



## **ENGINEERING STATEMENT**

**IN SUPPORT OF**  
**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**  
**WTKR**  
**NORFOLK, VA**

### **Request for Special Temporary Authority**

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WTKR, located at Norfolk, VA, which is presently authorized to operate its digital facility on Channel 40. The FCC assigned Ch. 16 to WTKR for its post-incentive auction facility and scheduled it to complete construction in Phase 10, which has a deadline of July 3, 2020.

The new WTKR repack broadcast facility will be located at an American Tower approximately 12.5 miles West of Norfolk. WHRO, WPXV and WGNT (also owned by Scripps) will share the site with WTKR. All four stations are moving to new channels as part of repack and all will share a common broadband antenna that has been installed at the top of the tower. Unanticipated delays due to both the COVID-19 virus and weather have prevented tower crews from installing all the required transmission line for the new main antenna. As such, WTKR will not be able to transition to the new main antenna by the Phase 10 deadline.

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American Tower has installed a broadband interim/auxiliary antenna which is side-mounted, lower on the tower and all stations are currently capable of operating from it. WTKR intends to operate on its repack channel from the interim facility starting at the Phase 10 transition deadline (July 3, 2020). Therefore, Scripps respectfully requests Special Temporary Authority to operate WTKR on Ch. 16 with the following parameters:

Coordinates: 36° 48' 31.8" N (NAD83)  
76° 30' 11.3" W  
ERP: 625.0 kW (DA)  
RCAMSL: 299.6m  
Antenna: RFS SBB-EPD-24C160

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 WTKR Ch. 16 construction permit facility (LMS File#0000034472) 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 0.005305 mW/cm<sup>2</sup>, which is less than 5% of the MPE for public exposure (0.323333 mW/cm<sup>2</sup>) at

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Ch. 16 (482-488 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 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.  
June 23, 2020

**Attached:**

Figure 1 - Noise-Limited Contour of WTKR Ch. 16 CP Facility vs. Noise-Limited Contour of Proposed STA Facility

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**Noise Limited Contour of WTKR Ch. 16 Construction Permit Facility vs.  
Noise Limited Contour of Proposed Ch. 16 STA Facility**

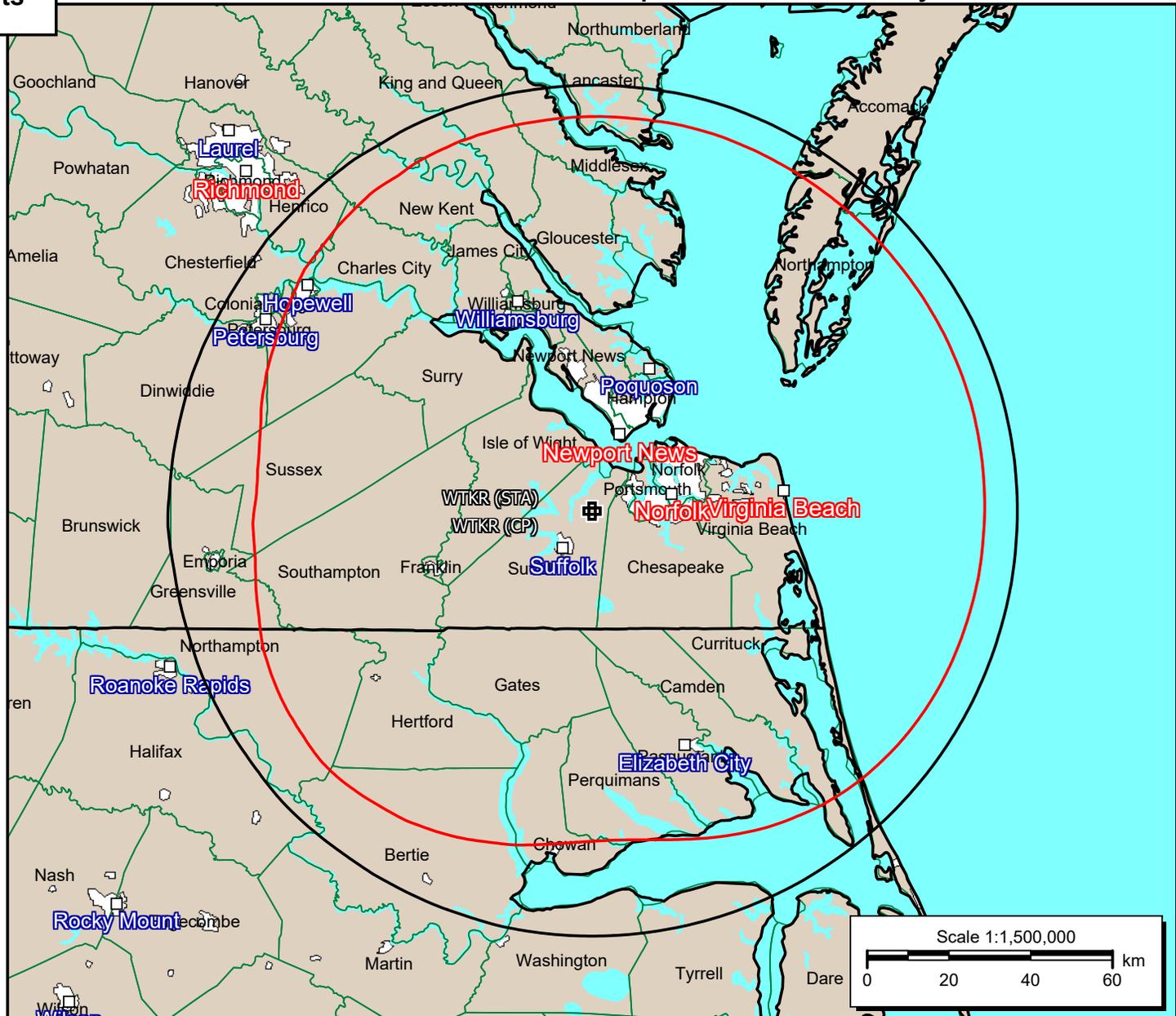
**Mid-State Consultants**

**WTKR (CP)**

0000034472  
 Latitude: 36-48-31.26 N  
 Longitude: 076-30-12.49 W  
 ERP: 610.00 kW  
 Channel: 16  
 Frequency: 485.0 MHz  
 AMSL Height: 380.7 m

**WTKR (STA)**

Latitude: 36-48-31.80 N  
 Longitude: 076-30-11.30 W  
 ERP: 625.00 kW  
 Channel: 16  
 Frequency: 485.0 MHz  
 AMSL Height: 299.6 m



**Black - Noise Limited Contour of WTKR Ch. 16 CP Facility**  
**Red - Noise Limited Contour of WTKR Ch. 16 STA Facility (ERP - 625 kW, RCAMSL - 299.6m)**

**Figure 1**  
**6-23-20**