



ENGINEERING STATEMENT

IN SUPPORT OF

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

WLEX-TV

LEXINGTON, KY

Request for Special Temporary Authority

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WLEX-TV, located at Lexington, KY, which is presently authorized to operate its digital facility from a side-mounted antenna on Ch. 39 with the following parameters:

Coordinates: 38° 02' 03.0" N (NAD83)
84° 23' 39.0" W
ERP: 475.0 kW (DA)
RCAMSL: 578.3m
Antenna: Dielectric TFU-30DSC-R 35180DC

The FCC assigned Ch. 28 to WLEX-TV for its post-incentive auction facility and also scheduled it to complete construction in Phase 6 (completion date of October 18, 2019). The Ch. 39 main antenna is a coaxial slot antenna that is channel specific, and it must be replaced in order for WLEX-TV to move to Ch. 28. This change will require tower work involving the removal of the existing antenna and installation of the new antenna.

In order for WLEX-TV to remain broadcasting while the existing side-mount antenna is replaced, they have installed a new broadband interim antenna which will allow WLEX-TV to operate on either its currently licensed channel (Ch. 39) or its new post-incentive auction channel

**PROVIDING COMMUNICATION
SYSTEMS ENGINEERING**

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750



(Ch. 28). WLEX-TV is linked with WPTO (Ch. 28 at Cincinnati, OH) and it cannot transition to Ch. 17 until the last date of Phase 6 (October 18, 2019).

WLEX-TV intends to transition its operation over to the Ch. 39 interim facility on October 7, 2019. Since WLEX-TV will need to continue operating from the interim facility until the end of Phase 6, Scripps respectfully requests Special Temporary Authority to operate WLEX-TV with the following parameters until it can complete its transition to the new Ch. 28 main facility:

Coordinates: 38° 02' 03.0" N (NAD83)
84° 23' 39.0" W
ERP: 92.0 kW (Omni)
RCAMSL: 441.5m
Antenna: SWR 4-4-4-0

As can be seen in Figure 1, attached hereto, the noise-limited contour of the proposed WLEX-TV STA facility will not exceed the noise-limited contour of the licensed WLEX-TV facility in any azimuth.

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 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 in public areas is calculated to be 0.006796 mW/cm², which is less than 5% of the MPE for public

PROVIDING COMMUNICATION SYSTEMS ENGINEERING

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750



exposure (0.415333 mW/cm²) at Ch. 39 (620-626 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.

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.
September 24, 2019

Attached:

Figure 1 – Noise-Limited Contour of Proposed WLEX-TV STA Facility vs. Noise-Limited Contour of Licensed Facility.

PROVIDING COMMUNICATION SYSTEMS ENGINEERING

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750

Mid-State Consultants

WLEX-TV

BLCDT-20050728AOX
 Latitude: 38-02-03 N
 Longitude: 084-23-39 W
 ERP: 475.00 kW
 Channel: 39
 Frequency: 623.0 MHz
 AMSL Height: 578.3 m

WLEX-TV (STA)

Latitude: 38-02-03 N
 Longitude: 084-23-39 W
 ERP: 92.00 kW
 Channel: 39
 Frequency: 623.0 MHz
 AMSL Height: 441.5 m

Noise-Limited Contour of Licensed WLEX-TV Ch. 39 Facility (Black) vs. Predicted Noise-Limited Contour of Proposed STA Facility (Red)

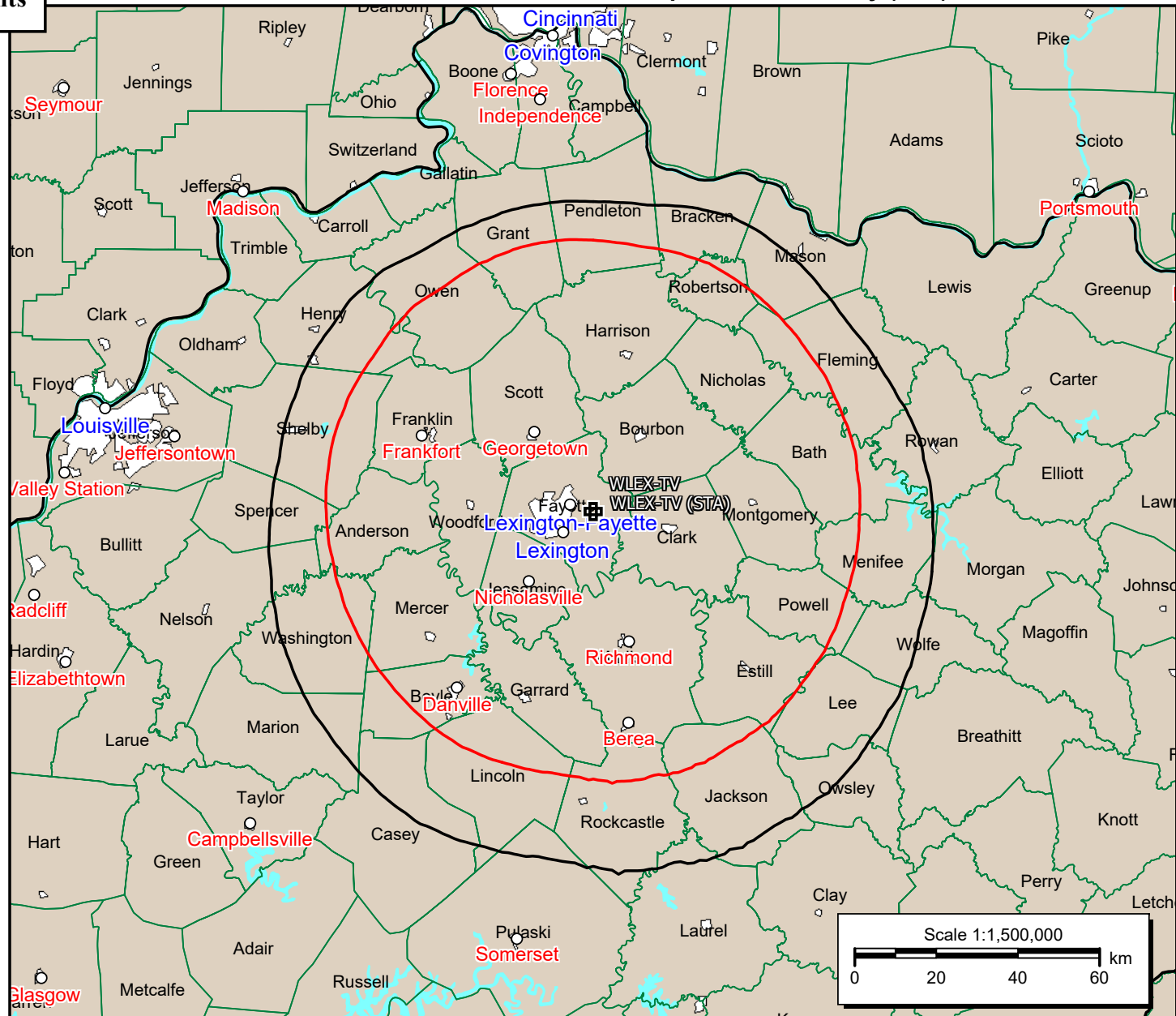


Figure 1
 9-24-19