

**Supplement to Request for Waiver of Transition Phase Assignment,
Testing Period, and Phase Completion Date**

This supplement is being filed to address the following circumstances:

- WTAE-TV's early transition complies with all interference requirements;
- WTAE-TV's early transition will provide service a year early to a larger population than WTAE-TV's current operation;
- It would be unreasonable and impractical for WTAE-TV to operate for a year using its auxiliary facility;
- WTAE-TV's tower company has provided a second letter in support of WTAE-TV's early transition proposal;
- The change in WQED's Transition Phase from 9 to 4; and
- WTAE-TV's target date for its early transition will be **August 14** instead of August 7, 2018.

For clarity, the Request for Waiver of Transition Phase Assignment, Testing Period, and Phase Completion Date exhibit that was filed with the original application in File No. 0000052992 remains attached to the application and it incorporated herein by reference. To the extent that information in this Supplement conflicts with information provided in the original Request, that information is hereby superseded. Thus, for example, the initial Request stated a target transition date of August 7, 2018, and Hearst is now proposing a target date of August 14, 2018.

A. The Proposed Early Transition of WTAE-TV Is Fully Compliant with All Interference Rules

At the request of the Commission Staff, attached to this Supplement is an Engineering Statement prepared by Joseph M. Davis, P.E., of Chesapeake RF Consultants, LLC. The Engineering Statement conclusively demonstrates that WTAE-TV's proposal to transition early will comply with all interference rules.¹

B. The Proposed Early Transition of WTAE-TV Would Serve the Public Interest By Providing Service One Year Early to a Larger Population

As set forth in the Engineering Statement, early transition of WTAE-TV will result in new service to nearly 84,000 people a year early. The provision of new wireless service to the public

¹ It should be noted, too, that the Engineering Statement uses an 850 kW operation—instead of the 1,000 kW operation authorized in WTAE-TV's current “maximized” construction permit—to demonstrate interference compliance. The reason for using 850 kW is because a final decision has been made that WTAE-TV's final operating power on its post-transition channel will be 850 kW. WTAE-TV will be submitting an application to modify its current maximized CP to specify 850 kW.

has been cited as a public interest benefit in other cases where stations have been granted authority to transition early. *See, e.g.*, WXOW, LMS File No. [0000040297](#); WBEC-TV, LMS File No. [0000036051](#). Here, the provision of new broadcast service is a similarly beneficial factor that cuts in favor of granting WTAE-TV's proposal.

C. It Would Be Unreasonable and Impractical for WTAE-TV to Broadcast for a Year from Its Auxiliary Antenna

Commission Staff has inquired whether WTAE-TV's repack project could be completed in one tower mobilization during the July/August 2018 period with WTAE-TV continuing to operate on its pre-transition channel until Phase 4. The answer is that it would be technically possible for WTAE-TV to operate on its channel 51 auxiliary antenna, but it would be unreasonable and impractical for WTAE-TV to do so for a year until the Phase 4 deadline rolls around. WTAE-TV's auxiliary antenna operations

As a station that airs 38 hours of local news per week (35½ hours on its primary channel, and 2½ hours on its multicast channel) and routinely provides critical emergency information during severe weather and other emergency events in a Top-25 DMA,² it would be unreasonable for WTAE-TV to limp along for a year on channel 51 on its auxiliary antenna, which will be side-mounted at 265 meters above ground level and will operate with 621 kW of power. (The current aux facility is a 207 kW operation, *see* CDBS File No. BXLCDT-20121114ABN, but the new aux facility that will be installed in the July/August 2018 period will be capable of a 621 kW operation.) By comparison, WTAE-TV's top-mounted channel 51 antenna broadcasts with 1,000 kW from a height AGL of 287 meters. Such a decrease in service would be contrary to the public interest, and we believe that it would be beyond the scope of the type of "interim" operation that the Commission has contemplated as a necessary gap-filling measure during construction of repacked station facilities.

Moreover, such an extended period of reduced power/reduced height operations could cause WTAE-TV's signal to be dropped from cable systems that may lose access to the station's over-the-air signal. Such an effect would mean that even cable television subscribers would not be immune to losing WTAE-TV's service.

Finally, the nature of the Pittsburgh market is such that reduced power operation on the auxiliary antenna for a year could have a significant effect on WTAE-TV's business. As reported just last year, very few viewers separate the local news stations from each other in terms of ratings: "The ratings race was particularly tight in the evenings with **one-tenth of a ratings point** separating KDKA, WPXI and WTAE at 5 p.m. At 6 p.m., **KDKA and WTAE tied for first place** in the age 25-54 demographic." Rob Owen, TV RATINGS RACE TIGHTENS FOR EVENING

² Nielsen's 2018 DMA rankings are available at <http://www.nielsen.com/content/dam/corporate/us/en/public%20factsheets/tv/2017-18%20TV%20DMA%20Ranks.pdf>.

PITTSBURGH NEWSCASTS, PITTSBURGH POST-GAZETTE (Mar. 7, 2017) (emphases added), *available at* <http://www.post-gazette.com/ae/tv-radio/2017/03/07/TV-Ratings-race-tightens-for-evening-newscasts-pittsburgh-market/stories/201703070024>. And, the tightness of the ratings race in Pittsburgh is not a new phenomenon; it has characterized the market for years, and was described in 2013 as “one of the country’s closest races.” *See* Maria Sciallo, RATINGS RACE TIGHT FOR KDKA, WTAE, WPXI NEWS, PITTSBURGH POST-GAZETTE (Mar. 18, 2013) (“Pittsburgh’s big three are embroiled in one of the country’s closest races, where the status quo held for the sweeps book running Jan. 31-Feb. 27. In general, WTAE (ABC affiliate) won the morning broadcasts, KDKA (CBS) took much of noon until 11 p.m. WPXI (NBC) was almost uniformly second throughout the day and night.”), *available at* <http://www.post-gazette.com/ae/tv-radio/2013/03/02/Ratings-race-tight-for-KDKA-WTAE-WPXI-news/stories/201303020220>. Thus, the singular nature of the competition in this market and WTAE-TV’s role within the market combine to make it uniquely impractical for WTAE-TV to operate for a year on its auxiliary antenna.

D. WTAE-TV’s Tower Vendor Continues to Fully Support WTAE-TV’s Early Transition So that the Vendor Can Perform Its Tower Work in One Mobilization Instead of Two

Attached to this Supplement is a second letter from the President of Coast to Coast, which is WTAE-TV’s tower vendor for the repack project. While the letter speaks for itself, it is worth noting that Coast to Coast observes that two recent fatal tower crew accidents have put even more pressure on the tower industry to accomplish even more repack tower work, and especially so with respect to qualified “tall tower” crews such as the Coast to Coast crew which will perform the work on WTAE-TV’s 1,000-plus foot tower.

E. WQED Has Agreed to Change Its Transition Phase from 9 to 4

By letter dated April 27, 2018, DA 18-425, WQED’s Transition Phase was changed from 9 to 4. *See* https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0427/DA-18-425A1.pdf. Two relevant results flow from the WQED decision. First, if WTAE-TV transitions early, the market will only have two rescans. Second, WTAE-TV’s original Request included a commitment to provide consumer education notices around the time of WQED’s Phase 9 transition in order to help ensure that consumers would be aware of WQED’s transition. WQED’s transition with the rest of the market obviates the need for WTAE-TV to provide supplementary consumer education around the time of Phase 9. However, WTAE-TV remains committed to providing additional consumer education above and beyond the obligations set forth in Rule Section 73.3700.

Conclusion

For all the reasons stated in the original Request, as supplemented by this Supplement, WTAE-TV respectfully urges the Bureau to act favorably on its request to transition early.

* * * * *

ENGINEERING STATEMENT

Request for Waiver of Transition Phase Assignment

prepared for

Hearst Stations Inc.
WTAE-TV Pittsburgh, PA
Facility ID 65681

This statement is prepared on behalf of *Hearst Stations Inc.* (“*Hearst*”), licensee of digital television station WTAE-TV, Facility ID 65681, Pittsburgh, PA, in support of *Hearst*’s pending request for waiver of WTAE-TV’s transition phase assignment (LMS file# 0000052992). Reassignment of WTAE-TV from Channel 51 to Channel 27 was specified in the *Incentive Auction Closing and Channel Reassignment Public Notice* (“*CCRPN*”, DA 17-317, released April 13, 2017). WTAE-TV has been assigned to make the transition to Channel 27 at phase 4 (testing period start date June 22, 2019 and phase completion date August 2, 2019). This statement provides engineering details to support the pending waiver request. *Hearst* proposes to transition to the WTAE-TV reassignment facility a year early, with a target completion date of August 7, 2018.

The WTAE-TV reassignment facility Construction Permit (“CP”, file# 0000034565) authorizes operation at 1000 kW effective radiated power (“ERP”) with a directional antenna at 269 meters antenna height above average terrain (“HAAT”). *Hearst* proposes to implement the WTAE-TV’s reassignment Channel 27 facility pursuant to the CP, except that the ERP will be set to 850 kW. A summary of the CP’s technical parameters is provided in Table 1.

According to the FCC’s transition data files,¹ there are no linked stations or dependencies that involve WTAE-TV at any phase. The WTAE-TV CP facility achieved an expansion beyond the *CCRPN* reassignment facility of 628 kW ERP at 273 m HAAT. Since the proposed 850 kW early transition facility for WTAE-TV may have a different interference impact to other stations than the WTAE-TV reassignment parameters, and many other stations have similarly achieved

¹ http://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/

an expanded facility and/or alternate channels, additional analysis is provided herein to determine if any dependencies now exist.

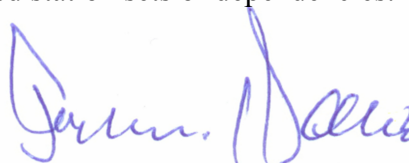
Interference study per FCC TVStudy (OET Bulletin 69) shows that the proposal complies with the 2.0 percent limit of additional interference permitted during the transition with respect to pertinent nearby full service and Class A television stations. The TVStudy report is supplied in Table 2 and considers stations that are presently operating (*i.e.*, on their current channels, not repack channels). The analysis was conducted using a 2 km cell size and 0.1 km terrain profile increment.

In particular, the interference analysis shows that the early transition operation of WTAE-TV would cause interference to only two existing stations. WOSC-CD (Ch. 26 Pittsburgh, PA) would receive 0.68 percent additional interference to its licensed facility and 1.29 percent to its construction permit facility, and WOUB-TV (Lic Ch. 27 Athens OH) would receive 0.74 percent additional interference. These amounts are within the 2.0 percent limit permitted during the reassignment transition period. Therefore, the early transition of WTAE-TV to Channel 27 will comply with the interference protection requirements for operation during the transition, and will not create any new linked station set.

The proposed WTAE-TV Channel 27 early transition facility would provide increased interference-free service from that of the licensed Channel 51 operation. Table 3 supplies a summary of the WTAE-TV predicted coverage and incoming interference for both scenarios, based on TVStudy analysis. The licensed Channel 51 facility experiences 0.76 percent incoming interference and achieves an interference-free service population of 2,777,969 persons. The proposed early transition Channel 27 facility would provide interference-free service to 2,852,416 persons and experience 0.30 percent incoming interference. These scenarios are depicted in Figures 1 and 2, which are maps showing the locations of interference-free service, terrain blocked areas, and locations subject to incoming interference. The Channel 27 results correspond to surrounding stations operating with their current facilities (pre-repack).

A comparison of the resulting service area gains and losses is provided in Figure 3, according to TVStudy analysis. Of the areas that currently receive interference-free service from WTAE-TV's licensed Channel 51, a population of 9,443 persons would lose service. The loss is 0.3 percent of the WTAE-TV's existing interference-free population of 2,777,969 persons. The proposed early transition Channel 27 facility would result in new service to 83,890 persons (a 3.0 percent gain), which includes some areas that presently receive interference or are terrain-blocked on Channel 51. Therefore, the individual service losses are well within a 2 percent threshold for operation during the transition, and are outweighed by a gain of 3.0 percent.

In summary, the proposed early transition for WTAE-TV will comply with the interference allowance established for the transition period (regarding both caused and received interference) and will not create any new linked station sets or dependencies.



Joseph M. Davis, P.E.
May 3, 2018

Chesapeake RF Consultants, LLC
207 Old Dominion Road
Yorktown, VA 23692
703-650-9600

List of Attachments

Table 1	WTAE-TV Ch. 27 Technical Parameters
Table 2	TVStudy Analysis – WTAE-TV Early Transition
Table 3	TVStudy Analysis – Interference-Free Service
Figure 1	Predicted Coverage and Interference – Existing Facility Licensed Ch. 51
Figure 2	Predicted Coverage and Interference – Proposed Early Transition Ch. 27
Figure 3	Service Gain-Loss Analysis

**Table 1 WTAE-TV Ch. 27 Technical Parameters
Hearst Stations Inc.**

WTAE-TV Channel 27 Construction Permit Technical Data
Proposed Early Transition: Implement at 850 kW ERP

WTAE-TV - PITTSBURGH, PA, US - [Main Listing](#)

Licensee (Owner): WTAE HEARST TELEVISION INC. ([Hearst-Argyle](#))
Service Designation: **DTV** Full Service Digital TV Station
Channel: 27 548 - 554 MHz **Construction Permit** (Expires 08/02/2019)
File Number: 0000034565 Facility ID Number: 65681
Application ID Number: 25076f915f0d91b4015f11a7bca505d8
CDBS Application ID: 2007835

Location: [Buena Vista \(PA\)](#)

40° 16' 49" N ([40.280278](#)) Latitude

79° 48' 10" W ([-79.802778](#)) Longitude (NAD83)

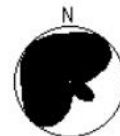
Polarization: Horizontal (H)	<u>Horizontal</u>	<u>Vertical</u>
Effective Radiated Power (ERP):	1000	kW ERP

TV Zone: 1	<u>Feet</u>	<u>Meters</u>
Antenna Height Above Average Terrain:	883'	269.2m
Antenna Height Above Ground Level:	941'	287m
Antenna Height Above Mean Sea Level:	1924'	586.6m

Directional Antenna ID No.: 1002384 Pattern Rotation: 0°
Elec. Beam Tilt: 0.75°
Antenna Make: DIE Antenna Model: TFU-24JSC-R CT150

Relative Field values for directional antenna [Relative Field polar plot](#)
Relative field values do not include any pattern rotation that may be indicated above.

0° 0.861	60° 0.864	120° 0.497	180° 0.507	240° 0.936	300° 0.949
10° 0.889	70° 0.704	130° 0.539	190° 0.707	250° 0.887	310° 0.959
20° 0.937	80° 0.504	140° 0.496	200° 0.867	260° 0.860	320° 0.950
30° 0.983	90° 0.319	150° 0.385	210° 0.965	270° 0.863	330° 0.923
40° 0.999	100° 0.274	160° 0.273	220° 1.000	280° 0.889	340° 0.890
50° 0.964	110° 0.386	170° 0.319	230° 0.983	290° 0.923	350° 0.864
38° 1.000	97° 0.265	163° 0.264	222° 1.000		



ASRN: 1025144 [ULS Data](#) [Other Stations on Tower](#)

Data Summary from: <https://rabbitears.info/tvq.php?request=items&appid=25076f915f0d91b4015f11a7bca505d8&arch=>

Table 2 TVStudy Analysis

WTAE-TV Ch. 27 Early Transition

(page 1 of 2)



tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: WTAE-TV CP at 850kW pre-auct 2.0-0.1, Model: Longley-Rice
Start: 2018.05.03 09:14:00

Study created: 2018.05.03 09:14:00

Study build station data: LMS TV 2018-05-03

Proposal: WTAE-TV D27 DT APP PITTSBURGH, PA
File number: WTAE-TV CP at 850kW
Facility ID: 65681
Station data: User record
Record ID: 1995
Country: U.S.
Zone: I

Build options:
Protect pre-transition records not on baseline channel

Search options:
Baseline record excluded if station has CP
All post-transition APP, CP, and baseline records excluded

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WDVM-TV	D26	DT	LIC	HAGERSTOWN, MD	BLCDT20090612AFP	171.0 km
No	WNYB	D26	DT	LIC	JAMESTOWN, NY	BLCDT20090508ABW	239.7
No	WVIZ	D26	DT	LIC	CLEVELAND, OH	BLANK0000006262	200.7
Yes	WOSC-CD	D26	DC	CP	PITTSBURGH, PA	BLANK0000029678	22.9
Yes	WOSC-CD	D26	DC	LIC	PITTSBURGH, PA	BLDTA20130115ADH	22.9
No	WETA-TV	D27	DT	LIC	WASHINGTON, DC	BLEDT20120731ALN	276.1
Yes	WOUB-TV	D27	DT	LIC	ATHENS, OH	BLEDT20030411ABC	227.4
No	WBGU-TV	D27	DT	LIC	BOWLING GREEN, OH	BLEDT20090612AFQ	358.6
No	WKPT-TV	D27	DT	LIC	KINGSPORT, TN	BLANK0000003746	473.7
No	WFPT	D28	DT	CP	FREDERICK, MD	BLANK0000029876	241.1
No	WFPT	D28	DT	LIC	FREDERICK, MD	BLEDT20090330AFA	241.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D27
Latitude: 40 16 49.00 N (NAD83)
Longitude: 79 48 10.00 W
Height AMSL: 586.6 m
HAAT: 269.2 m
Peak ERP: 850 kW
Antenna: DIE-TFU-24JSC-R CT150 (ID 1002384) 0.0 deg
Elev Pattn: Generic
Elec Tilt: 0.75

40.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	630 kW	270.7 m	90.2 km
45.0	819	247.1	89.0
90.0	86.5	254.4	75.0
135.0	228	278.9	82.7
180.0	218	274.6	81.9
225.0	839	259.0	91.2
270.0	633	293.2	93.8
315.0	774	276.0	93.2

**Proposal is within coordination distance of Canadian border
Distance to Canadian border: 236.0 km

Distance to Mexican border: 2243.3 km

Conditions at FCC monitoring station: Laurel MD
Bearing: 115.0 degrees Distance: 283.4 km

Table 2 TVStudy Analysis
WTAE-TV Ch. 27 Early Transition
 (page 2 of 2)



Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
 Bearing: 277.9 degrees Distance: 2150.3 km

Study cell size: 2.00 km
 Profile point spacing: 0.10 km

Maximum new IX to full-service and Class A: 0.50%
 Maximum new IX to LPTV: 2.00%

 Interference to BLANK0000029678 CP scenario 1
 **IX: 1.29% interference caused

Desired:	Call WOSC-CD	Chan D26	Svc DC	Status CP	City, State PITTSBURGH, PA	File Number BLANK0000029678	Distance			
Undesireds:	WTAE-TV KDKA-TV	D27 D25	DT DT	APP LIC	PITTSBURGH, PA PITTSBURGH, PA	WTAE-TV CP at 850kW BLCDT20041004ACS	22.9 km 7.1			
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX		
8830.0	2,163,006	8541.4	2,079,895		7818.2	1,970,045	7605.0	1,944,568	2.73	1.29
Undesired				Total IX		Unique IX, before		Unique IX, after		
WTAE-TV	D27	DT	APP	281.5	36,701		213.2	25,477		
KDKA-TV	D25	DT	LIC	723.2	109,850		654.9	98,626		

 Interference to BLDTA20130115ADH LIC scenario 1
 **IX: 0.68% interference caused

Desired:	Call WOSC-CD	Chan D26	Svc DC	Status LIC	City, State PITTSBURGH, PA	File Number BLDTA20130115ADH	Distance
Undesireds:	WTAE-TV	D27	DT	APP	PITTSBURGH, PA	WTAE-TV CP at 850kW	22.9 km
	KDKA-TV	D25	DT	LIC	PITTSBURGH, PA	BLCDDT20041004ACS	7.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
6057.8	1,918,290	5857.4	1,855,420	4904.8	1,697,673	4820.5	1,686,148
							1.72
							0.68
Undesired				Total IX	Unique IX, before		Unique IX, after
WTAE-TV D27 DT APP	289.1			48,421	84.4		11,525
KDKA-TV D25 DT LIC	952.6			157,747	747.8		120,851

 Interference to BLEDT20030411ABC LIC scenario 1
 **IX: 0.74% interference caused

Desired:	Call WOUB-TV	Chan D27	Svc DT	Status LIC	City, State ATHENS, OH	File Number BLEDT20030411ABC	Distance			
Undesireds:	WTAE-TV	D27	DT	APP	PITTSBURGH, PA	WTAE-TV CP at 850kW	227.4 km			
	WIPX-TV	D27	DT	LIC	BLOOMINGTON, IN	BLANK0000050610	343.4			
	WBGU-TV	D27	DT	LIC	BOWLING GREEN, OH	BLEDT20090612AFQ	251.5			
	WCBZ-CD	D28	DC	LIC	Columbus, OH	BLANK0000044818	113.9			
Service area		Terrain-limited			IX-free, before		IX-free, after	Percent New IX		
20037.1	756,762	19665.6		734,273	19525.9	715,581	19485.8	710,295	0.21	0.74
Undesired				Total IX		Unique IX, before		Unique IX, after		
WTAE-TV	D27	DT	APP	52.1		5,507		40.1	5,286	
WIPX-TV	D27	DT	LIC	7.9		426		4.0	255	
WBGU-TV	D27	DT	LIC	135.7		18,437		123.7	18,015	
WCBZ-CD	D28	DC	LIC	8.1		251		0.0	0	

Table 3 TVStudy Analysis – Interference-Free Service
WTAE-TV Licensed and Proposed Early Transition
 (page 1 of 1)



WTAE-TV Existing Facility - Licensed Ch. 51

tvstudy v2.2.5 (4uoc83)

Database: localhost
 Study: Early Transition
 Model: Longley-Rice
 Scenario: WTAE-TV on LIC channel
 Start: 2018.05.02 17:55:49

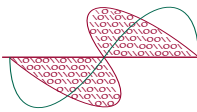
Desired station	Service area		Terrain-limited		Interference-free	
Undesired station	Total interference		Unique interference			
WTAE-TV D51 DT LIC PITTSBURGH, PA	22783.9	2,967,614	20701.6	2,799,254	20573.6	2,777,969
WEAO D50 DT LIC AKRON, OH	0.0	0	0.0	0		
WPCB-TV D50 DT LIC GREENSBURG, PA	128.1	21,285	128.1	21,285		
Total Incoming Interference (population)					21,285	(0.76%)

WTAE-TV Proposed Early Transition Ch. 27
Interfering Stations at Existing, Pre-Repack Facilities

tvstudy v2.2.5 (4uoc83)

Database: localhost
 Study: Early Transition
 Model: Longley-Rice
 Scenario: WTAE-TV repack early
 Start: 2018.05.02 17:55:49

Desired station	Service area		Terrain-limited		Interference-free	
Undesired station	Total interference		Unique interference			
WTAE-TV D27 DT CP PITTSBURGH, PA (CP facility at 850 kW)	23955.1	2,995,755	22231.3	2,860,979	21978.8	2,852,416
WETA-TV D27 DT LIC WASHINGTON, DC	12.1	210	8.1	194		
WDVM-TV D26 DT LIC HAGERSTOWN, MD	0.0	0	0.0	0		
WOUB-TV D27 DT LIC ATHENS, OH	244.5	8,369	240.5	8,353		
WBGU-TV D27 DT LIC BOWLING GREEN, OH	0.0	0	0.0	0		
WOSC-CD D26 DC LIC PITTSBURGH, PA	0.0	0	0.0	0		
Total Incoming Interference (population)					8,563	(0.30%)



Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 1
Predicted Coverage and Interference
WTAE-TV Pittsburgh, PA
Existing Facility - Licensed Ch. 51

prepared for
Hearst Stations Inc.

May, 2018

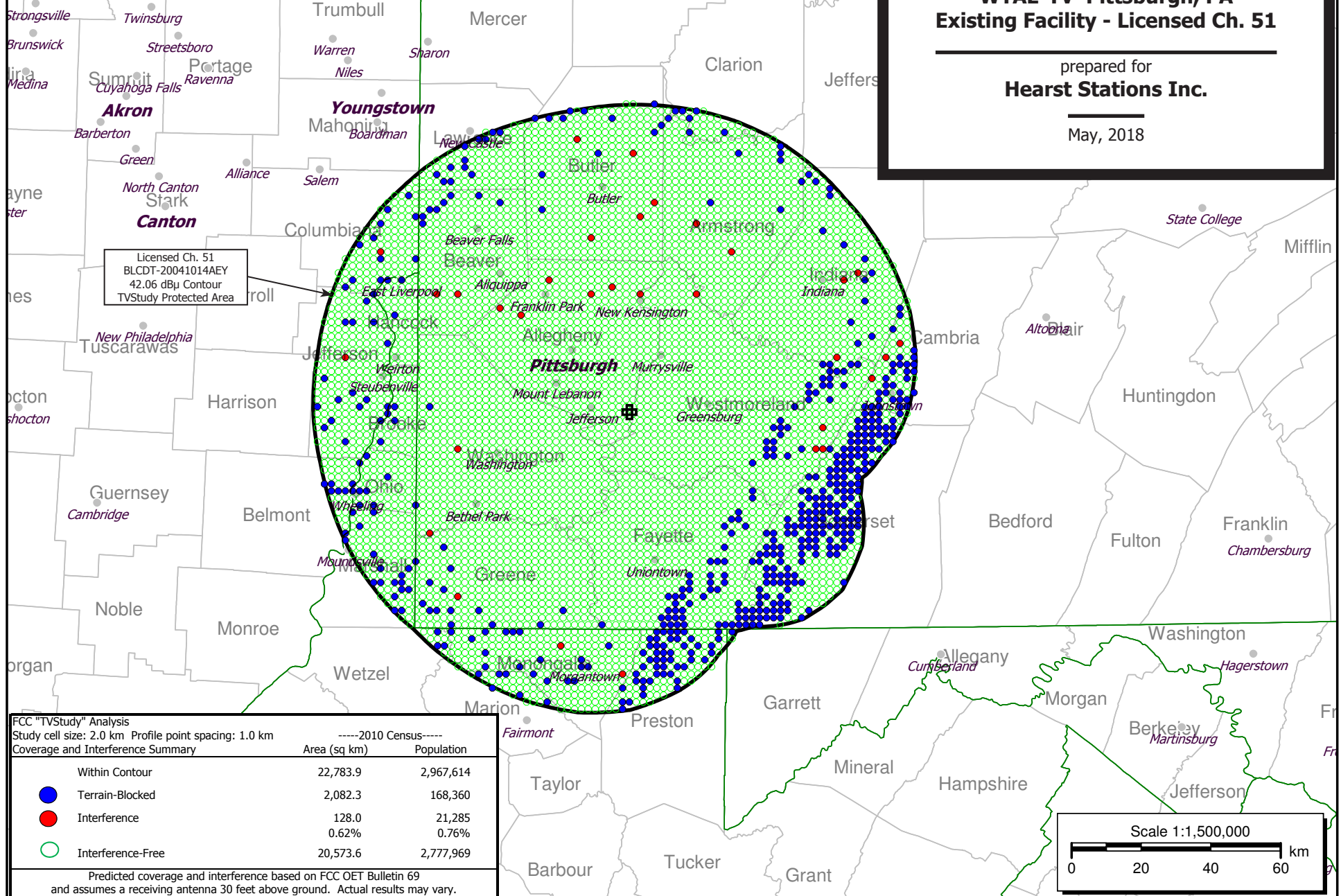
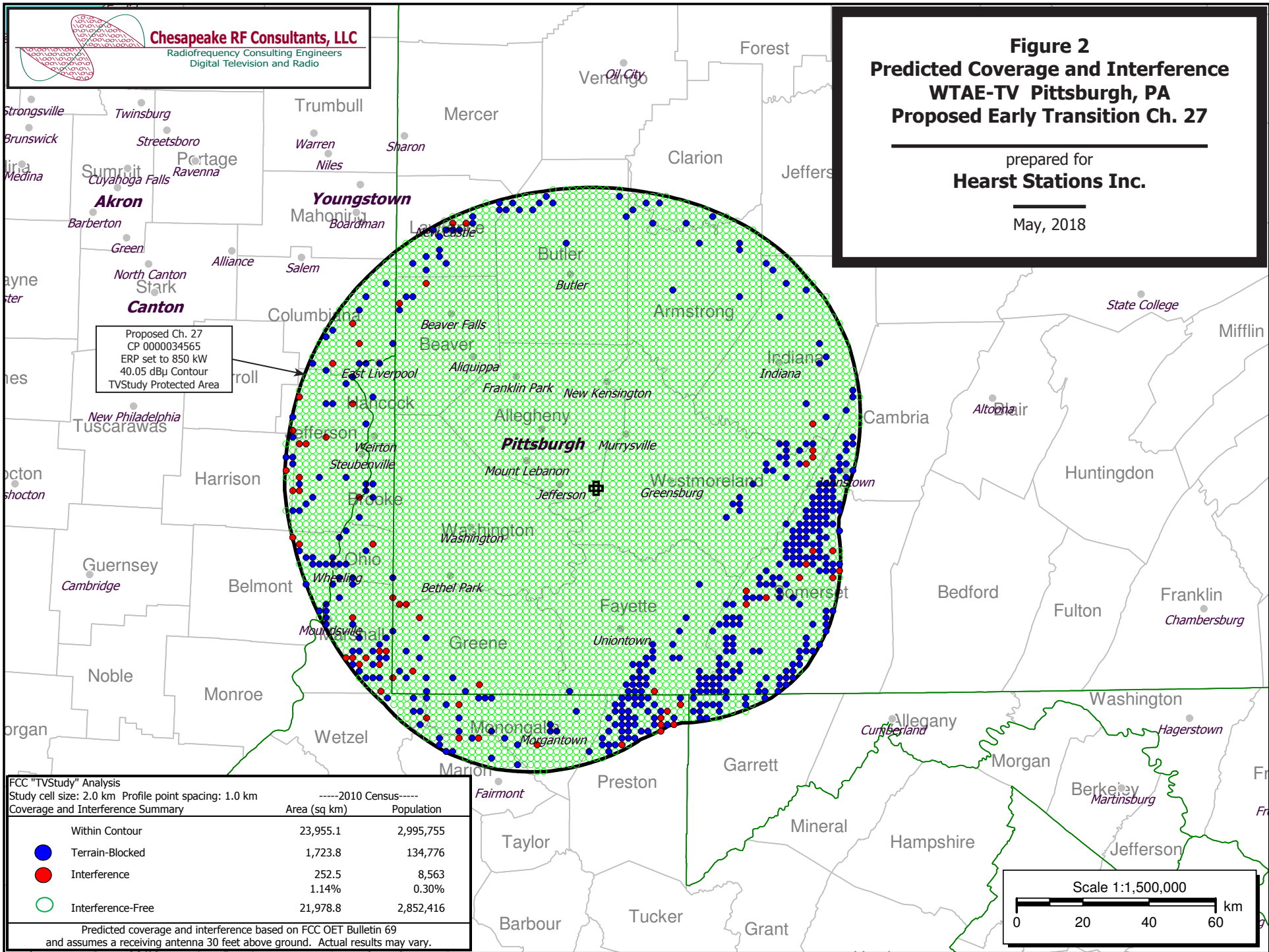
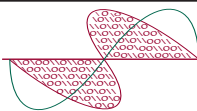


Figure 2
Predicted Coverage and Interference
WTAE-TV Pittsburgh, PA
Proposed Early Transition Ch. 27

prepared for
Hearst Stations Inc.

May, 2018



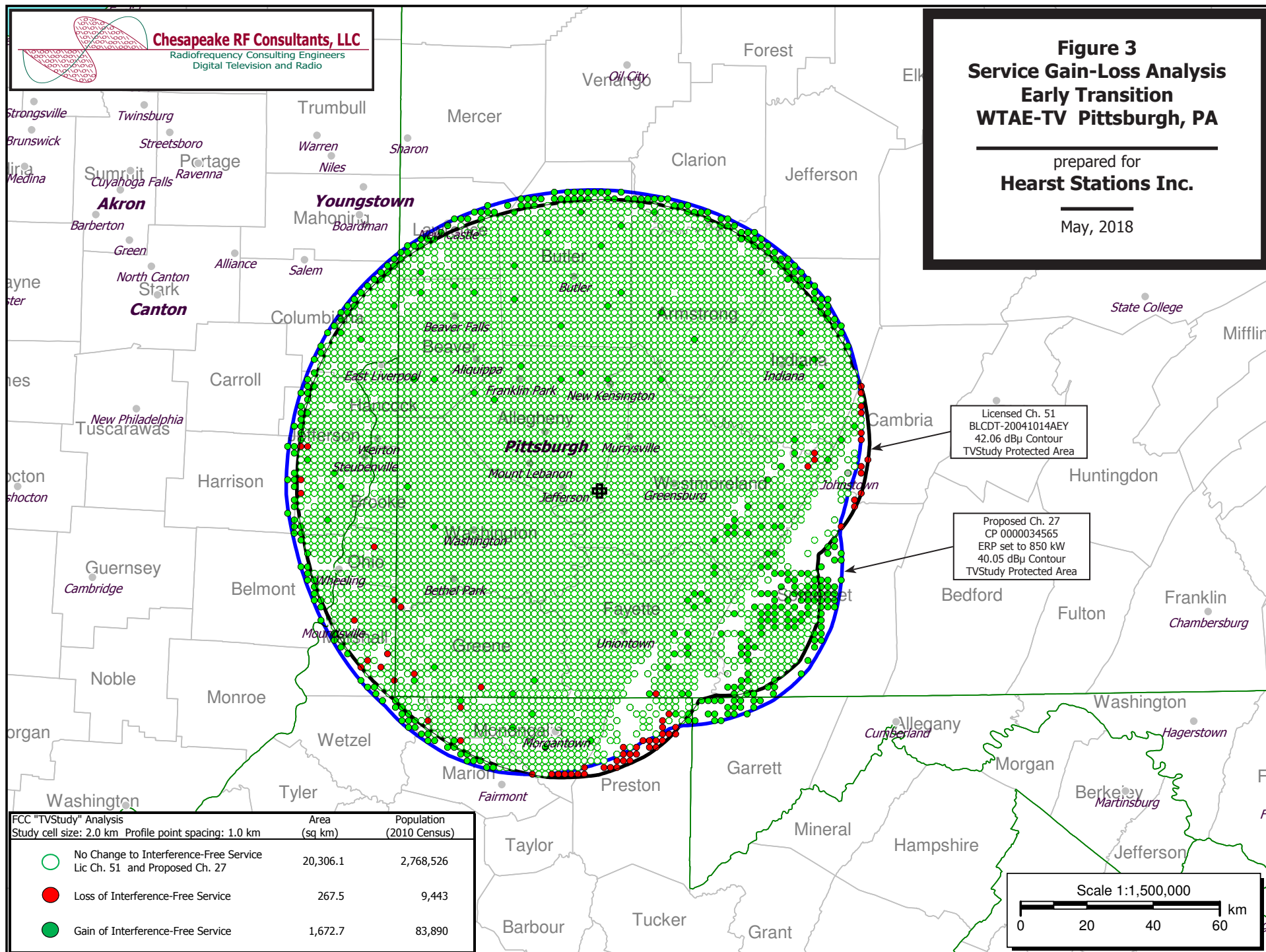


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 3
Service Gain-Loss Analysis
Early Transition
WTAE-TV Pittsburgh, PA

prepared for
Hearst Stations Inc.

May, 2018





753 Arrowhead Road
Waxahachie, Texas 75167
<http://ctctower.com>
Office: 972-923-9504
Fax: 972-923-9619

Mr. Paul Nowakowski
WTAE TV
400 Ardmore Blvd.
Pittsburgh, PA 15221
(412) 242-4300

May 4, 2018

Dear Chuck and Paul:

This letter is to follow-up with you about the request you submitted to the FCC to try to move your transition up by approximately one year, from the designated Transition Phase 4 to the July/August 2018 time period. You have my permission to submit this letter to the FCC.

As I stated earlier, Coast to Coast strongly supports your request to move your transition up by a year because it will mean that our tower crew will only have to mobilize to WTAE-TV's tower site one time, instead of two. As you know, the recent tower tragedies in Miami and Missouri—both of which were “tall tower” projects involving 1,000+ foot structures like yours—have put a greater strain on tower crews nationwide. Coast to Coast is going to be feeling the effects of the reduction of available, qualified tall tower crews. Thus, I would like to be on record again that I strongly hope you are able to move to the July/August 2018 time frame.

I understand that if you are not able to move up to the July/August time frame, Coast to Coast will have to return to complete the work next year in time for your Phase 4 repack. When I asked you if we could complete the job in one mobilization in July/August 2018 and have you broadcast for a year from your auxiliary antenna, you informed me that it is not practical for WTAE-TV to do so because of how your ratings would likely be affected for an entire year. I understand and respect that it is not practical for you to broadcast from your auxiliary antenna for a year and lose viewers and business. I also agree that over-the-air viewers should not have to lose access to your signal for a period of one year, which is what would happen if you were on your aux for a year. As a result, I understand that my crew will have to return in 2019 to complete the tower work if you are not able to change your transition date. Of course, I cannot guarantee that we will not already be behind schedule at that point of the nationwide transition—the time pressures are going to be enormous—but you have my commitment that WTAE-TV (and the other repacked stations in your group) are a high priority for Coast to Coast.

I want to reiterate, too, that if we are authorized to complete your transition early as you are requesting, it will not negatively impact any other work or repack client that we have already lined up. In reality, it will help ease some of the strain that exists in the industry.

If you have any questions, please let me know. We look forward to working on your project, and I hope the FCC grants your request to transition early.

Sincerely,

M. Todd Jackson, President
Coast to Coast Tower Service, Inc.
753 Arrowhead Road
Waxahachie, TX 75167

(214) 251-8050 - Direct Phone
(972) 923-9504 - Office Phone
(972) 816-2815 - Cell Phone