



**WFMJ-TV - Youngstown, Ohio - Facility ID #72062**  
**Application for License-to-Cover Construction Permit - 0000033638**

**STATEMENT OF COMPLIANCE WITH CP SPECIAL CONDITIONS RE: AM STATIONS**

WFMJ-TV did not notify AM stations WGFT, Campbell, OH or WBBW, Youngstown, OH "prior to construction of the tower" or submit partial proof of performance, antenna impedance measurements, or field strength measurements as required by special operating conditions #1 and #2 in construction permit file number 0000033638 because the tower was an existing structure that was constructed prior to issuance of the CP and WFMJ-TV's repack transition would not have a measurable effect on either AM station.

More specifically, WFMJ-TV previously operated on channel 20 using the facilities authorized by BLCDDT-20061013 until it discontinued channel 20 operations and began operating on auxiliary facilities on channel 33. The station is now transitioning to its permanent post-repack channel 33 facilities as authorized by construction permit file number 0000033638. The only change associated with implementation of WFMJ-TV's construction permit was the replacement of the former channel 20 antenna, a Dielectric TFU-27ETT-R 4C150 SP DC, with a new channel 33 antenna, a Dielectric TFU-31ETT/VP-R O6, which is located on the existing tower at precisely the same height Above Ground Level (AGL) as the previous channel 20 antenna. WFMJ-TV therefore contends that the mere substitution of one antenna for another at the same position on an existing tower would cause no measurable effect on either of the subject AM radio stations.

November 13, 2019

