

***COMPREHENSIVE TECHNICAL EXHIBIT
REQUEST FOR SPECIAL TEMPORARY AUTHORITY***

**WDNP-LP – ST. PETERSBURG, FLORIDA
FACILITY ID: 67986**

DIGITAL NETWORKS – SOUTHEAST, LLC

AUGUST 2020

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8.13.2020

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

The following engineering statement has been prepared for **Digital Networks-Southeast, LLC** ("Southeast"), licensee of low power television station WDNP-LD at St. Petersburg, Florida, and are in support of their request for special temporary authority.¹

WDNP-LD is licensed to operate on channel 36 with a maximum effective radiated power of 15 kW at a center of radiation of 78.9 meters above mean sea level utilizing a directional antenna.² This facility was displaced as a result of the Commission's "repack" activities. The current outstanding construction permit for WDNP-LD is on channel 34, where the authorized maximum effective radiated power is also 15 kW. The authorized center of radiation is 103 meters above mean sea level, where a directional antenna would be utilized. The authorized technical parameters are located at a different tower than that utilized by the licensed facility. This proposed special temporary authority seeks to operate with the authorized technical parameters, but with a reduction in the maximum effective radiated power to 2 kW.

Due to the current conditions in the post-repack industry, including the impact on labor and supply chains that the COVID-19 pandemic has caused, Southeast will be unable to complete the installation of the transmitter in time to preserve the license, which is currently silent. Southeast therefore respectfully requests operation at the authorized parameters with a reduced maximum effective radiated power for up to 180 days to complete the necessary construction of the facility displaced by the spectrum repack.

¹ The Facility ID for WDNP-LD at St. Petersburg, Florida is 67986.

² See LMS File No. 0000007389.

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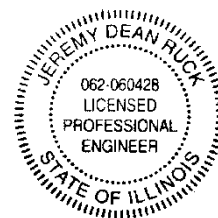
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The proposed technical parameters represent a reduction in the maximum effective radiated power, while maintaining all other parameters identical to those authorized under the current construction permit. As a result, the STA technical parameters would not result in any predicted increase in the level of interference caused to other proposed and authorized facilities. Additionally, due to the reduced maximum effective radiated power, the specified parameters would represent a reduction in the power density at ground level relative to the authorized parameters. Thus, the proposed special temporary authority would not constitute a significant environmental impact, and is exempt from environmental processing.

Southeast certifies that it will coordinate with all other users of the site to ensure that workers and other persons are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power output or cessation of operation as necessary to protect persons at the site.

The preceding statement has been prepared by me, or under my direction, and is true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2021

Jeremy D. Ruck, PE
August 13, 2020

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