

**Environmental Statement**

This license modification application is the result of preparing a Form 2100, Schedule 381 Incentive Auction Certification for Class A TV Station WRMD-CD, D49, Tampa, FL. At the time the application for construction permit and license to cover that construction permit were prepared, there was a taller tower atop to the Park Tower belonging to Entravision, Antenna Structure Registration (ASR) number 1254059. However, that tower has been removed, leaving the WRMD-CD rooftop tower as the tallest structure atop the 36-story Park Tower. The tower supporting the side-mounted WRMD-CD transmitting antenna is attached to the side of a rooftop penthouse, and extends 10.7 meters (35 feet) above the penthouse, with the center-of-radiation of the WRMD-CD Antenna Concepts Model ACS12E omnioid antenna at 7.6 meters (25 feet) above the penthouse. Normally this would have required WRMD-CD to obtain an ASR, since at 147.5 m (484 feet) AGL the Park Tower is greater than 61.0 m (200 feet) AGL in height, and the penthouse tower extends the height of the building by more than 6.1 m (20 feet).

Although at one time the Park Tower was the tallest building in Tampa, that is no longer the case. Across the street is now the Bank of America Plaza building, a 42-story structure. Wikipedia reports the height of the Bank of America Plaza building as 175.9 m (577 feet) AGL, which makes that structure 17.7 m (58 feet) taller than the top of WRMD-CD tower bolted to the side of the Park Tower penthouse. Section 17.14 of the FCC rules exempts antenna structures that would be shielded by existing structures of a permanent and substantial character, and would be located in the congested area of a city, town, or settlement where it is evident beyond all reasonable doubt that the structure so shielded will not adversely affect safety in air navigation. As shown by the attached Figure 1, that is the case for the WRMD-CD tower atop the Park Tower with respect to the Bank of America Plaza building. Therefore it is believed that no FAA notification, and no FCC ASR, are needed for the now single remaining tower on the roof of the Park Tower.

There was another ASR for the Park Tower, when CBS had a tower on the roof of that structure, ASR Number 1031700, which was dismantled on January 24, 2011. That is the ASR of record for WRMD-CD. Further, it has been determined that ASR had incorrect coordinates (which WRMD-CD used), plotting to Lykes Gaslight Park on an adjacent block rather than to the Park Tower.

This license modification application therefore seeks to:

1. Correct the station coordinates from 27-56-51.0 N, 82-27-33 W, NAD27, to 27-56-49.9 N, 82-27-34.7 W, NAD27 (27-56-51.0 N, 82-27-34.0 W, NAD83), a shift of no more than  $\pm 3$  seconds in latitude and longitude, as allowed by Section 73.1690(c)(11) of the FCC rules. (These are the coordinates of the now dismantled ASR1254059, which are judged to be accurate.)

## Class A Station WRMD-CD • DTV Channel D49 • Tampa, Florida

### Environmental Statement

2. Correct the site elevation from 4.9 meters AMSL to 4.5 meters AMSL. (This is the site elevation of record for the now dismantled ASR1254059.) Although there is no physical change in the center-of-radiation height of the WRMD-CD transmitting antenna, it is now believed that the as-built C.O.R. height is 155.2 m AGL and 159.7 m AMSL, versus the of-record C.O.R. heights of 154.8 m AGL/159.7 m AMSL. That is, the correction of the site elevation cancels out the correction of the AGL height, leaving no change in the AMSL height.
3. Correct the license to change the associated ASR from 1031700 to “none.”

Because these are permissive changes for a licensed facility when there is no change in the physical location and height of the antenna, it is believed that no Engineering Special Temporary Authority (STA) is needed.

Grant of this license modification application would not constitute a major environmental action. The transmitting antenna is an existing antenna side-mounted on an existing rooftop tower that does not require an ASR. No Section 1.1307 conditions triggering major environmental action status are believed to exist.

The proposed operation would continue to comply with FCC guidelines governing human exposure to radio frequency energy, since there is no physical change of the transmitting antenna. The maximum predicted ground-level radio frequency power density for the proposed operation is 0.047% of the 0.455 mW/cm<sup>2</sup> public exposure limit applying at TV Channel 49. Since this is less than 5% of the public limit, the applicant is categorically excluded by Section 1.1307(b)(3) of the FCC rules from having to consider the contributions of other stations at or near the site.

When studied on an OET-69 basis using 1 km x 1 km cells and 1 point/km of terrain extraction, the slightly changed values for the existing operation, based on the corrected coordinates, is not predicted to cause greater than 0.5% incremental interference to any full-service TV station or Class A station, nor greater than 2% incremental interference to any LPTV or TV Translator station. If an OET-69 interference study is deemed necessary for a permissive license modification, processing on that basis is requested.

The Park Tower tower is 1,525 km from the Canadian border, 1,470 km from the Mexican border. Therefore, no Mexican or Canadian coordination issues apply. The closest FCC Monitoring Station is Vero Beach, Florida, at 184 km distant and therefore not a conflict.



**Class A TV Station WRMD-CD • Channel D49 • Tampa, Florida**

**Location of Park Tower vs. Taller Bank of American Plaza  
in Downtown Tampa**

