



## **ENGINEERING STATEMENT**

**IN SUPPORT OF**

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

**WHDT**

**STUART, FL**

### **Request for Special Temporary Authority**

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WHDT, located at Stuart, FL, which is presently licensed to operate its digital facility on Ch. 42. The FCC assigned Ch. 34 to WHDT for its post-incentive auction facility and assigned it a Phase 2 construction completion deadline of April 12, 2019.

Scripps took possession of the station very recently. The previous owner of WHDT had not planned to complete construction of the post-repack facility until sometime after the end of Phase 2 (see Extension of CP request, LMS File No. 0000067428). The previous owner had also intended for the station to be off-air during construction of the new post-repack facility. Scripps prefers for the station to remain on-air while construction of the main facility occurs at a different location. Scripps intends to operate an interim facility from the current site and has completed the necessary infrastructure to do so. Therefore, Scripps respectfully requests Special Temporary Authority to operate WHDT on Ch. 34 with the following parameters:

Coordinates: 26° 34' 30.7" N (NAD83)  
80° 14' 31.1" W  
ERP: 153.7 kW (DA)  
RCAMSL: 439.0m

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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 WHDT Ch. 34 construction permit facility (LMS File No. 0000034673) in any azimuth.

### **Coverage**

Given the distance between the existing WHDT tower site and the limitation on the available transmitter power, the principal community of Stuart, FL will not be within the predicted F(50,90) 48 dBu contour of the proposed facility; however, the terrain in the area around the station is essentially flat. For that reason, the alternative Longley Rice propagation model was used to predict the level of signal strength that can be expected from the proposed WHDT facility in the Stuart area. Figure 2, attached hereto, shows a map of the predicted 48 dBu "City Grade" field strength for the proposed WHDT Ch. 34 facility in the Stuart, FL area. As can be seen from the map, the proposed facility is predicted to provide a 48 dBu "City Grade" signal level to the entire community of Stuart, FL and surrounding area.

### **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 a multi-user site and it is assumed that the site is 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

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in public areas is calculated to be 0.001681 mW/cm<sup>2</sup>, which is less than 5% of the MPE for public exposure (0.395333 mW/cm<sup>2</sup>) at Ch. 34 (590-596 MHz). The contribution to the overall RFR from the proposed facility is negligible and, therefore, the site will remain “in compliance” with FCC guidelines.

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

Benjamin L. Pidek, P.E.  
April 10, 2019

### **Attached:**

Figure 1 - Noise-Limited Contour of WHDT Ch. 34 CP Facility vs. Noise-Limited Contour of Proposed STA Facility  
Figure 2 - Predicted 48 dBu "City Grade" Field Strength for Proposed WHDT STA facility in the Stuart, FL Area.

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**Mid-State Consultants**

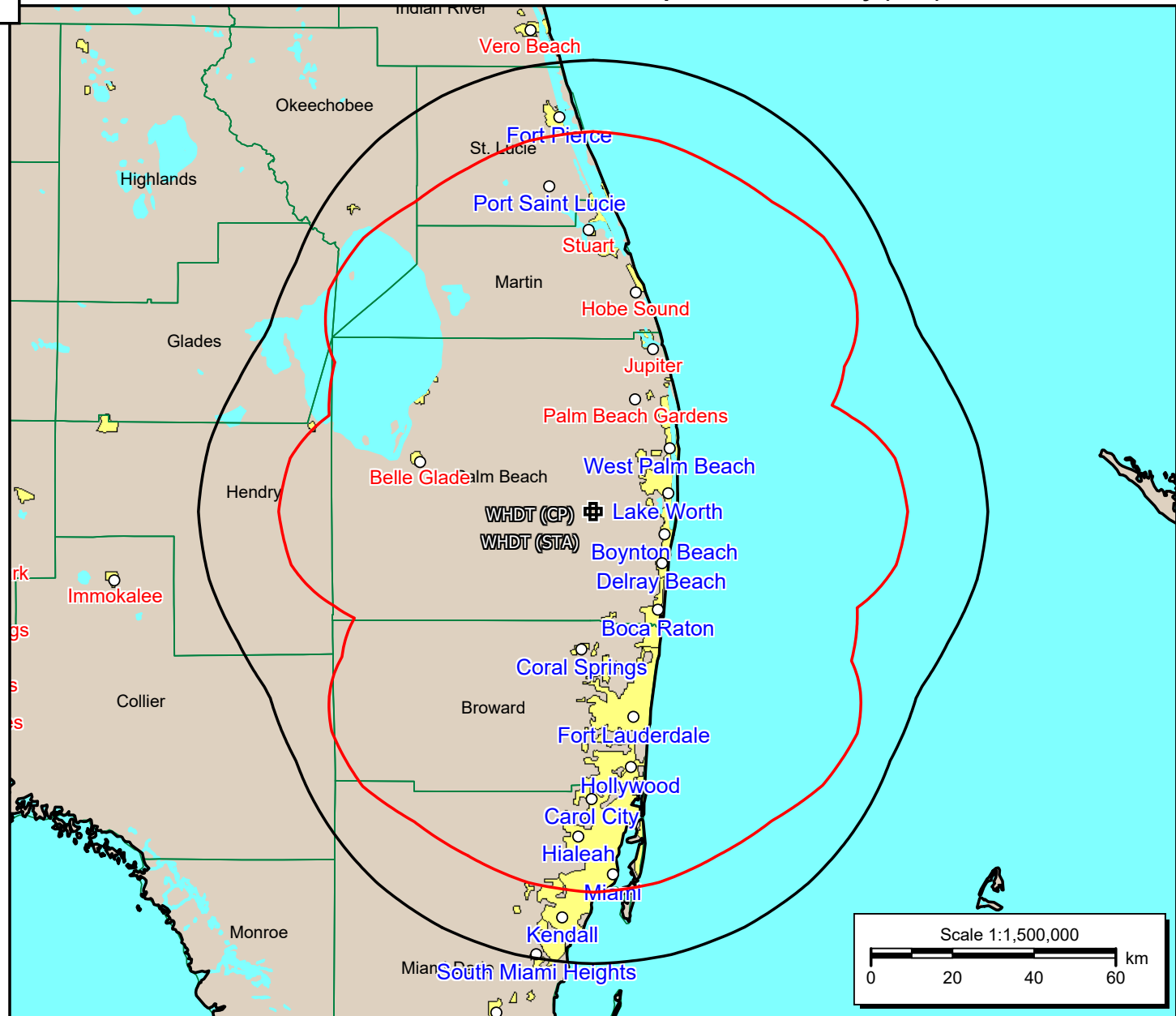
**WHDT (CP)**

0000034671  
Latitude: 26-34-30.70 N  
Longitude: 080-14-31.10 W  
ERP: 1000.00 kW  
Channel: 34  
Frequency: 593.0 MHz  
AMSL Height: 444.2 m

**WHDT (STA)**

Latitude: 26-34-30.70 N  
Longitude: 080-14-31.10 W  
ERP: 153.70 kW  
Channel: 34  
Frequency: 593.0 MHz  
AMSL Height: 444.2 m

**Noise-Limited Contour of WHDT Ch. 34 Post-Repack Construction Permit Facility (Black)  
vs. Predicted Noise-Limited Contour of Proposed STA Facility (Red)**




**Figure 1**  
**4-10-19**

## Mid-State Consultants

### WHDT STA

Latitude: 26-34-30.70 N  
Longitude: 080-14-31.10 W  
ERP: 153.70 kW  
Channel: 34  
Frequency: 593.0 MHz  
AMSL Height: 444.2 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 0.75  
Prop Model: Longley-Rice  
Climate: Cont temperate  
Conductivity: 0.0050  
Dielec Const: 15.0  
Refractivity: 301.0  
Receiver Ht AG: 10.0 m  
Receiver Gain: 0 dB  
Time Variability: 90.0%  
Sit. Variability: 50.0%  
ITM Mode: Broadcast

### Longley Rice Coverage

 > 48.0 dBuV/m

## Predicted Longley Rice 48 dBu "City Grade" Coverage of the Proposed WHDT STA Facility in the Stuart, FL Area

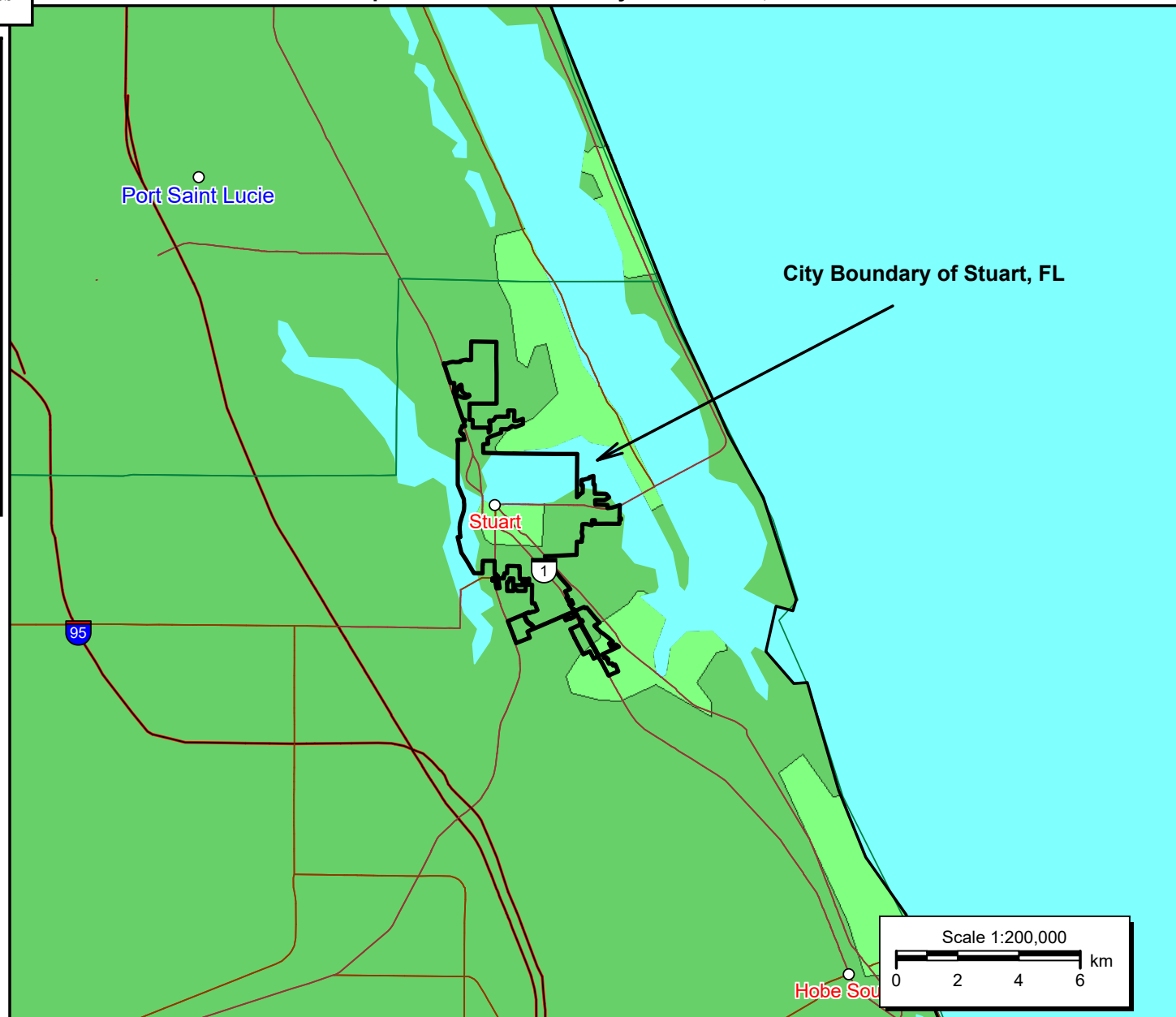


Figure 2  
4-10-19