

Environmental Statement

This license modification application is the result of preparing a Form 2100, Schedule 381 Incentive Auction Certification for Class A TV Station WZDC-CD, D25, Washington, DC. At the time the application for construction permit and license to cover that construction permit were prepared, there was a single Antenna Structure Registration (ASR), number 103610, for the two immediately-adjacent towers at 4001 Nebraska Avenue NW, Washington, DC, and both towers were owned by NBC. The taller tower was 201.8 m AGL, and the height of the shorter tower was reported as 134.1 m AGL. The WZDC-CD transmitting antenna is on the shorter tower. However, the shorter tower is now owned by American Tower, and that structure now has its own ASR, number 1285336. ASR1285336 reports coordinates of 38-56-24.2 N, 77-04-52.5 W, NAD83, which differ from the ASR1036610 coordinates by +0.2 seconds in latitude and -0.5 seconds in longitude. The of-record ground elevation is slightly higher, at 119.5 m AMSL, versus 117.9 m AMSL for ASR2036610. Finally, the ASR of-record height for the shorter tower is 135.0 m AGL rather than the previously reported overall tower height of 134.1 m AGL. There is no change to the physical location or height of the as-built WZDC-CD transmitting antenna, which in all other respects continues to comply with the station authorization. This application therefore seeks to:

1. Correct the station coordinates from 38-56-23.6 N, 77-04-54.1 W, NAD27, to 38-56-23.8 N, 77-04-53.6 W, NAD27 (38-56-24.2 N, 77-04-52.5 W, NAD83), a shift of no more than ± 3 seconds in latitude and longitude, as allowed by Section 73.1690(c)(11) of the FCC rules.
2. Correct the site elevation from 117.9 meters AMSL to 119.5 meters AMSL. Although there is no-change in the 62.5 meter AGL center-of-radiation height of the transmitting antenna, the AMSL height changes by +1.6 m, from 180.4 m AMSL to 182.0 m AMSL, and the height above average terrain changes from 112.5 m AMSL to 114.9 m AMSL (USGS 3-second terrain data, 8-radial average). This is within the +2/-4 meter window allowed by Section 73.1690 of the FCC rules.

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 believe 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 tower that has 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 1.0% of the 0.359



Class A Station WZDC-CD • DTV Channel D25 • Washington, DC

Environmental Statement

mW/cm² public exposure limit applying at TV Channel 25. 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 and corrected height, 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 American Tower tower is 456 km from the Canadian border, and 2,361 km from the Mexican border. Therefore, no Mexican or Canadian coordination issues apply. The closest FCC Monitoring Station is Laurel, Maryland, at 33.6 km distant and therefore not a conflict.

