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Engineering Statement

Minor Modification of WFLD
Chicago, IL
Channel 24
October 29, 2017

This Engineering Statement has been prepared on behalf of the Fox Television Stations, LLC (FOX), licensee of television station WFLD and permittee of Construction Permit File Number 0000027828 Facility ID #22211 at Chicago, Illinois. The statement was prepared in support of a Minor Amendment to the outstanding Construction Permit for the FCC's "Maximization Window" filing as herein proposed.

The instant application proposes only to increase WFLD's ERP to 1,000 kW. The proposed increase is in accordance with Section 73.622(f)(5), to achieve a coverage area on par with the "largest station in the market". The WFLD proposed facility at 1,000 kW appears to be smaller than WLS, Channel 44, licensed to Chicago, Illinois.

Determination of the "Largest Station in the Market"

It appears from an analysis of the stations that are licensed to communities located in the Chicago, Illinois Designated Market Area (DMA) that the largest station in geographic area is WLS, channel 44, Chicago, Illinois with a predicted coverage area of 39,090.7 square kilometers.

The instant application to increase WFLD's ERP to 1,000kW results in a predicted coverage area of 35,330.0 square kilometers. Clearly WFLD is entitled, according to Section 73.622(f)(5), to the proposed increase in its ERP to 1,000 kW .

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The parameters of the proposed facility are as follows:

Proposed Parameters:

Transmitter Location:	41° 52' 44.10" N 87° 38' 10.20" W (NAD 83)
Channel:	24
ERP:	1,000 KW
Antenna Pattern:	Directional
Antenna Manufacturer:	ERI
Antenna Model:	ATW13H3-ETC2-24H
Antenna RCAGL:	474 Meters
Overall Structure AGL:	527.3 Meters
RCAMSL	655.4 Meters
ASRN:	1032959

Interference Study:

An interference study was undertaken utilizing the FCC's TVStudy program to analyze the co-channel and adjacent channel interference scenarios for the new proposal. A copy of the results from the TVStudy analysis is attached hereto.

The results of the study indicated that no impermissible interference would result from the proposed operations.

Based upon the forgoing interference study, it is believed that the proposed facility can operate without any impermissible interference to other stations.

RF Exposure Study:

Furthermore, a study was conducted to determine compliance with the RF Radiation Maximum Permissible Exposure (MPE) limits of the proposed operation. The study was conducted using the methodology outlined in the FCC's OET Bulletin 65 regarding RF Radiation Compliance.

The transmitter site owner, Willis Tower, has a comprehensive RFR safety and measurement program in place for all users of the site. The site owner will conduct extensive measurements of the site during the testing of the facilities in cooperation with all stations and licensees on the tower in order to ensure compliance with all applicable RF Exposure Limitations. However, the instant modification application proposes an ERP the same as the existing pre-repack channel. Consequently, no significant change in WFLD's contribution to the overall maximum permissible exposure is anticipated.

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Based upon the forgoing it is believed that the proposed facility is in compliance with the required RF Exposure limits.

Furthermore, the licensee and all station personnel and contractors are required to follow appropriate safety procedures before the commencement of any work on the tower or in close proximity to the antenna. These procedures including reducing power or turning off the transmitter before any work is undertaken at the site. The licensee in coordination with any other users of the site must reduce power or cease operations as necessary to ensure workers having access to the site, tower, and antenna locations are not exposed to RF Radiation levels in excess of those prescribed by FCC Guidelines.

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Dennis W. Wallace C.B.T.E.
Meintel, Sgrignoli, & Wallace, LLC
1282 Smallwood Drive
Suite 372
Waldorf, MD 20603
(202) 251-7589
dennis.wallace@mswdtv.com