

## **Request for Engineering STA**

Murray Hill Broadcasting, LLC (“Licensee”) respectfully requests special temporary authorization to operate WLFM-LP pursuant to the technical parameters specified in this Engineering STA application. Because WLFM-LP has had to unexpectedly and suddenly cease operations to protect WOUC-TV, Cambridge, OH (see silent notification file number 0000068413), we request an expeditated grant of this application.

The grant of this Engineering STA allows WLFM-LP to continue its operation and fulfill its programming agreements with the Cleveland Cavaliers, Cleveland Browns, and other programmers to provide the only independent Spanish-language broadcast service in Cleveland, Ohio.

The Engineering STA proposes to lower the ERP from 3kW to 0.003kW, which will protect WOUC-TV.

The proposed facility was studied using TV Study v2.2.5 using the following parameters and the results are shown in Attachment A (“TV Study”).

Study cell size: 2.0 km  
Profile point spacing: 1.0 km

### **Canadian Coordination Not Required**

Because we are shrinking contour in every direction, no Canadian coordination is required. The F(50,90) 51 dBu contours of the proposed facility is completely within the F(50,90) contour of the existing licensed facility.

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

### **Digital TV and Class A Station Protection**

The proposed facility is predicted to cause less than 0.46% interference to WOUC-TV.

Except as reference above, the proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., “*de minimis*”) based on TV Study v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

### **Low Power TV and TV Translator Station Protection**

The proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”) based on TV Study v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

### **Environment Assessment Not Required**

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. The applicant also certifies that it, in coordination with other users of each transmitter site, will reduce power or cease operation as necessary to protect persons having access to each site, transmitter or antenna from radio frequency electromagnetic exposure more than FCC guidelines.

Attachment A

tvstudy v2.2.5 (4uoc83)  
Database: localhost, Study: WLFM-LP 6 3W BLTVL20120613AAZ CPXB 2.0 1.0, Model: Longley-Rice  
Start: 2019.03.06 13:12:44

Study created: 2019.03.06 13:12:44

Study build station data: LMS TV 2019-03-03

Proposal: WLFM-LP N6z TX LIC CLEVELAND, OH  
File number: WLFM-LP 6 3W BLTVL20120613AAZ CPXB  
Facility ID: 6699  
Station data: User record  
Record ID: 1801  
Country: U.S.

Search options:  
Baseline record excluded if station has CP

Individual records excluded:  
20120613AAZ WLFM-LP N6z TX LIC CLEVELAND, OH BLTVL20120613AAZ

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WNYB	D5	DT	CP	JAMESTOWN, NY	BLANK0000034892	233.4 km
No	WIVN-LD	D5	LD	CP	NEWCOMERSTOWN, OH	BLANK0000054240	115.1
No	WLMB	D5	DT	APP	TOLEDO, OH	BLANK0000035695	196.8
No	WLMB	D5	DT	LIC	TOLEDO, OH	BLCDT20050201AAF	196.8
No	WDTV	D5	DT	APP	WESTON, WV	BLANK0000036129	258.5
No	WDTV	D5	DT	LIC	WESTON, WV	BLCDT20090612AJX	258.5
Yes	WOUC-TV	D6	DT	CP	CAMBRIDGE, OH	BLANK0000033599	147.6
No	WDMY-LP	N6-	TX	CP	TOLEDO, OH	BLANK0000054740	161.1
No	WKBS-TV	D6	DT	CP	ALTOONA, PA	BLANK0000034187	288.3
No	WBPA-LP	N6-	TX	APP	PITTSBURGH, PA	BDISTVL20090122ABF	172.3

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: N6z  
Latitude: 41 22 58.00 N (NAD83)  
Longitude: 81 42 6.00 W  
Height AMSL: 505.7 m  
HAAT: 0.0 m  
Peak ERP: 0.003 kW  
Antenna: Omnidirectional  
Elev Pattrn: Generic

62.0 dBu contour:			
Azimuth	ERP	HAAT	Distance
0.0 deg	0.003 kW	302.7 m	6.2 km
45.0	0.003	258.9	5.8
90.0	0.003	255.5	5.8
135.0	0.003	234.2	5.6
180.0	0.003	144.5	4.5
225.0	0.003	211.5	5.3
270.0	0.003	256.3	5.8
315.0	0.003	275.1	6.0

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 242 m

\*\*Proposal 13.00 dBu contour crosses Canadian border, coordination required  
Distance to Canadian border: 66.5 km

Distance to Mexican border: 2186.6 km

Conditions at FCC monitoring station: Allegan MI  
Bearing: 292.6 degrees Distance: 376.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 273.8 degrees Distance: 1978.9 km

Study cell size: 2.00 km  
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

Interference to BLANK0000033599 CP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WOUC-TV	D6	DT	CP	CAMBRIDGE, OH	BLANK0000033599	
Undesireds:	WLFM-LP	N6z	TX	LIC	CLEVELAND, OH	WLFM-LP 6 3W BLTVL2012	147.6 km
	WDTV	D5	DT	APP	WESTON, WV	BLANK0000036129	119.5
	WKBS-TV	D6	DT	CP	ALTOONA, PA	BLANK0000034187	247.0
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX

31197.1 1,713,515 30215.3 1,649,853 29811.5 1,636,016 29783.7 1,628,425 0.09 0.46

Undesired			Total IX	Unique IX, before	Unique IX, after
WLFM-LP N6z TX LIC	27.8	7,591		27.8	7,591
WDTV D5 DT APP	99.4	519	95.4	506	95.4
WKBS-TV D6 DT CP	308.4	13,331	304.4	13,318	304.4

Interference to BLANK0000033599 CP scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WOUC-TV	D6	DT	CP	CAMBRIDGE, OH	BLANK0000033599	
Undesireds:	WLFM-LP	N6z	TX	LIC	CLEVELAND, OH	WLFM-LP 6 3W BLTVL2012	147.6 km
	WDTV	D5	DT	LIC	WESTON, WV	BLCDT20090612AJX	119.5
	WKBS-TV	D6	DT	CP	ALTOONA, PA	BLANK0000034187	247.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
31197.1 1,713,515	30215.3 1,649,853	29811.4 1,635,940	29783.6 1,628,349	0.09 0.46

Undesired			Total IX	Unique IX, before	Unique IX, after
WLFM-LP N6z TX LIC	27.8	7,591		27.8	7,591
WDTV D5 DT LIC	99.5	595	95.5	582	95.5
WKBS-TV D6 DT CP	308.4	13,331	304.4	13,318	304.4

Interference to proposal scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WLFM-LP	N6z	TX	LIC	CLEVELAND, OH	WLFM-LP 6 3W BLTVL2012	

Service area	Terrain-limited	IX-free	Percent IX
105.2 139,331	105.2 139,331	105.2 139,331	0.00 0.00