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ENGINEERING STA REQUEST
WJLP (DTV) CHANNEL 3
MIDDLETOWN TOWNSHIP, NJ
FCC FACILITY ID 86537

ENGINEERING STA STATEMENT

NARRATIVE

PMCM TV, LLC., licensee of WJLP Middletown Township, New Jersey proposes operation at its licensed antenna site, using its licensed antenna system with an increase in effective radiated power (ERP) from 6.96 kilowatts to 15.0 kilowatts. No other changes are proposed.

Extraordinary Circumstances & Public Interest:

PMCM TV, LLC, holds a construction permit that authorizes modification of its current facility license to operate at WTC-Freedom Tower (LMS file number 0000035766).

That authorization is part of a mutual power increase agreement and the associated minor change applications of WJLP, Channel 3, Middletown Township, NJ, and the immediate adjacent channel facilities of WDPN-TV (formerly KJWP), Channel 2, Wilmington, DE, WACP Channel 4, Atlantic City, NJ. ¹

WJLP has been notified by WDPN-TV and WACP that they are ready to proceed with the increased power as authorized in their respective construction permits on or before April 1st.

WJLP has however experienced delays in its construction that may last several more months as result of unforeseen construction modifications made by the building owners concerning the antenna mounting design at WTC-Freedom Tower.

¹ A fourth station, WVIR-TV, Channel 2, Charlottesville, VA is also part of the mutual power increase agreement, but does not (due to its physical distance) affect the operation of WJLP.

Additional delays in construction have also been encountered as a result of the lack of availability of building owner approved tower crews as a result of the scheduling demands placed upon such crews during the television spectrum repack.

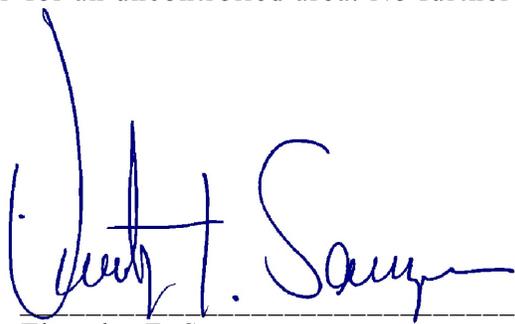
Failure of WJLP to increase its ERP in concert with the other facilities will result in a detrimental increase in interference to the viewers (public) of WJLP from adjacent channel facilities WDPN-TV and WACP. To minimize the results of the unbalanced power increase between the facilities, WJLP seeks to increase its effective radiated power at its current license site to 15 kilowatts (H & V). The increase in ERP requested in this STA by WJLP will allow for the respective power increases to proceed to the benefit of all three facilities viewers. The ERP requested matches to the extent possible the authorized service contour of the WTC/Freedom tower facilities as shown in Figure 1.² No other facilities are impacted by this request.

Environmental Impact:

No new construction will occur at the 4-Times Square site that would trigger an environmental review. The increase in ERP from 6.96 to 15 kilowatts (3.33 dB) will not result in an increase above the limits for controlled or uncontrolled areas. Power density contribution from the proposed operation was computed using the appropriate equations of the OET Bulletin 65. The maximum radiated power is 15-kilowatts (30-kilowatts H+V). Using a "worst-case" relative field pattern of 0.25 for all values 30 degrees and greater below the horizon, the power density was computed at a level of 2 meters above the building's rooftop to be 0.002 mW/cm² or 0.02% of the recommended limit of 1.0 mW/cm² for a controlled area, and 1% of the recommended limit of 0.2 mW/cm² for an uncontrolled area. No further study is required.

February 25, 2019

Respectfully Submitted,
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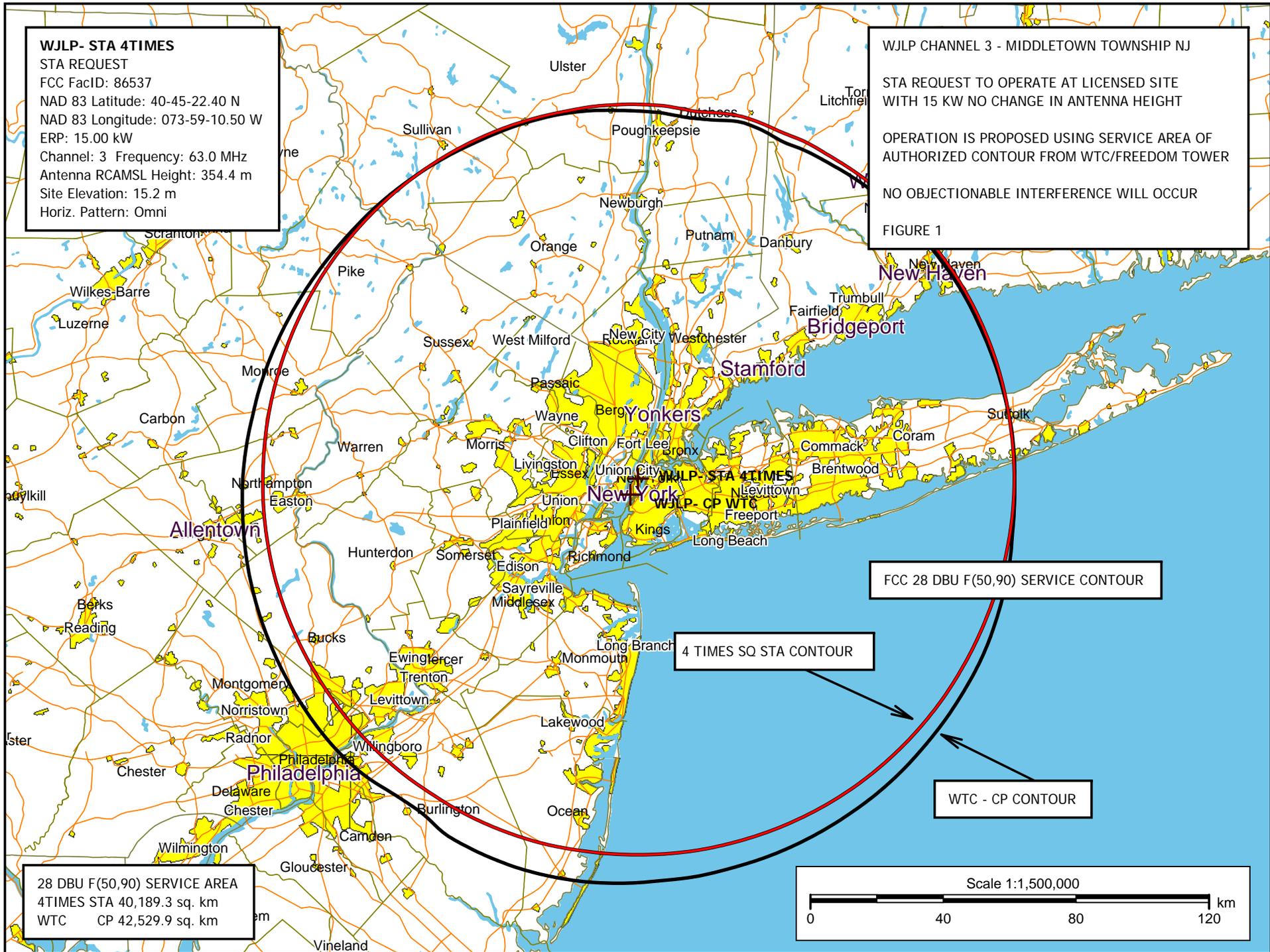


Timothy Z. Sawyer

² Minor deviation between the predicted service contours are a result of differences in the site locations and the resulting terrain path profiles.

WJLP- STA 4TIMES
 STA REQUEST
 FCC FacID: 86537
 NAD 83 Latitude: 40-45-22.40 N
 NAD 83 Longitude: 073-59-10.50 W
 ERP: 15.00 kW
 Channel: 3 Frequency: 63.0 MHz
 Antenna RCAMSL Height: 354.4 m
 Site Elevation: 15.2 m
 Horiz. Pattern: Omni

WJLP CHANNEL 3 - MIDDLETOWN TOWNSHIP NJ
 STA REQUEST TO OPERATE AT LICENSED SITE
 WITH 15 KW NO CHANGE IN ANTENNA HEIGHT
 OPERATION IS PROPOSED USING SERVICE AREA OF
 AUTHORIZED CONTOUR FROM WTC/FREEDOM TOWER
 NO OBJECTIONABLE INTERFERENCE WILL OCCUR
 FIGURE 1



28 DBU F(50,90) SERVICE AREA
 4TIMES STA 40,189.3 sq. km
 WTC CP 42,529.9 sq. km

