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**WHYY INCORPORATED**

**PHILADELPHIA, PA**

**LICENSEE OF WHYY-DT CHANNEL 12**

**WILMINGTON, DELAWARE**

**FCC Facility ID #72338**

**FCC FILE No. BLEDT-20110907ADS**

**APPLICATION FOR A CP TO OPERATE ON CHANNEL 13 POST  
TVREPACK**

**RFR EXHIBIT**

**July 3, 2017**

**WHYY INCORPORATED**  
**LICENSEE OF WHYY-DT CHANNEL 12**  
**APPLICATION FOR A CP TO OPERATE ON CHANNEL 13 POST TVREPACK**  
**FCC FILE No. BLEDT-20110907ADS**

**RFR EXHIBIT**

**RFR STATEMENT**

This application for a new Construction Permit (CP) to specify operation on TV Channel 13 post TV Repack. As outlined below, WHYY Incorporated, Licensee of WHYY-TV is currently in full compliance with the RFR energy requirements of 47 CFR 1.1310.

The post transition operation of WHYY-DT will be on Channel 13 with 30 kW MAX DA ERP and with horizontal polarization. This operation, when combined with the previous shutdown of WHYY-TV operating on Channel 12 at 30 kW MAX DA results in a “no change” of existing RFR levels on and in the immediate vicinity of the multiple use tower.

Further, as part of the 2009 WHYY License renewal process for co-located companion WHYY-FM, WHYY Incorporated commissioned a complete RFR measurement study at the WHYY-TV/FM antenna site. The results of that study, which are in the station engineering files, indicated there were no locations where RFR levels, in the immediate vicinity of the multiple use antenna structure, exceeded the allowable RFR exposure levels for the general public/uncontrolled environment. WHYY Incorporated plans to conduct a new RF Safety study after the completion of the conversion from CH

12 to CH 13 and will place the results in the station engineering file. The tower itself is posted with the appropriate RF Safety signage and surrounded by a locked fence system.

Since the total RFR energy contributed by WHYY-TV on Channel 13 and the ERP and azimuth and elevation patterns will not be altered significantly, the resultant RFR energy levels on and near this multiple use tower will remain essentially the same as previously recorded on June 12, 2009, WHYY Incorporated will continue to be in full compliance with FCC OET-69 and FCC 47 CFR 1.1310.