



ENGINEERING STATEMENT

IN SUPPORT OF

APPLICATION FOR NEW DIGITAL AUXILIARY CONSTRUCTION PERMIT

WTVF

NASHVILLE, TN

Background

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WTVF, located at Nashville, TN, which had previously been licensed to operate its digital facility on Ch. 25, but was assigned Ch. 36 as its post-incentive auction channel. WTVF completed its transition to the new channel in October 2019 and the post-incentive auction facility is now licensed (LMS File No. 0000090378).

As part of the process to transition to its repack channel, WTVF constructed an interim facility capable of operating on Ch. 36 and it would now like to license the interim facility as an auxiliary facility.

Antenna System and Tower

The WTVF auxiliary facility will continue using the same site and tower as its main facility. It will operate from a side-mounted directional ERI ATW16HW-HSOX-36H antenna (pattern data attached hereto). The antenna is installed on the tower (ASR#1041373) at a radiation center of 498.0m AMSL.

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ERP and Coverage

WTVF proposes to operate the auxiliary DTV facility with an ERP of 1000 kW; the entire principal community of Nashville, TN is well within the predicted F(50,90) 48 dBu contour of this facility. Furthermore, as shown in Figure 1, attached hereto, the predicted noise-limited contour of the proposed auxiliary facility does not extend beyond the noise-limited contour of the licensed main facility.

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 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 0.014075 mW/cm², which is less than 5% of the MPE for public exposure (0.403333 mW/cm²) at Ch. 36 (602-608 MHz). Per Section 1.1307(b) of the FCC Rules, the proposed operation would be categorically excluded from taking corrective action in areas with levels above the MPE limit where the contribution to the RFR from the proposed facility is less than 5%.

Scripps 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

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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", written over a horizontal line.

Benjamin L. Pidek, P.E.
November 27, 2019

Attached:

Figure 1 - Noise-Limited Contour of Licensed Main Ch. 36 Facility vs. Noise-Limited Contour of Proposed Auxiliary Facility

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Mid-State Consultants

WTVF

0000090378

Latitude: 36-16-05 N

Longitude: 086-47-16 W

ERP: 1000.00 kW

Channel: 36

Frequency: 605.0 MHz

AMSL Height: 616.0 m

WTVF (Aux)

Latitude: 36-16-05 N

Longitude: 086-47-16 W

ERP: 1000.00 kW

Channel: 36

Frequency: 605.0 MHz

AMSL Height: 498.0 m

Noise-Limited Contour of Licensed WTVF Ch. 36 Facility (Black) vs. Predicted Noise-Limited Contour of Proposed Auxiliary Facility (Red)

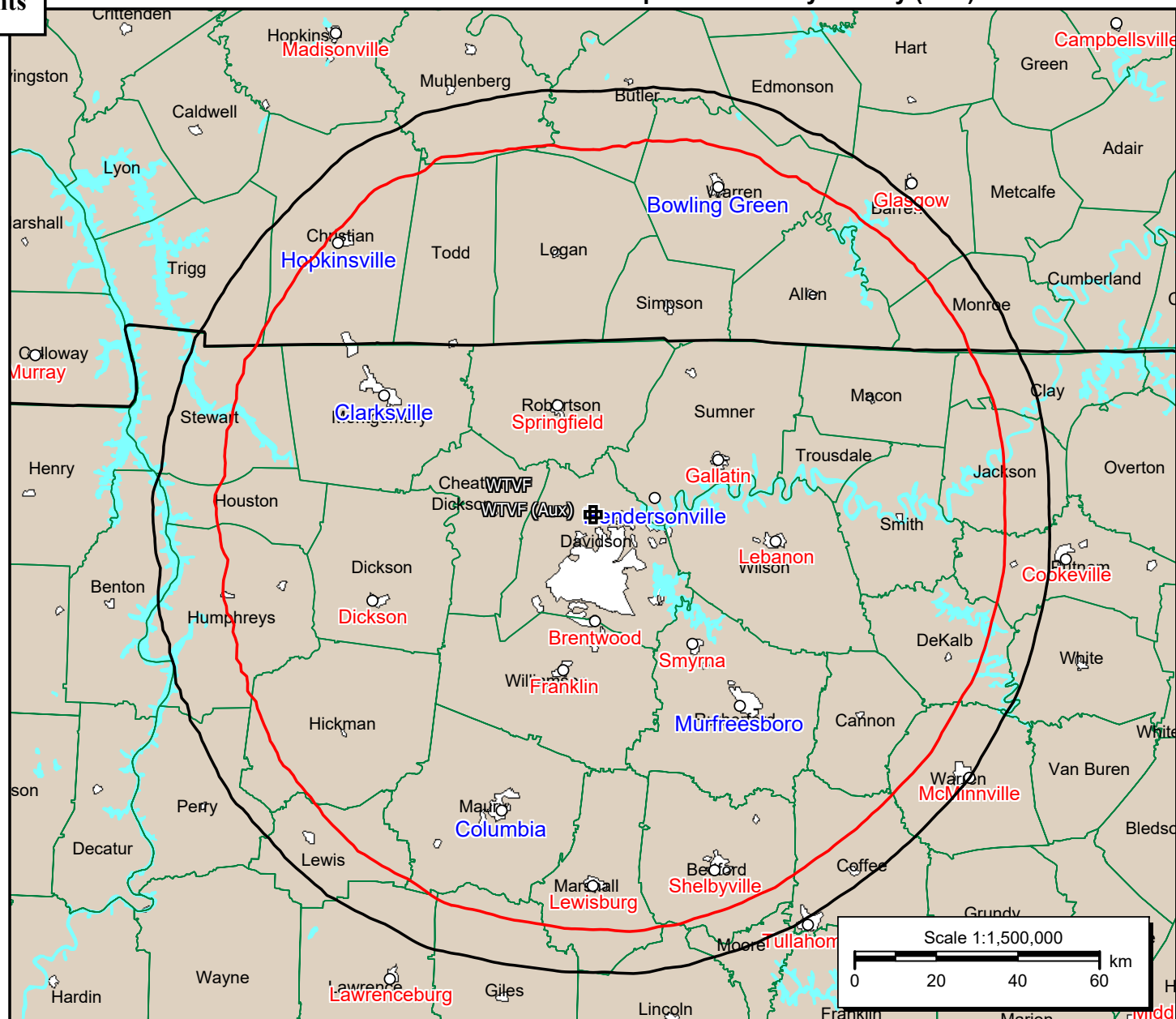


Figure 1
11-22-19