

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAGING SYSTEMS, INC., licensee of digital Low Power Television Station WLMF-LD, Channel 51 in Miami, Florida, in support of its displacement Application for Construction Permit to specify operation on Channel 20. This station is being displaced as a result of the spectrum auction and the relocation of upper UHF channel television stations to the band between Channels 14 and 36. No change in site location, effective radiated power, or antenna height is proposed herein. [It is also important to note that WLMF-LD has an outstanding construction permit to move to Channel 39 (BDISDTL-20110831ACI). However, this channel has been auctioned as well and cannot be constructed.]

It is proposed to mount a broadband panel directional antenna at the 240.8-meter level of the existing 318.2-meter communications tower on which the licensed WLMF-LD antenna is located. The proposed effective radiated power for the facility is 15.0 kW in the horizontal plane, which is the present power level of WLMF-LD. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted.

Included in a separate showing is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed both a cell size and increment spacing of 1.0 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed WLMF-LD facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities, except to the pre-repack facility of WLRN-DT, Channel 20 in Miami (BLEDT-20090611ABR).

EXHIBIT A

However, WLRN-DT has been allotted repack Channel 26 in Miami and the instant proposal protects that new facility. Since operation of WLMF-LD on proposed Channel 20 is contingent upon the move of WLRN-DT to its post-repack facility on Channel 26, the instant applicant requests a waiver of the Commission's "contingent application Rule", which the FCC has said it will entertain during this LPTV displacement filing window.

A detailed power density calculation is provided in Exhibit C.

Since no change in the overall height or location of the existing WLMF-LD tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, the FCC assigned Antenna Structure Registration Number 1027529 to this structure.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



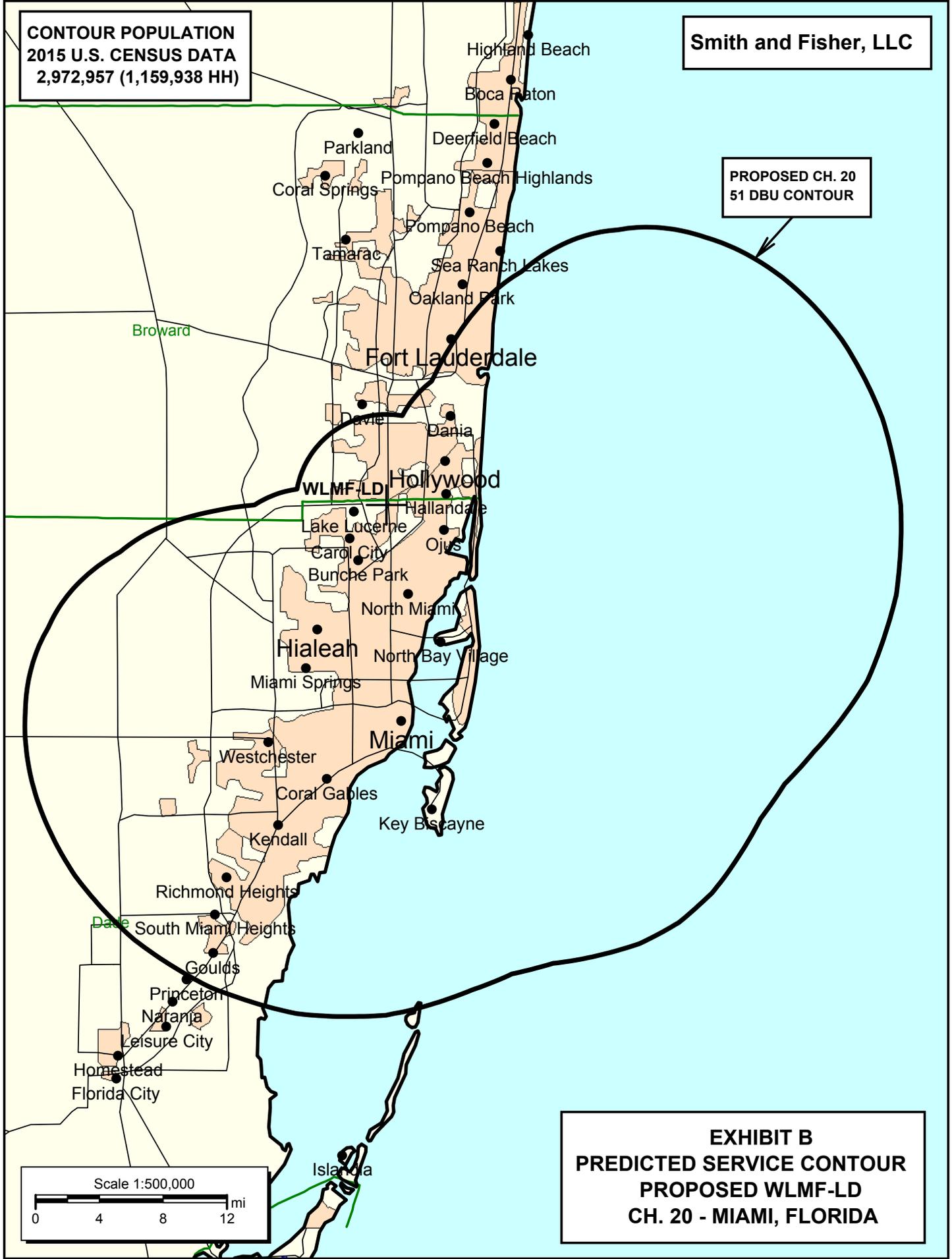
KEVIN T. FISHER

April 13, 2018

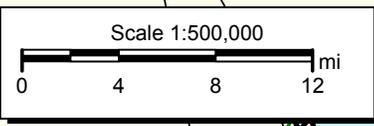
**CONTOUR POPULATION  
2015 U.S. CENSUS DATA  
2,972,957 (1,159,938 HH)**

**Smith and Fisher, LLC**

**PROPOSED CH. 20  
51 DBU CONTOUR**



**WLMF-LD**



**EXHIBIT B  
PREDICTED SERVICE CONTOUR  
PROPOSED WLMF-LD  
CH. 20 - MIAMI, FLORIDA**

POWER DENSITY CALCULATION

PROPOSED WLMF-LD  
CHANNEL 20 – MIAMI, FLORIDA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Miami facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kW, an antenna radiation center 240.8 meters above ground, and assuming a vertical relative field value of 10 percent at the steeper elevation angles for the proposed MCI panel antenna, a maximum power density value two meters above ground of 0.000088 mW/cm<sup>2</sup> is calculated to occur near the base of the tower. Since this is significantly less than 0.1 percent of the 0.34 mW/cm<sup>2</sup> reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 20 (506-512 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.