

# **STA - COMPREHENSIVE ENGINEERING STATEMENT**

prepared for

**Washington DC FCC License Sub, LLC**

WTOP-FM Washington, DC

Facility ID 11845

Ch. 278B 15 kW (Proposed)

## **Extraordinary Circumstances for STA**

*Washington DC FCC License Sub, LLC (WTOP-FM)* herein requests an STA to operate in variance with their licensed parameters. *WTOP-FM* is currently participating in a master antenna system rebuild on the WAMU(FM) tower<sup>1</sup>, for which the station planned to modify their existing license. Due to some technical difficulties with the filtering of the directional portion of the antenna, the station requests the ability to operate at reduced power (15 kW) from the non-directional input of the antenna system until the directional filtering ports can be re-engineered.

The attached **Figure 1** shows that the proposed STA contour falls within the currently licensed F(50,50) 60 dB $\mu$  contour, so as not to cause unauthorized contour overlap with other co-channel or first-adjacent stations.

## **Environmental Considerations**

The instant proposal is not believed to have a significant environmental impact as defined under §1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required. The *WTOP-FM* proposed STA facility remains on the tower with ASRN 1045309 at a power level significantly reduced from the current level.

The use of existing antenna support structures has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. No change in structure height is proposed, thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

The applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

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<sup>1</sup> See antenna system described in File No. BPED-20190128ABV