



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
A MINOR MODIFICATION OF A
POST REPAK CONSTRUCTION PERMIT
FILE # 0000034421
WSWB - SCRANTON, PENNSYLVANIA
DTV - CH. 34 - 120 kW - 379 m HAAT**

Prepared for: MPS MEDIA OF SCRANTON LICENSE, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

GENERAL

This office has been authorized by MPS MEDIA OF SCRANTON LICENSE, LLC, licensee of WSWB, channel 31, facility ID number 73374, licensed to Scranton, Pennsylvania, to prepare this statement, FCC Form 2100, Schedule A, its technical sections, and the associated exhibits in support of an application for a minor modification of its post-reassignment construction permit, File # 0000034421, that authorizes WSWB to use channel 34 for its post-reassignment broadcasting. The instant application proposes only to substitute a different model of non-directional antenna at the same height above ground as its currently authorized non-directional antenna. No other changes are proposed

NON-DIRECTIONAL ANTENNA

The applicant proposes to substitute and install a new Dielectric model TFU-12JSC/VP-R O4 elliptically polarized non-directional transmitting antenna with its center of radiation located at the same height above ground of 100.3 meters, and the same height above average terrain of 379 meters, as currently authorized. The antenna manufacturer's vertical plane elevation radiation pattern, illustrating the antenna's radiation characteristics above and below the horizontal plane is shown and tabulated in Exhibit 2.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 1 shows the predicted Noise Limited (40.68 dBu) contour, and the principal community (48 dBu) contour, which completely encompasses the principal community of license, Scranton, Pennsylvania.

OTHER CONSIDERATIONS

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the proposed WSWB site. The applicant does recognize its responsibility

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to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT & STATEMENT OF COMPLIANCE

As discussed below, WSWB's predicted power density contribution at the multiple-use site is not considered significant and does not require consideration. As shown on the vertical elevation pattern submitted elsewhere in this application, the relative field of the proposed antenna does not exceed a value of 0.156 at any downward direction greater than 10 degrees below the horizontal. Therefore, considering this worst-case downward relative field, WSWB is predicted to produce a maximum power density of only 17.60 microwatts per square centimeter toward a distance which is 37.7 meters from the tower base. This represents only 4.45% of the FCC Guideline value of 395.33 microwatts per square centimeter for uncontrolled RFR environments. Pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed facility would not exceed 5% of the uncontrolled and controlled exposure limits, the proposal's power density contribution is insignificant.

Further, the applicant will continue to cooperate and coordinate with other site users and reduce power and/or cease operation during times of service or maintenance of the transmission system as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

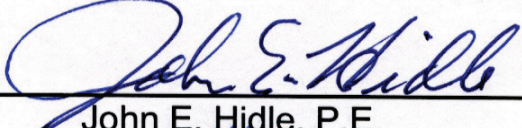
SUMMARY

It is submitted that the instant application for minor modification of its post-reassignment channel 34 construction permit, file # 0000034421, to substitute a different


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non-directional antenna, as described herein, does comply with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement, FCC Form 2100, its technical sections, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: April 26, 2019



John E. Hidle, P.E.



The seal is a circular blue stamp. The outer ring contains the text "COMMONWEALTH OF VIRGINIA" at the top and "PROFESSIONAL ENGINEER" at the bottom. In the center, it reads "J E HIDLE" and "Lic. No. 007418".