



## **ENGINEERING STATEMENT**

**IN SUPPORT OF**

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

**WVIZ**

**CLEVELAND, OH**

### **Request for Special Temporary Authority**

ideastream is the licensee of WVIZ, located at Cleveland, OH, which is presently authorized to operate its digital facility on Channel 26. The FCC assigned Ch. 35 to WVIZ for its post-incentive auction facility and scheduled it to complete construction in Phase 4, which has a deadline of August 2, 2019.

WVIZ had been on track to complete construction of its new, main Ch. 35 facility by the deadline and had planned to begin operating with its new channel on that date; however, WVIZ has had numerous issues with the tower crews hired to install its new Ch. 35 antenna. WVIZ had to replace the original tower crew it hired. The replacement crew changed the methodology for installing the antenna from a crane lift to a helicopter lift since the antenna is part of a complicated, stacked antenna configuration with WKYC (also changing channels in Phase 4). Given that the lift had not originally been planned as a helicopter lift, the antenna manufacturer and the new tower company had to do an extensive analysis on the structural forces the antennas (and spacer) would be subjected to during the helicopter lift to ensure structural integrity could be maintained. The study was just recently completed and, while it has confirmed that the antennas

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and spacer can withstand the helicopter lift, the study was not completed in-time for the installation to be completed by the August 2 deadline.

WVIZ has installed an interim antenna, mounted lower on the tower. The antenna is broadband, and WVIZ will be able to transition to Ch. 35 on the interim facility by the August 2 deadline. Therefore, ideastream respectfully requests Special Temporary Authority to operate WVIZ on Ch. 35 with the following parameters:

Coordinates: 41° 23' 09.9" N (NAD83)  
81° 41' 20.7" W  
ERP: 150 kW (DA)  
RCAMSL: 482.2m  
Antenna: Dielectric TFU-8WB-R C160

As can be seen in Figure 1, attached hereto, the noise-limited contour of the proposed STA facility will not exceed the noise-limited of the WVIZ Ch. 35 construction permit facility (LMS File#0000075873) in any azimuth.

### **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.

The location of the proposed post-incentive auction facility is a multi-user site and it is assumed that the site is currently "in compliance" with FCC guidelines for human exposure to RFR

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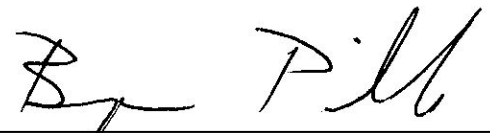
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(as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be  $0.007155 \text{ mW/cm}^2$ , which is less than 5% of the MPE for public exposure ( $0.399333 \text{ mW/cm}^2$ ) at Ch. 35 (596-602 MHz). The contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain “in compliance” with FCC guidelines.

ideastream 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

#### **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", is written over a horizontal line.

Benjamin L. Pidek, P.E.  
July 31, 2019

#### **Attached:**

Figure 1 - Noise-Limited Contour of WVIZ Ch. 35 CP Facility vs. Noise-Limited Contour of Proposed STA Facility

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## Mid-State Consultants

### WVIZ (CP)

0000075873  
 Latitude: 41-23-09.90 N  
 Longitude: 081-41-20.70 W  
 ERP: 219.50 kW  
 Channel: 35  
 Frequency: 599.0 MHz  
 AMSL Height: 590.4 m

### WVIZ (STA)

0000074148  
 Latitude: 41-23-09.90 N  
 Longitude: 081-41-20.70 W  
 ERP: 150.00 kW  
 Channel: 35  
 Frequency: 599.0 MHz  
 AMSL Height: 482.2 m

## Noise-Limited Contour of WVIZ Ch. 35 Construction Permit Facility vs. Noise-Limited Contour of Proposed Ch. 35 STA Facility

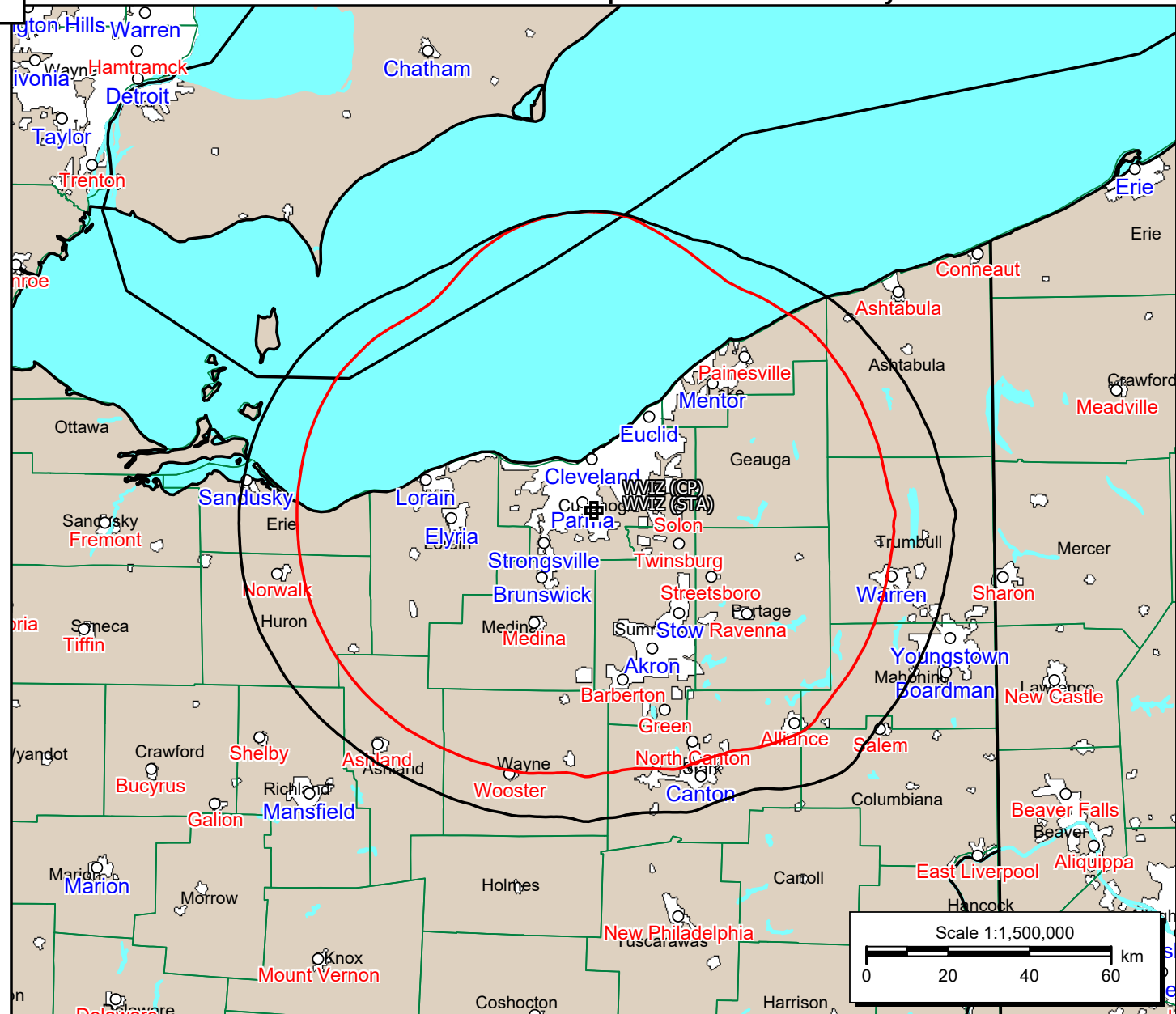


Figure 1  
 7-31-19