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STA Application for Interim Operation at Alternate Site During Spectrum Repack Transition Cox Television Tulsa, LLC KMYT Television, Tulsa, OK File Number: BLCDT-20021112ABD

KMYT Antenna Installation Issues

KMYT Television, licensed to Cox Television Tulsa, LLC, (hereinafter "KMYT") and serving the Tulsa, Oklahoma market, currently operates on Channel 42 at a site called Broken Arrow, approximately southeast of Tulsa. The antenna is side-mounted on a tower shared with KOKI Television, the antenna for which is top-mounted. The tower at Broken Arrow is seriously overloaded per current structural standards, as described in a recently-filed construction permit modification application (in LMS File No. 0000058928) to reduce the height of the antenna that KMYT will be installing to enable it to change channels in the ongoing broadcast television spectrum repack. The height reduction was necessary to reduce loading on the tower sufficiently to avoid a total replacement of the tower.

To permit continued use of the tower at Broken Arrow, quite significant structural reinforcement must be added during the process of changing antennas for KMYT. Installing the reinforcing components, making the changes necessary to install the KMYT antenna, plus installing the antenna itself will require a substantial period for completion of the work. KMYT will not be able to operate from the Broken Arrow site during that time, which will be measured in months. In the tower's overloaded condition, there was no possibility of installing a temporary antenna on it, meaning that KMYT had only two choices: move to an alternate site or go off the air for a prolonged period.

Request for Operation from an Alternate Site Under STA

For an ongoing broadcast operation, going off the air for any period, let alone a prolonged one, is not an option. Consequently, KMYT has located a site that can accommodate an Interim KMYT operation at an antenna height and an emitted power level that should permit it to retain much of its service to the Tulsa region. The site is the transmitter location of KTUL Television, which also is situated to the southeast of Tulsa. Arrangements for installation of a KMYT equipment shelter, transmitter, transmission line, and antenna have been made with the site owner, and contracts have been signed. Costs for the KMYT Interim operation were included in the station's Form 2100 Schedule 399 filings and have been approved by the FCC Repack Reimbursement Administrator. Construction of the Interim facility is nearing completion.

Somewhat complicating matters is the fact that KMYT was approached by the wireless operator that will be moving into the spectrum currently occupied by KMYT with a request to vacate its current channel

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earlier than required by the FCC's phased transition plan. Consequently, KMYT has applied for and been granted permission to move its transition between channels from Phase 2 to "Phase 0," i.e., the period prior to Phase 1. To accomplish the early transition, KMYT will have to operate on its new channel (34) from the Interim site rather than on its current channel (42), as originally planned. The antenna that was purchased for the Interim operation at the KTUL site can operate on both channels, thereby permitting the change in the ordering of the KMYT transition between channels to be accomplished despite the lateness of the request from the wireless operator.

Because of the arrangement with the wireless operator, KMYT recently filed a Legal STA application (in LMS file number 0000055766) to permit its early move to its new channel. That STA application, granted on July 27, 2018, included information about KMYT and three other similarly-situated, nearby stations, interference dependencies between two of which other stations and KMYT must be managed during their respective channel transitions in Phase 0. The provisions of the Legal STA grant must be carried over to the KMYT Interim operation so that KMYT will be properly authorized to operate on its new channel (34) at the Interim site during Phase 0. The currently-requested Engineering STA is to cover the period of KMYT operation at the KTUL site, during which the Broken Arrow facility will be reconstructed. The period during which the currently-requested Engineering STA will be needed in force extends from August 27, 2018, at the latest (earlier if possible), to permit testing of the Interim facility prior to its use for carrying programming, through the date 6 months after authorization of the STA (approximately February 22, 2019), to allow for unforeseen delays in the work required at the Broken Arrow site. The KMYT transition from operation on Channel 42 at Broken Arrow to operation on Channel 34 at the KTUL site is planned for the period between September 1 and September 4, 2018.

Facilities Requested Under STA

Requested facilities at the KTUL site are detailed technically in the LMS form to which this description is attached. In summary, they include operation with a directional antenna having a radiation center height of 496.8 m (1630 ft) above ground level (RCAGL), corresponding to 692.8 m above mean sea level (RCAMSL), peak effective radiated power (ERP) of 875 kW, and an azimuth orientation of the peak of the beam of the antenna toward 316 degrees True. As can be seen on the map on the next page, the pattern and power of the facility at the KTUL site are set to obtain a match, as closely as possible, between the contours of the Broken Arrow KMYT facility and the Interim facility at the KTUL site.

The combination of antenna elevation and ERP of the KMYT Interim facility exceeds the combined limit on antenna height and power given in §73.622(f)(8) of the Commission's rules. Nevertheless, it does not exceed the 1 MW limit; neither does it exceed the authorized contour size of the KMYT facility at Broken Arrow nor that of the largest station in the market, as permitted in §73.622(f)(5). (KOKI, for instance, has a larger service area contained within its contour.) Therefore, the proposal is permissible under the rules at the elevation and power level specified, without requiring a waiver of the rules.

Environmental Impact and Radio Frequency Radiation

None of the conditions specified in Section 1.1307 of the FCC rules that would require the preparation of an Environmental Assessment pertain with respect to the proposed facility. In particular, because the proposed facility will be installed on a tower at an existing site, the proposed operation does not implicate many of the causes for further investigation and preparation of further reports.

With respect to Radio Frequency Radiation exposure, OET Bulletin No. 65 provides methods for evaluating the level of exposure for both employees (occupational/controlled situations) and non-employees (general population/uncontrolled situations). The combination of the antenna radiation pattern, as provided in the manufacturer's technical specifications, with the antenna height above ground level and the operating power level indicate that the potential exposure would be less than 5

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percent of the Maximum Permissible Exposure (MPE) limit for general population/uncontrolled situations at the site.

To be precise, OET-65 methods produce an exposure estimate of approximately 0.27 percent of the limit for general population/uncontrolled situations. Since the site has calculated exposure values of less than 5 percent of the relevant exposure limit, it is categorically excluded from requirements for detailed RF exposure analyses of the site.

Notwithstanding the foregoing, Cox Television Tulsa, LLC recognizes its responsibility for the safety and health of employees and contractors when exposed to RF radiation conditions. It will take the steps necessary to assure that personnel working in its facilities and on the tower and antennas are protected from exposure to RF radiation levels exceeding those specified in the Commission's rules. It will work cooperatively with other users of the site to assure a safe working environment for all. Added steps to be taken may include measurements and monitoring as well as power reduction or turning off the transmitter, if necessary to ensure a safe working environment.

Contour Comparison of KMYT Broken Arrow and KMYT Proposed Interim Facilities

Figure 1 below shows the contours of the normal KMYT facility at the Broken Arrow site, in pink, and the proposed Interim KMYT facility at the KTUL Tower site, in blue, overlaid upon one another. The map was produced using EDX Signal software, version 11.5.1.

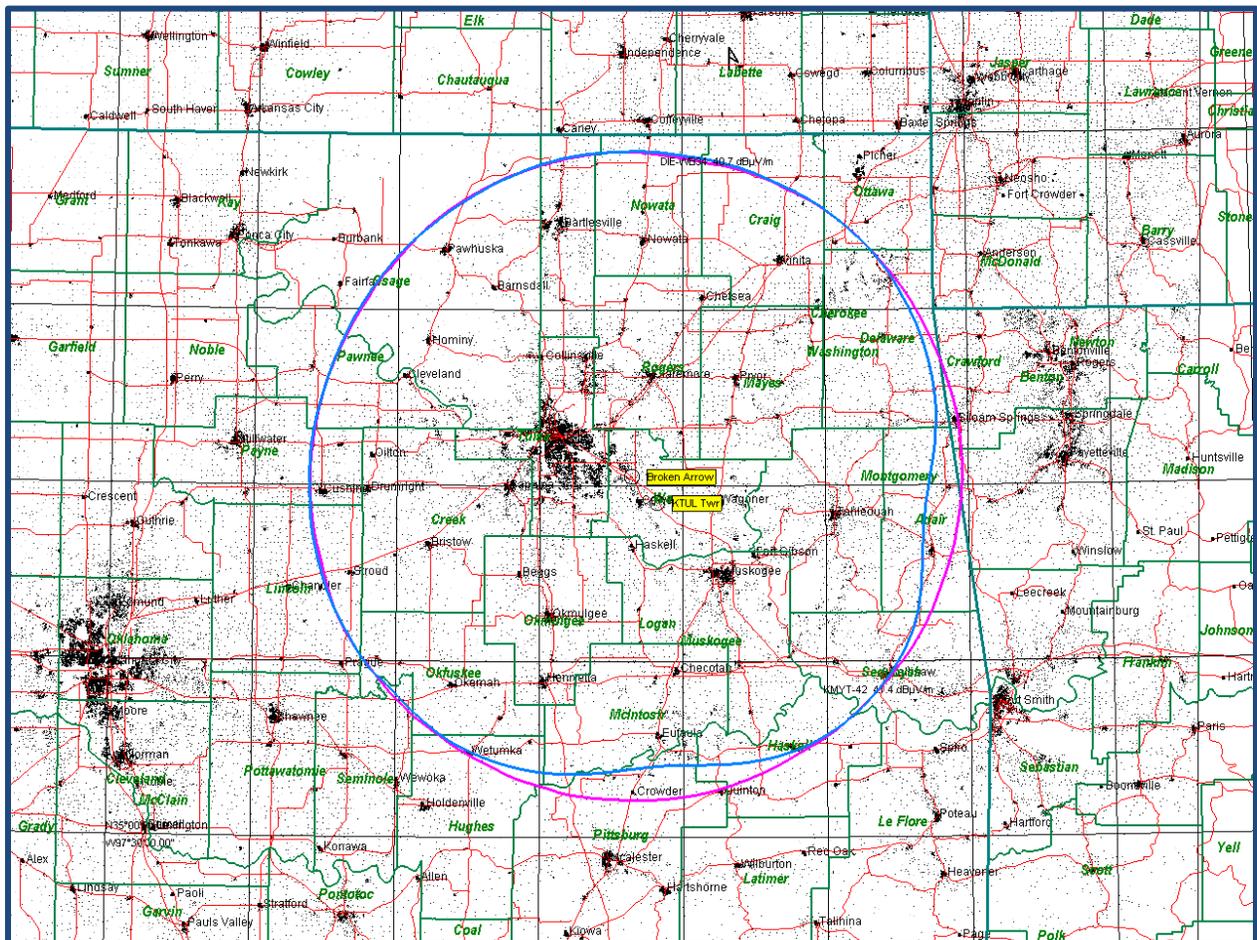


Figure 1 – Comparison of KMYT Contours – Broken Arrow site (Pink) vs. KTUL Tower Interim site (Blue)