

**TECHNICAL STATEMENT
CONCERNING THE PROPOSED MEDIAFLO
OPERATIONS AT TAMPA, FLORIDA**

This Technical Statement provides information concerning a proposed MediaFLO system operation in the Tampa, Florida market. The proposed MediaFLO system will consist of 2 stations operating on channel 55. The proposed MediaFLO stations will employ non-directional (ND) antenna systems. The proposed effective radiated power (ERP) for each MediaFLO station is 25 kilowatts (kW). The following provides the site coordinates and antenna radiation center height for the proposed MediaFLO stations in the Tampa market.

TAMPA4, 26-47-09, 81-47-46, Rc=391.1 m AMSL, 25 kW-ND

TAMPA5, 26-25-23, 81-37-48, Rc=360.6 m AMSL, 25 kW-ND

A preliminary examination of the FCC database indicates prohibited contour overlap between the proposed MediaFLO stations and the following television (TV) and digital television (DTV) assignments.

WEDU-DT, Ch.54, Tampa, FL, 1000 kW-ND, 453 m

WACX(TV), Ch.55, Leesburg, FL, 5000 kW-DA, 515 m

WPTV-DT, Ch.55, West Palm Beach, FL, 900 kW-DA, 386.5 m

Figures 1A, 1B and 1C are maps for channels 54, 55 and 56 showing the predicted TV/DTV protected contours and the predicted interfering contours from the proposed Tampa MediaFLO operations. Interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin with adjustments made for Part-27 stations (see attached Appendix). A 1 kilometer grid and the 2000 Census were employed.

WEDU-DT, Channel 54, Tampa, FL

With respect to the WEDU-DT construction permit (CP) operation on channel 54 (BPEDT-19991112ACO, 1000 kW-ND, 453 m), the following is a summary of the interference calculations before and after consideration of the proposed MediaFLO stations.

<u>Description</u>	<u>Population</u>
Within WEDU-DT noise limited contour	4,178,825
Not affected by terrain losses	4,178,825
Interference from NTSC stations	0
Additional interference from DTV stations	0
Total NTSC and DTV interference	0 (0.0%)
Resulting WEDU-DT service	4,178,825
Additional interference from Part-27 stations	0 (0.0%)
Resulting WEDU-DT service	4,178,825

WACX(TV), Channel 55, Leesburg, FL

With respect to the WACX(TV) license operation on channel 55 (BLCT-19860319KE, 5000 kW-DA, 515 m), the following is a summary of the interference calculations before and after consideration of the proposed MediaFLO stations.

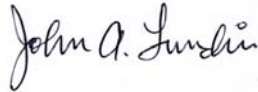
<u>Description</u>	<u>Population</u>
Within WACX(TV) noise limited contour	2,662,853
Not affected by terrain losses	2,662,853
Interference from NTSC stations	73,114 (WOPX)
Additional interference from DTV stations	1,126 (WEDU-DT)
Total NTSC and DTV interference	74,240 (2.79%)
Resulting WACX(TV) service	2,588,613
Additional interference from Part-27 stations	0 (0.0%)
Resulting WACX(TV) service	2,588,613

WPTV-DT, Channel 55, West Palm Beach, FL

With respect to the WPTV-DT license operation on channel 55 (BLCDDT-20030425AAD, 900 kW-DA, 386.5 m), the following is a summary of the interference calculations before and after consideration of the proposed MediaFLO stations.

<u>Description</u>	<u>Population</u>
Within WPTV-DT noise limited contour	4,818,730
Not affected by terrain losses	4,818,730
Interference from NTSC stations	0
Additional interference from DTV stations	0
Total NTSC and DTV interference	0 (0.0%)
Resulting WPTV-DT service	4,818,730
Additional interference from Part-27 stations	11,635 (0.24%)
Resulting WPTV-DT service	4,807,095

If there are questions concerning this Technical Statement, please communicate with the office of the undersigned.



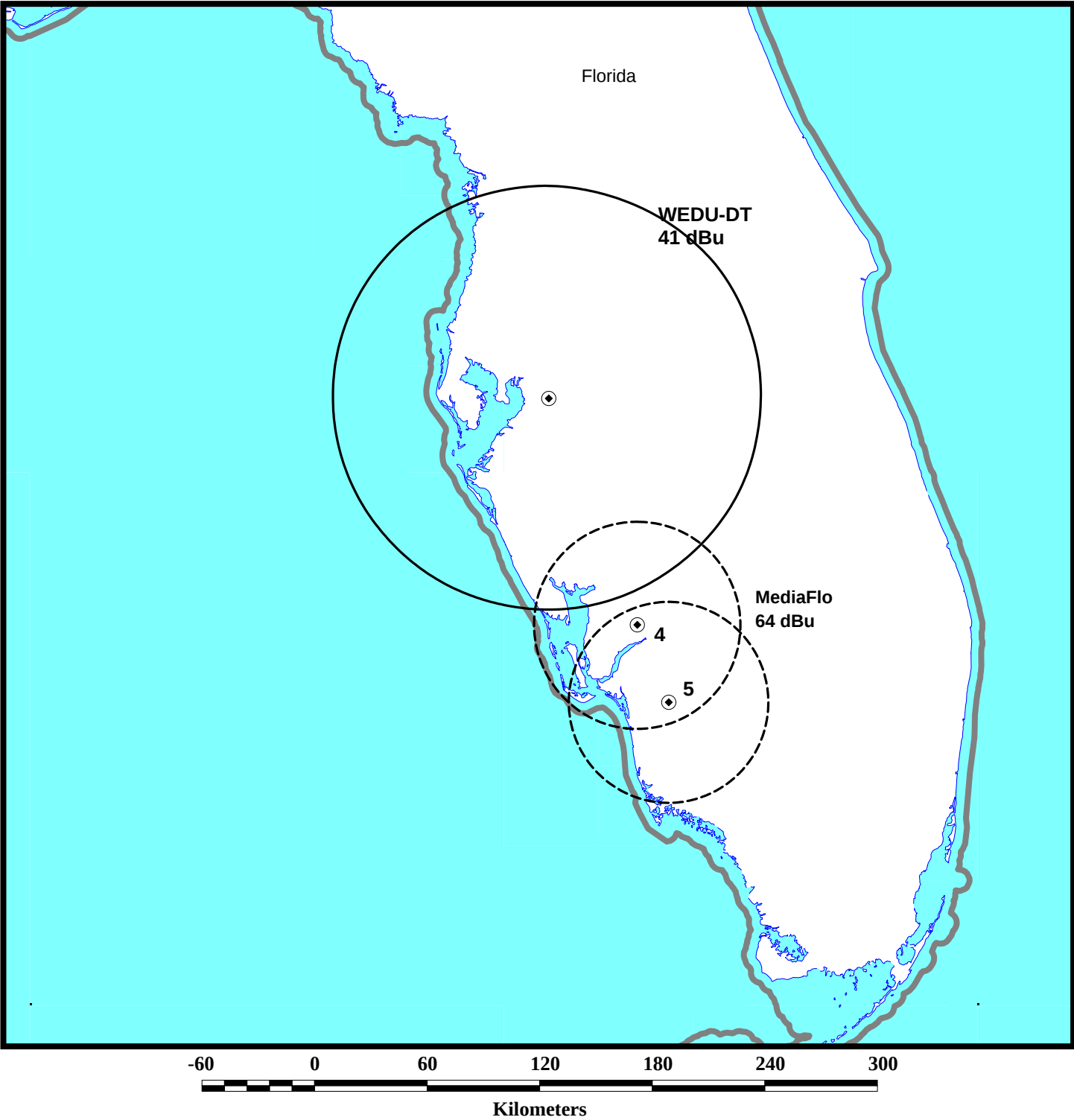
John A. Lundin

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, FL, 34237

Phone : 941-329-6000
Fax : 941-329-6030
Email : john@DLR.com

March 13, 2006

Figure 1A

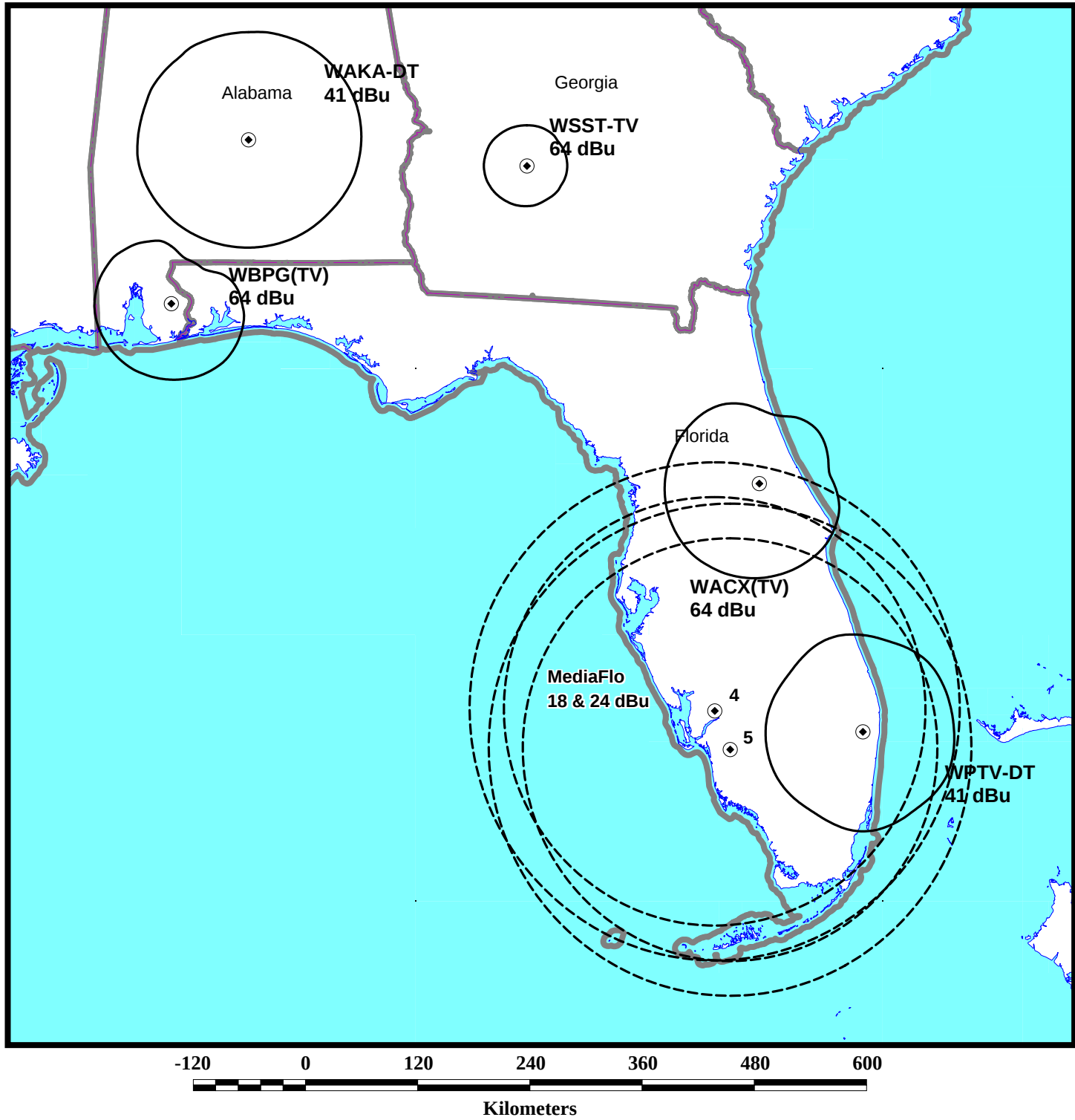


PREDICTED CONTOURS

CHANNEL 54

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 1B

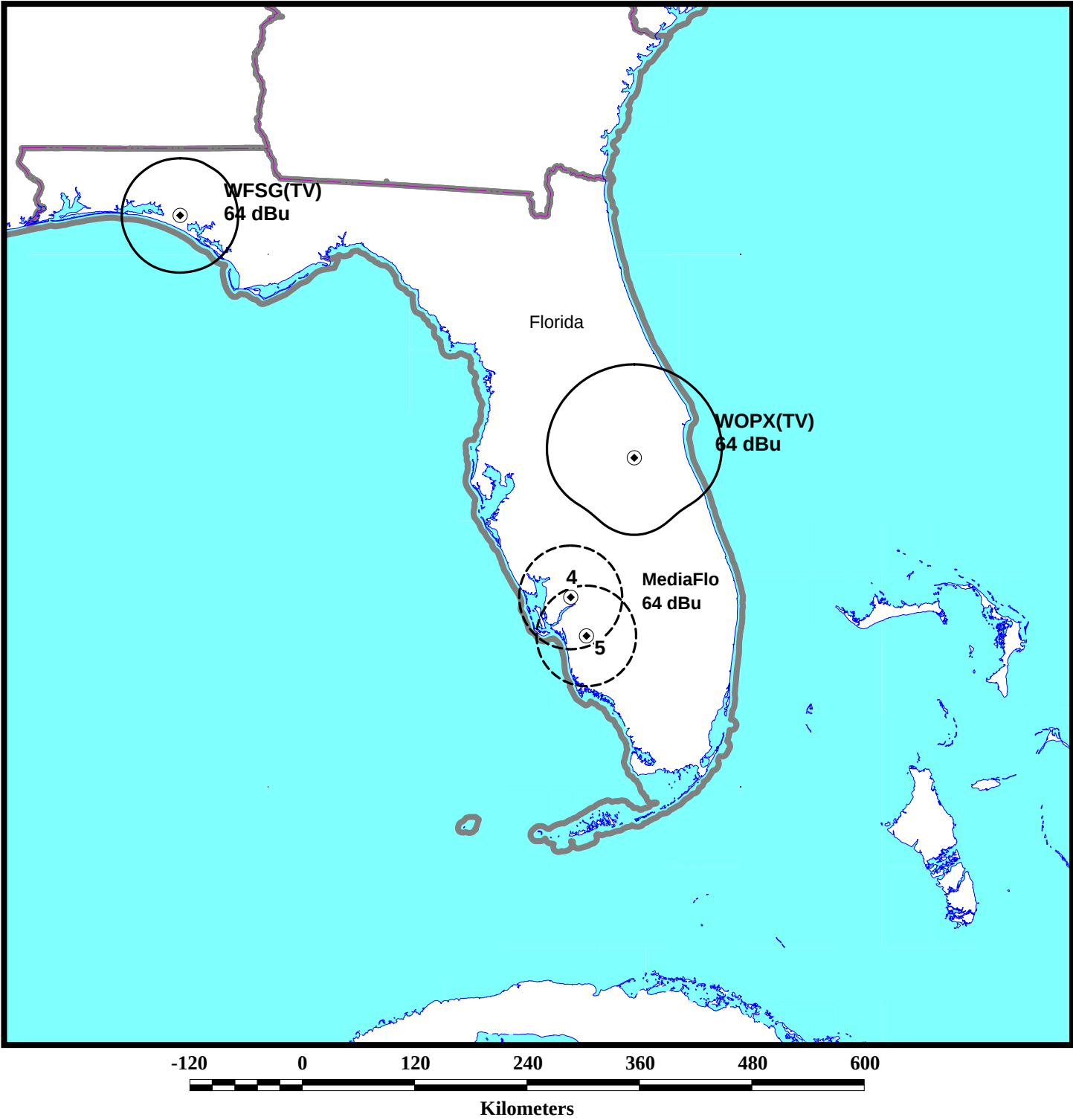


PREDICTED CONTOURS

CHANNEL 55

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 1C



PREDICTED CONTOURS

CHANNEL 56

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

APPENDIX

Proposed Modifications to OET-69 Methodology

OET-69 describes a methodology for evaluating service from and interference to broadcast television stations. It is divided into three parts: a methodology for evaluation of service, a methodology for evaluation of interference and a description of the FCC Longley-Rice computer program. QUALCOMM proposes no changes to the first part of OET-69. It proposes only minor changes to the second and third parts of OET-69.

Evaluation of Service

QUALCOMM does not propose any changes to the current OET-69 methodology of evaluating television station service. It does not propose creation of a new class of service for Part 27 licensees, and therefore there is no need to establish a method of determining service for Part 27 stations. QUALCOMM's proposed changes only impact evaluation of interference.

Evaluation of Interference

QUALCOMM proposes four minor modifications to the OET-69 methodology of evaluating interference so as to permit evaluation of interference from Part 27 stations. These minor modifications provide a method for evaluating interference to full-service analog and digital television stations operating on channels 54, 55, and 56 during the remainder of the DTV Transition Period. At the end of the DTV Transition Period, these analog and digital television stations will vacate these channels and there will be no more need for evaluation of interference to them.

The proposed changes to the OET-69 methodology of evaluating interference are as follows:

1. For Part 27 stations, the D/U ratios for co-channel and adjacent-channel protection of broadcast stations will be modified to reflect the D/U ratios contained in Section 27.60.
2. For Part 27 stations the D/U ratio for determining co-channel interference to DTV service will be +23 dB at all locations and will not be adjusted based on the signal-to-noise ratio of the DTV signal.
3. In accordance with Section 27.60, no consideration will be given to taboo-channel interference to analog television stations.
4. Where multiple Part 27 transmitting stations are to be deployed in a local broadcast market, a Root-Sum-Square (RSS) summation of undesired fields from individual Part 27 transmitting stations will be used to establish the interfering signal in each grid evaluated.

A discussion of the proposed changes to the OET-69 methodology follows.

The first proposed change is to adopt the D/U ratios of Section 27.60 for evaluation of interference from Part 27 transmitting stations. It is noted that the co-channel and adjacent-channel D/U ratios contained in Section 27.60 are greater than those contained in OET-69 for all cases except co-channel, non-offset analog into analog TV. A comparison of the D/U ratios is contained in the following table.

D/U Ratio Comparison (dB)			
Relationship	Undesired Signal Type		
	Analog TV	Digital TV	Proposed Part 27
Co-channel into desired DTV	+2	+15	+23
Co-channel into desired analog TV	+28 (offset) +45 (non-offset)	+34	+40
Lower adjacent channel into desired DTV	-48	-28	-23
Lower adjacent channel into desired analog TV	-3	-14	0
Upper adjacent channel into desired DTV	-49	-26	-23
Upper adjacent channel into desired analog TV	-13	-17	0

The second proposed change relates to the adjustable D/U ratio for determining co-channel interference to DTV service found in Section 73.623 of the Commission's Rules. For co-channel analog TV into DTV the D/U ratio varies from +2 dB at locations where the DTV service signal-to-noise ratio is 25 dB or greater to as great as +21 dB where the DTV service signal-to-noise ratio is 16 dB. For co-channel DTV into DTV the D/U ratio varies from +15 dB where the DTV service signal-to-noise ratio is 28 dB or greater to as great as +23 dB where the DTV service signal-to-noise ratio is 16 dB. QUALCOMM proposes a flat +23 dB D/U ratio, which matches the D/U ratio contained in Section 27.60 and is the "worst-case" D/U ratio for co-channel interference to DTV service presently in OET-69.

Since Section 27.60 does not prescribe consideration of taboo-channel interference to analog TV service during the DTV Transition Period, QUALCOMM proposes that taboo-channel interference from Part 27 transmitters to analog TV service not be considered in the modified OET-69 methodology.

Finally, with respect to the fourth proposed change, QUALCOMM may require more than one MediaFlo™ transmitter in certain local markets. To evaluate the combined interference impact from multiple transmitters in the same local market, QUALCOMM proposes use of an RSS method of summing predicted fields from multiple transmitters. The interfering fields from each MediaFlo™ transmitter, in dBμV/m, in each OET-69 grid would be converted to their corresponding linear values in μV/m, squared, then summed, and the square root of the sum taken to get the combined field in μV/m. This combined field would then be converted back into logarithmic form in dBμV/m and tested to determine whether it meets the required D/U ratio.