



ENGINEERING STATEMENT

IN SUPPORT OF REQUEST FOR SPECIAL TEMPORARY AUTHORITY WICU-TV ERIE, PA

Request for Special Temporary Authority

SJL of Pennsylvania License Subsidiary, LLC (SJL) is the licensee of WICU-TV which has been granted a construction permit (CDBS File No. BPCDT-20120619ABB) to move WICU-TV from a leased tower site (ASR#1037808)[location of licensed facility] to a nearby tower site (ASR#1055828) approximately 5.4 km away. The facility at the leased site had significant issues with the antenna and transmission line, both of which needed to be replaced. Since the lease at the site of the licensed facility was up at the end of 2018, SJL preferred to build a new facility at the nearby tower site rather than rebuild the facility at the leased site.

While awaiting grant of the construction permit (which had to go through Industry Canada review), WICU was granted Special Temporary Authority to construct a temporary facility at the new tower location in November 2018 (LMS File No. 0000063440). SJL intends to coordinate the construction of the new WICU facility with the construction of the co-located WSEE repack facility which is anticipated to occur at the end of May 2019. In order to facilitate the construction, WICU-TV

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will need to alter its interim facility to operate from a side-mounted antenna lower on the tower. SJL is therefore requesting Special Temporary Authority to operate WICU-TV with the following parameters:

Parameters	Proposed WICU-TV STA Facility
Coordinates: (NAD83)	42-02-16.0 N 80-03-43.0 W
ERP (kW):	6.5 (omni)
RCAMSL (m):	577.9

As can be seen in Figure 1, attached hereto, the noise-limited contour of the proposed WICU-TV STA facility will not exceed the noise-limited contour of the WICU-TV construction permit facility in any azimuth. The table below includes a comparison of the parameters of the WICU-TV construction permit facility vs. the proposed parameters of the STA facility.

WICU-TV Parameters	Construction Permit Facility BPCDT-20120619ABB	Proposed STA Facility
Coordinates: (NAD83)	42-02-16.0 N 80-03-43.0 W	42-02-16.0 N 80-03-43.0 W
ERP (kW):	6.8 (omni)	6.5 (omni)
RCAMSL (m):	625.9	577.9

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; since the structure is existing and registered, such conditions should not be an issue requiring further consideration.

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The location of the proposed facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.002224 mW/cm², which is less than 5% of the MPE for public exposure (0.2 mW/cm²) at Ch. 12 (204-210 MHz). The contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain “in compliance” with FCC guidelines.

SJL agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower base is enclosed by a locked security fence and appropriate signage warning of potential RFR hazards is posted.

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Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

A handwritten signature in black ink, appearing to read "B. Pidek", written over a horizontal line.

Benjamin L. Pidek, P.E.
May 1, 2019

Attached:

Figure 1 – Noise-Limited Contour of WICU-TV CP Facility vs. Noise-Limited Contour of Proposed STA Facility

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Mid-State Consultants

WICU-TV (CP)

BPCDT-20120619ABB
 Latitude: 42-02-15.80 N
 Longitude: 080-03-43.80 W
 ERP: 6.80 kW
 Channel: 12
 Frequency: 207.0 MHz
 AMSL Height: 625.9 m

WICU-TV STA

Latitude: 42-02-15.80 N
 Longitude: 080-03-43.80 W
 ERP: 6.50 kW
 Channel: 12
 Frequency: 207.0 MHz
 AMSL Height: 577.9 m

Noise-Limited Contour of WICU-TV Construction Permit Facility (Black) vs. Noise-Limited Contour of Proposed WICU-TV STA Facility

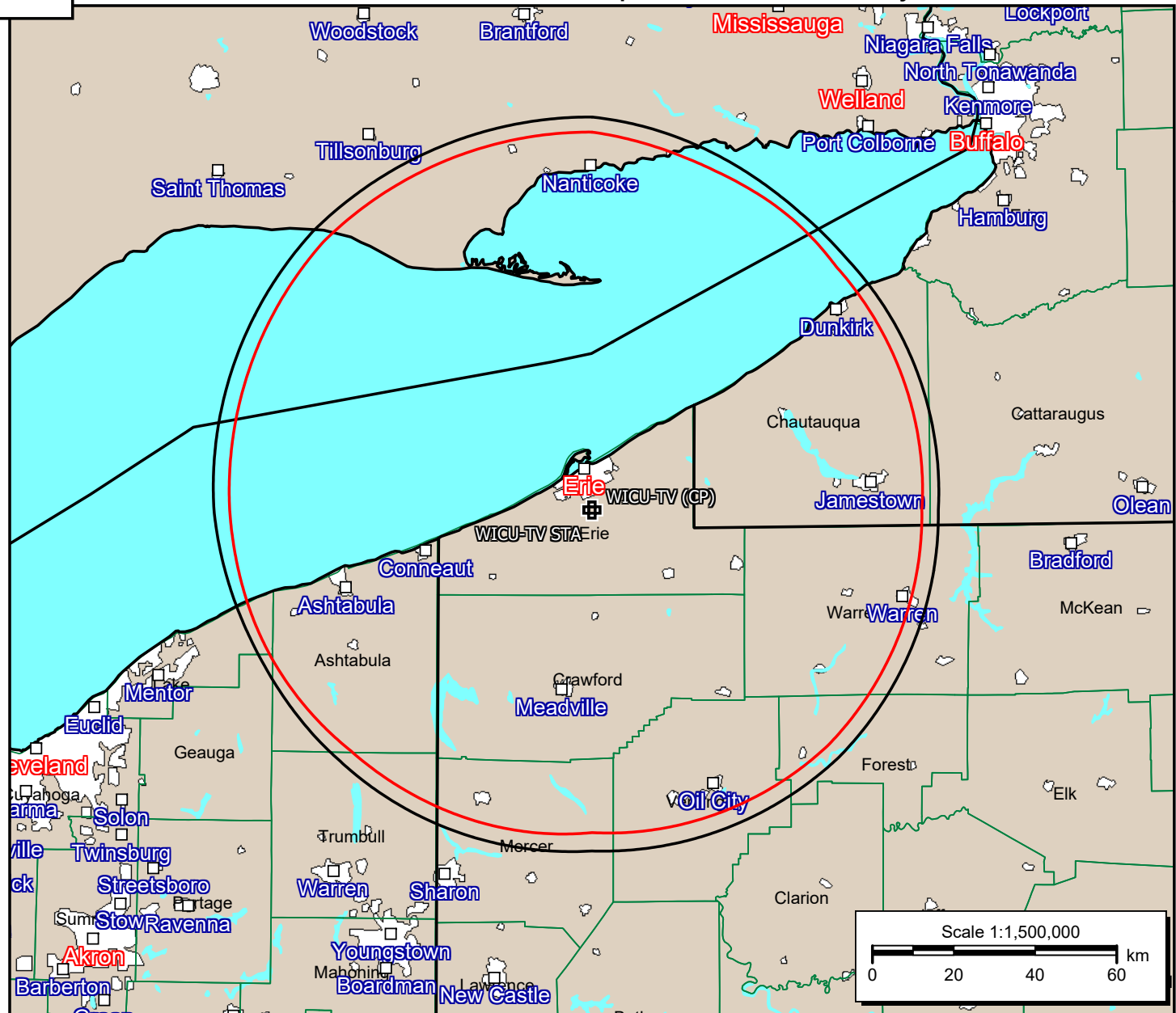


Figure 1
 5-1-19