

Statement A
NATURE OF THE PROPOSAL
prepared for
Peak Media Of Pennsylvania Licensee LLC
WWCP-TV Johnstown, Pennsylvania
Facility ID: 20295
Ch. 8 9.3 kW (MAX-DA) 368 m

Peak Media Of Pennsylvania Licensee LLC (“*Peak*”) is the licensee of digital television station WWCP-TV, Johnstown, Pennsylvania. *Peak* has replaced the aging WWCP-TV antenna and transmission line. Because the new directional antenna pattern does not exceed the licensed directional pattern at any azimuth and there is no change in effective radiated power (“ERP”), the antenna replacement complies with §73.1690(c)(3) of the FCC Rules which permits this change by filing a License Application. In keeping with the rule, the pertinent antenna specifications have been attached as an exhibit.

Although there will be no change in the physical location of the antenna, *Peak* also seeks slight corrections in coordinates and height to make data shown license consistent with that of Antenna Structure Registration 1026534. Because these corrections are less than three-seconds in latitude and longitude and less than two meters in height, they are believed to comply with §73.1690.

The new antenna has a different elevation pattern. Consequently, the following study was conducted to demonstrate continued compliance of the WWCP-TV facility with FCC Rules regarding radiofrequency exposure.

The WWCP-TV operation was evaluated for human exposure to radiofrequency energy using the procedures outlined in the Commission’s OET Bulletin No. 65 (“OET 65”). OET 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in §1.1310. Under present Commission policy, a facility may be presumed to comply with the limits specified in §1.1310 if it satisfies the exposure criteria set forth in OET 65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The installed WWCP-TV antenna has a center of radiation 84 meters above ground level. An ERP of 9.3 kilowatts, horizontally polarized, is employed. According to information provided by the WWCP-TV antenna manufacturer, there is a maximum relative field value of

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30 percent or less from 20 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 30 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for Channel 8 (center frequency 183 MHz) is 200 $\mu\text{W}/\text{cm}^2$.

OET 65’s formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the *average* power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (9) in OET 65.

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

<i>S</i>	=	power density in microwatts/cm ²
<i>ERP</i>	=	total (average) ERP in Watts
<i>F</i>	=	relative field factor
<i>D</i>	=	distance in meters

Using this formula, the proposed facility would contribute a power density of 4.2 $\mu\text{W}/\text{cm}^2$ at two meters above ground level near antenna support structure, or 2.1 percent of the general population/uncontrolled limit. At ground level locations away from the base of the tower, the calculated RF power density is even lower, due to the increasing distance from the transmitting antenna.

§1.1307(b)(3) states that facilities at locations with multiple transmitters are categorically excluded from responsibility for taking any corrective action in the areas where their contribution is less than five percent. Since the instant situation meets the five percent exclusion test at all ground level areas, the impact of any other facilities using this site may be considered independently from this proposal. Accordingly, the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas at ground level near the antenna supporting structure.

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Consequently, members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, tower access will continue to be restricted and controlled through the use of a locked fence. Additionally, appropriate RF exposure warning signs will continue to be posted.

With respect to worker safety, based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy will continue to be employed protecting maintenance workers from excessive exposure when work must be performed on the tower in areas where high RF levels may be present. Such protective measures may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas. The applicant will coordinate exposure procedures with all pertinent stations.

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules, hence preparation of an Environmental Assessment is not required.