



ENGINEERING STATEMENT

IN SUPPORT OF

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

WICU-TV

ERIE, PA

Request for Special Temporary Authority

SJL of Pennsylvania License Subsidiary, LLC (SJL) is the licensee of WICU-TV which has been authorized to operate on Ch. 12 (BLCDT-20090619ABT) at Erie, PA, with an ERP of 5.4 kW at an HAAT of 306.7m. The tower is located at the following coordinates:

42° 03' 50.0'' N (NAD 83)
80° 00' 20.0'' W

SJL is leasing space on the site where the licensed WICU-TV facility is located. The antenna is very old and, based on recent measurements, is malfunctioning and impairing coverage. WICU-TV is also experiencing problems with the transmission line which can only be corrected by replacing the line. The lease at the site of the licensed facility is up at the end of the year (2018) and, rather than rebuild the facility at the leased site, SJL would prefer to build a new facility at a nearby tower (ASR#1055828) approximately 5.4 km away from the site of the licensed facility. SJL has applied to move the WICU-TV transmit antenna from the current location to the nearby tower (see 9/13/18 amendment to pending application BPCDT-20120619ABB); however, WICU-TV is located in the Canadian Border zone and the application must go through coordination with Canada. The time required for Industry Canada to complete its review of the proposed facility is unknown, but, given recent history with the

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processing of other applications in the border zone, it is likely to take longer than the remaining two months left in 2018.

SJL is therefore requesting Special Temporary Authority to operate WICU-TV from the proposed tower location with an omni-directional ERP of 2.7 kW. As can be seen in Figure 1, attached hereto, given the proposed WICU-TV ERP and antenna height combination from the new tower site, the noise-limited contour of the proposed WICU-TV facility is not predicted to exceed the noise-limited contour of the licensed WICU-TV facility in any azimuth. The table below includes a comparison of the parameters of the licensed WICU-TV facility vs. the proposed parameters of the STA facility.

| WICU-TV Parameters | Licensed Facility BLCDT-20090619ABT | Proposed STA Facility |
|---------------------------|--|----------------------------------|
| Coordinates: (NAD83) | 42-03-50.0 N 80-00-20.0 W | 42-02-16.0 N 80-03-43.0 W |
| ERP (kW): | 5.4 (omni) | 2.7 (omni) |
| RCAMSL (m): | 650.0 | 625.9 |

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; since the structure is existing and registered, such conditions should not be an issue requiring further consideration.

The location of the proposed facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000555 mW/cm², which is less than 5% of the MPE for public exposure (0.2 mW/cm²) at Ch. 12 (204-210 MHz). The

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contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain “in compliance” with FCC guidelines.

SJL agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower base is enclosed by a locked security fence and appropriate signage warning of potential RFR hazards is posted.

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Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

A handwritten signature in black ink, appearing to read "Ben Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.
November 8, 2018

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**Noise-Limited Contour of Licesed WICU-TV Facility (Black) vs.
Noise-Limited Contour of Proposed WICU Facility at Lilly Tower ASR#1055828 (Red)
with Power Reduced to Stay Inside Licensed Facility Contour**

Mid-State Consultants

WICU-TV
 BLCDT-20090619ABT
 Latitude: 42-03-49.80 N
 Longitude: 080-00-20.81 W
 ERP: 5.40 kW
 Channel: 12
 Frequency: 207.0 MHz
 AMSL Height: 650.0 m

WICU-TV (ASR 1055828)
 Latitude: 42-02-15.80 N
 Longitude: 080-03-43.80 W
 ERP: 2.70 kW
 Channel: 12
 Frequency: 207.0 MHz
 AMSL Height: 625.9 m

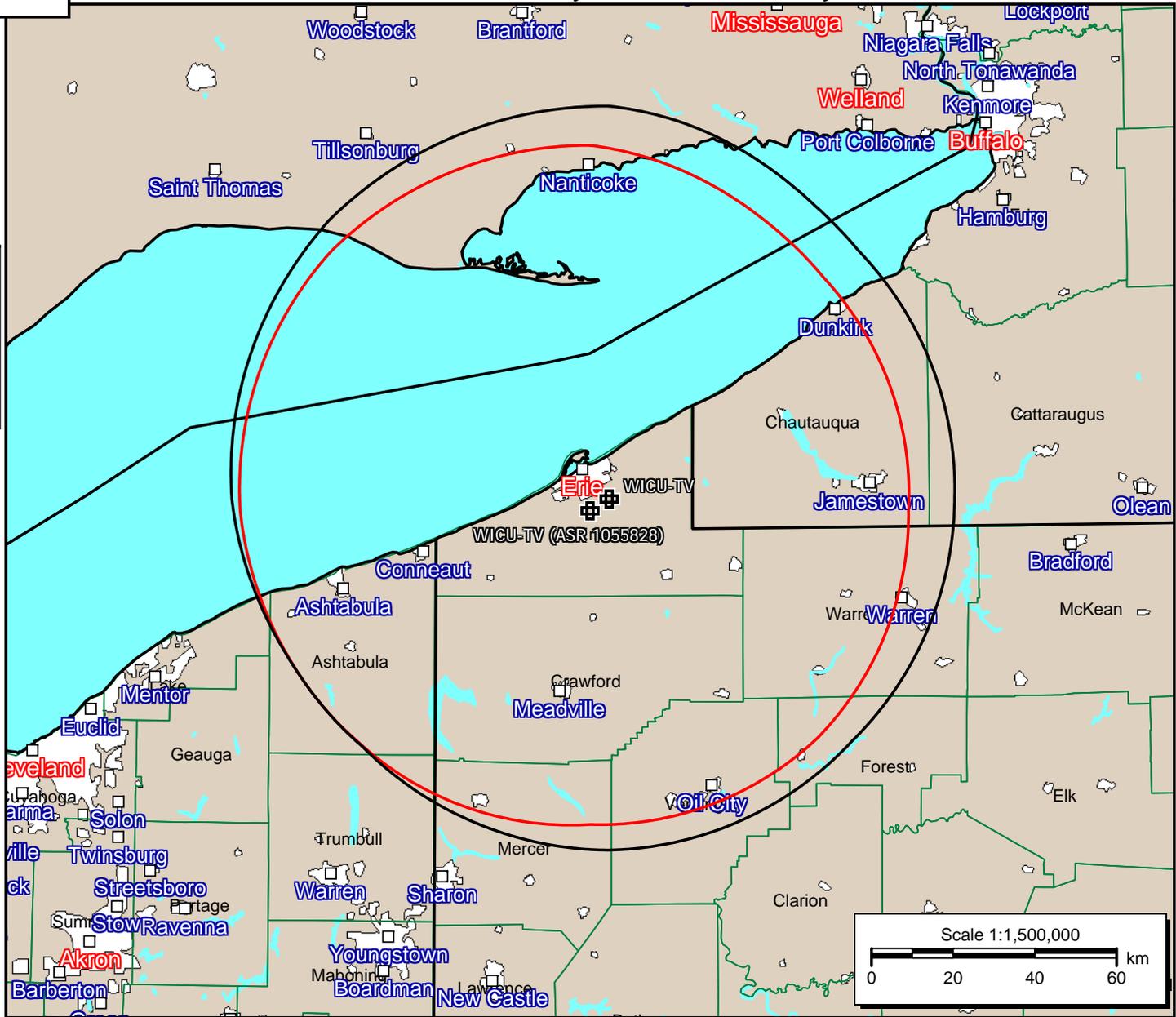


Figure 1
 11-08-18