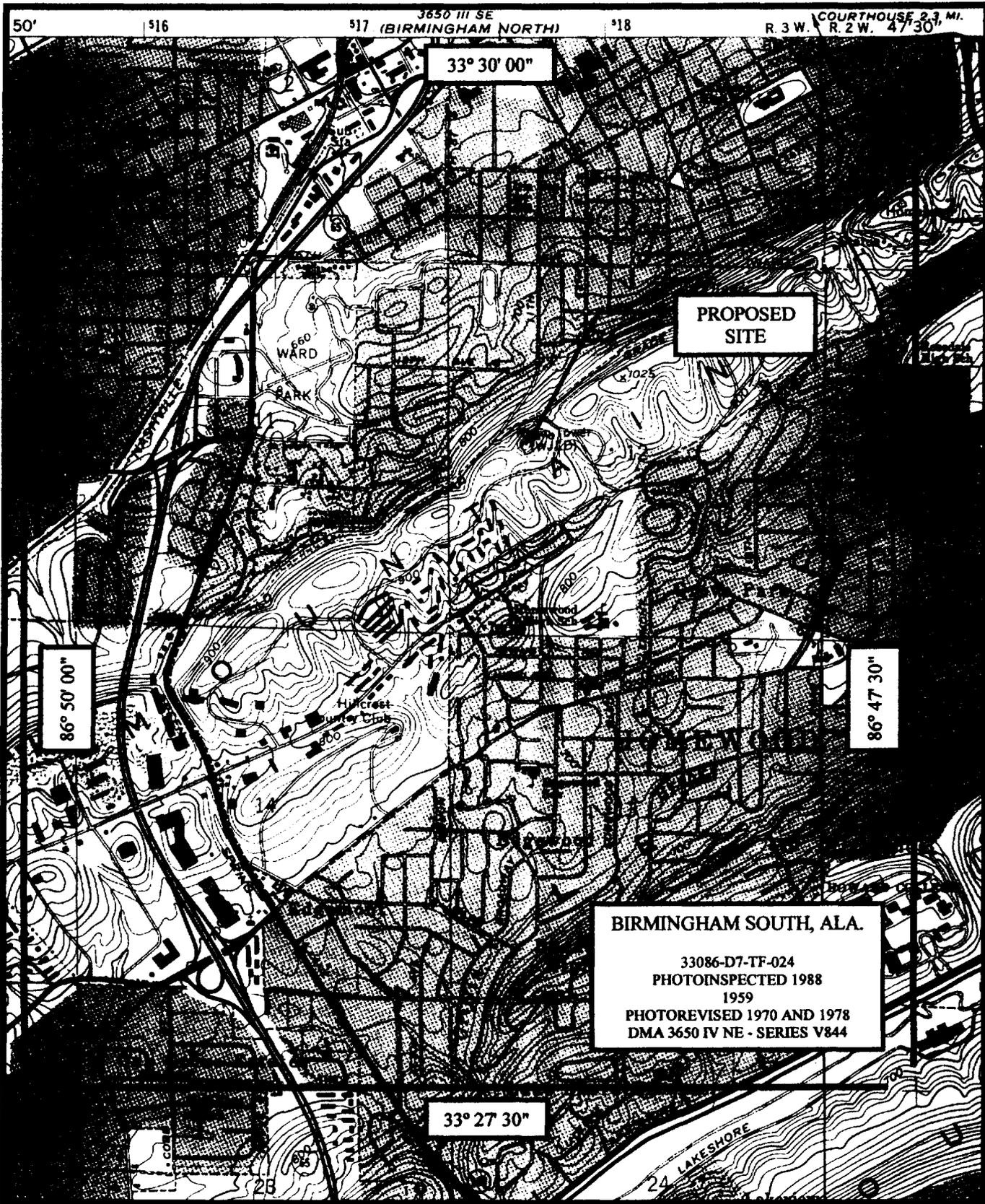
TELECOMMUNICATIONS CONSULTING ENGINEERS

507 N.W. 60th Street, Suite C
Gainesville, Florida 32607

WBIQ - DT
BIRMINGHAM, ALABAMA

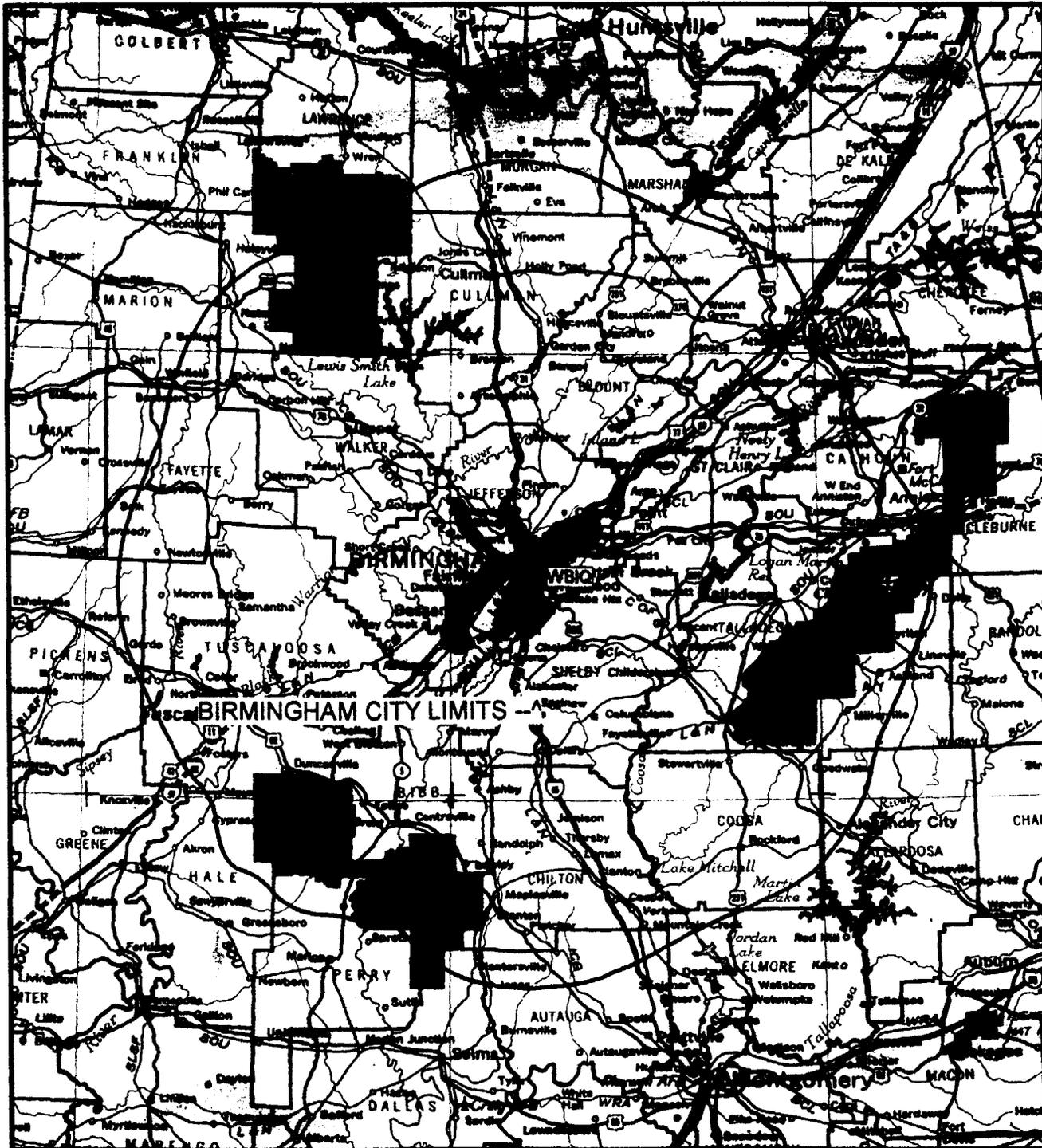
990208

EXHIBIT 3



KESSLER & GEHMAN
TELECOMMUNICATIONS CONSULTING ENGINEERS
507 N.W. 60th Street, Suite C
Gainesville, Florida 32607

WBIQ - DT
BIRMINGHAM, ALABAMA
990208
EXHIBIT 5



SIGNAL™: WBQI DTV COVERAGE MAP.map

Prop. model: FCC-FCC
 Time: 90.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Groundcover: none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: DA
 Height: 9.1 m AGL Gain: 0.00 dBd
 Field strength at remote

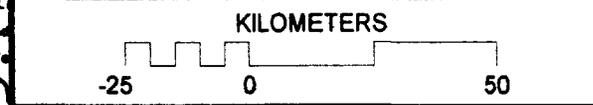
■ = 28.0 dBuV/m
 Min. receiver threshold level: -90.1 dBmW

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type/Orient.	Coordinates
WBQI	489.0	38.50	DA-H	N33°29'19.00"
group: 1	79.0000 MHz	0.0		W86°47'58.00"

Notes
 EFFECTIVE RADIATED POWER 7.0 KW
 EFFECTIVE HEIGHT (AAT) 296 M

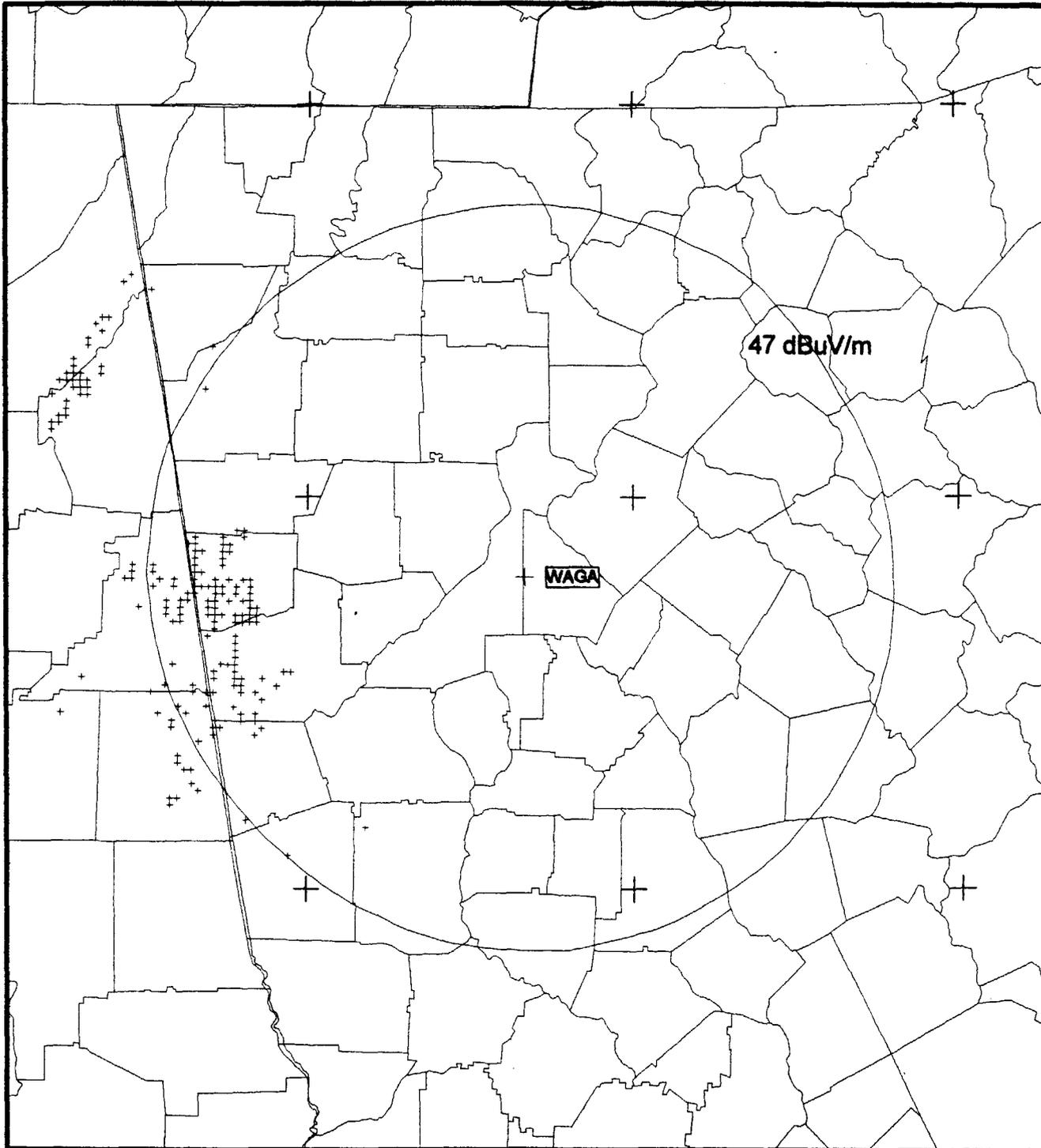
SOUTHERN MISSISSIPPI VALLEY STATES
 USGS MAP

DTV CHANNEL 5



DTV COVERAGE CONTOUR
 WBQI - DT

EXHIBIT 6 990208



SIGNAL™: WBIQ CHANNEL 4 TO WAGA.map

Prop. model: Longley-Rice v1.2.2
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Groundcover: none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: DA
 Height: 9.1 m AGL Gain: 0.00 dBd
 C/I ratio group 1 TXs to group 2 TXs

□ > 34.0 dB
 ⊕ < 34.0 dB

Min. receiver threshold level: -66.0 dBmW

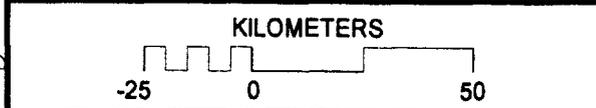
Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type/Orient.	Coordinates
WBIQ	489.0	38.50	DA-H	N33°29'19.00"
group: 2	79.0000	MHz	0.0	W86°47'58.00"
WAGA	613.0	50.00	DA-H	N33°47'49.00"
group: 1	79.0000	MHz	0.0	W84°20'00.00"

Notes

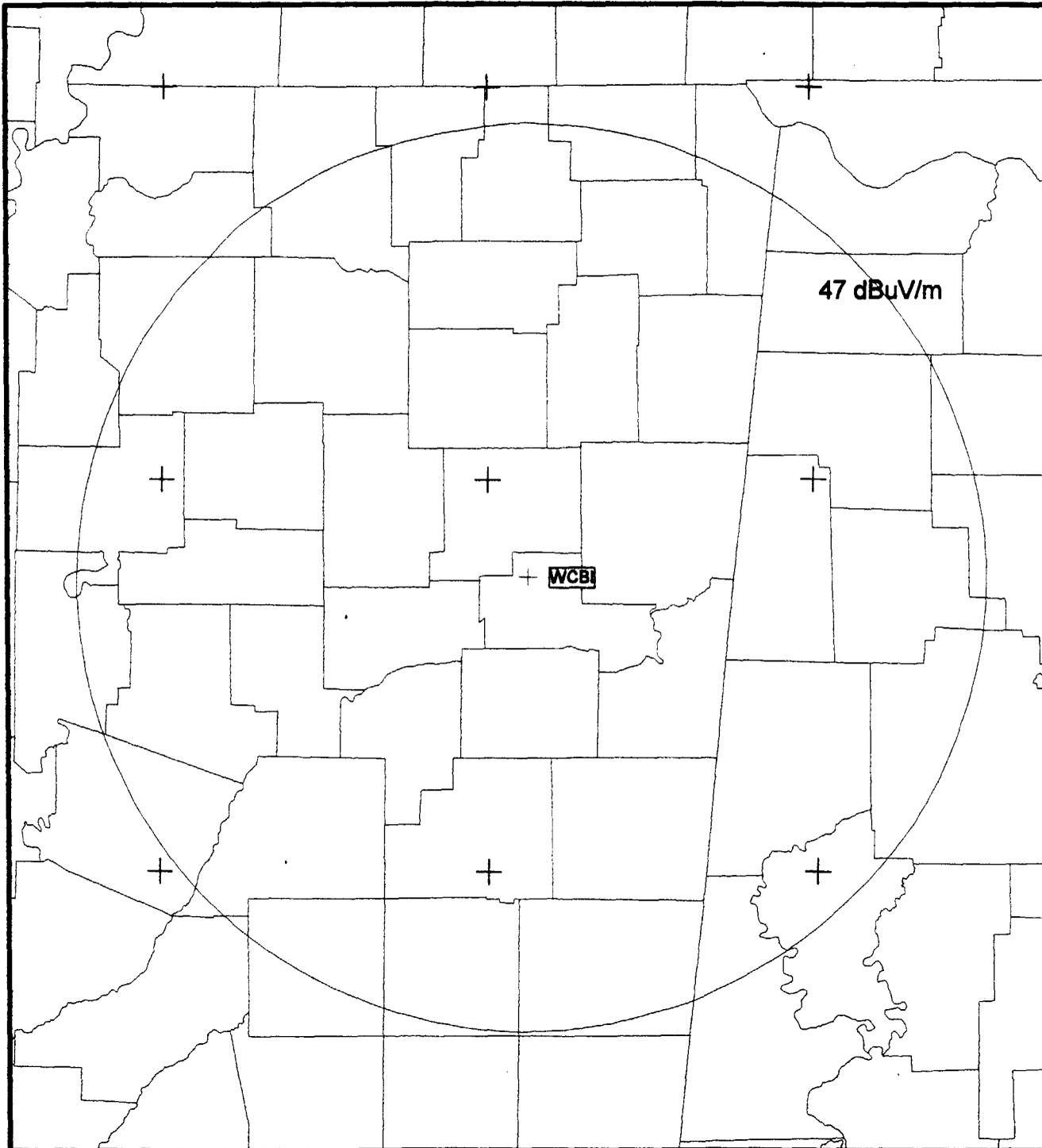
POPULATION WITHIN THE WAGA 47 F(50,50)
 FCC CONTOUR: 3,585,602 PEOPLE

POPULATION WITHIN THE WAGA 47 F(50,50)
 FCC CONTOUR THAT WOULD RECEIVE
 INTERFERENCE FROM WBIQ: 12,844 PEOPLE

PERCENT POPULATION SUBJECT TO
 NEW INTERFERNECE FROM WBIQ: 0.36%



WBIQ-DT
 CO-CHANNEL INTERFERENCE TO WAGA
 EXHIBIT 7A 980208



SIGNAL™: WBIQ CHANNEL 4 TO WCBI.map

Prop. model: Longley-Rice v1.2.2
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Groundcover: none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: DA
 Height: 9.1 m AGL Gain: 0.00 dBd
 C/I ratio group 1 TXs to group 2 TXs

□ > -14.0 dB
 ⊕ < -14.0 dB

Min. receiver threshold level: -64.8 dBmW

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type/Orient.	Coordinates
WBIQ	489.0	38.50	DA-H	N33°29'19.00"
group: 2	79.0000	MHz	0.0	W86°47'58.00"
WCBI	695.0	50.00	DA-H	N33°45'06.00"
group: 1	69.0000	MHz	0.0	W88°52'40.00"

Notes

POPULATION WITHIN THE WCBI 47 F(50,50)
 FCC CONTOUR: 790,198 PEOPLE

POPULATION WITHIN THE WCBI 47 F(50,50)
 FCC CONTOUR THAT WOULD RECEIVE
 INTERFERENCE FROM WDIQ: 0 PEOPLE

PERCENT POPULATION SUBJECT TO
 NEW INTERFERNECE FROM WCIQ: 0.000%

KILOMETERS



WBIQ-DT

ADJACENT CHANNEL INT. TO WCBI

EXHIBIT 7B

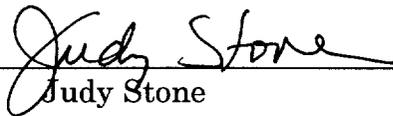
980208

Declaration of Judy Stone

I, Judy Stone, declare as follows:

1. I am Executive Director of the Alabama Educational Television Commission ("AETC").
2. If the proposed rulemaking amending Section 73.622, Digital Television Table of Allotments, is adopted, AETC intends to apply for Commission consent to construct the digital television facilities that will operate on the channel proposed in the attached submission.
3. If awarded this construction permit, AETC intends to construct and operate such facilities pursuant to the Commission's requirements.

I hereby declare under penalty of perjury that the statements made in this declaration are true and accurate to the best of my knowledge, information and belief.



Judy Stone

February 12, 1999