

**WCWJ-DT CHANNEL 34 STA
JACKSONVILLE, FLORIDA
GRAHAM MEDIA GROUP
(BLCDT-20060630AFM)**

PURPOSE OF STA

The purpose of this STA application is to allow the WCWJ-DT facility to operate at another site located less than 0.5 mi from the licensed site with alternate parameters on its pre-transition channel (34) using an interim antenna while the existing WCWJ tower is dismantled and the new post-transition main antenna and facility are installed at the new primary site (WJXT tower). This STA will need to remain in effect until January 2020 which is the assigned Phase 7 deadline for the WCWJ facility. The WCWJ interim facility will completely encompass its community of license with the F(50,90) 48.0 dBu principal community contour and will not exceed its licensed F(50,90) 41.20 dBu pre-transition protected noise limited contour in any azimuthal direction. The interim facility's proposed parameters achieve an F(50,90) 41.36 dBu noise limited contour that closely replicates the licensed facility's F(50,90) 41.36 dBu noise limited contour but does not exceed it any azimuthal direction (see showing below).

SUMMARY

Graham Media Group (GMG) is the licensee of the WCWJ-DT Channel 34, Jacksonville, FL full-service digital television facility (BLCDT-20060630AFM). As part of the FCC repack, the WCWJ facility has been assigned Channel 20 for post-transition operation. In May 2017, GMG visited the Commission in Washington, D.C. to discuss its transition plan for its Jacksonville stations and to seek guidance due to the complexity. GMG is also the licensee of the WJXT-DT Channel 42, Jacksonville, FL full-service digital television facility (BLCDT-20020405AAX) which is being repacked from Channel 42 to Channel 18. The initial plan for both stations was to repack them independently at their licensed sites; however, after retaining the services of Malouf Engineering, Inc. (MEI), GMG was informed by MEI that the WCWJ tower cannot

support the post-transition loads under 222-G and the tower must be replaced or the WCWJ facility moved to an alternate site (see attached Malouf report). GMG requested a quote from ERI to replace the WCWJ tower which came in at \$2,586,115.00 to replace the WCWJ tower. As a result, via waiver approval, the WCWJ facility was officially designated an “Unable to Construct” station and was given authorization to file in the First Priority Filing Window (FPFW) in lieu of filing in the initial 90-day filing window.

ANTENNA AND TRANSMISSION LINE SYSTEM

The WCWJ-DT Channel 34 facility currently operates with a horizontally polarized Dielectric TFU-28GTH-R 6T170 directional antenna, which is a single-channel, side-mount antenna specifically tuned for Channel 34 and cannot be used on post-transition Channel 20. If it were possible for WCWJ to repack using the WCWJ existing tower, it would be required to install a new interim antenna and line to avoid off-air time while the new post-auction facility was built-out. However, the new tower cannot support any additional loads pursuant to the MEI analysis which means an alternate site would be required for interim operation. Accordingly, an alternate site is required for the WCWJ interim facility under any repack scenario. In lieu of building a new tower, the WCWJ main facility will move to the WJXT site and collocate with the WJXT post-transition facility sharing the antenna and line. GMG identified a tower with available space that can accommodate the WCWJ interim facility. The site is located at 9050 Hogan Road in Jacksonville, FL and is owned by InSite Wireless Group, LLC (InSite). The InSite tower is less than a half mile from the WCWJ tower and the Antenna Structure Registration Number (ASRN) is 1016457.

CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he

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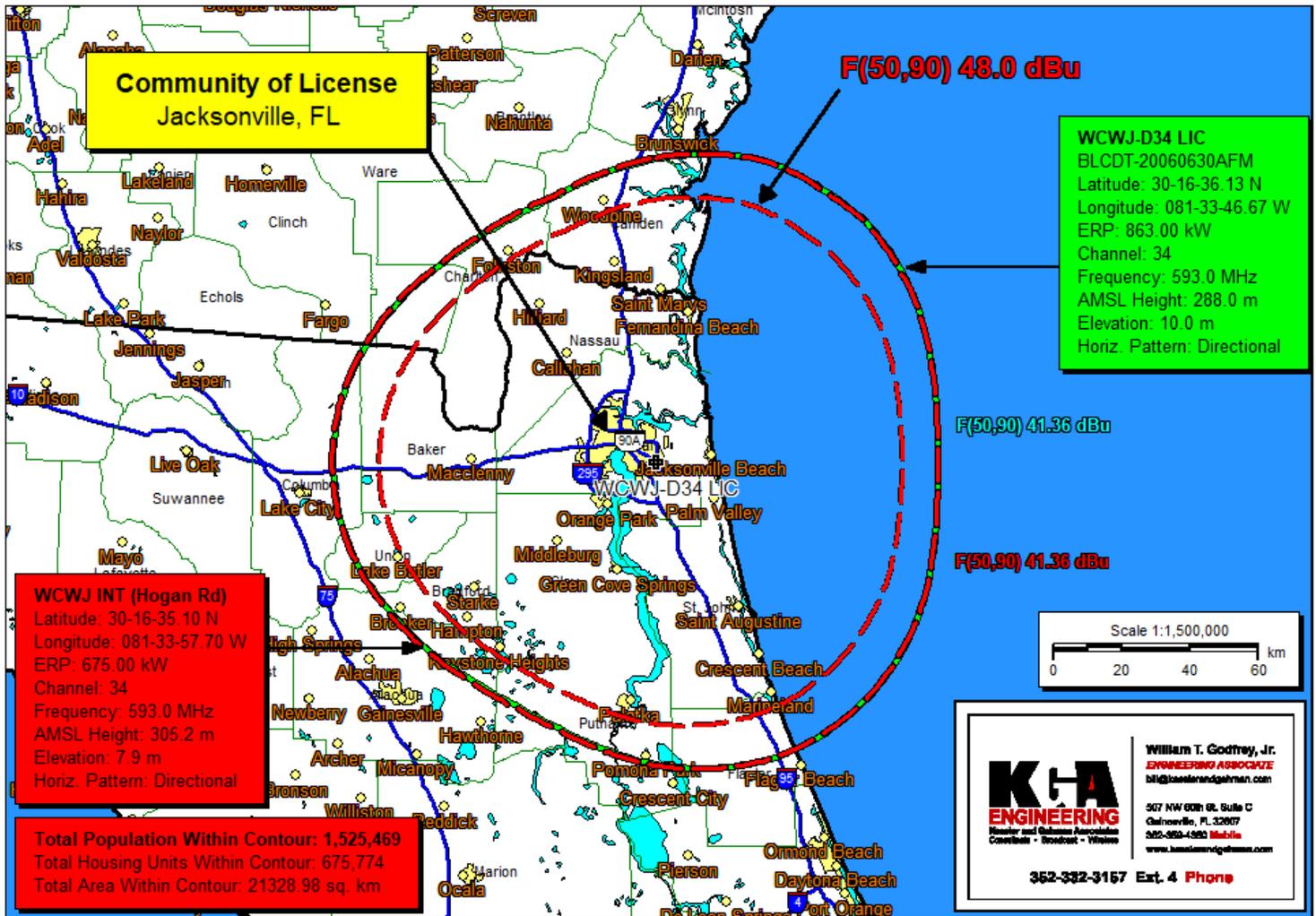
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states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

William T. Godfrey, Jr.
 WILLIAM T. GODFREY, JR., CBT
 Engineering Associate

18 July, 2018



WCWJ-D34 LIC (green) vs. WCWJ-D34 INT at Hogan Rd Site (red)