

TECHNICAL EXHIBIT
IN SUPPORT OF COMMENTS OF
LIN OF ALABAMA, LLC
MB DOCKET NO. 87-268

This Technical Exhibit was prepared on behalf of LIN of Alabama, LLC in support of comments in MB Docket No. 87-268. This exhibit supports the modification of the certification for WBPG-DT, Gulf Shores, Alabama (Channel 25). It is demonstrated herein that WBPG-DT's certification facility can be modified to reflect a non-directional operation with an effective radiated power (ERP) of 1000 kilowatts and an antenna radiation center height above average terrain (HAAT) of 381 meters, from an alternate transmitter site location.

NTSC station WBPG is currently licensed (BMLCT-20021029AAA) to operate on channel 55 with a maximum directional ERP of 3750 kilowatts and an HAAT of 308 meters. It is a single-channel NTSC-only station and therefore, according to paragraph 28 of the *Seventh Further Notice of Proposed Rule Making* in MB Docket No. 87-268, is permitted to change its certification to specify maximized facilities.

Based on its certification, WBPG was allotted a DTV facility on channel 25 with a maximum directional ERP of 64.5 kW and an HAAT of 308 meters from its currently licensed NTSC site. This DTV facility was designed to replicate the current NTSC coverage. However, WBPG-DT proposes to relocate to a transmitter site located 20.2 kilometers west-northwest of its current site and operate with a non-directional ERP of 1000 kW and an HAAT of 381 meters. It is requested that the Commission modify the proposed Appendix B DTV Table of Allotment specifications to the following:

Facility ID	State & City		DTV									
			NTSC Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	Percent IX Received
83943	AL	GULF SHORES	55	25	1000	381	73142	304117	0874754	35,219	1,204,938	0

The proposed facilities (1000 kW/381 m) exceed the maximum allowable ERP and HAAT limits for UHF DTV stations in all zones set forth in Section 73.622. However, section 73.622(f)(5) permits stations to operate with facilities that exceed these limits in order

to provide the same geographic coverage as the largest station within the market. DTV station WEAR-DT on channel 17 at Pensacola is in the same market and located 3.6 kilometers west of the licensed WBPG-TV site. It is authorized by construction permit (BPCDT-19991028AEX) to operate with a non-directional ERP of 1000 kW and an HAAT of 579 meters. Thus, the proposed WBPG-DT facilities would not exceed those already authorized to DTV station WEAR-DT.

The proposed facility meets the city coverage requirement, as the 48 dBu contour will completely encompass the city limits of Gulf Shores.

An engineering analysis was conducted for the proposed WBPG-DT operation to determine the predicted interference to all other licensee's potentially affected tentative channel designations (TCD's). The analysis calculated net new predicted interference according to the procedures outlined by the FCC in the *Second DTV Periodic Report and Order*^{*} and related Public Notices. The results of the analysis are summarized as follows:

Analysis of Proposed WBPG-DT Ch. 25, Gulf Shores, AL (1000 kW, 381 m HAAT)

Tentative Channel 24 WMDN-DT Meridian, MS
Proposal causes no interference.

Tentative Channel 25 WLPB-DT, Baton Rouge, LA
Proposal causes no interference

Tentative Channel 25 WMAO-DT, Greenwood, MS
Proposal causes no interference.

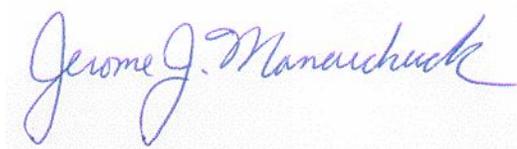
Tentative Channel 26 WGNO-DT, New Orleans, LA
Proposal causes no interference

Based on the above, the proposed new certified facility for WBPG-DT would comply with the FCC 0.1% interference requirement, as no interference is predicted to be caused to all pertinent tentative channel designations.

^{*} *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 03-15, Report and Order, 19 FCC Rcd 18279, 18281 (2004).

There is no significant additional interference that would be received by the WBPG-DT proposed certified facility. However, to the extent that additional interference would be caused to the WBPG-DT proposed new certified facility by other licensee's TCD's, this is hereby accepted.

Based on the foregoing, the FCC is respectfully requested to change the WBPG-DT specified allotment facility as described herein.



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