



Kessler and Gehman Associates
Consultants • Broadcast • Wireless

**MINOR AMENDMENT
TO A DIGITAL TV
TRANSLATOR
CONSTRUCTION
PERMIT
APPLICATION**

CALL SIGN: W28EZ-D
FACILITY ID: 182289
LOCATION: Gainesville, FL

Prepared For:

SagamoreHill of Tennessee, LLC
525 Blackburn Drive
Augusta, GA 30907

Prepared By:

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TABLE OF CONTENTS

1.0 INTRODUCTION AND SCOPE OF WORK..... 2

2.0 MINOR MODIFICATION 2

3.0 TRANSMITTER LOCATION AND TOWER REGISTRATION..... 3

4.0 ALLOCATION ANALYSIS 3

5.0 RADIO FREQUENCY RADIATION (RFR) COMPLIANCE..... 3

6.0 CERTIFICATION..... 5

APPENDIX A – TVStudy V2.2.5 Allocation Analysis 6

APPENDIX B – 51dB μ F(50,90) Permitted and Proposed Contour..... 8

APPENDIX C – Far Field Exposure to RF Emissions 9

1.0 INTRODUCTION AND SCOPE OF WORK

SagamoreHill of Tennessee, LLC is the licensee of a digital low power television translator broadcast station having call sign W28EZ-D, and facility ID 182289.

W28EZ-D has a construction permit¹ and a pending application². It is proposed to make the following changes to the pending application:

- decrease the ERP from 450W to 280W,
- decrease the antenna height AMSL by 7.3m, and
- change the transmitter site from
 - 29-35-29.0 N 82-22-11.1 W (NAD 83) to
 - 29-24-51.1 N 82-35-48.2 W (NAD 83)

No other changes are proposed.

2.0 MINOR MODIFICATION

The proposed facility modification described in section 1.0 is considered “minor” pursuant to 47 CFR 74.787 since

- there is no change in output frequency,
- the protected contour of the proposed facility overlaps some portion of the protected contour of the authorized facility as illustrated in Appendix B,
- and the change in transmitting antenna location is less than 30 miles (48km) from the reference coordinates of the existing station’s antenna location.

The W28EZ-D original construction permit was filed during the 2009-2010 rural translator filing window³ and is subject to the distance restrictions found in Appendix A of the R&O. Appendix B demonstrates that the proposed facility is more than 121km from the Jacksonville, FL reference coordinates and thus maintains its rural designation status.

¹ FCC File No.: BNPDTL-20090825AOQ

² FCC File No.: 0000210808

³ [DA 09-1487 Released June 29, 2009](#)

3.0 TRANSMITTER LOCATION AND TOWER REGISTRATION

It is proposed to amend the pending application from its permitted location to an existing tower not registered with the FCC. The FCC's TOWAIR determines that tower registration is not required:

- “Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.”

It is proposed to side mount the W28EZ-D antenna to the existing structure which would not modify the support structure height.

4.0 ALLOCATION ANALYSIS

Appendix A are the summarized results from TVStudy V2.2.5 which illustrate that there are no interference failures to other facilities.

5.0 RADIO FREQUENCY RADIATION (RFR) 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 extraction is compiled from the support structure site, if the support structure is on a rooftop with no higher elevations (e.g., elevator shaft) then flat terrain is compiled. Terrain is extracted using 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 C demonstrates that the peak exposure is 15.3% of the most restrictive permissible exposure threshold. Pursuant to OET Bulletin 65 concerning multiple-user transmitter sites, 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 greater than 5% of the most permissible exposure at any location 2 meters above the ground, it is considered a significant contributor to RFR exposure. Thus, contributions to exposure from other RF sources in the vicinity of the proposed facility must be considered; however, in this instance there are no additional contributors. As proposed, the facility is compliant with the FCC limits for human exposure to RF radiation and thus is excluded from further environmental processing.

6.0 CERTIFICATION

The foregoing statement and the report regarding the engineering work are true and correct to the best of my knowledge. Executed March 9, 2023.

Kessler and Gehman Associates, Inc.



Ryan Wilhour
Consulting Engineer

W28EZ-D – Construction Permit Minor Modification

Gainesville, FL

APPENDIX A – TVStudy V2.2.5 Allocation Analysis

Study created: 2023.03.08 11:32:57

Study build station data: LMS TV 2023-03-08

Proposal: W28EZ-D D28 LD APP GAINESVILLE, FL
File number: W28EZ-D Bronson
Facility ID: 182289
Station data: User record
Record ID: 1249
Country: U.S.

Build options:
Protect pre-transition records not on baseline channel

Search options:
Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WOCD-LD	D27	LD	LIC	DUNNELLO, FL	BLANK0000154197	41.0 km
No	WOCD-LD	D27	LD	LIC	DUNNELLO, FL	BLANK0000204523	51.4
No	WOCD-LD	D27	LD	CP	DUNNELLO, FL	BLANK0000188883	51.4
No	WOCD-LD	N27-	TX	LIC	DUNNELLO, FL	BLTTL20090331AEX	35.4
Yes	WYME-CD	D27	DC	LIC	GAINESVILLE, FL	BLANK0000098965	24.1
No	WWRJ-LD	D27	LD	LIC	JACKSONVILLE, FL	BLANK0000149999	133.7
No	WWRJ-LD	D27	LD	CP	JACKSONVILLE, FL	BLANK0000150180	138.1
No	WWRJ-LD	N27-	TX	LIC	JACKSONVILLE, FL	BLTTL20140115AAF	133.7
No	WRDQ	D27	DT	LIC	ORLANDO, FL	BLANK0000149085	177.0
No	WTXL-TV	D27	DT	LIC	TALLAHASSEE, FL	BLCDT20090217ABY	192.1
No	WTBT-LD	D27	LD	LIC	TAMPA, FL	BLANK0000179693	177.1
No	WMCF-TV	D28	DT	LIC	MONTGOMERY, AL	BLANK0000107502	477.7
No	W28FD-D	D28	LD	LIC	GREENVILLE, FL	BLANK0000198523	137.5
No	WHFT-TV	D28	DT	LIC	MIAMI, FL	BLANK0000071957	448.8
No	WZVN-TV	D28	DT	LIC	NAPLES, FL	BLANK0000107164	299.3
No	WRBW	D28	DT	LIC	ORLANDO, FL	BLANK0000143935	172.3
No	WFSG	D28	DT	LIC	PANAMA CITY, FL	BLANK0000064507	337.7
No	WSST-LD	D28	LD	LIC	ALBANY, GA	BLANK0000169383	298.8
No	WJBF	D28	DT	LIC	AUGUSTA, GA	BLANK0000116201	449.5
No	W28EU-D	D28	LD	LIC	MACON, GA	BLANK0000112812	424.2
No	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	180.2
No	WTBZ-LD	N29z	TX	LIC	GAINESVILLE, FL	BLTTL20050907ABX	4.6
No	WGFL	D29	DT	LIC	HIGH SPRINGS, FL	BLANK0000100460	24.1
No	WSWF-LD	D29	LD	LIC	ORLANDO, FL	BLANK0000106247	162.6
No	WQXT-CD	D29	DC	LIC	ST. AUGUSTINE, FL	BLANK0000098976	129.3
No	W29FO-D	D29	LD	CP	TALLAHASSEE, FL	BNPDTL20090825AMR	193.2
No	WFXL	D29	DT	CP	ALBANY, GA	BLANK0000150485	245.2

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D28
Mask: Simple
Latitude: 29 24 51.10 N (NAD83)
Longitude: 82 35 48.20 W
Height AMSL: 36.6 m
HAAT: 16.5 m
Peak ERP: 0.280 kW
Antenna: Omnidirectional
Elev Pattn: Generic

50.1 dBu contour:
Azimuth ERP HAAT Distance
0.0 deg 0.280 kW 14.1 m 12.7 km

W28EZ-D – Construction Permit Minor Modification

Gainesville, FL

45.0	0.280	11.8	12.7
90.0	0.280	13.3	12.7
135.0	0.280	11.3	12.7
180.0	0.280	16.3	12.7
225.0	0.280	23.1	12.7
270.0	0.280	22.7	12.7
315.0	0.280	19.2	12.7

Distance to Canadian border: 1363.0 km

Distance to Mexican border: 1459.8 km

Conditions at FCC monitoring station: Vero Beach FL
Bearing: 135.9 degrees Distance: 277.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 306.1 degrees Distance: 2374.0 km

Study cell size: 1.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

Proposal causes 0.48% interference to BLANK0000098965 LIC scenario 1

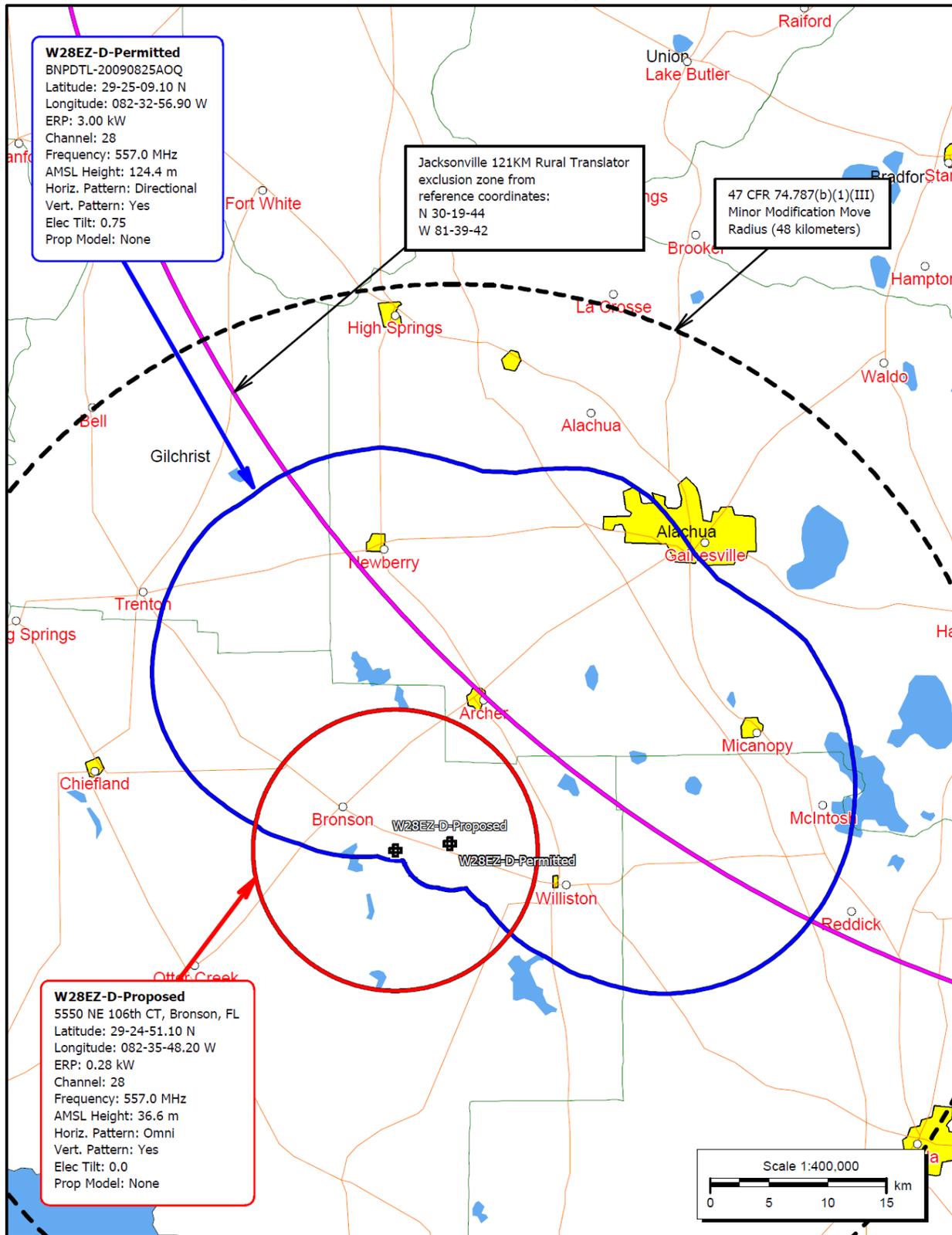
---- Below is IX received by proposal W28EZ-D Bronson ----

Proposal receives 15.73% interference from scenario 1
No IX check failures found.

W28EZ-D – Construction Permit Minor Modification

Gainesville, FL

APPENDIX B – 51dB μ F(50,90) Permitted and Proposed Contour



APPENDIX C – Far Field Exposure to RF Emissions

