



**Kessler and Gehman Associates**

**Consultants • Broadcast • Wireless**

**APPLICATION FOR  
SPECIAL TEMPORARY  
AUTHORITY OF A  
TELEVISION BROADCAST  
STATION**

**CALL SIGN: WACS-TV**

**FACILITY ID: 23930**

**LOCATION: DAWSON, GA**

**Prepared For:**

Georgia Public  
Telecommunications  
Commission  
260 14th St NW  
Atlanta, GA 30318

**Prepared By:**

Ryan Wilhour  
Consulting Engineering  
Kessler and Gehman Associates  
507 NW 60<sup>th</sup> Street, Suite D  
Gainesville, FL 32607-2055  
352-332-3157 Extension 3  
[ryan@kesslerandgehman.com](mailto:ryan@kesslerandgehman.com)  
[www.kesslerandgehman.com](http://www.kesslerandgehman.com)

March 16, 2021

## **1.0 PROPOSED SPECIAL TEMPORARY AUTHORITY**

Kessler and Gehman Associates, Inc. has been authorized by Georgia Public Telecommunications Commission licensee of WACS-TV to prepare an engineering Special Temporary Authority (STA) application to operate its main facility at reduced ERP through an unused existing antenna<sup>1</sup> mounted to a lower section of the tower. On or about March 13, 2021 the WACS-TV main antenna experienced a catastrophic anomaly. Upon inspection of the antenna it was discovered that the Teflon insulators were melted, and other internal damage was observed. The main antenna must be removed from the tower and shipped to the antenna manufacturer for repair. Grant of the instant STA will serve the public interest by allowing WACS-TV to continue broadcasting while the main antenna is being repaired and reinstalled.

## **2.0 PREDICTED COVERAGE CONTOUR**

Appendix A demonstrates the predicted noise limited coverage contours of the proposed STA facility and its associated main licensed facility. The contours were generated in accordance with the method described in 47 CFR Section 73.625 utilizing the appropriate F(50,90) propagation curves.

Appendix A clearly illustrates that the proposed STA contour is 100% subsumed by the licensed contour. The instant STA facility shall substantially achieve its goal of providing comparable coverage to its viewers while the main antenna is down for repair.

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<sup>1</sup> Jampro JSM-4 / 7 SHTO-V-R antenna which was used during the incentive auction while converting WACS-TV from channel 25 to 7.

### **3.0 RADIO FREQUENCY RADIATION COMPLIANCE**

A theoretical analysis has been conducted of the human exposure to radio frequency radiation (“RFR”) using the calculation methodology described in OET Bulletin 65, Edition 97-01. The RFR analysis is conducted pursuant to the following methodology:

Terrain<sup>2</sup> extraction is compiled from the proposed tower site to radial lengths of 0.25 miles in 0.001 mile increments for 360 radials. The power density is calculated for each terrain point at 6 feet above ground level using the elevation and azimuth pattern of the proposed broadcast antenna. The power density calculations are conducted using the lower edge of the proposed channel frequency. To account for ground reflections, a coefficient of 1.6 was included in the calculation.

The resulting cylindrical polar analysis is then summarized into a coordinate plane graph using the following methodology:

Starting from the origin the maximum calculated RFR value is determined among the 360-degree radials for each 0.001 mile increment, the value is then converted into a percentage of the maximum allowable general population or uncontrolled exposure and plotted as a function of perpendicular distance from the tower.

The resulting RFR study in Appendix B demonstrates that the peak exposure is 0.500% of the most restrictive permissible exposure threshold. Pursuant to OET Bulletin 65 concerning multiple-user transmitter sites only those licensees whose transmitters produce power density levels greater than 5.0% of the exposure limit are considered significant contributors to RFR. Since the proposed operation is within 5% of the most permissible exposure at any location 2 meters above the

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<sup>2</sup> Terrain extraction is based upon a 3 arc second point spacing terrain database.

ground, it is not considered a significant contributor to RFR exposure. Thus, contributions to exposure from other RF sources in the vicinity of the proposed facility were not taken into account. The instant application is compliant with the FCC limits for human exposure to RF radiation and is excluded from further environmental processing since no changes are proposed to the tower structure in order to accommodate the proposed antenna.

A chain link fence encloses the support structure and the applicant will cooperate with any other users of the tower by reducing the power to the antenna or if necessary, completely cutting it off to protect maintenance workers on the tower.

#### **4.0 CERTIFICATION**

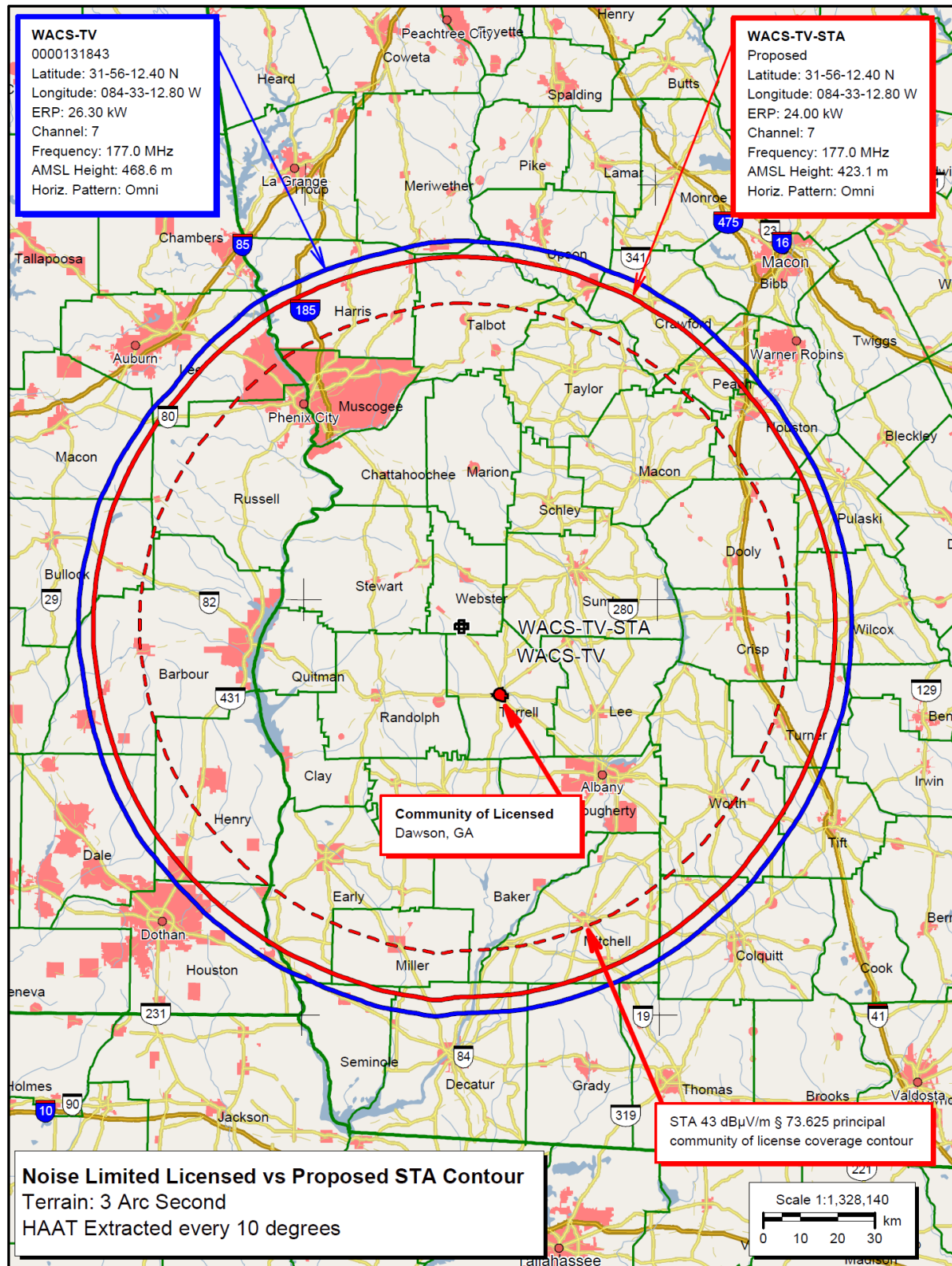
I, Ryan Wilhour, am an engineering associate of Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and have been working in the field of radio and television broadcast consulting since 1996. The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge.

Ryan Wilhour



Consulting Engineer  
March 16, 2021

APPENDIX A – Section 73.625(a) Community of License Coverage Map



## APPENDIX B – Far Field Exposure to RF Emissions

