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Scripps Broadcasting Holdings, LLC  
Lansing, MI

WSYM-TV is presently licensed to operate on Channel 38 and is moving to Channel 28 as part of the incentive auction repack. WSYM-TV requests special temporary authority for the use of its licensed Channel 38 auxiliary antenna as an interim antenna on Channel 28 to permit continued operation during the installation of the new top mounted Channel 28 antenna while complying with the FCC restrictions on human exposure to nonionizing radiation.

This proposed interim antenna is a Dielectric TFU-16WB C160H horizontally polarized directional antenna which operates from the 207.9 meter level on the tower which supports WSYM-TV's main antenna. Details on this antenna, as supplied by the manufacturer, are included in a separate attachment to this request. The main lobe of this antenna will be oriented at an azimuth of 75° and it will operate with a maximum effective radiated power of 147.5 kilowatts, which will require a transmitter output power of 8.71 kilowatts. The predicted 41 dBu contour for these interim operating facilities won't extend beyond the predicted 41 dBu contour for the facilities authorized by WSYM-TV's Channel 28 construction permit.

The proposed WSYM-TV STA facilities will fully comply with the current FCC standard with regard to human exposure to nonionizing radiation. Equation (2), found on Page 30 of Supplement A to OET Bulletin 65, details the calculation technique used to determine the power density at the base of a TV broadcast tower. In this case, however, it is necessary to substitute the total proposed average DTV effective radiated power (147.5 kilowatts) for the expression  $[0.4ERP_V + ERP_A]$  in this equation to compensate for the fact that DTV power levels are expressed in terms of average power, rather than peak power, as is the case for the visual portion of an analog TV

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signal. Using the vertical radiation pattern data for the proposed antenna, which is detailed in a separate attachment to this request, and substituting these values into this equation yields a predicted maximum power density at two meters above ground level of  $0.752 \mu\text{W}/\text{cm}^2$ , which will occur at a depression angle of 43 degrees below horizontal and at a distance of 222.9 meters from the base of this tower. Since the maximum permitted power density for uncontrolled exposure on TV Channel 28 is  $411.3 \mu\text{W}/\text{cm}^2$ , this amounts to only 0.183% of the permitted level for uncontrolled exposure. Since this is less than 5% of the permitted level, the proposed facilities are excluded from environmental processing and need not be considered in conjunction with other co-located and nearby facilities to establish compliance with this standard for uncontrolled exposure.

WSYM-TV will also continue to take appropriate steps to insure that workers who must climb this tower will not be exposed to power densities exceeding the permitted levels for controlled exposure. This will include a reduction in power or the cessation of operation, as appropriate, at any time that workers must be on this tower in any area where the total power density exceeds the permitted level for controlled exposure.

Because the facilities proposed in the attached request will fully comply with the FCC standard regarding human exposure to nonionizing radiation and don't involve any tower modifications which would qualify as a major environmental action, it isn't necessary to undertake any further environmental studies or submit an environmental assessment for these proposed facilities.