

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

### **Supplemental Information to Schedule 381 Filing**

In preparing this Form 2100, Schedule 381 Incentive Auction Certification for Class A TV Station WRMD-CD, D49, Tampa, FL, several discrepancies were discovered; however, all of the discrepancies are within the permissive change provisions of Section 73.1690 of the FCC rules. Therefore, a license modification application has been separately filed, and it is believed that no application for Construction Permit and application for an Engineering Special Temporary Authority (STA) are needed.

At the time the application for construction permit and license to cover that construction permit were prepared, there was a taller tower atop the 36-story 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 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.



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A separately filed 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.)
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.

The tower bolted to the side of the penthouse belongs to ZGS. No evidence could be found that a structural study was done, apparently because of the modest nature of the tower and its short height. Schedule 381 requires a year for the structural study to be selected in order to file the form, but in this case no structural study is believed to exist. In order to allow filing the form, the year of 2002, when WZDC-CD first operated on TV Channel 49, was selected.



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

