

ENGINEERING STATEMENT

This Engineering Statement supports this Application to modify construction permit 0000054814 for WCHU-LD, Facility ID 129745, licensed to the Applicant herein.

Proposed Facility

The Applicant proposes to modify the antenna location and technical data. This is the only way Applicant can complete construction of WCHU-LD's displacement facility and resume operations in a timely manner.¹ Between general delays in getting equipment and crews, the COVID-19 pandemic, several stations in the Chicago market required tolling extensions. Applicant is confident that WCHU-LD will get built without further extensions required at the proposed site.

The proposed facility is 0.7 miles from its existing licensed facility and from its existing authorized CP facility. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility.

The proposed facility was studied using TVStudy v2.2.5 using the following parameters and the results are as follow:

- Study cell size: 0.50 km
- Profile point spacing: 0.05 km
- Distance to Canadian border: 370.3 km
- Distance to Mexican border: 1826.9 km
- Conditions at FCC monitoring station: Allegan MI
Bearing: 59.4 degrees Distance: 158.9 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:
Bearing: 268.4 degrees Distance: 1485.7 km

It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

Waiver Request

The Applicant hereby requests to waive the contingent application rule 47 C.F.R Section 73.3517 to allow the grant of this application which is necessary for the station to continue to serve its current viewers.

In addition, in order to comply with Section 73.3700(g)(2), the Applicant agrees to a condition that the proposed facility will not commence operation of the proposed facility until any other potentially mutually interfering repacked full power or Class A stations have left their channels pursuant to the relevant phase assignment.

¹ WCHU-LD went off the air on August 15, 2019 pursuant to STA 0000080601.

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 TVStudy 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 TVStudy 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 Effect

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. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.