

DECLARATION OF FREDERICK VOBBE

I, Frederick Vobbe, do make the following Declaration in support of the request of West Central Ohio Broadcasting, Inc. for a waiver of the 90-day application filing deadline for its station WOHL-CD, Lima, Ohio (“the Station”) in connection with the repacking process associated with the broadcast television spectrum incentive auction.

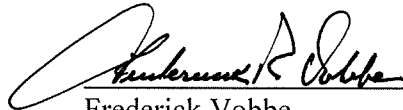
1. I have been employed with Block Communications, Inc. broadcast companies for 32 years. Block Communications, Inc. is the parent company of West Central Ohio Broadcasting, Inc. I serve as the Chief Engineer for the Station and in the same capacity for the Station’s sister broadcast companies operating in Lima, Ohio. I am the person principally responsible for the Station’s broadcast facilities.
2. By letter dated February 8, 2017, the FCC advised West Central Ohio Broadcasting, Inc. that the Station is being reassigned from its existing channel 35 to new channel 15.
3. The Station’s facility ID is 68549. Its broadcast facilities, including a 500-foot tower (approximately 550-foot including the Station’s top antenna), transmitter, master control, studio, and offices are located at 1424 Rice Avenue, Lima, Ohio 45805 (“the Site”), a residential neighborhood within the city of Lima. The Site consists of approximately four acres making up one city block bounded by Rice Avenue, N. Woodland Avenue, Leland Avenue, and N. Rosedale Avenue. Occupied residential homes are located on each of those streets immediately adjacent to the Site. An aerial photograph of the Site is attached to this Declaration as Exhibit A.
4. The Station’s tower (FCC Antenna Structure Registration Number 1014519) was originally constructed in January of 1964, more than 50 years ago.¹ Following receipt of the FCC’s letter notifying the Station that it would be moving from channel 35 to channel 15, I commissioned a rigorous structural analysis of the Station’s tower by Malouf Engineering Int’l, Inc. (“Malouf Engineering”), an experienced structural engineering firm. I asked Malouf Engineering to determine whether, under the most recent and governing building standards set forth at ANSI/TIA-222-G (“the 222-G Tower Standard”), the tower would support the new antenna for channel 15, the necessary related equipment and facilities for new channel 15, as well as the other broadcast facilities now on the tower.
5. The 222-G Tower Standard is applicable in Ohio pursuant to the Ohio Basic Building Code, found at Ohio Administrative Code Section 4101:1-35-01.
6. In addition to the current channel 35 antenna, the tower now hosts the antenna for WOHL-CD’s sister station, WLIO(DT), operating on channel 8. WLIO is not being repacked. The tower also holds the antennas for WLQP-LP (channel 25) and WLMO-LP (channel 38), two low power stations operating on an analog signal serving a segment of the DMA pursuant to Special Temporary Authorizations.

¹ See FCC Application A0287636 for Antenna Structure Registration Number 1014519.

7. Malouf Engineering performed the rigorous structural analysis for the following scenarios: first, channel 15 at the top, and channel 8 side-mounted; second, channel 8 at the top, and channel 15 side-mounted; and, third, both of the foregoing scenarios with a third antenna for channel 35 to operate on an interim basis while the work to transition from channel 35 to channel 15 was taking place. The antennas for the two low power stations are located far enough down on the tower that they are not contributing factors to tower stress.
8. Malouf Engineering determined that in each scenario, the tower would be overstressed, failing to meet the 222-G Tower Standard. Because of the age and configuration of the tower on a compact urban site, Malouf Engineering could not confirm that the tower would meet the 222-G Tower Standard even if reinforcing measures were undertaken in an effort to strengthen the tower. One of the factors Malouf Engineering identified as a cause of this problem is the very steep guy wire angles (approximately 30 degrees) which were employed when the tower was originally constructed more than fifty years ago to keep the tower facilities within the confines of the Site. Construction standards today would require guy wires at 45 degree angles and, at the current Site, require locating the guy wire anchors across one or more of the public streets on the adjoining residential property.
9. I also have been advised by a reputable tower contractor with more than 40 years of experience that if reinforcement attempts were to be undertaken (e.g., replace the tower's diagonal and horizontal bracing, wrap the legs in steel, replace the guy wires with wires of wider diameter, and add more mass to the anchors), the tower contractor would require the Site to be completely unoccupied during all construction work for safety reasons. Construction is estimated to last a period of 4 to 8 weeks or more depending on the weather. In addition, because the "fall radius" of the tower extends into the surrounding neighborhood, the contractor would want the homes in the surrounding area to be unoccupied as well. That is obviously not a matter within the control of the Station, even if it were practical, which it is not.
10. Moreover, even if the tower could be retrofitted and the surrounding homes temporarily evacuated, during construction both WOHL-CD and WLIO would either be off the air, or the cost of interim facilities would be cost prohibitive. I have estimated the cost of interim facilities for equipment alone to be approximately \$6.4 million because the interim facilities would include offices, a studio, a master control, a leased tower, transmitters and antennas. And finally, even if temporary facilities could be found for WOHL-CD and WLIO, it is certain that they would have to operate at a much lower power level and be unable to cover the entire DMA.
11. For these reasons, the Station has determined that the best, most cost-effective solution is to find a new location upon which to build a new tower that meets the 222-G Tower Standard. That solution requires the Station to identify and purchase land. The Station is diligently pursuing this course of action, but at the present time the Station does not have a tower location identified. Knowing the location for its new tower is a prerequisite for the Station to (i) determine the facilities needed to broadcast within the permissible

contour coverage variance as allowed by the FCC, (ii) develop reasonable cost estimates, and (iii) apply for a construction permit.

12. West Central Ohio Broadcasting, Inc. therefore requests a waiver of the 90-day filing application deadline for the Station in connection with the repacking process for broadcast television stations.

 June 7, 2017
Frederick Vobbe Date

