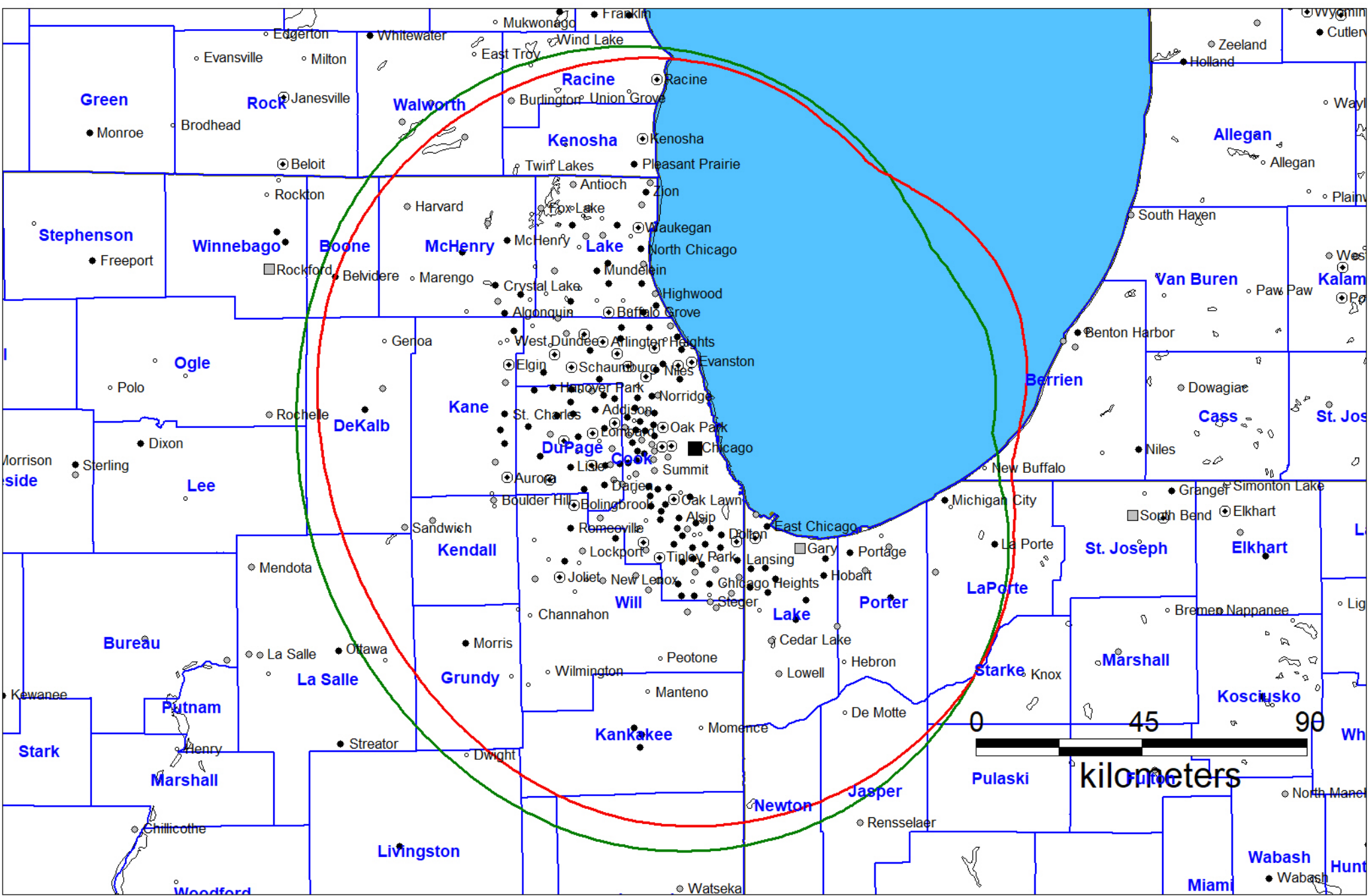


**STA Justification and Engineering Statement**  
**WFLD Channel 31 Chicago, IL**  
**January 28, 2019**

As a result of the now concluded Incentive Auction, WFLD is being repacked from channel 31 to channel 24. WFLD is located on the Willis Tower and is one of seven stations at this site being repacked in Phase 6. The repack will require replacement of the existing antennas that in turn requires significant structural work to the building itself. In that the work would result in significant off-air time for WFLD, it is proposed that WFLD will operate temporarily from a master antenna on the building now named 875 North Michigan Avenue (previously The John Hancock Center). Therefore, a STA is being requested to operate from that location on channel 31 prior to transitioning to channel 24 in Phase 6.

In order to maintain as much service as possible, it is proposed to operate from the temporary location with an effective radiated power (ERP) of 1,000 kW. An analysis using the FCC's TVStudy software with its default settings has indicated that WFLD can operate at that ERP level without causing new interference above the allowable de minimis limit to other existing stations. It is noted that due to the design of the master antenna at 875 North Michigan Avenue there will be some contour excursion to the east compared to the current licensed facility. A plot (copy attached) comparing the predicted licensed noise limited contour to the noise limited contour of the proposed STA facility shows the majority of the excursion is over Lake Michigan with only a very small area over land in Indiana and Michigan. Since, as also shown by the plot, the predicted STA noise limited contour would already be inside the licensed contour over much of the existing WFLD service area any attempt to mitigate the contour excursion to the east would further impair the existing service. Therefore, in that no new interference is created, it is requested that the contour excursion be permitted and the STA granted

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**WFLD Chicago, IL - Predicted Noise Limited Contours**  
**Licensed Channel 31 (GREEN)**  
**Proposed Channel 31 STA (RED)**