



ENGINEERING STATEMENT

IN SUPPORT OF
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
WKBW-TV
BUFFALO, NY

Request for Special Temporary Authority

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WKBW-TV, located at Buffalo, NY, which is presently authorized to operate its digital facility on Channel 38. The FCC assigned Ch. 34 to WKBW for its post-incentive auction facility and scheduled it to complete construction in Phase 8, which has a deadline of March 13, 2020.

WKBW-TV had been on track to begin operating on Ch. 34 with its new main antenna by the Phase 8 deadline; however, the tower crew that WKBW-TV has hired to install its new transmission line recently informed WKBW-TV that they will not be able to make it to Buffalo until sometime in April (at the earliest) to complete the scheduled installation due to delays on other projects that must be completed ahead of WKBW-TV.

**PROVIDING COMMUNICATION
SYSTEMS ENGINEERING**

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750



WKBW-TV has installed a broadband antenna on the tower which can operate on Ch. 34 and WKBW-TV intends to transition to that antenna on the March 13, 2020 deadline, if necessary. Therefore, Scripps respectfully requests Special Temporary Authority to operate WKBW-TV on Ch. 34 with the following parameters:

Coordinates: 42° 38' 15.0" N (NAD83)
78° 37' 11.0" W
ERP: 560.0 kW (DA)
RCAMSL: 761.4m
Antenna: Dielectric TFU-16WB-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 contour of the WKBW-TV Ch. 34 construction permit facility (LMS File#0000034829) 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 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 0.014074 mW/cm², which is less than 5% of the MPE for public exposure (0.395333 mW/cm²) at Ch. 34 (590-596 MHz). Per Section 1.1307(b) of the FCC Rules, the proposed operation would be

PROVIDING COMMUNICATION SYSTEMS ENGINEERING

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750



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 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 "Ben Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.
February 21, 2020

Attached:

Figure 1 - Noise-Limited Contour of WKBW-TV Ch. 34 CP Facility vs. Noise-Limited Contour of Proposed STA Facility

PROVIDING COMMUNICATION SYSTEMS ENGINEERING

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750

Mid-State Consultants

WKBW-TV (CP)

0000034829

Latitude: 42-38-14.78 N

Longitude: 078-37-11.91 W

ERP: 660.00 kW

Channel: 34

Frequency: 593.0 MHz

AMSL Height: 844.7 m

WKBW-TV (STA)

Latitude: 42-38-14.78 N

Longitude: 078-37-11.91 W

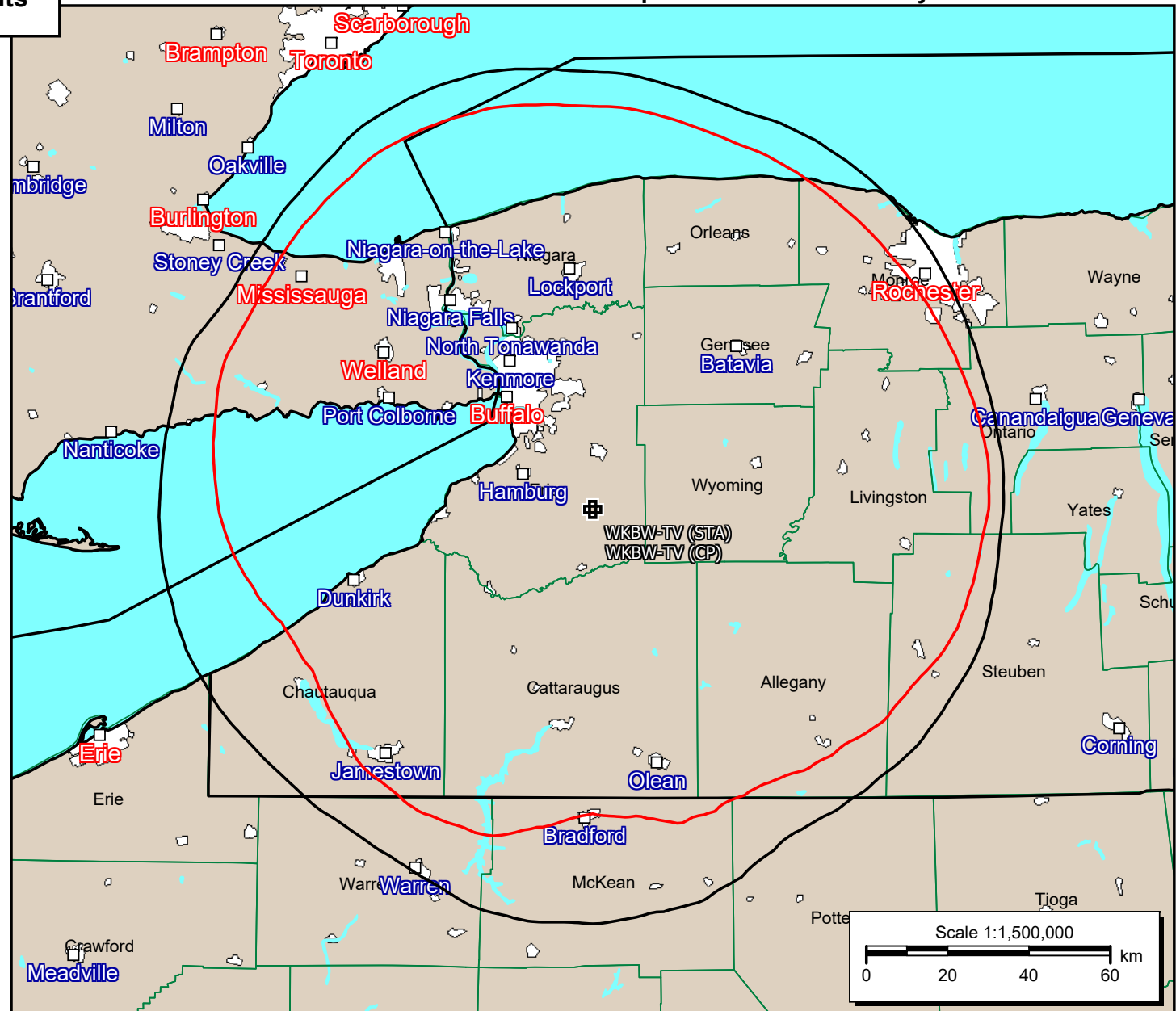
ERP: 560.00 kW

Channel: 34

Frequency: 593.0 MHz

AMSL Height: 761.4 m

Noise Limited Contour of WKBW-TV Ch. 34 Construction Permit Facility vs. Noise Limited Contour of Proposed Ch. 34 STA Facility



Black - Noise Limited Contour of WKBW Ch. 34 CP Facility

Red - Noise Limited Contour of WTVS Ch. 34 STA Facility (ERP - 560 kW, RCAMSL - 761.4m)

Figure 1

2-21-20