

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of THE UNION MISSION, licensee of Class A television station WJGN-CD, Channel 38 in Chesapeake, Virginia. The station was granted a construction permit by the Federal Communications Commission to change its operating channel to Channel 27 as part of the FCC's spectrum auction and television station repack. The permit (LMS-0000025319) for the Channel 27 facility specifies the same transmitter site and antenna radiation center above ground as that presently in operation on Channel 38. The only physical changes to the transmitting facility on the existing tower will be a same-in-kind replacement of the antenna.

The WJGN-CD transmitter site is located 3.0 kilometers southeast of AM station WGPL, 1350 kHz, DA-2, in Portsmouth, Virginia. The Commission's rules state that construction of a new television facility located within two miles (3.2 kilometers) of an existing directional AM station must agree to perform proof-of-performance measurements on the AM station, before and after construction of the television station, in order to ensure that the new television structure does not alter the directional pattern of the AM station. Accordingly, the following condition was placed on the WJGN-CD, Channel 27, construction permit:

Prior to construction of the tower authorized herein, permittee shall notify AM Station(s) listed below so that, if necessary, the AM station(s) may determine operating power by the indirect method and request temporary authority from the Commission in Washington, D.C. to operate with parameters at variance in order to maintain monitoring point field strengths within authorized limits. Permittee shall be responsible for the installation and continued maintenance of detuning apparatus necessary to prevent adverse effects upon the radiation pattern of the AM station(s). Both prior to construction of the tower and subsequent to the installation of all appurtenances thereon, a partial proof of performance, as defined by Section 73.154(a) of the Commission's Rules, shall be conducted to establish that the AM array has not been adversely affected and, prior to or simultaneous with the filing of the application for license to cover this permit, the results submitted to the Commission. Call sign: WGPL City: Portsmouth State VA.

However, due to the fact that replacement of the WJGN-CD transmitting antenna will not significantly change the electrical characteristics of the existing overall tower on which they are presently located, it is believed that this condition should not apply to the new WJGN-CD repack facility.

The broadcast tower on which the present WJGN-CD slotted cylinder antenna is mounted (ASRN-1047304) has an overall height above ground of 152.1 meters (including appurtenances). The WJGN-CD antenna is mounted 110.9 meters above ground. Also mounted on the same tower are the transmitting antennas of the following broadcast stations: WGBS-LD, Channel 11, Carrollton, Virginia; WJHJ-LD, Channel 39, Newport News, Virginia; and, WUSH(FM), Channel 291B1, Poquoson, Virginia. No new tower construction was proposed by WJGN-CD in its repack application and no extension of the height of the existing tower was specified.

Clearly, from the electrical viewpoint of WGPL(AM), the addition of the WJGN-CD antenna to an existing tower located 3 kilometers away is not significant, and the replacement of that antenna with a similar one will not alter the antenna pattern of this AM station.

Accordingly, it is believed that the AM measurement condition placed by the Commission on the WJGN-CD construction permit (LMS-0000025319) is unnecessary in this instance due to the reasons stated above.

I declare, under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read 'K. T. Fisher', is written over a horizontal line.

Kevin T. Fisher, President
Smith and Fisher, LLC

January 10, 2020