



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
POST REPACK CONSTRUCTION PERMIT
KMEG - SIOUX CITY, IOWA
DTV - CH. 32 - 870 kW - 611 m HAAT**

Prepared for: WAITT BROADCASTING, 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, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WAITT BROADCASTING, INC., licensee of KMEG, channel 39, facility ID number 39665, licensed to Sioux City, Iowa, to prepare this statement, FCC Form 2100, Schedule A, its technical sections, and the associated exhibits in support of an application for construction permit, in accordance with the Incentive Auction Closing and Channel Reassignment Public Notice, DA 17-314, and the technical information provided in the confidential reassignment letter from the FCC announcing the substitution of DTV channel 32 for DTV channel 39 to be used by KMEG for its post-reassignment broadcasting.

OMNI-DIRECTIONAL ANTENNA

The applicant proposes to install a new Dielectric model TFU-27JTH/VP-R O6 elliptically polarized omni-directional transmitting antenna with its center of radiation located at a height above ground of 598.5 meters, and a height above average terrain of 611 meters. The antenna manufacturer's horizontal plane azimuth radiation pattern for the horizontally polarized component is shown and tabulated in exhibit 2. The manufacturer's horizontal plane azimuth pattern for the vertically polarized component is shown and tabulated in exhibit 3. The manufacturer's vertical plane elevation radiation pattern, illustrating the antenna's radiation characteristics above and below the horizontal plane is shown and tabulated in Exhibit 4.

The existing channel 39 DTV antenna will be removed from the tower structure and the new channel 32 antenna will be installed in its place, while maintaining the overall structure height of 1012.2 meters Above Mean Sea Level (AMSL). (See ASR #1057963)

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated 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 NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna

registration data. Exhibit 1 shows the predicted Noise Limited (40.51 dBu) contour, and the principal community (48 dBu) contour. The 48 dBu contour completely encompasses the principal community of license, Sioux City, Iowa.

ALLOCATION CONSIDERATIONS

Post-Transition DTV Considerations

A study was performed, using the FCC's software, tv_study, v. 2.2.2, to determine if the instant application for construction permit is predicted to cause new prohibited interference to post reassignment DTV stations, construction permits, DTV allotments or Class A DTV stations. The study results, shown in Appendix B, indicate that the instant application for construction permit is predicted to cause no new interference exceeding 0.5% to the populations served by any post reassignment DTV station, construction permit, allotment or Class A DTV stations. The study also shows that KMEG's proposed service area is within the baseline plus 1%. (See Appendix B)

International DTV Considerations

The KMEG site is located within neither the Canadian nor the Mexican international coordination zone, therefore there are no international DTV considerations required.

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the proposed KMEG 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

The FCC's guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines define a maximum permissible exposure (MPE) level for occupational or "controlled" situations, and for "uncontrolled" environments that apply in all other cases that might affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance to determine whether FCC-regulated transmitting facilities, operations or devices comply with guidelines for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. OET Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC's policies and guidelines.

The Maximum Permitted Exposure (MPE) level for broadcast facilities that operate on a frequency between 30 MHz and 300 MHz is 200 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) for an "uncontrolled" environment, and is 1000 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) for a "controlled" environment. The MPE level for broadcast facilities that operate on a frequency between 300 MHz and 1500 MHz, primarily UHF TV stations, is determined, in $\mu\text{W}/\text{cm}^2$, for an "uncontrolled" environment by dividing the operating frequency in MHz by 1.500, and is similarly determined for a "controlled" environment by

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dividing the operating frequency in MHZ by 0.300.

The predicted emissions of KMEG must be considered, in addition to predicted emissions from any other proposed or existing stations at the site. For KMEG, which will operate on television Channel 32 (578-584 MHZ), the MPE is 387.33 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) in an "uncontrolled" environment and 1,936.7 $\mu\text{W}/\text{cm}^2$ in a "controlled" environment. The proposed KMEG facility will operate with a maximum ERP of 870 kW from an elliptically polarized omni-directional transmitting antenna with a centerline height of 598 meters above ground level (AGL). Considering a predicted vertical plane relative field factor of 0.300 the KMEG facility is predicted to produce a power density at two meters above ground level of 16.828 $\mu\text{W}/\text{cm}^2$, which is 3.83% of the FCC guideline value for an "uncontrolled" environment, and 0.766% of the FCC's guideline value for "controlled" environments. There are two other full-power DTV stations and two Lo-VHF LPTV stations that are located at the KMEG site. Therefore, the total percentage of the ANSI value at the proposed site, including the cumulative radiation from all authorizations within relevant proximity, is 8.18% of the limit applicable to "uncontrolled" environments, and 1.636% of the limit for "controlled" environments. (See Appendix A)

OCCUPATIONAL SAFETY

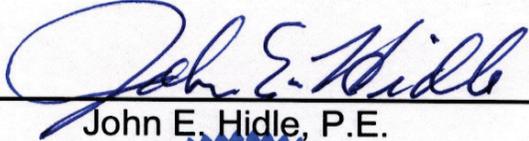
The licensee of KMEG is committed to the protection of station personnel and/or tower contractors working in the vicinity of the KMEG antenna, and is committed to reducing power or ceasing operation during times of maintenance of the transmission systems, when necessary, to ensure protection to personnel.

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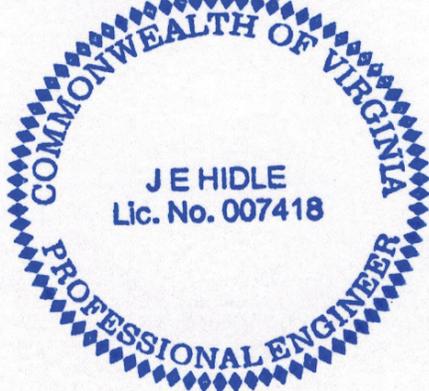
SUMMARY

It is submitted that the instant application for construction permit to change KMEG from channel 39 to channel 32, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement, FCC Form 2100, its technical sections, 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: May 23, 2017



John E. Hidle, P.E.


COMMONWEALTH OF VIRGINIA
J E HIDLE
Lic. No. 007418
PROFESSIONAL ENGINEER

SUMMARY OF RADIOFREQUENCY

RADIATION STUDY

KMEG, Sioux City, IA

Channel 32, 870 kW, 611 m HAAT

May, 2017

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLAR- IZATION</u>	<u>ANTENNA HEIGHT</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>WORST-CASE PREDICTED POWER DENSITY ($\mu\text{W}/\text{cm}^2$)</u>	<u>FCC UNCONTROLLED LIMIT ($\mu\text{W}/\text{cm}^2$)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
KMEG	DT	32	581	H & V	596	870.000	0.300	14.828	387.33	3.83%
KTIV	DT	14	473	H	595	484.000	0.300	4.139	315.33	1.31%
KPTH	DT	30	569	H & V	596	675.000	0.300	11.505	379.33	3.03%
K03IS-D	DT	3	63	H	550	0.300	0.300	0.003	200.00	0.00%
K06QG-D	DT	6	85	H	550	0.300	0.300	0.003	200.00	0.00%
TOTAL PERCENTAGE OF FCC GUIDELINE VALUE =										8.18%

* For television stations a very conservative vertical relative field factor of 0.3 was assumed pursuant to OET Bulletin 65.