

## **ENGINEERING STATEMENT**

This minor modification application is submitted for WQAV-CD, Facility ID 191822, Channel 26, Glassboro, New Jersey, FCC File No. 0000079835, licensed to the Applicant herein.

### **Waiver Request and Proposed Facility**

For reasons stated below, Applicant respectfully requests (1) a waiver of the April 5, 2013 freeze (*Public Notice. DA 19-684. Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate.*) to allow the filing and processing of this application immediately.

The agreement to use the existing licensed facility expires on December 31, 2019 and American Tower has informed us that they are unable to extend the lease. They've asked us to move to another site in the existing Philadelphia antenna farm. See Attachment A.

Therefore, Applicant proposes this minor modification to move WQAV-CD to ASRN 1026755. The proposed move is less than 30 miles distant and the F(50,90) 51 dBu contour of proposed facility overlaps with the F(50,90) 51 dBu contour of the existing licensed facility. The proposed facility on channel 26 was studied using TV Study v2.2.5 using:

Study cell size: 2.00 km  
Profile point spacing: 0.10 km

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

### **Digital TV and Class A Station Protection**

The proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., "*de minimis*") based on TV Study v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

### **Low Power TV and TV Translator Station Protection**

The proposed facility causes less than 2.0% interference to surrounding low power licenses and construction permits (i.e., "*de minimis*") based on TV Study v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

### **Environment Assessment Not Required**

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. The applicant also certifies that it, in coordination with other users of each transmitter site, will reduce power or cease operation as necessary to protect persons having access to each site, transmitter or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.



VIA ELECTRONIC MAIL

November 7, 2019

Mr. Lawrence Rogow, Manager  
WMT, LLC  
5670 Wilshire Blvd., Suite 1620  
Los Angeles, CA 90036

Re: American Tower (AMT) notice of non-renewal for WQAV-CD at AMT tower site #282658 Waterford Works, NJ (FCC ASRN 1042989.)

Dear Mr. Rogow,

I am writing to inform you that the contract for WQAV-CD on our Waterford Works, NJ tower is expiring December 31, 2019. Due to commitments made to other users of the site, AMT will not be able to extend the term beyond the expiration of the current contract at this facility. I would, however, like to suggest that WAQV-CD work with me to select a location on our Paoli tower #10110 (ASR 1026755.) This tower is in the existing antenna farm location in Philadelphia, PA.

Please contact me as soon as possible to discuss finding a suitable tower location for WQAV-CD's channel 26 requirements on our Paoli tower. Thank you.

Warmest Regards,

*Cyndi Byrd*

Cyndi Byrd  
Senior Manager, Broadcast  
American Tower Corporation