

Invoice

R & L Media Systems, Inc.

135 N Country Club Drive * Hendersonville, TN 37075 * (615) 826-0792 * FAX 824-3282

Purchased By:	Ship To:
Philadelphia Television Network Attn: Gene Cliett 2 Johns Lane Lafayette Hill, PA 19444 (267) 784-1007	Philadelphia Television Network Attn: Gene Cliett 2 Johns Lane Lafayette Hill, PA 19444 (267) 784-1007

Date:	Invoice No.	Terms:	Project
5/10/2018	1805104	Prepaid	1805104

Qty	Description	List Price	Each	Total
1	LMS Application For A Construction Permit Discount If Paid Within 10 Days	1,295.00	1,295.00 -400.00	1,295.00 -400.00

<i>Thank You! Please see terms on back.</i>	Subtotal	\$895.00
	Sales Tax (0.0%)	\$0.00
	Total	\$895.00
	Payments	\$0.00
	Balance Due	\$895.00



(REFERENCE COPY - Not for submission)

Displacement for LPTV Station Application

File Number: **0000053972** | Submit Date: **05/10/2018** | Call Sign: **WEFG-LD** | Facility ID: **167606** | FRN: **0007622624**

State: **Pennsylvania** | City: **PHILADELPHIA**

Service: **LPD** | Purpose: **Displacement BLDLTL-20131212ABH** | Status: **Pending** | Status Date: **05/10/2018** | Filing Status: **Active**

General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

Fees, Waivers, and Exemptions

Section	Question	Response
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

**Applicant
Information**

Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
PHILADELPHIA TELEVISION NETWORK, INC. Doing Business As: PHILADELPHIA TELEVISION NETWORK, INC.	EUGENE CLIETT 2 JOHNS LANE LAFAYETTE HILL, PA 19444 United States	+1 (267) 784-1007	ELCLIETT@PHILLYTVNEWS. COM	Corporation

Authorization Holder Name

Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

**Contact
Representatives
(2)**

Contact Name	Address	Phone	Email	Contact Type
EUGNE CLIETT PHILADELPHIA TELEVISION NETWORK	2 JOHNS LANE LAFAYETTE HILL, PA 19444 United States	+1 (267) 784- 1007	ELCLIETT@PHILLYTVNEWS. COM	Legal Representative
Richard C Goetz <i>Broadcast Consultant</i> R & L Media Systems	135 N Country Club Dr Hendersonville, TN 37075 United States	+1 (615) 826- 0792	rickg@rlmediasystems.com	Technical Representative

Alien Ownership

Question	Response
1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?	No
2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))	No
3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))	No
4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))	No
5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))	No
6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?	
6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.	
7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?	
7a) Enter the File or Docket Number of the Petition for Declaratory Ruling that the applicant has filed for its foreign ownership in connection with this application pursuant to Section 310(b)(4) of the Communications Act. It is not necessary to file a request for a foreign ownership declaratory ruling if the applicant attaches a showing that the requested authorization(s) is exempt from the provisions of Section 310(b)(4).	
8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?	
9) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?	

Basic Qualifying Questions

Section	Question	Response
Revoked Application	Has the Applicant or any party to this application had any FCC station Authorization revoked or had any application for an initial, modification or renewal of FCC station Authorization denied by the Commission?	No
State or Federal Convictions	Has the Applicant or any party to this application, or any party directly or indirectly controlling the Applicant, ever been convicted of a felony by any state or federal court?	No

Channel and Facility Information

Section	Question	Response
Proposed Community of License	Facility ID	167606
	State	Pennsylvania
	City	PHILADELPHIA
	LPD Channel	21

Antenna Location Data

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1026755
Coordinates (NAD83)	Latitude	40° 02' 19.7" N+
	Longitude	075° 14' 12.8" W-
	Structure Type	GTOWER-Guyed Structure Used for Communication Purposes
	Overall Structure Height	360.5 meters
	Support Structure Height	338.9 meters
	Ground Elevation (AMSL)	75.6 meters
Antenna Data	Height of Radiation Center Above Ground Level	207 meters
	Height of Radiation Center Above Mean Sea Level	282.6 meters
	Effective Radiated Power	11.5 kW

**Antenna
Technical Data**

Section	Question	Response
Antenna Type	Antenna Type	Directional Custom
	Do you have an Antenna ID?	No
	Antenna ID	1003580
Antenna Manufacturer and Model	Manufacturer:	SWR
	Model	SWLP8WL Modified
	Rotation	110 degrees
	Electrical Beam Tilt	Not Applicable
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Horizontal
Elevation Radiation Pattern	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	No
	Uploaded file for elevation antenna (or radiation) pattern data	
	Out-of-Channel Emission Mask:	Full Service

Directional Antenna Relative Field Values (Pre-rotated Pattern)

Degree	V _A (Authorized Value)						
0	1	90	.6	180	.03	270	.6
10	.98	100	.4	190	.04	280	.71
20	.98	110	.23	200	.05	290	.82
30	1	120	.08	210	.05	300	.89
40	.99	130	.07	220	.06	310	.97
50	.97	140	.06	230	.07	320	.99
60	.89	150	.05	240	.08	330	1
70	.82	160	.05	250	.23	340	.98
80	.71	170	.04	260	.4	350	.98

Additional Azimuths

Degree	V _A
--------	----------------

**Parties to the
Application (0)**

Information not provided.

Attributable Interest

Section	Question	Response
Equity and Financial Interests	Applicant certifies that equity and financial interests not set forth by the applicant parties are non-attributable.	Yes
Other Authorizations	Does the applicant or any party to the application have an attributable interest in any other broadcast station(s).	N/A

**Construction
Permit
Certifications**

Section	Question	Response
<p>Post-Incentive Auction Expedited Processing</p>	<p>It will operate on the DTV channel for this station as established in the post-incentive auction channel reassignment public notice.</p>	
	<p>It will operate post-incentive auction facilities that do not expand the noise-limited service contour in any direction beyond that established by the post-incentive auction channel reassignment public notice.</p>	
	<p>It will operate post-incentive auction facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the post-incentive auction channel reassignment public notice.</p>	
	<p>The antenna structure to be used by this facility has been registered by the Commission and will not require re-registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely affect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.</p>	
<p>Environmental Effect</p>	<p>Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See Section 1.1306 of 47 C.F.R.)</p>	<p>No</p>
<p>Broadcast Facility</p>	<p>The proposed facility complies with all of the following applicable rule sections. 47 C.F.R. Sections 74.709, 74.793 (e), 74.793(f), 74.793(g), 74.793(h)</p>	<p>Yes</p>

**Legal
Certifications**

Section	Question	Response
Character Issues	<p>Applicant certifies that neither applicant nor any party to the application has or had any interest in, or connection with:</p> <p>(a) any broadcast application in any proceeding where character issues were left in unresolved or were resolved adversely against the applicant or party to the application; or</p> <p>(b) any pending broadcast application in which character issues have been raised.</p>	Yes
Adverse Findings	<p>Has the Applicant or any party to this application had an adverse finding or an adverse final action taken by any court or administrative body in a civil or criminal proceeding brought under any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?</p>	No
Program Service Certification	<p>Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	Yes
Local Public Notice	<p>Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	Yes
Equal Employment Opportunity (EEO)	<p>If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report.</p>	N/A
Auction Authorization	<p>If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.</p>	N/A
Rebroadcast Certification	<p>(For Applicants proposing rebroadcasts that are not the licensee of the primary station) Applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.</p>	Yes

Certification

Section	Question	Response
<p>General Certification Statements</p>	<p>The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).</p>	
	<p>The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002 (c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	
<p>Authorized Party to Sign</p>	<p>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I certify that this application includes all required and relevant attachments.</p>	<p>Yes</p>
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	<p>Eugene Leslie Cliett <i>President</i></p> <p>05/10/2018</p>

Attachments

File Name	Uploaded By	Attachment Type	Description
Displacement.pdf	Applicant	All Purpose	Displacement Statement
Environmental Protection.pdf	Applicant	Construction Permit Certifications	Environmental Protection
WEFG_21.pdf	Applicant	All Purpose	WEFG Study

Environmental Protection Act. - FCC Rule, Section 1.1306

The proposed operation is with an ERP of 11.5 Kw Average power on Channel 21. Calculations to determine power density levels from the proposed operation were performed using formulas outlined in OET Bulletin 65 (Edition 97-01) based on antenna relative field factor of .1 The formula used is:

$$S = \frac{(33.4)(F^2)(\text{Average ERP})}{R^2}$$

The maximum power density levels at two meters above ground level is 0.09 $\mu\text{W}/\text{cm}^2$ computed for a radiation center of 207 meters above ground level. The maximum allowed by OET 65 bulletin is:

Occupational/Controlled Exposure	General Population
Frequency / .3	Frequency / 1.5
1,717 $\mu\text{W}/\text{cm}^2$	343 $\mu\text{W}/\text{cm}^2$

The proposed operation will be in compliance with the FCC RF radiation guidelines and areas that exceed the FCC standards will be alerted to workers by posting warning signs and restricting areas. All stations on the tower will have a mutual written agreement and procedures for workers climbing the tower. Transmitter power of each station will be reduced or terminated when workers are near areas on the tower where power density levels are in excess of the FCC standard.

An environmental assessment (EA) is categorically excluded under Section 1.1307 of the FCC Rules and Regulations since the applicant indicates:

- (a)(1) The proposed facilities are not located in an officially designated wilderness area.
- (a)(2) The proposed facilities are not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The proposed facilities are not located near any known Indian religious sites.
- (a)(6) The proposed facilities are not located in a flood plain.
- (a)(7) The side-mounted TV antenna on the existing tower will not involve a significant change in surface features of the ground in the vicinity of the tower. There will be a security fence with a locked gate to surround the tower. Workers and the general public will not be subjected to RF radiation levels in excess of FCC OET Bulletin 65 (Edition 97-01). Authorized personnel will be alerted to areas of the tower where potential radiation levels are in excess of the FCC standard. The transmitter power will be reduced or terminated when necessary.

Displacement

WEFG-LD is on Channel 48 and out-of-core, therefore, it is displaced.

Study created: 2018.05.10 15:44:54

Study build station data: LMS TV 2018-05-08 (62)

Proposal: WCFG-LD D21 LD LIC PHILADELPHIA, PA
File number: BLDLTL20131212ABH
Facility ID: 167606
Station data: User record
Record ID: 1530
Country: U.S.

Build options:

Protect pre-transition records not on baseline channel
Protect baseline records from LPTV

Search options:

Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WQAW-LP	D20	LD	CP	LAKE SHORE, MD	BDISDTL20090629AAY	164.0 km
No	W20EF-D	D20	LD	LIC	Teaneck, NJ	BLANK000008104	133.6
No	W20EF-D	D20	LD	CP	Teaneck, NJ	BLANK0000035010	133.6
No	W20EF-D	D20	LD	APP	Teaneck, NJ	BLANK0000053224	133.6
No	W20CM	N20-	TX	LIC	PORT JERVIS, NY	BLTTL20071129AIS	154.6
Yes	WEDW	D21	DT	CP	BRIDGEPORT, CT	BLANK0000034869	180.8
Yes	WEDW	D21	DT	BL	BRIDGEPORT, CT	DTVBL13594	221.2
No	WSBK-TV	D21	DT	CP	BOSTON, MA	BLANK0000034574	419.1
No	WSBK-TV	D21	DT	BL	BOSTON, MA	DTVBL73982	419.1
No	WFXQ-CD	D21	DC	CP	SPRINGFIELD, MA	BLANK0000027611	327.9
No	WSHM-LD	D21	LD	LIC	SPRINGFIELD, MA	BLDTL20101124ABC	331.0
No	WFXQ-CD	D21	DC	BL	SPRINGFIELD, MA	DTVBL2650	327.9
Yes	WMPT	D21	DT	CP	ANNAPOLIS, MD	BLANK0000029874	164.0
No	WFPT	D21	DT	BL	FREDERICK, MD	DTVBL40626	197.5
Yes	WBOC-TV	D21	DT	LIC	SALISBURY, MD	BLCDT20090618ABK	174.1
No	WCPB	D21	DT	BL	SALISBURY, MD	DTVBL40618	186.2
Yes	WLIW	D21	DT	LIC	GARDEN CITY, NY	BLEDT20090612AEP	172.5
No	W21CP-D	D21	LD	LIC	GLOVERSVILLE, NY	BLDTT20090601AQC	341.5
No	W25DY-D	D21	LD	APP	MONTICELLO, NY	BLANK0000052137	186.1
No	WROC-TV	D21	DT	APP	ROCHESTER, NY	BLANK0000034937	395.6
No	WROC-TV	D21	DT	CP	ROCHESTER, NY	BLANK0000027721	395.6
No	WROC-TV	D21	DT	BL	ROCHESTER, NY	DTVBL73964	395.6
No	WWTI	D21	DT	LIC	WATERTOWN, NY	BLCDT20040128AFQ	428.8
No	W21DO-D	D21	LD	CP	DUBOIS, PA	BNPDTL20100609AGH	331.6

No	WSEE-TV	D21	DT	CP	ERIE, PA	BLANK0000034791	461.4
No	WSEE-TV	D21	DT	BL	ERIE, PA	DTVBL49711	458.6
Yes	WHP-TV	D21	DT	LIC	HARRISBURG, PA	BLCDT20130703ACZ	142.7
No	WPXI	D21	LD	CP	PITTSBURGH, PA	BDRTCT20090610ABT	341.0
No	WPNT	D21	DT	CP	PITTSBURGH, PA	BLANK0000034376	407.5
No	WPNT	D21	DT	BL	PITTSBURGH, PA	DTVBL73907	407.5
No	WSBE-TV	D21	DT	LIC	PROVIDENCE, RI	BLEDT20050307ACR	388.7
No	WVPY	D21	DD	LIC	FRONT ROYAL, VA	BLEDT20140714AAV	291.2
No	WVBT	D21	DT	CP	VIRGINIA BEACH, VA	BLANK0000034803	374.5
No	WVBT	D21	DT	BL	VIRGINIA BEACH, VA	DTVBL65387	374.5
No	W21CQ	N21+	TX	LIC	BENNINGTON, VT	BLTTL20061201AAG	360.7
No	WMPB	D22	DT	CP	BALTIMORE, MD	BLANK0000029875	147.3
No	WMPB	D22	DT	BL	BALTIMORE, MD	DTVBL65944	147.3
Yes	WNJS	D22	DT	LIC	CAMDEN, NJ	BLANK0000040675	48.1
No	WDVB-CD	D22	DC	CP	EDISON, NJ	BLANK0000034859	132.0
No	WDVB-CD	D22	DC	BL	EDISON, NJ	DTVBL168834	132.1
Yes	WPHY-CD	D22	DC	CP	TRENTON, NJ	BLANK0000034674	0.3
Yes	WPHY-CD	D22	DC	BL	TRENTON, NJ	DTVBL74464	5.5
No	WXNY-LD	D22	LD	CP	NEW YORK, NY	BDISDTL20100421AAT	134.9
No	W22EW-D	D22+	LD	LIC	PORT JERVIS, NY	BLANK0000018995	120.8
No	W22EW-D	D22+	LD	APP	PORT JERVIS, NY	BLANK0000033500	117.7
No	WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	137.9
No	WOLF-TV	D22	DT	BL	HAZLETON, PA	DTVBL73375	138.0

No non-directional AM stations found within 0.8 km

Directional AM stations within 3.2 km:

WNWR 1540 C DA2 D PHILADELPHIA, PA BP20161215ABM
 WNWR 1540 L DA2 D PHILADELPHIA, PA BMML20171220ACU
 WNWR 1540 C DA2 N PHILADELPHIA, PA BP20161215ABM
 WNWR 1540 L DA2 N PHILADELPHIA, PA BMML20171220ACU

Record parameters as studied:

Channel: D21
 Mask: Full Service
 Latitude: 40 2 19.70 N (NAD83)
 Longitude: 75 14 12.80 W
 Height AMSL: 283.0 m
 HAAT: 0.0 m
 Peak ERP: 11.5 kW
 Antenna: ANT-ACS12BR (ID 17711) 110.0 deg
 Elev Pattn: Generic
 Elec Tilt: 1.00

49.5 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	0.608 kW	212.7 m	35.7 km
45.0	8.41	179.6	47.5
90.0	11.0	235.8	52.1
135.0	11.3	266.3	53.9
180.0	7.73	247.1	50.9
225.0	0.276	194.7	30.7
270.0	0.029	164.2	17.7
315.0	0.029	240.2	21.4

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 218 m

Distance to Canadian border: 419.6 km

Distance to Mexican border: 2543.4 km

Conditions at FCC monitoring station: Laurel MD
Bearing: 234.9 degrees Distance: 166.8 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 280.1 degrees Distance: 2537.6 km

No land mobile station failures found

Study cell size: 1.00 km
Profile point spacing: 1.00 km

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

No IX check failures found.