

TECHNICAL SUMMARY
SPECIAL DISPLACEMENT WINDOW
APPLICATION FOR CONSTRUCTION PERMIT
LOW POWER DIGITAL STATION WLZE-LD
FORT MYERS, FLORIDA
CHANNEL 27 15 KW (ND)

1. Application Purpose: The instant application is a special displacement window application for WLZE-LD currently on channel 20 at Fort Myers, Florida (LMS File No. 0000019273).¹ As detailed below, WLZE-LD is eligible for displacement due to impermissible interference caused and received with the authorized operation of full power station WVEA-TV on repacked channel 20 at Tampa, Florida (LMS File No. 0000034006). Therefore, it is proposed to operate WLZE-LD on “in core” channel 27 with a nondirectional antenna maximum effective radiated power (ERP) of 15 kW using a SWR model LP16/27 horizontally polarized nondirectional antenna. The antenna radiation center height will be 374.8 m AMSL. There will be no change in the overall structure height (ASRN 1213076).

2. Eligibility to File in Special Displacement Window: Station WLZE-LD is eligible to file in the special displacement window as it was operating with its currently licensed facilities (LMS File No. 0000019273) prior to April 13, 2017 – the release date of the *Closing and Channel Reassignment Public Notice*.² In addition, WLZE-LD is considered to be displaced due to impermissible interference caused and received with the authorized operation of full power station WVEA-TV on repacked channel 20 at Tampa, Florida (LMS File No. 0000034006). Specifically, as indicated by the attached *TVStudy* report summary, WLZE-LD’s licensed channel 20 operation is predicted to cause up to 7.35% new interference to WVEA-TV (up to 0.5% new interference is permitted) and will receive 8.33% new interference from WVEA-TV (a 2% threshold was used by the FCC for determination of displacement in the FCC Special Displacement Window PN).

¹ See FCC Public Notice dated February 9, 2018 entitled “*Incentive Auction Task Force and Media Bureau Announce Post-Incentive Auction Special Displacement Window April 10, 2018 through May 15, 2018 and Make Location and Channel Data Available*” (DA 18-124, MB Docket No. 16-306, GN Docket No. 12-268) (“FCC Special Displacement Window PN”).

² See *Media Bureau Announces Date by Which LPTV and TV Translator Stations Must Be “Operating” In Order to Participate In Post-Incentive Auction Special Displacement Window, Public Notice*, 31 FCC Rcd 5383 (MB 2016).

3. Interference Compliance: As indicated in the attached *TVStudy* analysis, WLZE-LD's proposed channel 27 displacement operation will not cause interference to the predicted service of: (1) all other primary users in the repacked TV Band or in adjacent bands including land mobile operations, (2) licenses and valid construction permits for LPTV stations, (3) licenses and valid construction permits for full power and Class A stations that were not reassigned, (4) the post-auction channels of reassigned full power and Class A stations as reflected in the *Closing and Reassignment Public Notice* and (5) the alternative channels and expanded facilities proposed during the two filing windows by reassigned full power and Class A stations. A cell size of 1.0 km and a profile resolution of 1.0 points/km were utilized for the *TVStudy* analysis.

4. RFR Compliance: The proposed facilities were evaluated in terms of potential radiofrequency radiation (RFR) exposure at ground level to workers and the general public. The radiation center for the proposed DTV antenna will be located 366 meters above ground level. The total DTV ERP is 15 (horizontal polarization). A worst case vertical plane relative field value of 1.0 is presumed for the antenna's downward radiation (-60° to -90° elevation). The calculated power density at a point 2 meters above ground level is 3.8 uW/cm^2 which is 1.0% of the FCC's recommended limit of 367.3 uW/cm^2 for channel 27 for an uncontrolled environment. Thus, as this is less than the 5% threshold value, it is believed that the WLZE-LD facility is in full compliance with the FCC's requirements with regard to radio frequency radiation exposure.

Access to the transmitting site will be restricted and appropriately marked with RFR warning signs. Furthermore, as this is a multi-user site, a formal RFR protection protocol is in effect in the event that workers or other authorized personnel enter the restricted area or climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to RFR exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.