



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
A CONSTRUCTION PERMIT TO
AUTHORIZE AN AUXILIARY FACILITY FOR
WPVI-TV - PHILADELPHIA, PENNSYLVANIA
CH. 6 - 32 kW - 332 meters HAAT**

Prepared for: ABC, INC.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

GENERAL

This office has been authorized by ABC, INC., Licensee of WPVI-TV, channel 6, Philadelphia, Pennsylvania, to prepare this statement, FCC Form 2100, and the associated exhibits, in support of an application for construction permit. It is proposed herein for WPVI-TV to utilize an existing antenna that originally was the main analog antenna on channel 6 prior to the installation of WPVI-TV's new circular polarized channel 6 antenna that is currently the main licensed antenna. The proposed former analog antenna is a RCA model TF-6BH horizontally polarized non-directional unit. WPVI-TV now seeks to utilize this antenna as its auxiliary channel 6 auxiliary digital facility. The proposed auxiliary facility's Effective Radiated Power (ERP) is 32 kW with a Height Above Average Terrain (HAAT) of 332 meters.

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PURPOSE OF APPLICATION

WPVI-TV seeks the proposed auxiliary facility for use when conditions necessitate the cessation of operation of WPVI-TV's main antenna. WPVI-TV seeks the proposed 32 kW ERP in order to maximally conform the predicted coverage area of the proposed auxiliary facility with the predicted coverage area of its licensed main facility. In compliance with Section 73.1675 of the Commission's rules, the licensee has determined that the instant proposal will, to a reasonable degree, approach its goal of providing comparable coverage to its viewers when necessary to use the proposed WPVI-TV auxiliary facility.

AUTHORIZED FACILITY

WPVI-TV's current authorization permits a facility with an ERP of 34 kW at a Height Above Average Terrain (HAAT) of 330 meters. WPVI-TV's authorized antenna is a Dielectric Model CBR-O3FMB-6/18H-1 channel 6 omni-directional circular polarized antenna. The antenna is mounted on a tower bearing the FCC's ASR number 1035474, with its radiation center line located 320.7 meters above ground level. The authorized antenna employs an electrical beam-tilt of 1 degrees below the horizontal plane.

PROPOSED AUXILIARY FACILITY

WPVI-TV seeks authorization for an auxiliary facility with an ERP of 32 kW at a HAAT of 332 meters. The proposed former analog antenna is a RCA model TF-6BH horizontally polarized non-directional unit mounted on a tower bearing FCC registration number 1023152, with its radiation center line located 327.5 meters above ground level. The antenna employs no beam tilt below the horizontal plane.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Figure 4 contains the predicted DTV Noise Limited (28 dBu) contours for both the main and auxiliary facilities. It is clear that the predicted 28 dBu auxiliary contour does not extend beyond the predicted 28 dBu contour for the main facility in any direction. The instant proposal therefore complies with Section 73.1675(a)(1)(iii) of the FCC's Rules.

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the proposed WPVI-TV site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT, SAFETY & STATEMENT OF COMPLIANCE

The licensee of WPVI-TV is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WPVI-TV antenna and will reduce power or cease operation, when necessary, to ensure protection to personnel.

As described herein the proposed WPVI-TV channel 6 auxiliary facility will operate with a maximum ERP of 32 kW from a horizontally polarized non-directional transmitting antenna with a centerline height of 327.5 meters above ground level (AGL). Based on worst-case calculations and considering a very conservative vertical relative field factor of 0.3 pursuant to OET Bulletin 65, the proposed auxiliary television facility is predicted to produce a maximum power density of only $0.908 \mu\text{W}/\text{cm}^2$ at two meters above ground level. This represents only 0.45% of the FCC Guideline value of $200 \mu\text{W}/\text{cm}^2$ for uncontrolled RFR environments, and 0.091% of the FCC's guideline value for "controlled" environments. Therefore, pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed facility would not exceed 5% of the uncontrolled and controlled exposure limits, the proposal's power density contribution is considered insignificant.

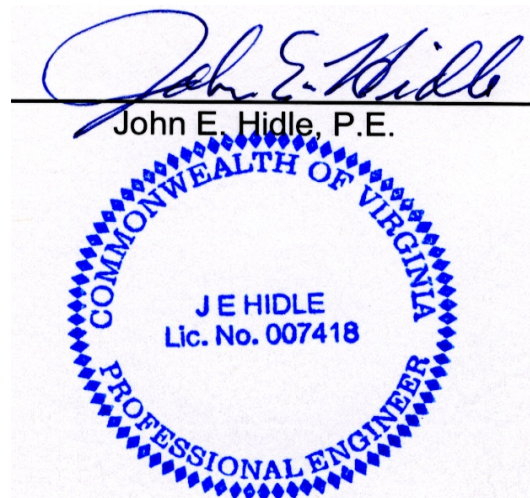
Further, the applicant will continue to cooperate and coordinate with other any other site users and reduce power or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

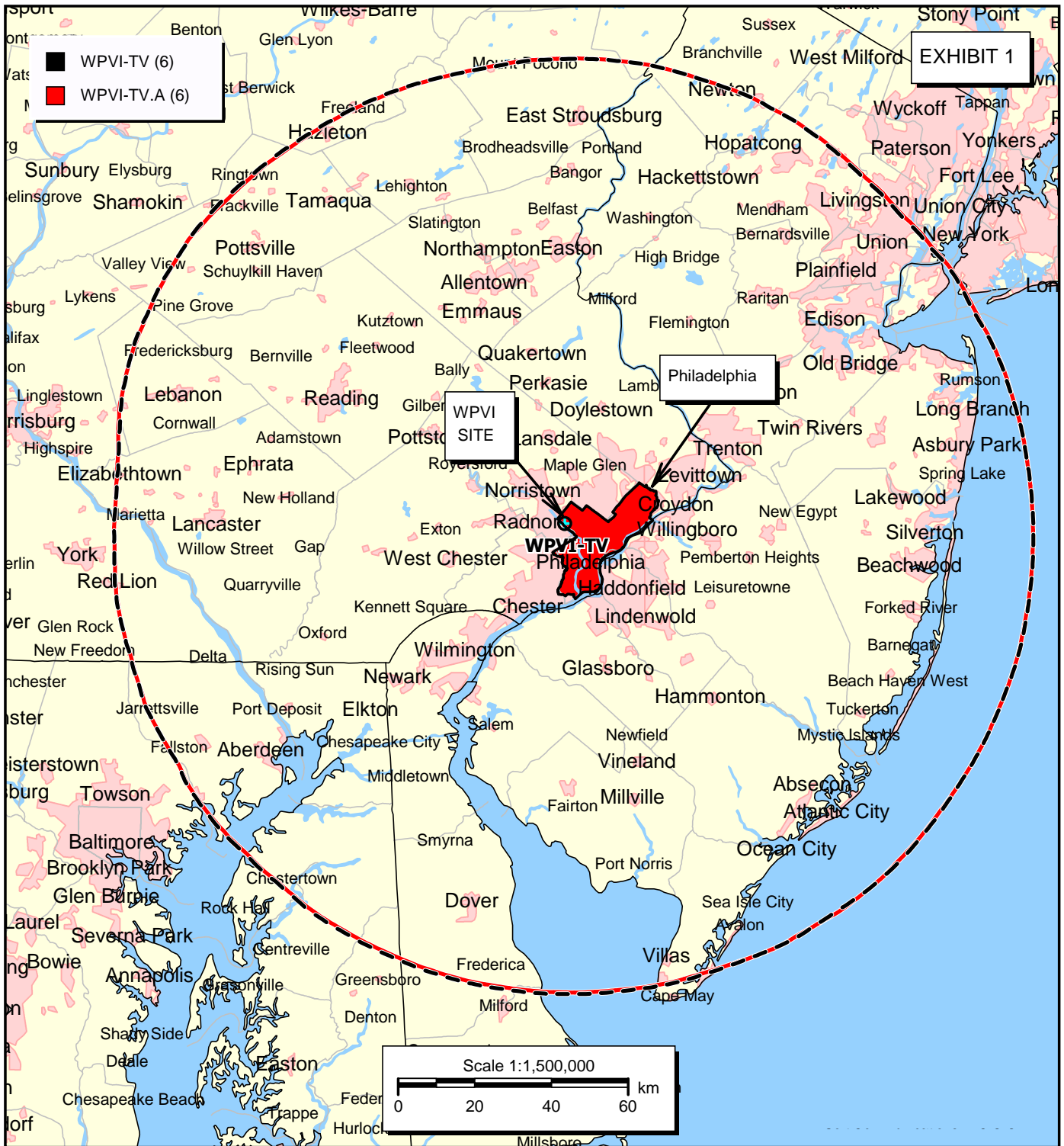
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SUMMARY

It is submitted that the instant application for construction permit for WPVI-TV seeking to use an existing former non-directional analog antenna for an auxiliary facility with an ERP of 32 kW at a HAAT of 332 meters, as described herein, complies with the Rules, Regulations, and Policies of the Federal Communications Commission. This statement, FCC Form 2100, and the attached exhibits were prepared by me, or under my direct supervision, and are believed to be true and correct to the best of my knowledge and belief.

DATED: July 22, 2020





PREDICTED COVERAGE CONTOURS

WPVI-TV 6 AP - Philadelphia, PA
 DTV Channel 6 - 32 kW ERP - 332 M HAAT
 JULY, 2020

Licensed Noise Limited 28.0 dBu
 F(50,90) Coverage Contour



Proposed Noise Limited 28.0 dBu
 F(50,90) Coverage Contour



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Further, the applicant will continue to cooperate and coordinate with other any other site users and reduce power or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.