



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
MODIFICATION OF
CONSTRUCTION PERMIT
BPCDT-19991109ACE
DTV STATION
WMYA-DT – ANDERSON, SOUTH CAROLINA
CHANNEL 14 - 430 kW - 286.6 m HAAT**

Permittee: Anderson (WFBC-TV) Licensee, Inc.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a registered Professional Engineer in the Commonwealth of Virginia, Registration No. 7418, and in the State of New York, Registration No. 63418.

GENERAL

Anderson (WFBC-TV) Licensee, Inc., the permittee of DTV station WMYA-DT, channel 14, Anderson, South Carolina, has authorized this office to prepare this statement, FCC Form 301 and associated exhibits in support of a request for modification of construction permit, BPCDT-19991109ACE. In accordance with Commission policies, as stated in Public Notice DA 06-1255 (*Notice*)¹, released on June 14, 2006, regarding DTV stations which have been able to come close to meeting the applicable replication or maximization requirements but cannot meet the precise requirements set forth in

¹ PUBLIC NOTICE: DTV Channel election Issues - Compliance with the July 1, 2006 Replication/Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline. MB Docket No. 03-15, DA 06-1255, Released June 14, 2006.

paragraph 78 of the *Memorandum Opinion and Order on Reconsideration (MO&O)*², the permittee is concurrently requesting a waiver of the Replication/Maximization Interference Protection Deadline while herein submitting, prior to the use-it-or-lose-it deadline, the instant application for modification of its construction permit to specify facilities which fully meet the replication/maximization requirements set forth in paragraph 78 of the *MO&O*. The pending request for modification of its current Special Temporary Authorization, BEDSTA-20050802AHA, was made in accordance with policies set forth in the *(MO&O)*, to operate with facilities different from those currently authorized and slightly different from those authorized in WMYA-DT's construction permit, BPCDT-19991109ACE.

The DTV facilities proposed herein differ from its facilities as authorized in its current construction permit in three respects. Because of tower limitations the permittee has been unable to top-mount its authorized DTV antenna, which results in a lower HAAT. The pending request for modification of STA specifies a side-mounted directional antenna, a Dielectric model TFU-16DSC-R T200SP instead of the Dielectric antenna, model TFU-29JTT T200 authorized in WMYA-DT's construction permit. The substitute antenna's azimuth pattern is essentially the same as the azimuth pattern of the authorized antenna. The permittee has determined that the substitute antenna specified in its modification of STA request is capable of operating at WMYA-DT's authorized ERP of 310 kW. The permittee therefore seeks modification of its construction permit to specify a different antenna model, a lower antenna Height Above Average Terrain (HAAT) of 286.6 meters

² *Memorandum Opinion and Order on Reconsideration* in MM Docket No. 00-39, 16 FCC Rcd 20594 (2001), paragraphs 34-36 and 78.

instead of its currently authorized HAAT of 311 meters, and an increase in ERP from its authorized 310 kW to an ERP of 430 kW in order to compensate for the reduction in its HAAT and fully meet the Commission's Replication/Maximization requirements as set forth in the MO&O.

PROPOSED TECHNICAL PARAMETERS

Digital station WMYA-DT is authorized to operate with an Effective Radiated Power of 310 kW at an antenna height above average terrain of 311 meters using a Dielectric directional antenna, model TFU-29JTT T200. The permittee initially installed a side-mounted substitute Dielectric directional antenna, model TFU-16DSC-R T200SP, on its existing tower at a height above ground of 285.6 meters. The antenna's azimuth and elevation patterns and tabulations are shown in the attached exhibits. The permittee's currently pending request for modification of STA will permit WMYA-DT to operate at its authorized ERP of 310 kW at a HAAT of 286.6 meters using the substitute antenna. The permittee herein requests modification of its construction permit to specify the substitute directional antenna and to authorize WMYA-DT to operate at a HAAT of 286.6 meters. Additionally, to compensate for the reduced HAAT and meet the Commission's Replication/Maximization requirements, the permittee requests modification of its construction permit to authorize WMYA-DT to operate with an ERP of 430 kW. No other changes are requested.

REQUEST FOR WAIVER OF THE APPLICATION FILING FREEZE

The permittee herein requests a waiver of the “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes” which was announced in Public Notice DA 04-2446³, and became effective, on August 3, 2004. In the (*Notice*) the Commission stated that waivers of the freeze would be considered on a case-by-case basis upon the showing of good cause, and when grant of such an application would be in the public interest.

The permittee submits that the grant of the instant application is in the public interest because it will permit WMYA-DT to completely replicate its authorized DTV coverage area, and therefore meet the requirements of paragraph 78 of the *MO&O* as to the “Replication/ Maximization Interference Protection Deadline”, as well as fulfil its certification of its intent to serve its authorized coverage area, as contained in BCERCT-20041105AMP.

ALLOCATION CONSIDERATIONS

Since the instant application for modification of construction permit requests a slight reduction in HAAT of currently authorized DTV facilities and a concurrent compensating increase in ERP it is believed that no additional allocation studies are necessary.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of both broadcast and non-broadcast facilities are located within 10 km of WMYA-DT's site. The permittee recognizes its responsibility to investigate and remedy

³ See *Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes*, DA 04-2446 (MB rel. August 3, 2004) (“*August 2004 Filing Freeze PN*”)

complaints of interference which might be created by this proposal in accordance with applicable Rules.

ENVIRONMENTAL CONSIDERATIONS

RADIO FREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance to determine whether FCC-regulated transmitting facilities, operations or devices comply with guidelines for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC's policies and guidelines.

The Commission's Maximum Permitted Exposure (MPE) level for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating

between 300 MHz and 1500 MHz, primarily UHF TV stations, is derived from the formula, (frequency/1500). The MPE level for "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm²) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz is derived from the formula, (frequency/300). The predicted emissions of WMYA-DT, channel 14, must be considered, along with the predicted emissions from other proposed and existing stations at the current site. For WMYA-DT, which will operate on television Channel 14 (470-476 MHz), the MPE is 0.315 milliwatts per centimeter squared (mW/cm²) in an "uncontrolled" environment and 1.575 mW/cm² in a "controlled" environment. The proposed WMYA-DT facility will operate with a maximum ERP of 430 kW from a horizontally polarized directional transmitting antenna with a centerline height of 285.6 meters above ground level (AGL). Considering the relevant conservative vertical plane relative field factor of 0.3, the WMYA-DT facility is predicted to produce a power density at two meters above ground level of 0.01607 mW/cm², which is 5.10% of the FCC guideline value for "uncontrolled" environments, and 1.02% of the FCC guideline value for "controlled" environments (see Appendix A). The total percentage of the ANSI value at the proposed site, considering the cumulative radiation of all stations to be located at the subject site is only 91.33% of the guideline's limit for "uncontrolled" environments, and 18.27% of the limit for "controlled" environments

OCCUPATIONAL SAFETY

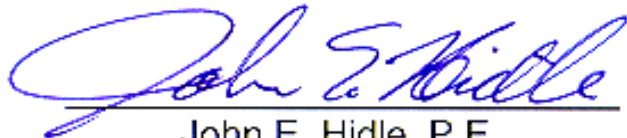
The permittee of WMYA-DT is committed to the protection of station personnel and/or tower contractors working in the vicinity of the antenna. The permittee is committed

to reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

It is submitted that the request for modification of Construction Permit, as described herein, complies with the policies, rules and regulations of the Federal Communications Commission, except as stated herein for which a waiver is requested. This statement, FCC Form 301 and the associated exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

Dated: June 28, 2006


John E. Hidle, P.E.





Proposal Number

978:4:152932

Date

19-Aug-02

EXHIBIT ONE

Call Letters

WBSC-DT

Channel

14

Location

Anderson, SC

Customer

Sinclair Broadcast Group

Antenna Type

TFU-16DSC-R T200SP

AZIMUTH PATTERN

Gain

2.00

(3.01 dB)

Calculated / Measured

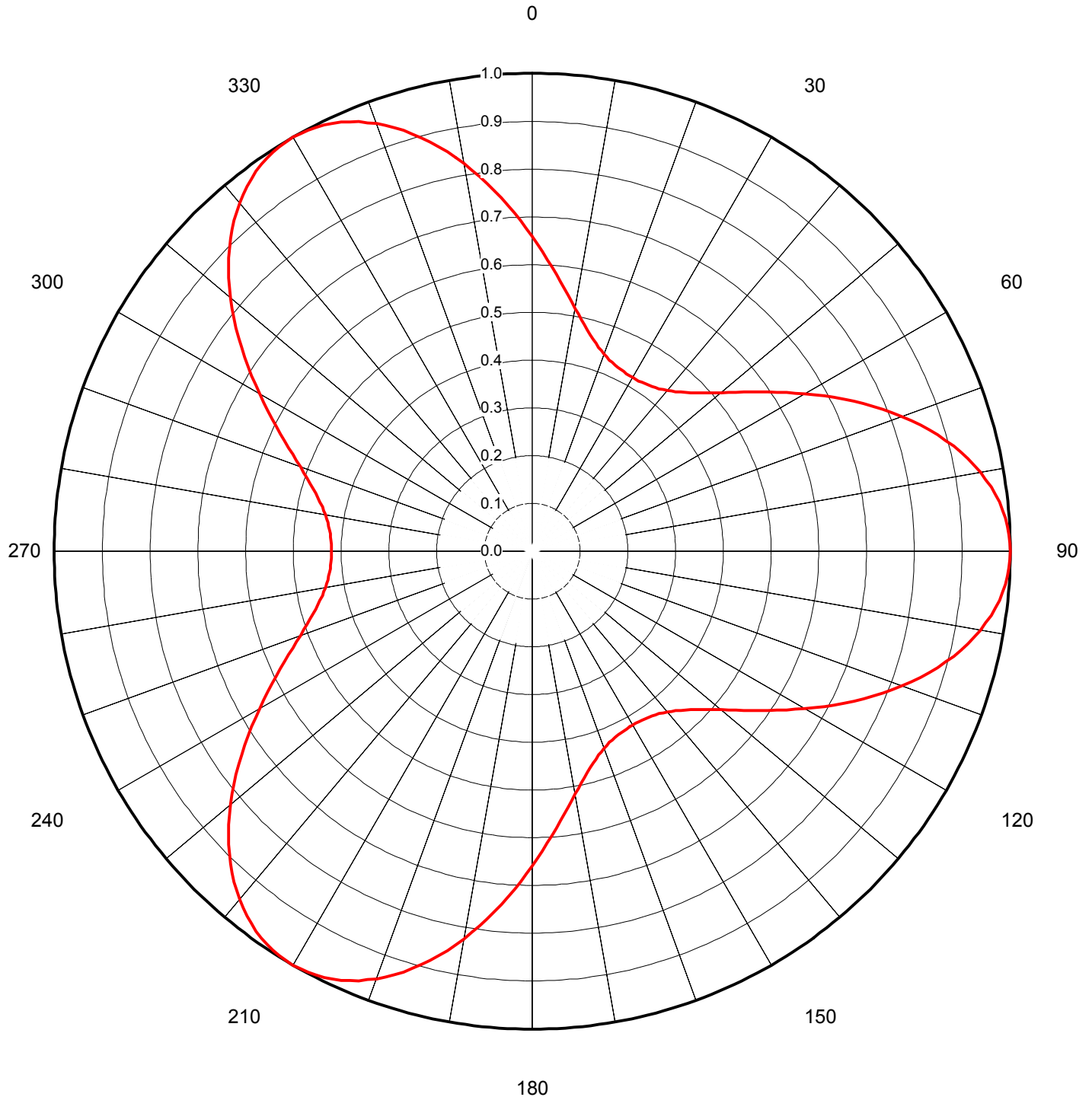
Calculated

Frequency

473.00 MHz

Drawing #

TFU-T200SP-14





Proposal Number **978:4:152932**
 Date **19-Aug-02** **EXHIBIT TWO**
 Call Letters **WBSC-DT** Channel **14**
 Location **Anderson, SC**
 Customer **Sinclair Broadcast Group**
 Antenna Type **TFU-16DSC-R T200SP**

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing #: **TFU-T200SP-14**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.659	45	0.469	90	1.000	135	0.469	180	0.659	225	0.895	270	0.420	315	0.895
1	0.643	46	0.477	91	0.999	136	0.461	181	0.675	226	0.882	271	0.420	316	0.908
2	0.626	47	0.486	92	0.998	137	0.455	182	0.692	227	0.868	272	0.420	317	0.920
3	0.611	48	0.495	93	0.995	138	0.449	183	0.709	228	0.854	273	0.422	318	0.932
4	0.596	49	0.506	94	0.992	139	0.444	184	0.725	229	0.839	274	0.423	319	0.942
5	0.581	50	0.516	95	0.987	140	0.439	185	0.742	230	0.824	275	0.424	320	0.952
6	0.567	51	0.528	96	0.982	141	0.435	186	0.759	231	0.808	276	0.426	321	0.960
7	0.554	52	0.540	97	0.976	142	0.432	187	0.775	232	0.792	277	0.429	322	0.969
8	0.540	53	0.554	98	0.969	143	0.429	188	0.792	233	0.775	278	0.432	323	0.976
9	0.528	54	0.567	99	0.960	144	0.426	189	0.808	234	0.759	279	0.435	324	0.982
10	0.516	55	0.581	100	0.952	145	0.424	190	0.824	235	0.742	280	0.439	325	0.987
11	0.506	56	0.596	101	0.942	146	0.423	191	0.839	236	0.725	281	0.444	326	0.992
12	0.495	57	0.611	102	0.932	147	0.422	192	0.854	237	0.709	282	0.449	327	0.995
13	0.486	58	0.626	103	0.920	148	0.420	193	0.868	238	0.692	283	0.455	328	0.998
14	0.477	59	0.643	104	0.908	149	0.420	194	0.882	239	0.675	284	0.461	329	0.999
15	0.469	60	0.659	105	0.895	150	0.420	195	0.895	240	0.659	285	0.469	330	1.000
16	0.461	61	0.675	106	0.882	151	0.420	196	0.908	241	0.643	286	0.477	331	0.999
17	0.455	62	0.692	107	0.868	152	0.420	197	0.920	242	0.626	287	0.486	332	0.998
18	0.449	63	0.709	108	0.854	153	0.422	198	0.932	243	0.611	288	0.495	333	0.995
19	0.444	64	0.725	109	0.839	154	0.423	199	0.942	244	0.596	289	0.506	334	0.992
20	0.439	65	0.742	110	0.824	155	0.424	200	0.952	245	0.581	290	0.516	335	0.987
21	0.435	66	0.759	111	0.808	156	0.426	201	0.960	246	0.567	291	0.528	336	0.982
22	0.432	67	0.775	112	0.792	157	0.429	202	0.969	247	0.554	292	0.540	337	0.976
23	0.429	68	0.792	113	0.775	158	0.432	203	0.976	248	0.540	293	0.554	338	0.969
24	0.426	69	0.808	114	0.759	159	0.435	204	0.982	249	0.528	294	0.567	339	0.960
25	0.424	70	0.824	115	0.742	160	0.439	205	0.987	250	0.516	295	0.581	340	0.952
26	0.423	71	0.839	116	0.725	161	0.444	206	0.992	251	0.506	296	0.596	341	0.942
27	0.422	72	0.854	117	0.709	162	0.449	207	0.995	252	0.495	297	0.611	342	0.932
28	0.420	73	0.868	118	0.692	163	0.455	208	0.998	253	0.486	298	0.626	343	0.920
29	0.420	74	0.882	119	0.675	164	0.461	209	0.999	254	0.477	299	0.643	344	0.908
30	0.420	75	0.895	120	0.659	165	0.469	210	1.000	255	0.469	300	0.659	345	0.895
31	0.420	76	0.908	121	0.643	166	0.477	211	0.999	256	0.461	301	0.675	346	0.882
32	0.420	77	0.920	122	0.626	167	0.486	212	0.998	257	0.455	302	0.692	347	0.868
33	0.422	78	0.932	123	0.611	168	0.495	213	0.995	258	0.449	303	0.709	348	0.854
34	0.423	79	0.942	124	0.596	169	0.506	214	0.992	259	0.444	304	0.725	349	0.839
35	0.424	80	0.952	125	0.581	170	0.516	215	0.987	260	0.439	305	0.742	350	0.824
36	0.426	81	0.960	126	0.567	171	0.528	216	0.982	261	0.435	306	0.759	351	0.808
37	0.429	82	0.969	127	0.554	172	0.540	217	0.976	262	0.432	307	0.775	352	0.792
38	0.432	83	0.976	128	0.540	173	0.554	218	0.969	263	0.429	308	0.792	353	0.775
39	0.435	84	0.982	129	0.528	174	0.567	219	0.960	264	0.426	309	0.808	354	0.759
40	0.439	85	0.987	130	0.516	175	0.581	220	0.952	265	0.424	310	0.824	355	0.742
41	0.444	86	0.992	131	0.506	176	0.596	221	0.942	266	0.423	311	0.839	356	0.725
42	0.449	87	0.995	132	0.495	177	0.611	222	0.932	267	0.422	312	0.854	357	0.709
43	0.455	88	0.998	133	0.486	178	0.626	223	0.920	268	0.420	313	0.868	358	0.692
44	0.461	89	0.999	134	0.477	179	0.643	224	0.908	269	0.420	314	0.882	359	0.675

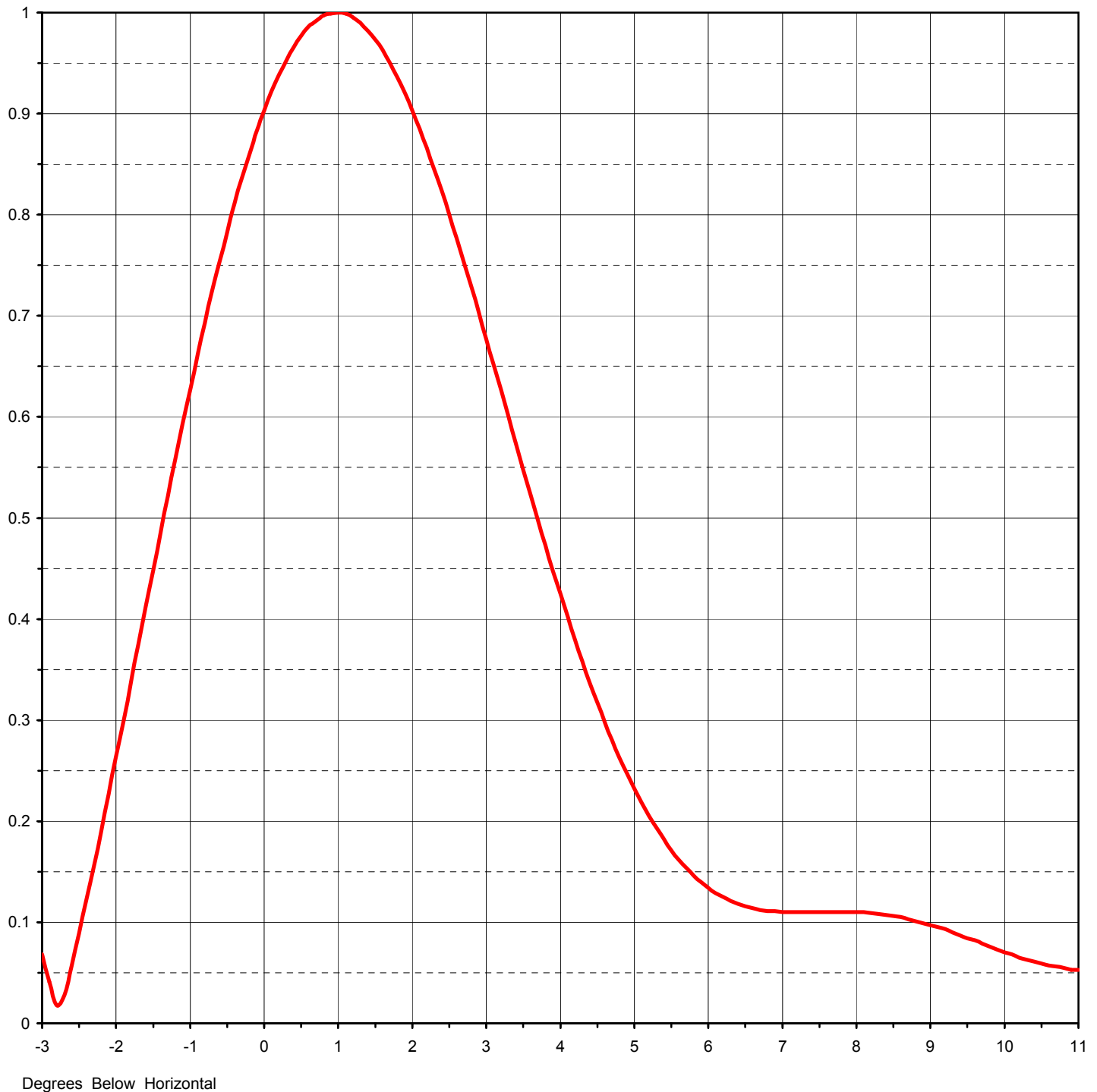


Proposal Number	978:4:152932
Date	19-Aug-02 EXHIBIT THREE
Call Letters	WBSC-DT Channel 14
Location	Anderson, SC
Customer	Sinclair Broadcast Group
Antenna Type	TFU-16DSC-R T200SP

ELEVATION PATTERN

RMS Gain at Main Lobe	13.00 (11.14 dB)
RMS Gain at Horizontal	10.60 (10.25 dB)
Calculated / Measured	Calculated

Beam Tilt	1.00 deg
Frequency	473.00 MHz
Drawing #	16Q130100



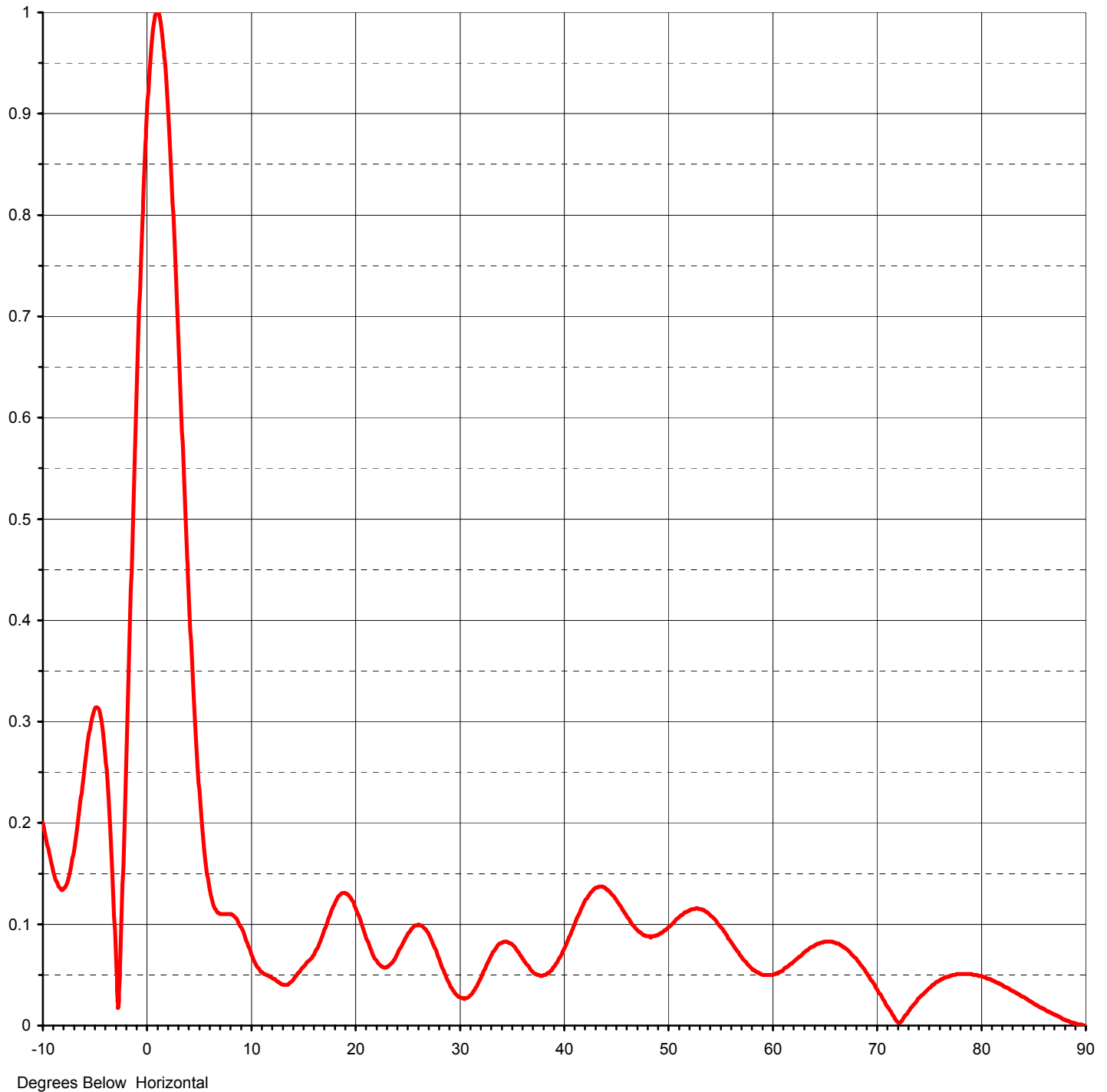


Proposal Number **978:4:152932**
Date **19-Aug-02** **EXHIBIT FOUR**
Call Letters **WBSC-DT** Channel **14**
Location **Anderson, SC**
Customer **Sinclair Broadcast Group**
Antenna Type **TFU-16DSC-R T200SP**

ELEVATION PATTERN

RMS Gain at Main Lobe **13.00 (11.14 dB)**
RMS Gain at Horizontal **10.60 (10.25 dB)**
Calculated / Measured **Calculated**

Beam Tilt **1.00 deg**
Frequency **473.00 MHz**
Drawing # **16Q130100-90**





Proposal Number **978:4:152932**

Date **19-Aug-02** **EXHIBIT FIVE**

Call Letters **WBSC-DT** Channel **14**

Location **Anderson, SC**

Customer **Sinclair Broadcast Group**

Antenna Type **TFU-16DSC-R T200SP**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **16Q130100-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.200	2.4	0.823	10.6	0.059	30.5	0.026	51.0	0.106	71.5	0.010
-9.5	0.175	2.6	0.777	10.8	0.056	31.0	0.029	51.5	0.110	72.0	0.003
-9.0	0.152	2.8	0.728	11.0	0.053	31.5	0.035	52.0	0.113	72.5	0.007
-8.5	0.137	3.0	0.677	11.5	0.050	32.0	0.045	52.5	0.115	73.0	0.014
-8.0	0.135	3.2	0.626	12.0	0.048	32.5	0.056	53.0	0.115	73.5	0.021
-7.5	0.147	3.4	0.574	12.5	0.044	33.0	0.067	53.5	0.114	74.0	0.027
-7.0	0.174	3.6	0.522	13.0	0.041	33.5	0.076	54.0	0.110	74.5	0.032
-6.5	0.212	3.8	0.473	13.5	0.040	34.0	0.081	54.5	0.105	75.0	0.037
-6.0	0.255	4.0	0.425	14.0	0.044	34.5	0.083	55.0	0.099	75.5	0.041
-5.5	0.292	4.2	0.379	14.5	0.051	35.0	0.081	55.5	0.092	76.0	0.045
-5.0	0.313	4.4	0.337	15.0	0.057	35.5	0.075	56.0	0.084	76.5	0.047
-4.5	0.307	4.6	0.298	15.5	0.063	36.0	0.068	56.5	0.076	77.0	0.049
-4.0	0.266	4.8	0.263	16.0	0.069	36.5	0.060	57.0	0.069	77.5	0.050
-3.5	0.186	5.0	0.232	16.5	0.078	37.0	0.054	57.5	0.063	78.0	0.051
-3.0	0.068	5.2	0.205	17.0	0.091	37.5	0.050	58.0	0.057	78.5	0.051
-2.8	0.018	5.4	0.182	17.5	0.106	38.0	0.049	58.5	0.053	79.0	0.051
-2.6	0.057	5.6	0.162	18.0	0.119	38.5	0.052	59.0	0.051	79.5	0.050
-2.4	0.122	5.8	0.146	18.5	0.128	39.0	0.057	59.5	0.050	80.0	0.049
-2.2	0.191	6.0	0.134	19.0	0.131	39.5	0.064	60.0	0.050	80.5	0.047
-2.0	0.264	6.2	0.125	19.5	0.128	40.0	0.074	60.5	0.052	81.0	0.045
-1.8	0.338	6.4	0.118	20.0	0.118	40.5	0.085	61.0	0.054	81.5	0.042
-1.6	0.412	6.6	0.114	20.5	0.105	41.0	0.098	61.5	0.058	82.0	0.040
-1.4	0.486	6.8	0.111	21.0	0.090	41.5	0.110	62.0	0.062	82.5	0.037
-1.2	0.558	7.0	0.110	21.5	0.076	42.0	0.121	62.5	0.067	83.0	0.034
-1.0	0.627	7.2	0.110	22.0	0.065	42.5	0.129	63.0	0.071	83.5	0.031
-0.8	0.693	7.4	0.110	22.5	0.059	43.0	0.135	63.5	0.075	84.0	0.028
-0.6	0.755	7.6	0.110	23.0	0.057	43.5	0.137	64.0	0.078	84.5	0.025
-0.4	0.811	7.8	0.110	23.5	0.061	44.0	0.136	64.5	0.081	85.0	0.022
-0.2	0.860	8.0	0.110	24.0	0.069	44.5	0.132	65.0	0.083	85.5	0.019
0.0	0.903	8.2	0.109	24.5	0.079	45.0	0.125	65.5	0.083	86.0	0.016
0.2	0.939	8.4	0.107	25.0	0.088	45.5	0.118	66.0	0.082	86.5	0.013
0.4	0.966	8.6	0.105	25.5	0.096	46.0	0.110	66.5	0.079	87.0	0.011
0.6	0.986	8.8	0.101	26.0	0.099	46.5	0.102	67.0	0.076	87.5	0.008
0.8	0.997	9.0	0.097	26.5	0.098	47.0	0.095	67.5	0.071	88.0	0.006
1.0	1.000	9.2	0.093	27.0	0.092	47.5	0.091	68.0	0.066	88.5	0.004
1.2	0.995	9.4	0.087	27.5	0.081	48.0	0.088	68.5	0.059	89.0	0.002
1.4	0.982	9.6	0.082	28.0	0.068	48.5	0.088	69.0	0.052	89.5	0.001
1.6	0.963	9.8	0.079	28.5	0.055	49.0	0.089	69.5	0.044	90.0	0.000
1.8	0.936	10.0	0.073	29.0	0.043	49.5	0.092	70.0	0.036		
2.0	0.903	10.2	0.068	29.5	0.034	50.0	0.096	70.5	0.027		
2.2	0.866	10.4	0.063	30.0	0.028	50.5	0.101	71.0	0.019		

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WMYA-DT, ANDERSON, SOUTH CAROLINA
CHANNEL 14, 430 kW ERP, 286.6 m HAAT
JUNE, 2006

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WMYA-DT	DT	14	473	H	283.6	430.000	0.300	0.01607	0.315	5.10%
WMYA-TV	TV	40	629	H	308	2570.000	0.300	0.04073	0.419	9.71%
WROQ	FM	266	101.1	H & V	295	100.000	1.000	0.07678	0.200	38.39%
WJMZ-FM	FM	297	107.3	H & V	296	100.000	1.000	0.07626	0.200	38.13%
TOTAL PERCENTAGE OF ANSI VALUE=										91.33%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*