

Western New Life, Inc., STA Request Explanation and Waiver

Western New Life, Inc., licensee of full service DTV station WQHA-TV, has received a letter from the FCC requiring WQHA-TV to change its channel from 50 to 25 by August 1st, 2018 to clear the frequency for use by cellular interests.

The recent devastating hurricane in Puerto Rico has made the job of Western New Life, Inc. using its current tower considerably more difficult. For safety reasons the WQHA-TV tower needs to be reinforced to correct for any damages caused by the hurricane and to have the capacity to hold the new heavier channel 25 antenna. Due to these unforeseen difficulties Western New Life, Inc. respectfully requests special temporary authority to begin transmitting on channel 25 at reduced power using a lighter weight Kathrein Model 75020023 antenna. The antenna pattern will be oriented a 2 degrees true north with 11 kW of radiated power. As is shown on the attached coverage map, the proposed temporary noise-limited coverage will fall entirely inside the authorized coverage of the current WQHA-TV construction permit.

Representatives of Western New Life, Inc. have been coordinating the move to channel 25 with WQTO-TV, also on channel 25. WQTO-TV is required by the Commission to move to a different channel by the August deadline. Western New Life, Inc. reports that they have been told that WQTO-TV will terminate the operation of its channel 25 booster and reduce power to 60 percent during the testing period with WQHA-TV that precedes its channel move.

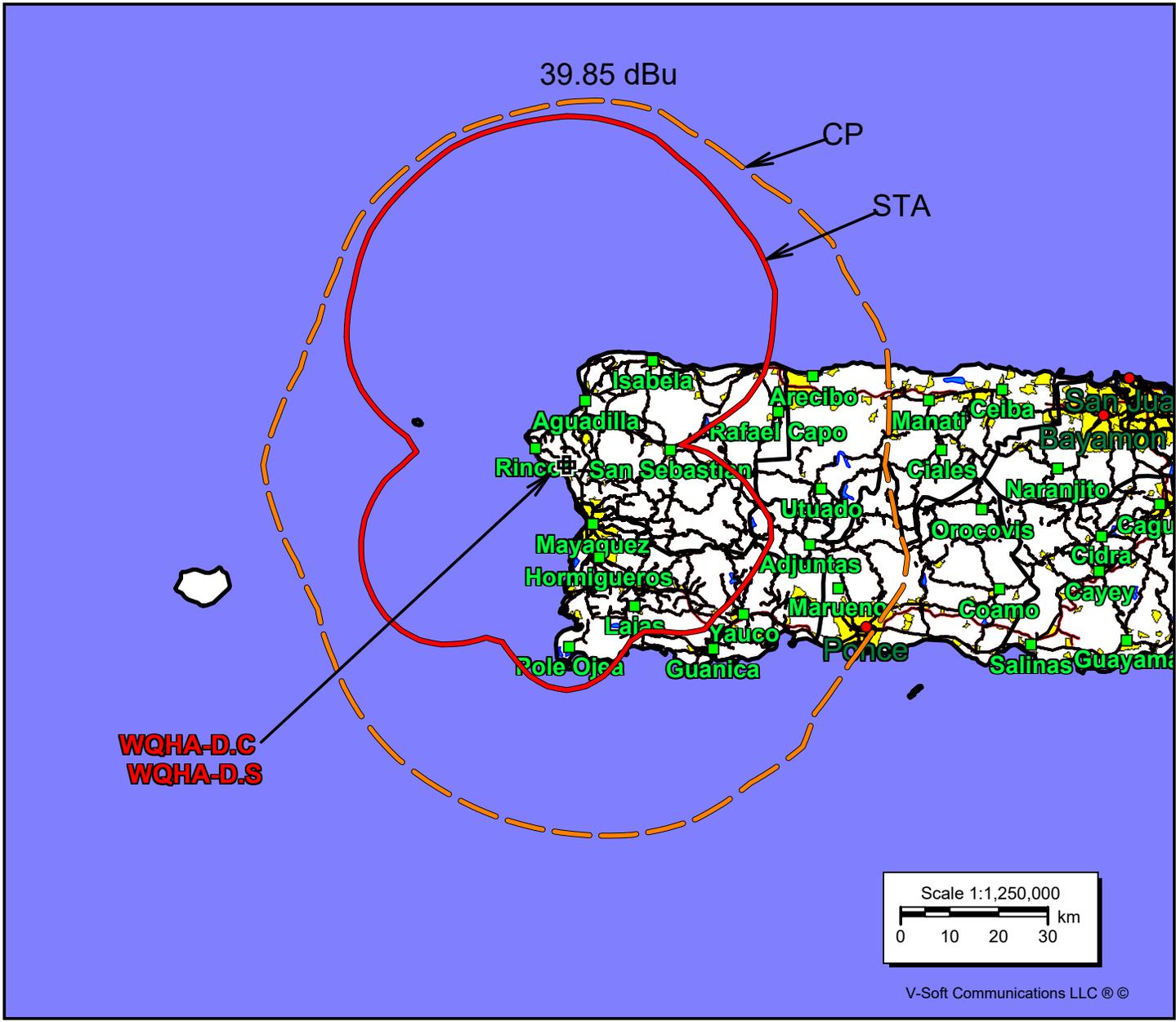
Use of the requested temporary facilities will allow WQHA-TV to resume providing its public services to Aguada, the city of license, and to the surrounding communities at an earlier time. This will also give Western New Life, Inc. the opportunity to assess and proceed with the required steps to have its fully licensed facilities on-the-air by the deadline.

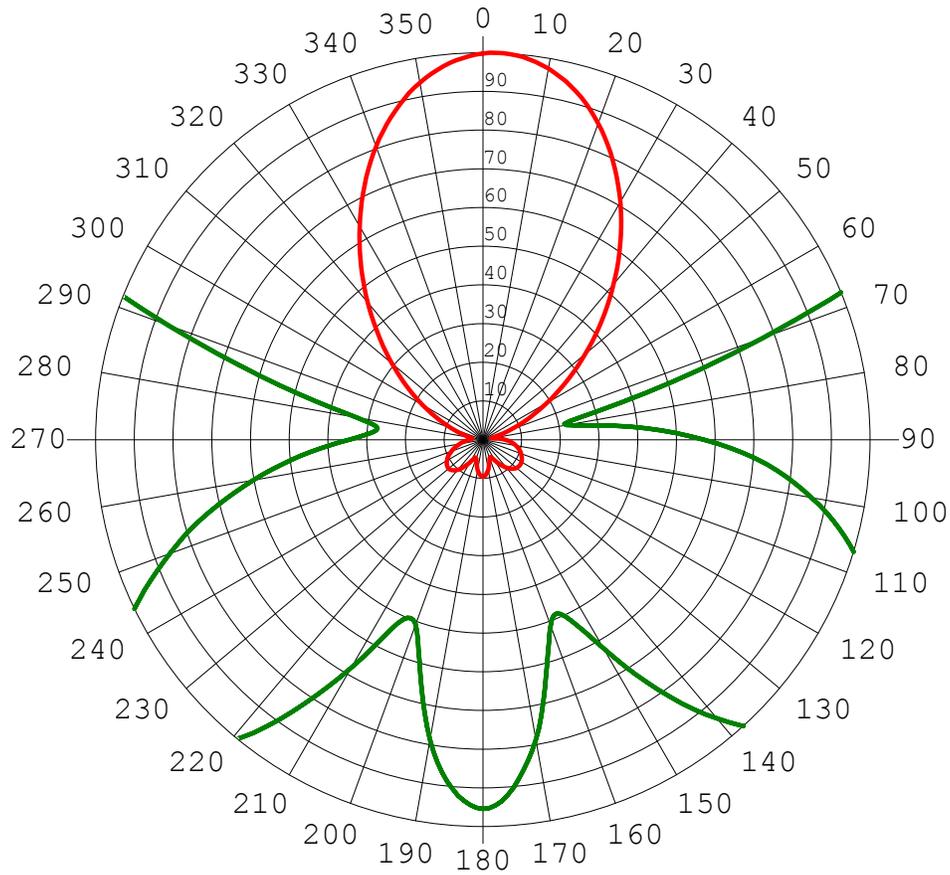
In conclusion, Western New Life, Inc., respectfully requests a waiver of the Commission's repacking process rules to begin transmitting with temporary facilities in advance of the August deadline and with the coordination with WQTO-TV to prevent mutual interference during the transition process.

CHannel 25 Noise-Limited Service Contour

WQHA-D.STA
 0000024276
 Latitude: 18-18-41.80 N
 Longitude: 067-11-24.60 W
 ERP: 11.00 kW
 Channel: 25
 Frequency: 539.0 MHz
 AMSL Height: 376.0 m
 Elevation: 344.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None
 Antenna: KAT 75010012

WQHA-D.CP
 0000024555
 Latitude: 18-18-41.80 N
 Longitude: 067-11-24.60 W
 ERP: 26.90 kW
 Channel: 25
 Frequency: 539.0 MHz
 AMSL Height: 376.0 m
 Elevation: 344.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: Yes
 Elec Tilt: 0.8





Azi	Rel	dBk	kW	dB	Azi	Rel	dBk	kW	dB
0	1.000	10.41	11.000	0.00	180	0.094	-10.09	0.098	-20.50
10	0.958	10.04	10.102	-0.37	190	0.072	-12.42	0.057	-22.83
20	0.841	8.91	7.787	-1.50	200	0.050	-15.66	0.027	-26.07
30	0.674	6.98	4.994	-3.43	210	0.075	-12.08	0.062	-22.50
40	0.488	4.18	2.621	-6.23	220	0.106	-9.06	0.124	-19.47
50	0.313	0.31	1.075	-10.10	230	0.116	-8.33	0.147	-18.75
60	0.166	-5.19	0.302	-15.61	240	0.104	-9.25	0.119	-19.66
70	0.059	-14.12	0.039	-24.54	250	0.081	-11.38	0.073	-21.80
80	0.027	-21.09	0.008	-31.50	260	0.055	-14.79	0.033	-25.21
90	0.064	-13.44	0.045	-23.85	270	0.031	-19.79	0.011	-30.20
100	0.091	-10.43	0.090	-20.85	280	0.040	-17.52	0.018	-27.94
110	0.107	-8.98	0.126	-19.40	290	0.102	-9.40	0.115	-19.81
120	0.116	-8.32	0.147	-18.73	300	0.203	-3.44	0.452	-13.86
130	0.111	-8.68	0.136	-19.09	310	0.336	0.93	1.240	-9.48
140	0.088	-10.66	0.086	-21.07	320	0.497	4.33	2.713	-6.08
150	0.056	-14.56	0.035	-24.97	330	0.671	6.95	4.959	-3.46
160	0.055	-14.76	0.033	-25.18	340	0.837	8.86	7.699	-1.55
170	0.084	-11.13	0.077	-21.55	350	0.955	10.01	10.032	-0.40

Rotation Angle = 2

Vertical Elevation Pattern

Angle (deg)	Relative Field
-10.25	0.15
-9.25	0.15
-8.25	0.15
-7.25	0.15
-6.25	0.15
-5.25	0.2
-4.25	0.21
-3.75	0.235
-3.25	0.26
-2.75	0.46
-2.25	0.69
-1.75	0.88
-1.0	1.0
-0.25	1.0
0.5	1.0
1.25	0.88
1.75	0.69
2.25	0.46
2.75	0.26
3.25	0.235
3.75	0.21
4.75	0.2
5.75	0.15
6.75	0.15
7.75	0.15
8.75	0.15
9.75	0.15

