

## **T.Z. SAWYER TECHNICAL CONSULTANTS**

2130 HUTCHISON GROVE COURT, SUITE 100  
FALLS CHURCH, VIRGINIA 22043  
TELEPHONE (703) 848-2130

---

ENGINEERING STA REQUEST  
WJLP (DTV) CHANNEL 3  
MIDDLETOWN TOWNSHIP, NJ  
FCC FACILITY ID 86537

### ENGINEERING STA STATEMENT - STA EXTENSION REQUEST

#### NARRATIVE

PMCM TV, LLC., licensee of WJLP Middletown Township, New Jersey, proposes a continuation of its temporary operation (STA) at its licensed antenna site, using its licensed antenna system with an effective radiated power (ERP) of 26.5 kilowatts. No changes or deviation in technical parameters are proposed from that of the current STA operation.

#### Extraordinary Circumstances & Public Interest:

PMCM TV, LLC, holds a construction permit that authorizes modification of its current facility license to operate at WTC-Freedom Tower (LMS file number 0000035766).

That authorization is part of a mutual power increase agreement and the associated minor change applications of WJLP, Channel 3, Middletown Township, NJ, and the immediate adjacent channel facilities of WDPN-TV (formerly KJWP), Channel 2, Wilmington, DE, WACP Channel 4, Atlantic City, NJ.

WDPN-TV and WACP have implemented the agreed-upon power increases. A continuation of the existing STA allows WJLP (as nearly as possible) to maintain the “desired to undesired” signal ratio between all facilities. Thus protected its established service area and viewers from undue interference.

WJLP continues to experience delays in its construction that may last several more weeks or months as a result of unforeseen construction modifications made by the building owners concerning the antenna mounting design at WTC-Freedom Tower. The exact timetable for completion has not been determined, as it is subject to weather conditions, tower crew availability, and antenna mounting structural changes.

During the current STA period (expiring December 6, 2019), significant progress has been made on the installation of equipment required at the WTC-Freedom Tower construction permit site. The transmitters required have been installed, and a significant milestone has been achieved with

the installation of 2-levels of the 4-level (bay) antenna (i.e., one-half of the antenna system). The remaining levels and the associated antenna panels are expected to be installed as weather condition permit over the next few weeks and months. Delays in construction beyond the station's control continue as each antenna panel mounting arrangement requires physical adjustment to match the nearly undocumented as-built conditions. Deteriorating winter weather conditions may continue to play a significant factor in the construction timetable.

As noted previously and approved, the ERP requested in this STA matches to the extent possible the authorized service contour of the WTC/Freedom tower facilities over the southern service area of concern (i.e., towards WDPN and WACP). No other facilities are impacted by this request that are not a part of the underlying mutual interference agreement.

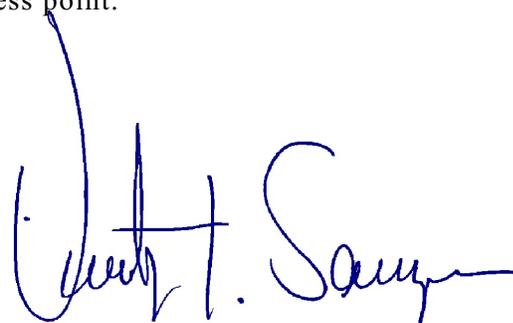
While the ERP requested is slightly below that in which an ideal match of the southern contour would occur, it represents that maximum ERP that can be obtained from the antenna system (transmitters and antennas) at 4-Times Square (the licensed and STA site).

Environmental Impact:

No new construction has occurred at the 4-Times Square site that would trigger an environmental review. The increase in ERP will not result in an increase above the limits for controlled or uncontrolled areas. Power density contribution from the proposed operation was computed using the appropriate equations of the OET Bulletin 65. The maximum radiated power is 26.5-kilowatts (53-kilowatts H+V). Using a "worst-case" relative field pattern of 0.25 for all values 30 degrees and greater below the horizon, the power density was computed at a level of 2 meters above the building's rooftop to be 0.003 mW/cm<sup>2</sup> or 0.03% of the recommended limit of 1.0 mW/cm<sup>2</sup> for a controlled area, and 1% of the recommended limit of 0.2 mW/cm<sup>2</sup> for an uncontrolled area. No further study is required. The rooftop is fully secured, and a power density monitoring device is in service at the roof access point.

December 3, 2019

Respectfully Submitted,  
T Z Sawyer Technical Consultants  
2130 Hutchison Grove Court, Suite 100  
Falls Church, VA 22043  
e-mail to: tzsawyer@tzsawyer.com



---

Timothy Z. Sawyer