



ENGINEERING STATEMENT
IN SUPPORT OF
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
WSEE-TV
ERIE, PA

Request for Special Temporary Authority

Lilly Broadcasting of Pennsylvania License Subsidiary, LLC (Lilly) is the licensee of WSEE-TV, located at Erie, PA which is presently licensed to operate its digital facility on Channel 16. The FCC assigned Ch. 21 to WSEE-TV for its post-incentive auction facility and scheduled it to complete construction in Phase 6, which has a deadline of October 18, 2019. On October 23, 2018 the FCC granted a request by Lilly (see LMS File #0000059641) to change the WSEE-TV phase construction deadline from Phase 6 to Phase 2 (April 12, 2019).

Since WSEE-TV is located in Erie, PA, a region of the country that experiences significant winter weather, Lilly had intended to complete the construction of the WSEE-TV post-incentive auction facility by early December to avoid the possibility of weather delays in construction in March/April 2019; however, the antenna manufacturer was not able to deliver the antenna in-time to meet the early December deadline.

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Since the main antenna will not be ready to complete construction in December, WSEE-TV has installed a temporary, side-mounted antenna for operation on Ch. 21. Given that it has completed all of the required viewer notifications regarding the change in channel, Lilly respectfully requests Special Temporary Authority to operate WSEE-TV on Ch. 21 with the following parameters:

Coordinates: 42° 02' 16.0" N (NAD83)
80° 03' 43.0" W
ERP: 51.1 kW (DA)
RCAMSL: 540.3m

As can be seen in Figure 1, attached hereto, the noise-limited contour of the proposed STA facility will not exceed the noise-limited of the WSEE Ch. 21 construction permit facility (LMS File#0000063404) in any azimuth.

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation (RFR). 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 post-incentive auction facility is assumed to be currently "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 0.004168 mW/cm², which is less than 5% of the MPE for public exposure (0.343333 mW/cm²) at Ch. 21 (512-

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

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 "B. L. Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.
December 18, 2018

Attached:

Figure 1 - Noise-Limited Contour of WSEE Ch. 21 CP Facility vs. Noise-Limited Contour of Proposed STA Facility

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Mid-State Consultants

WSEE-TV (CP)

0000063404

Latitude: 42-02-16 N

Longitude: 080-03-43 W

ERP: 96.00 kW

Channel: 21

Frequency: 515.0 MHz

AMSL Height: 633.7 m

WSEE-TV (STA)

Latitude: 42-02-16 N

Longitude: 080-03-43 W

ERP: 51.10 kW

Channel: 21

Frequency: 515.0 MHz

AMSL Height: 540.3 m

Noise-Limited Contour of WSEE Ch. 21 Post-Repack Construction Permit Facility (Black) vs. Predicted Noise-Limited Contour of Proposed STA Facility (Red)

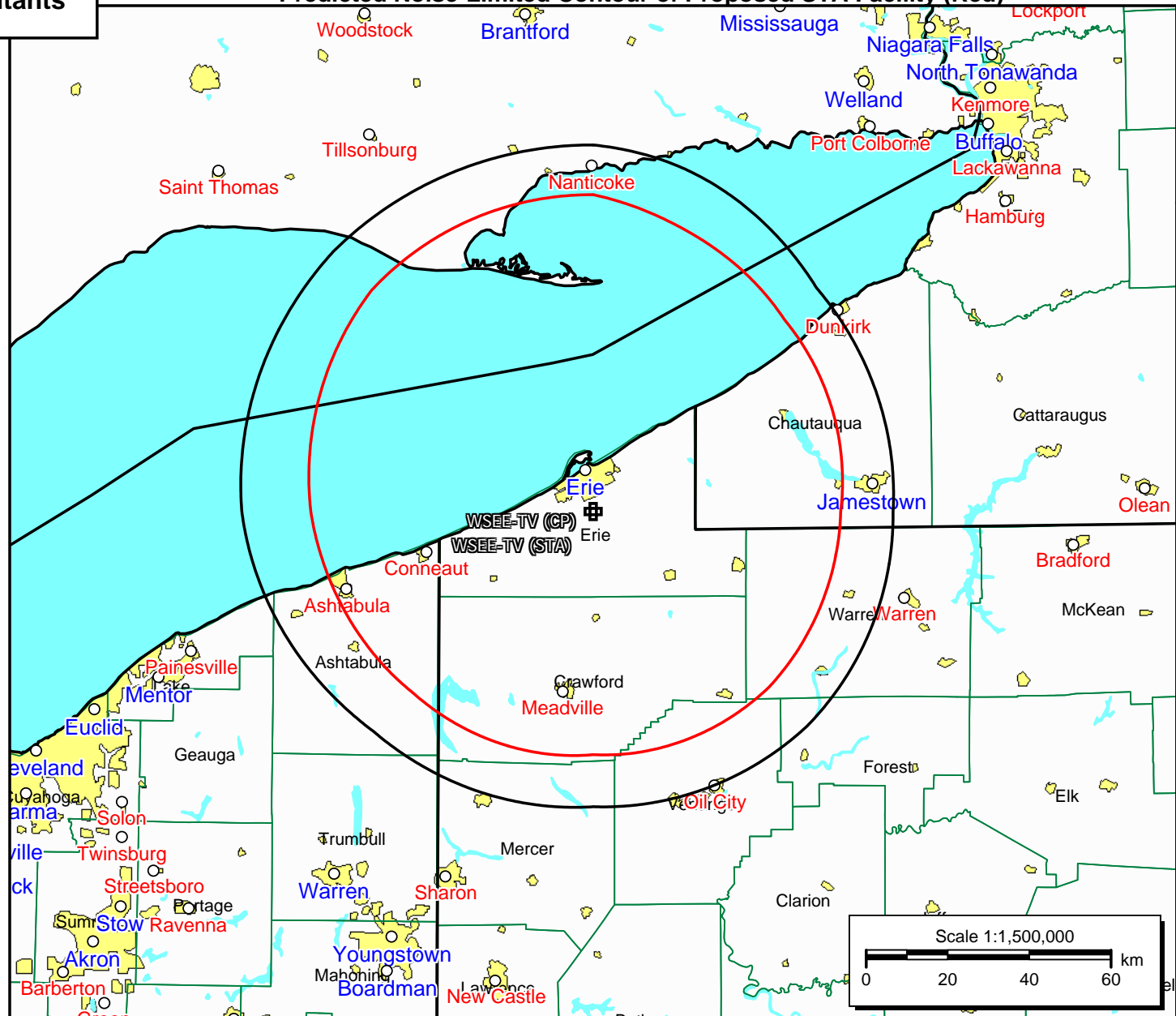


Figure 1
12-18-18