

## WDSK at South Kent, Connecticut (Facility ID 768354)

### Minor Modification of Construction Permit File Number 167135

Channel 202 (88.3 mHz.) ♦ 0.099 kW (H&V) DA ♦ 10 meters HAAT

### TECHNICAL STATEMENT

#### Compliance with Section 73.509

Note: The original WDSK application was a singleton. The following facilities were studied:

Call Sign	C	ST	City	Freq. ▼	ERP	CLS	Status	Distance
WLHV	2	NY	ANNANDALE-ON-HUDSON	88.1	910.0	A	LIC	50.53
WJZZ	2	NY	MONTGOMERY	88.1	1150.0	A	LIC	69.10
WMNR	2	CT	MONROE	88.1	5000.0	B1	LIC	44.75
WESU	2	CT	MIDDLETOWN	88.1	6000.0	A	LIC	70.54
Proposed	4	CT	SOUTH KENT	88.3	99.0	A	APP	0.00
WDSK CP	5	CT	SOUTH KENT	88.3	300.0	A	CP	13.18
WFSO	2	NY	OLIVEBRIDGE	88.3	578.0	A	LIC	67.94
WBGO	2	NJ	NEWARK	88.3	2500.0	B1	LIC	111.00
WVCR-FM	2	NY	LOUDONVILLE	88.3	2800.0	B1	LIC	114.31
WANR	2	NY	BREWSTER	88.5	235.0	A	LIC	33.23
WFCR	2	MA	AMHERST	88.5	13000.0	B	LIC	116.18
WNYK	1	NY	NYACK	88.7	10.0	D	LIC	76.08
WFNP	1	NY	ROSENDALE	88.7	230.0	A	LIC	42.61
WRHV	1	NY	POUGHKEEPSIE	88.7	230.0	A	LIC	42.61
WJMJ	1	CT	HARTFORD	88.9	2300.0	B	LIC	54.54

The proposed facility meets the requirements of 73.509, as shown in Figures 1 and 2. Contours which are not permitted to overlap under 73.509 are depicted in same colors.

The distance to the 60 dBu contour exceeds the 5.6 km minimum for a Class A facility between 25 degrees and 30 degrees True, extending a distance of 7.49 km at 28 degrees as shown on the next page. The applicant therefore believes its proposal meets the criteria for a Class A facility.

#### Section 73.525 TV Channel 6 Protection

There are three TV or Class A LPTV facilities operating on Channel 6 within 257 km of the proposed Channel 202 facility. These are:

WNYZ-LD, New York, NY at 110.6 km.  
WVCC-LD, Westmoreland, NH at 200.3 km.  
WPVI-TV at 234.6 km.

The proposed 50.7 dBu interfering contour does not overlap or approach the 47 dBu service contour of any of these facilities.

**Environmental Considerations**

The applicant proposes to mount its antenna on an existing mast with the center of radiation 7 meters above ground level without increasing the overall height of the mast.

Although RFR considerations may be categorically excluded at levels of ERP below 100 Watts, because the proposed ERP is 99 Watts in both the H and V planes, compliance with RFR exposure rules was established using the Commission’s online FM Model program.

The maximum exposure was found to be 159.2 uW/cm<sup>2</sup>, or 79.6% of the MPE limit for uncontrolled exposure to the general population. The antenna site is located in an isolated area on private property and enclosed within a fence marked with RFR warning signs .

The applicant will reduce power or cease operation as necessary in cooperation with other users of the tower to protect workers having access to the roof, tower, or antenna from RFR exposure in excess of FCC guidelines.

Respectfully submitted,



Dennis Jackson  
Technical Consultant  
March 31, 2023

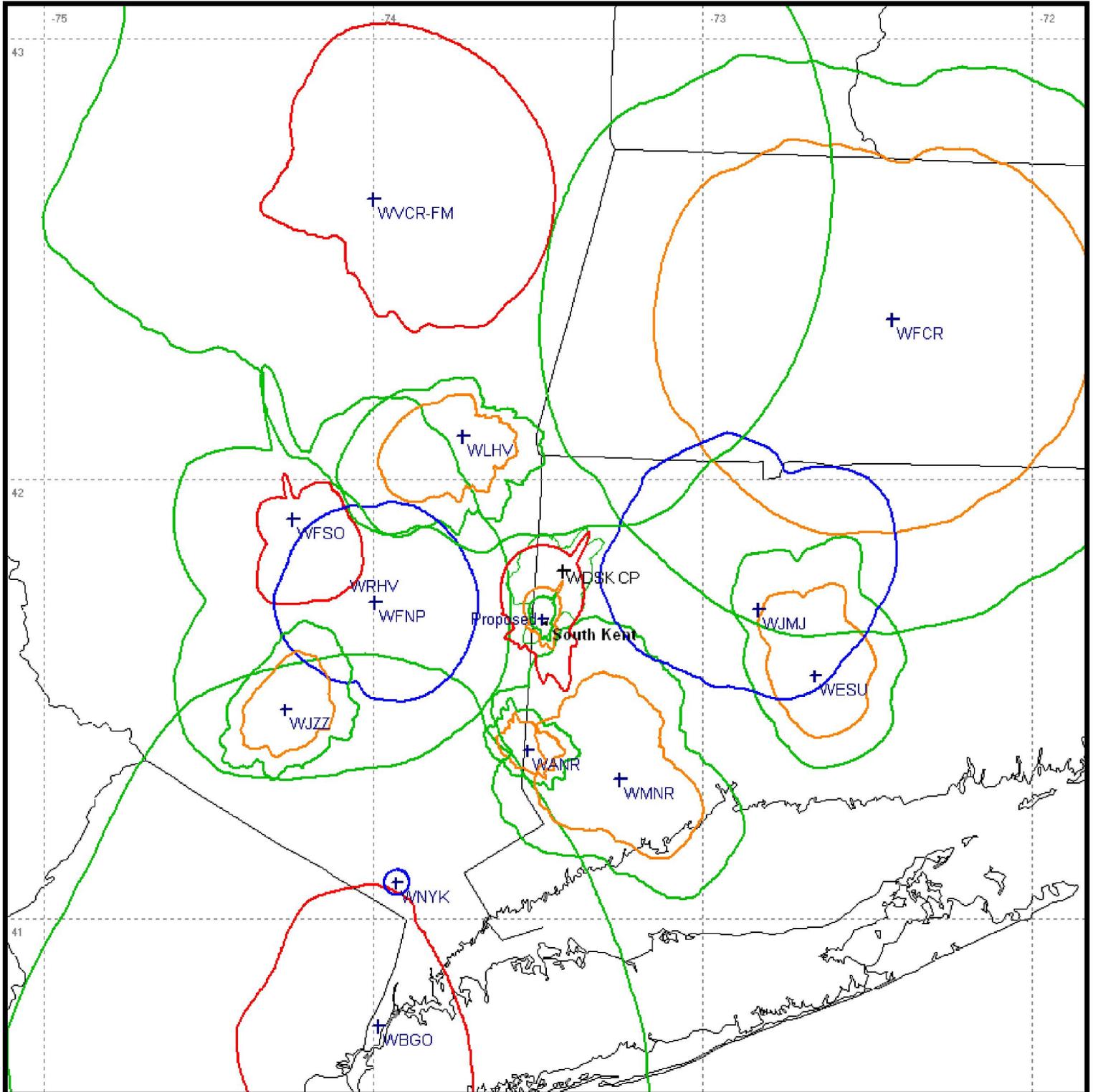
**Distance to 60 dBu F(50,50) Service Contour between 25 and 30 degrees True:**

$\theta^\circ$	DirERP [W]	HAAT [m]	Distance [km]
25	75.624	36.00	5.72
26	74.074	47.00	6.52
27	72.541	58.00	7.21
28	71.023	63.00	7.49
29	69.522	58.00	7.13
30	68.037	44.00	6.16

**Figure 1 – 73.509 Allocation Study**

**Key: Same colors may not overlap.**

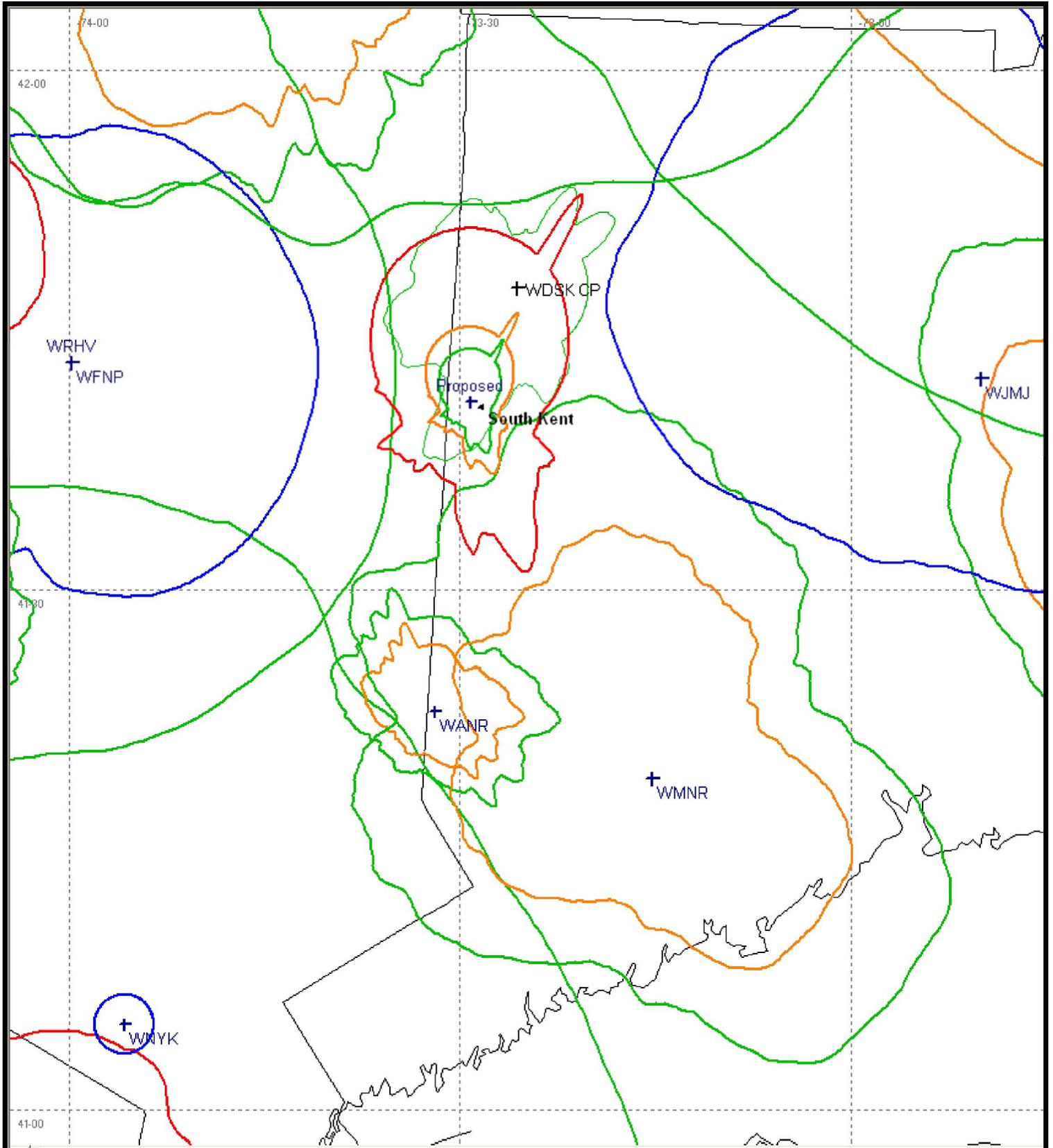
**Proposed Service Contour (green) overlaps that authorized in Construction Permit File No.167135 (thin green).**



**Figure 2 – Closeup Allocation Study**

**Key: Same colors may not overlap.**

**Proposed Service Contour (green) overlaps that authorized in Construction Permit File No.167135 (thin green).**



### Figure 3 – RFR Study Employing Online FM Model

Maximum RFR Exposure is 159.2 uW/cm<sup>2</sup>, or 79.6% of the MPE limit

For uncontrolled exposure to the general population..

