HOGAN & HARTSON
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March 12, 1999

BY HAND DELIVERY

The Secretary
Federal Communications Commission
The Portals -- Room TW-325
445 12th Street, S.W.
Washington, DC 20554

Re: Alabama Educational Television Commission
Clarification to Petition for Rule Making for
Amendment to Section 73.622 of the Commission's Rules
Digital Television Table of Allotments
(Birmingham, Alabama)

Dear Madam Secretary:

On behalf of Alabama Educational Television Commission ("AETC"), the licensee of WBIQ-TV, Birmingham, Alabama (the "Station"), enclosed please find an original and four copies of a revised Technical Exhibit to the above-referenced Petition for Rule Making, which was filed with the Commission on February 18, 1999 (the "Petition"). The attached Technical Exhibit, which includes both an engineering statement and a completed technical section of an FCC Form 301, better reflects the Commission's specifications in a recent Public Notice with regard to calculating interference resulting from proposed changes in digital television allotments. 1/ Accordingly, AETC respectfully requests that the Commission replace the Technical Exhibit that was filed with the Petition with the attached.

Please file-stamp the additional copy of this amendment, and return it to the undersigned. Please also direct communications to the undersigned.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: _____
F. William LeBeau

Attorneys for the Alabama Educational Television Commission

Enclosures

1/ Public Notice, Additional Application Processing Guidelines for Digital Television (issued on August 10, 1998).

EXHIBIT 1

(Revised Technical Statement)

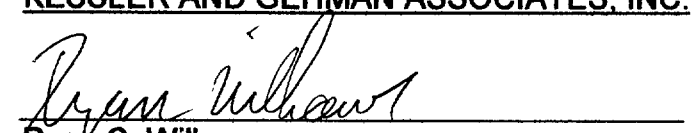
ENGINEERING STATEMENT OF
RYAN WILHOUR
ON BEHALF OF
ALABAMA EDUCATIONAL TELEVISION COMMISSION
LICENSEE OF TV BROADCAST STATION
WBIQ-TV, BIRMINGHAM, AL

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
March 4, 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	State
BIRMINGHAM	**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)*

- [x] Construct a new (main) facility
- [ ] Construct a new auxiliary facility
- [ ] Modify construction permit for main facility
- [ ] Modify construction permit for auxiliary antenna
- [ ] Modify licensed main facility
- [ ] 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.

- [ ] Antenna supporting structure height
- [ ] Effective radiated power
- [ ] Antenna height above average terrain
- [ ] Channel
- [ ] Antenna location
- [ ] Antenna system
- [ ] 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**	0	**29**	'	**19**	"	Longitude	**86**	0	**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)(]) + (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***

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 **N/A**

If Yes. proceed to item 15.

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 **N/A**

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**

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 kin (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. 1 31 1. 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 7E)

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 that fail to meet the spatial requirements specified by the FCC. All of the exhibits except Exhibit 7A demonstrate that no new interference is caused within the surrounding channel's service areas. Exhibit 7A demonstrates that new interference has been introduced within WAGA's service area due to this application. This new interference would affect 0.01% of the population that lies within their service area and thus is well below the *de minimis* 2% and 10% interference criteria.

KESSLER AND GEHMAN ASSOCIATES, INC.

_____

RYAN C. WILHOUR
Engineering Consultant

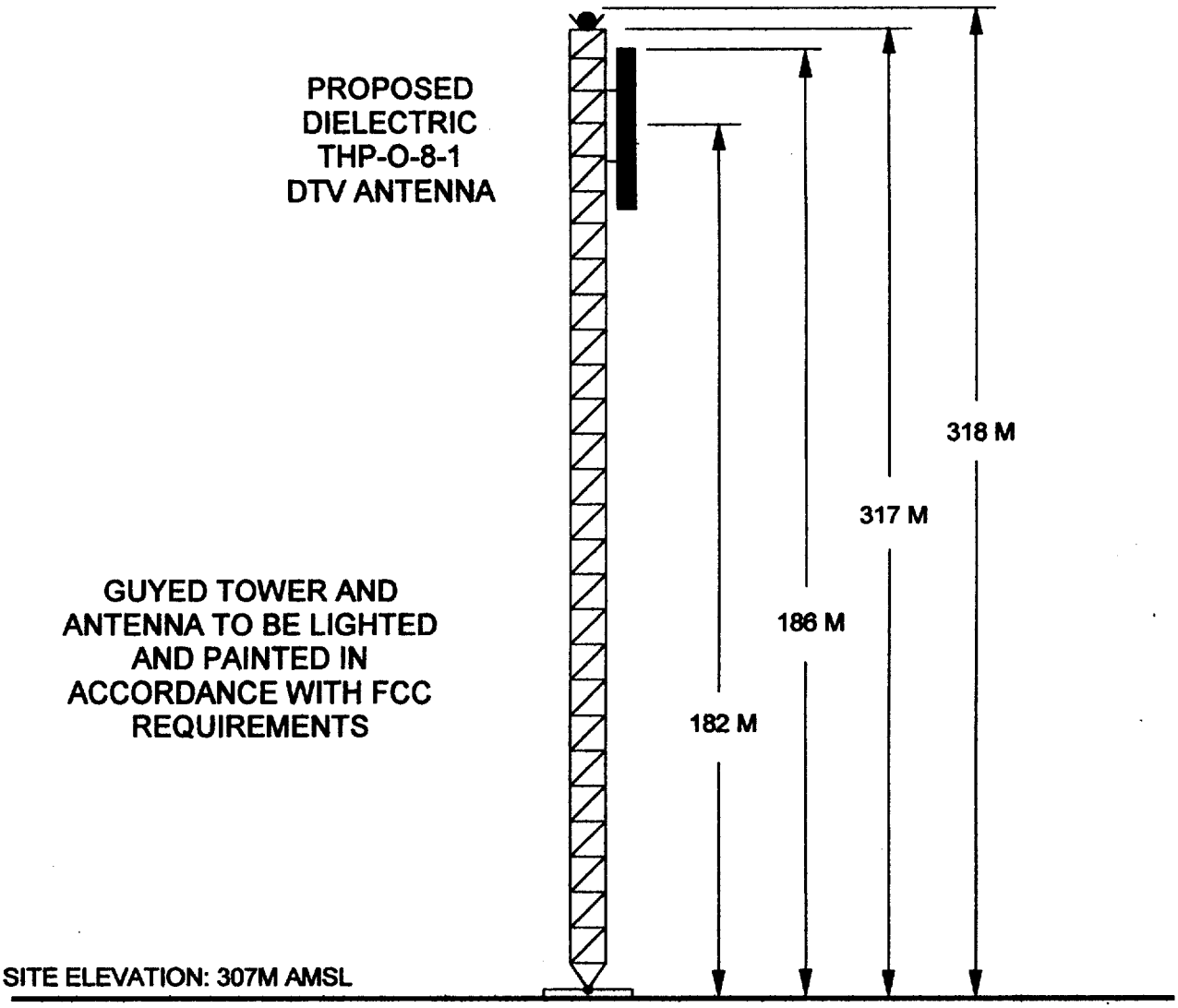
WBIQ - DT
BIRMINGHAM, ALABAMA

ENGINEERING SPECIFICATIONS

A.	Transmitter Site		
	North Latitude	33° 29' 19"	
	West Longitude	86° 47' 58"	
	Street Address	1720 Valley View Dr. Birmingham, AL	
B.	Proposed Facility		
	DTV Channel	Number	5
		Frequency	76-82 MHz
C.	Antenna Height		
	Height of site above mean sea level (AMSL).		307m
	Overall height of structure above ground (Including all appurtenances)		318m
	Overall height of structure above mean sea level (Including all appurtenances)		625m
	Height of site above average terrain		114m
	Effective height of antenna above ground		182m
	Effective height of antenna above average terrain		296m
	Effective height of antenna above mean sea level		489m
D.	Antenna Parameters - Horizontal Polarization		
	Maximum antenna gain in beam maximum		4.31dB
	Maximum antenna gain in horizontal plane		4.31dB
	Maximum effective radiated power		8.45dBk
	In beam maximum		7.00kW
	Maximum effective radiated power		8.45dBk
	In horizontal plane		7.00kW

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

ELEVATION VIEW



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

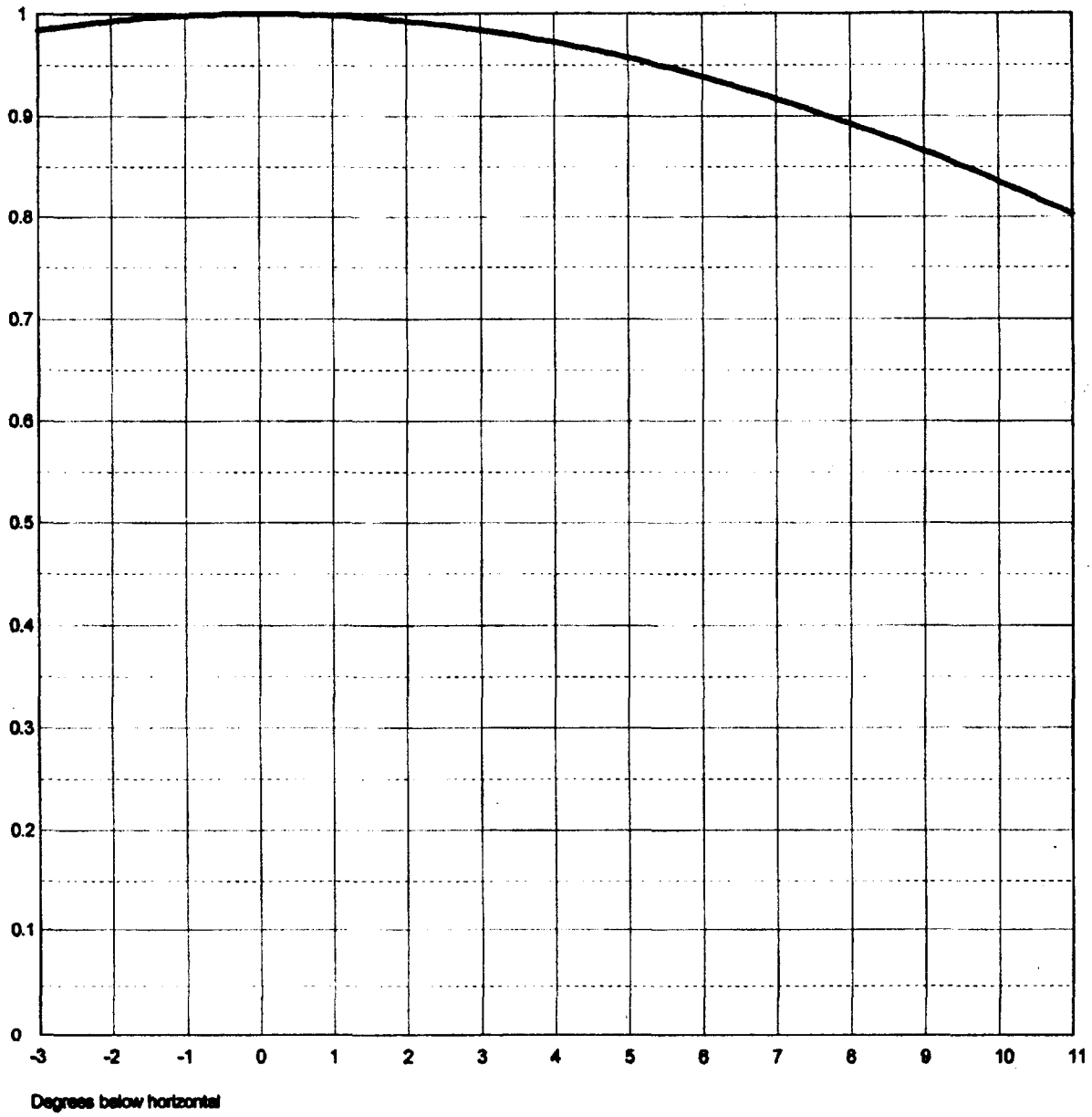
EXHIBIT 2

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 Hortzontal	2.1 (3.22 dB)	Frequency	79.00 MHz
Calculated / Meesured	Calculated	Drawing #	02H02100



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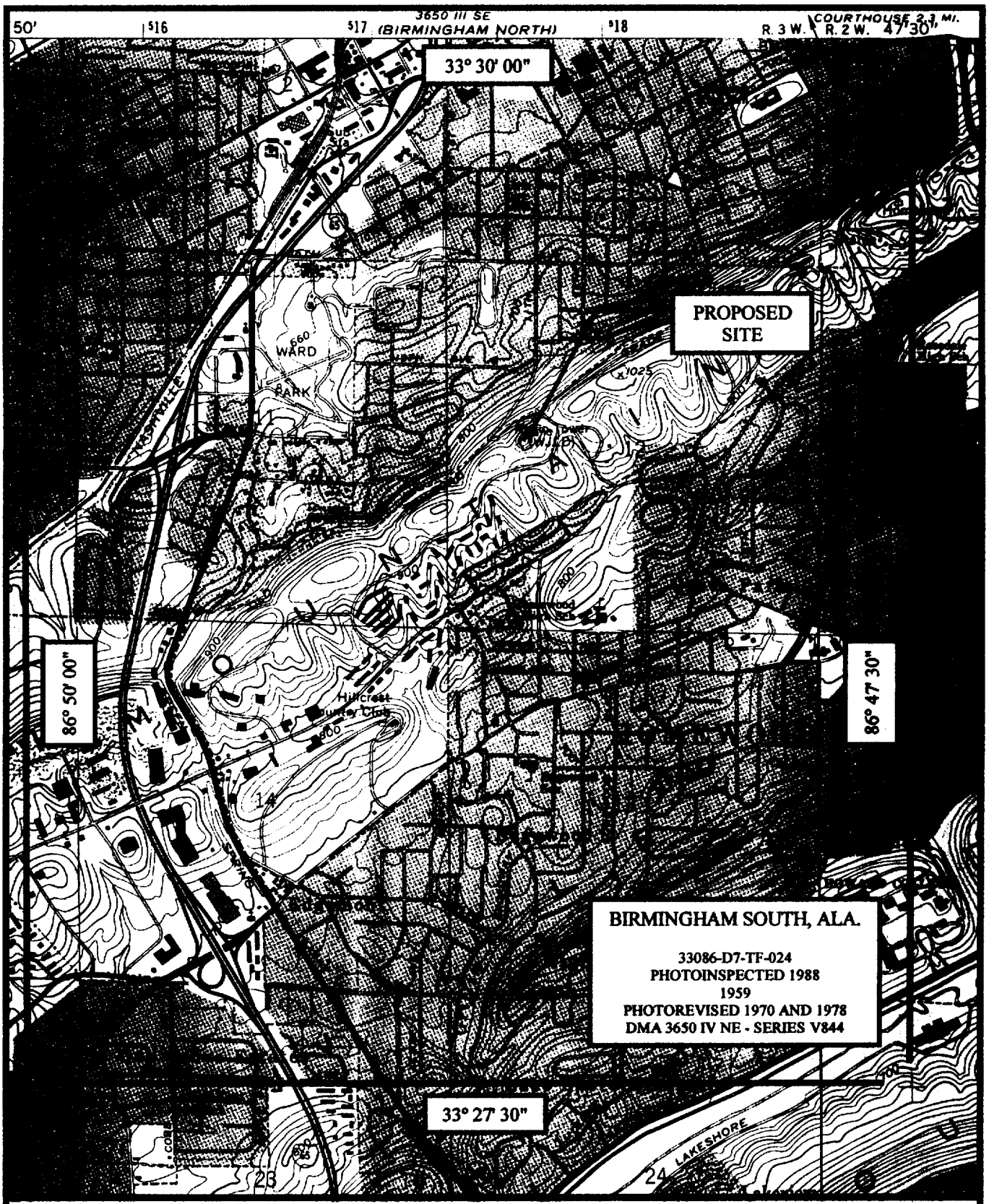
WBIQ - DT
BIRMINGHAM, ALABAMA
990208 EXHIBIT 3



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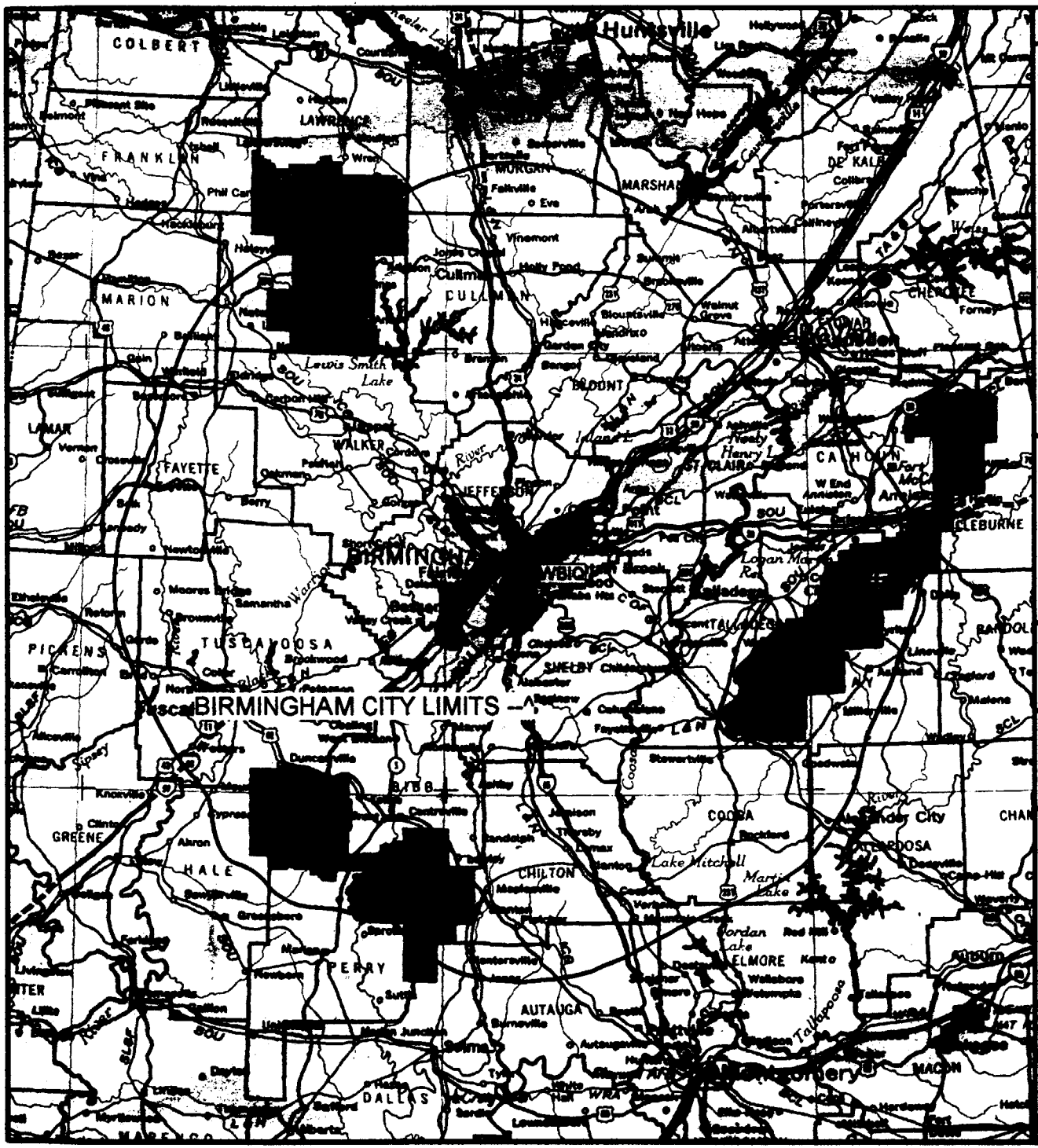
WBIQ - DT

BIRMINGHAM, ALABAMA

990208

EXHIBIT 5



SIGNAL™: WBIQ 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
WBIQ	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

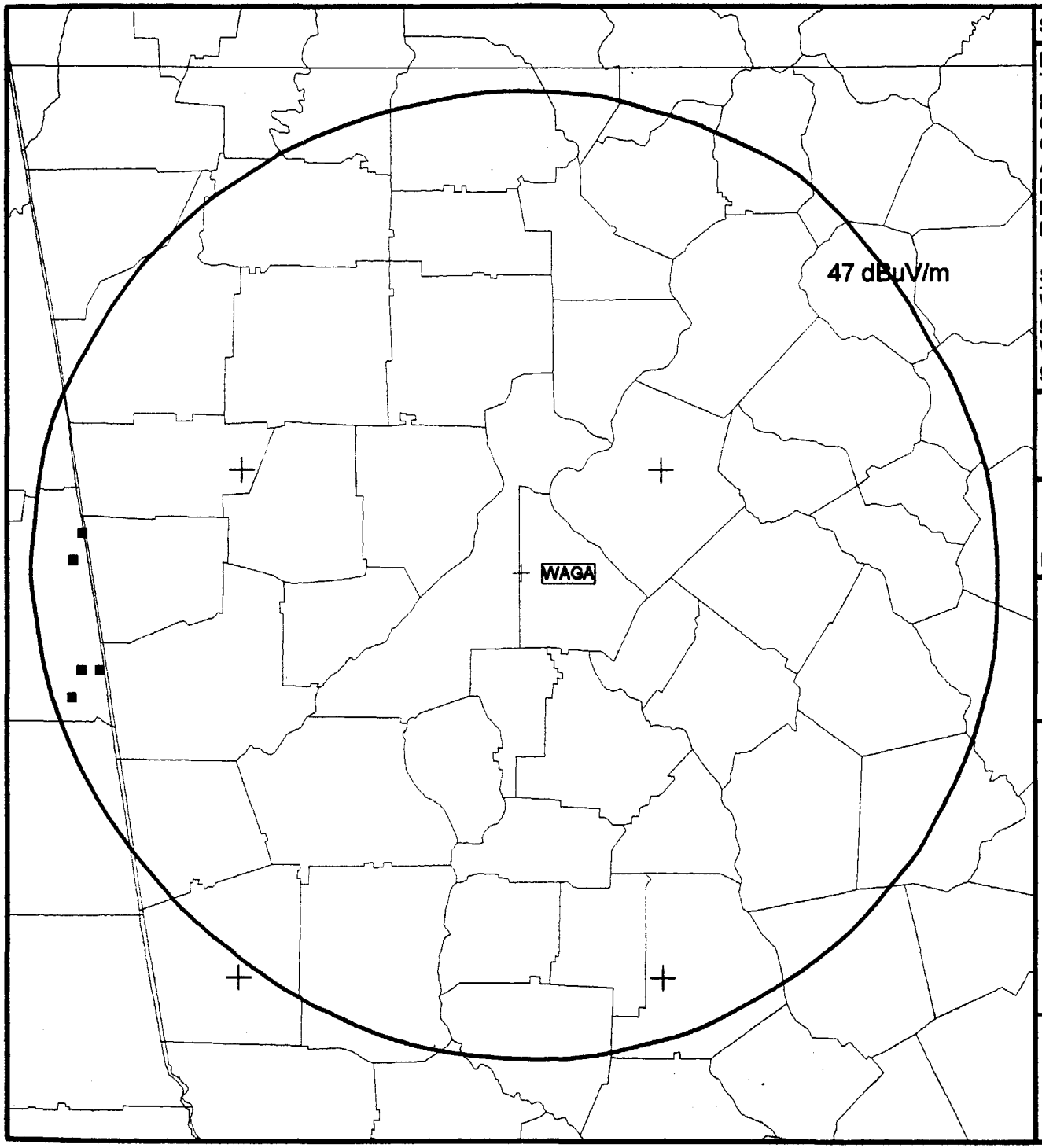
KILOMETERS

-25 0 50

DTV COVERAGE CONTOUR

WBIQ - DT

EXHIBIT 6 990208



SIGNAL™: WBIQ DT 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

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

KILOMETERS
-25 0 25

WBIQ DT

INTERFERENCE TO WAGA

EXHBIT 7A 990208

COLOR KEY

■ Areas that have lost service due to interference but would be served without interference.

DEMOGRAPHIC RESULTS

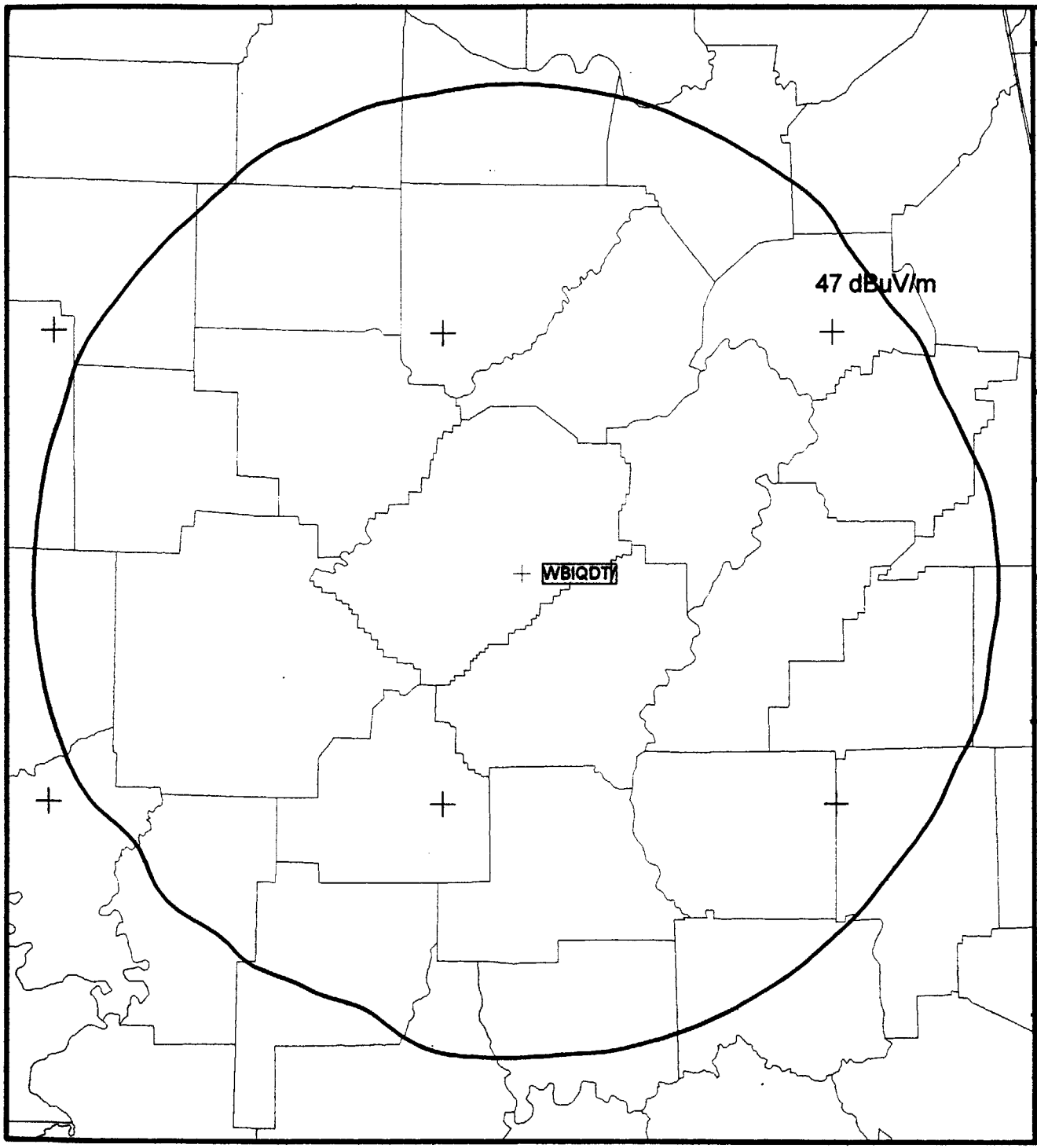
Service without interference:
3,449,654 people

Service with interference:
3,449,328 people

Amount of 2% int.
0.01%

Amount of 10 % int.
0.01%

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



SIGNAL™: WBIQ DT TO WBRCTV.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

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WBRCTV	615.0	50.00	Omni-H	N33°29'19.00"
group: 1	85.0000 MHz			W86°47'58.00"
WBIQDT	489.0	38.50	Omni-H	N33°29'19.00"
group: 1	79.0000 MHz			W86°47'58.00"

KILOMETERS

-25 0 25

WBIQ DT

INTERFERENCE TO WBRC TV

EXHBIT 7B 990208

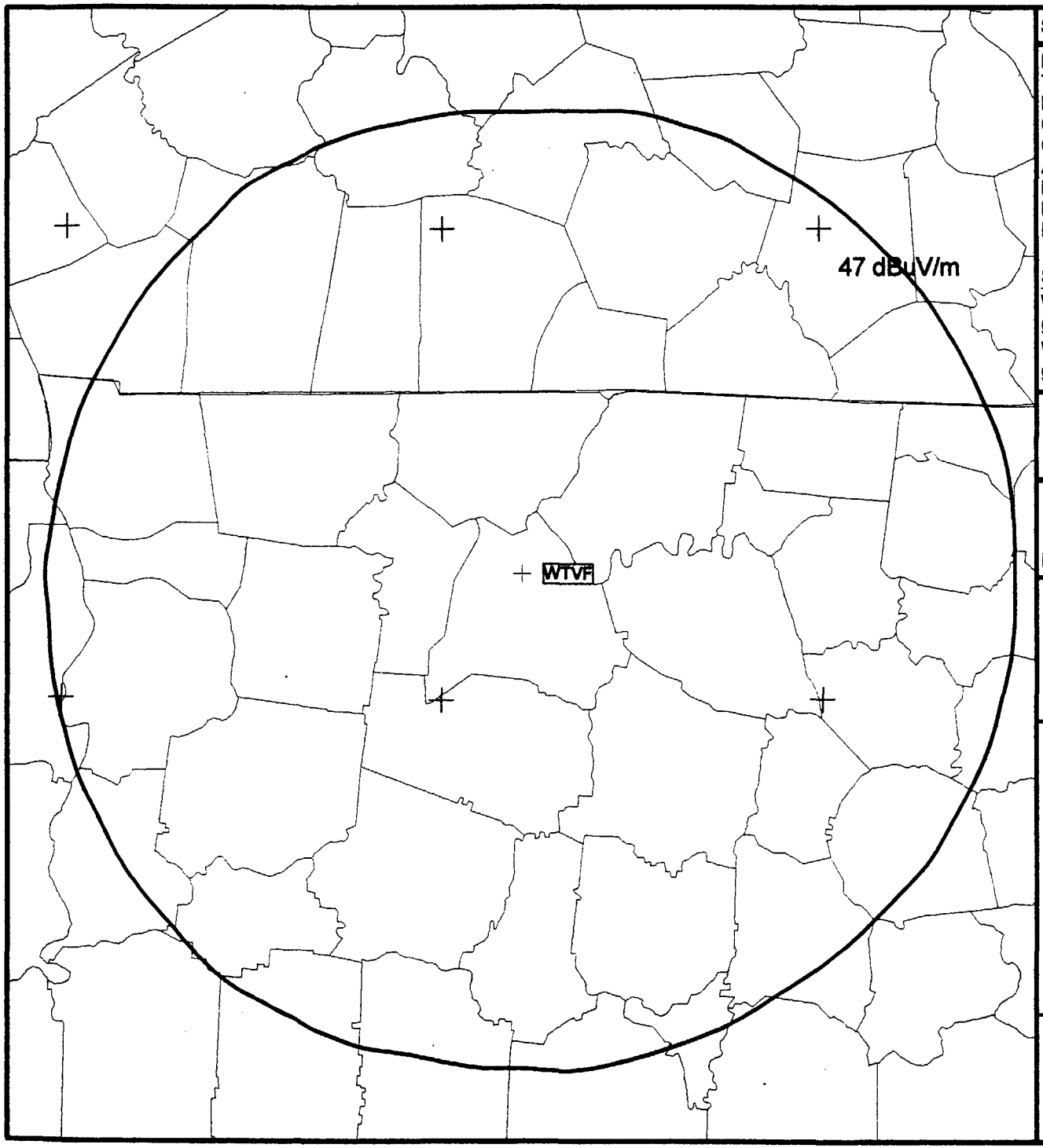
COLOR KEY

■ Areas that have lost service due to interference but would be served without interference.

DEMOGRAPHIC RESULTS

Amount of 2% int.
0.0%

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



SIGNAL™: WBIQ DT TO WTVF.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

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WTVF	613.0	50.00	Omni-H	N36°16'05.00"
group: 1	79.0000 MHz			W86°47'16.00"
WBIQDT	489.0	38.50	Omni-H	N33°29'19.00"
group: 1	79.0000 MHz			W86°47'58.00"

KILOMETERS

-25 0 25

WBIQ DT

INTERFERENCE TO WTVF

EXHBIT 7C 990208

COLOR KEY

■ Areas that have lost service due to interference but would be served without interference.

DEMOGRAPHIC RESULTS

Amount of 2% int.
0.0%

KESSLER & GEHMAN
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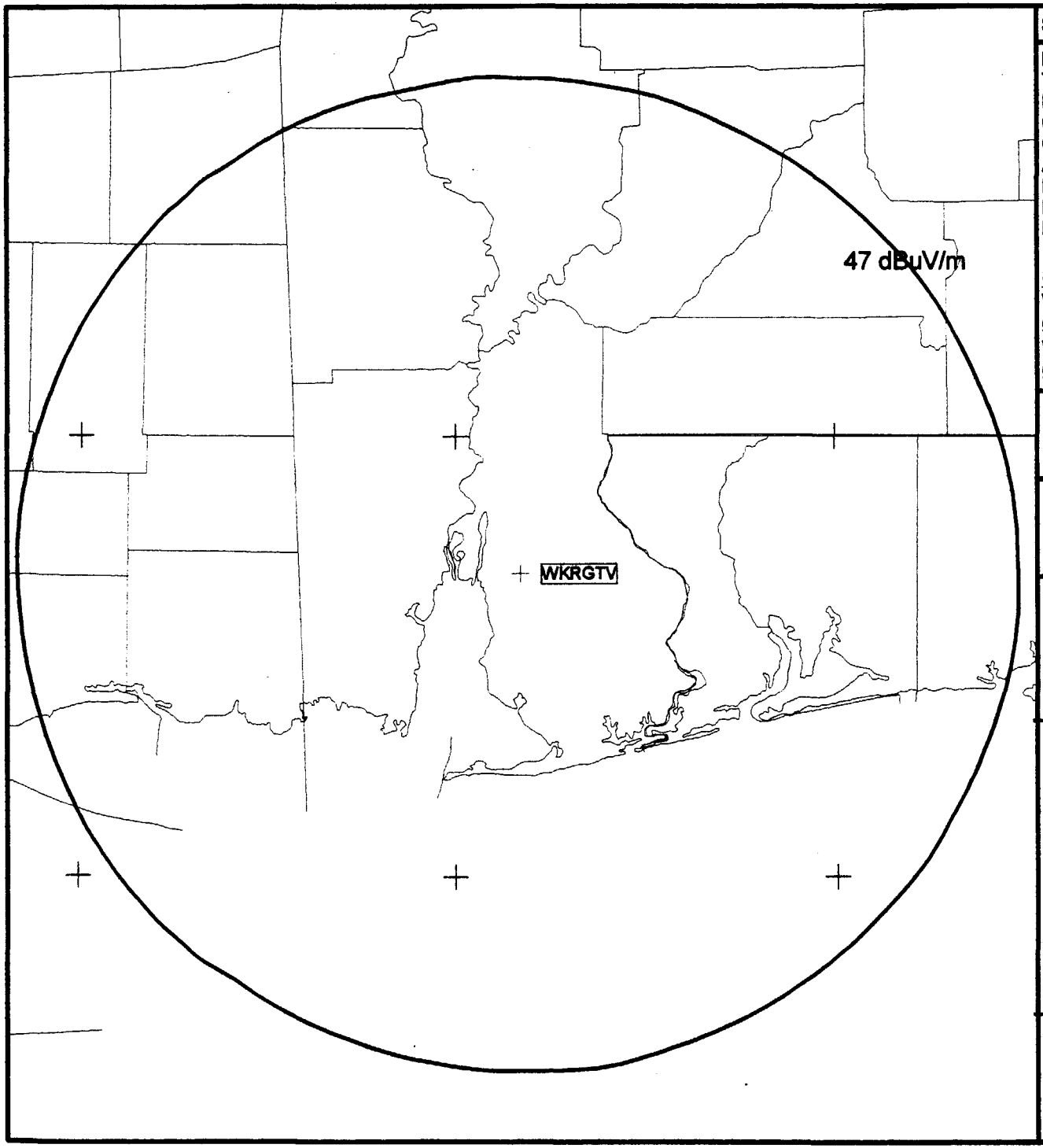
Gainesville, Florida 32607



SIGNAL™: WBIQ DT TO WKRG TV.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

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WKRGTV	614.0	50.00	Omni-H	N30°41'20.00"
group: 1	79.0000 MHz			W87°49'49.00"
WBIQDT	489.0	38.50	Omni-H	N33°29'19.00"
group: 1	79.0000 MHz			W86°47'58.00"

KILOMETERS

-25 0 50

WBIQ DT

INTERFERENCE TO WKRG TV

EXHBIT 7D 990208

COLOR KEY

■ Areas that have lost service due to interference but would be served without interference.

DEMOGRAPHIC RESULTS

Amount of 2% int.
0.0%

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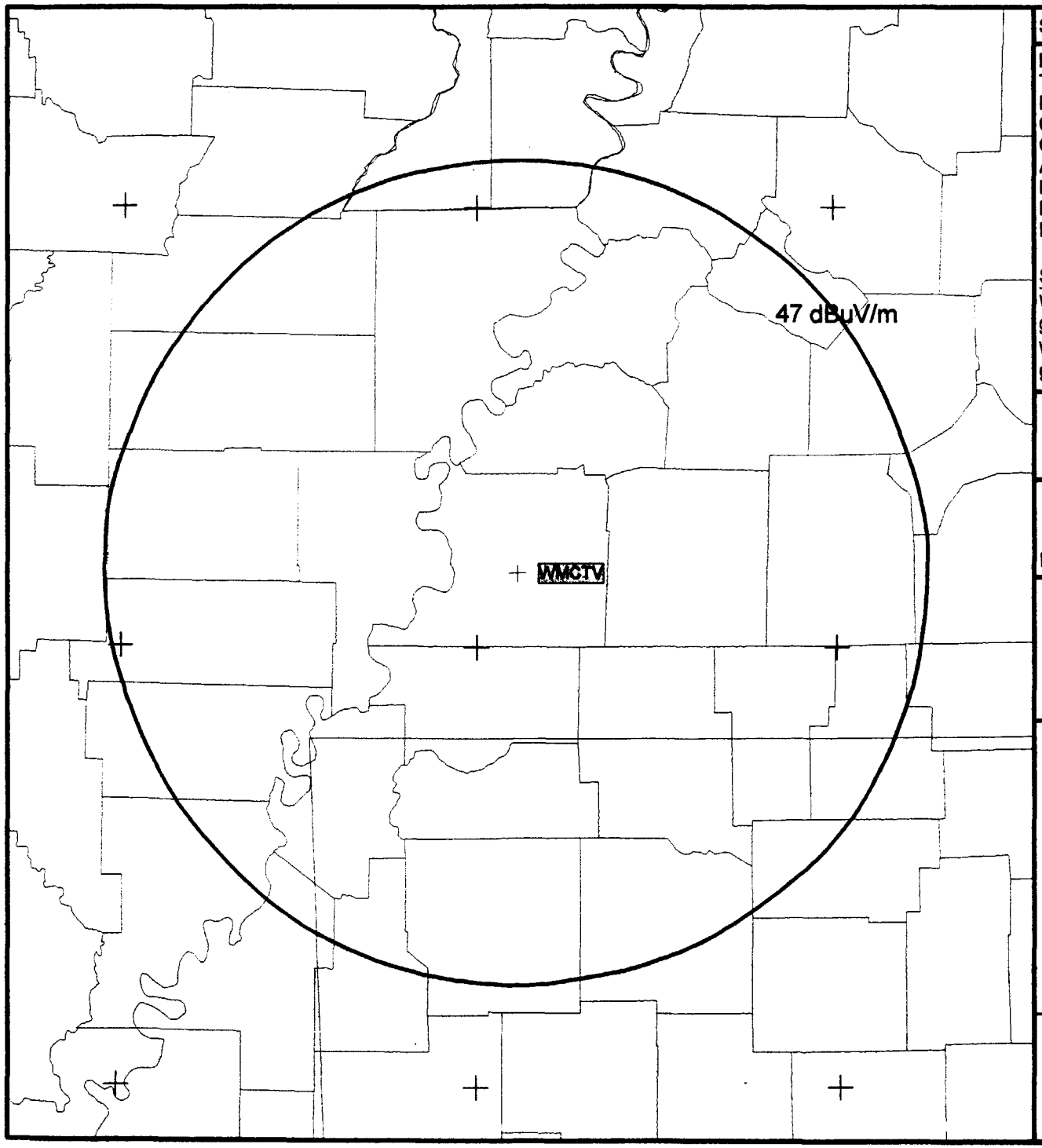
Gainesville, Florida 32607



SIGNAL™: WBIQ DT TO WMCTV.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

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type /Orient.	Coordinates
WMCTV	394.0	50.00	Omni-H	N35°10'09.00"
group: 1	79.0000 MHz			W89°53'12.00"
WBIQDT	489.0	38.50	Omni-H	N33°29'19.00"
group: 1	79.0000 MHz			W86°47'58.00"

KILOMETERS

-25 0 50

WBIQ DT

INTERFERENCE TO WMCTV

EXHBIT 7E 990208

COLOR KEY

■ Areas that have lost service due to interference but would be served without interference.

DEMOGRAPHIC RESULTS

Amount of 2% int.
0.0%

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Gainesville, Florida 32607