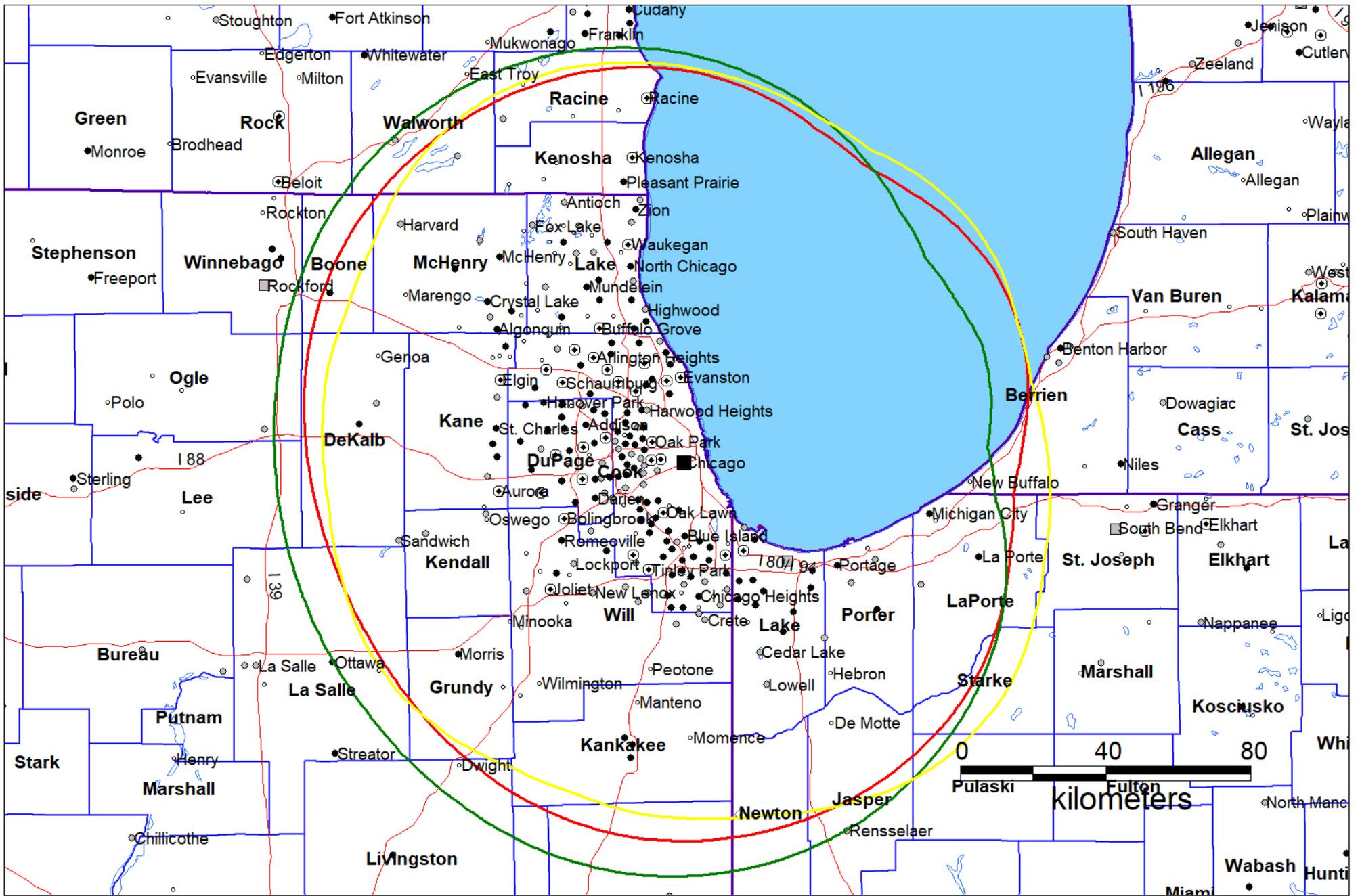


STA Justification and Engineering Statement
WFLD Channel 24 Chicago, IL
March 3, 2020

As a result of the now concluded Incentive Auction, WFLD was repacked from channel 31 to channel 24. WFLD is located on the Willis Tower and is one of seven stations at this site repacked in Phase 6. The repack required replacement of the existing antennas that in turn requires significant structural work to the building itself. Due to the lengthy delay in the required site work, WFLD previously requested and was granted an extension of its Construction Permit. In order to meet the Phase 6 deadline for transitioning to its Repack channel 24, WFLD requested and was granted a Special Temporary Authority (STA) to operate on its new channel (24) utilizing an existing master antenna located on the East Tower of the building now named 875 North Michigan Avenue (previously The John Hancock Center). The East Tower facility was temporary pending completion of a new master antenna located on the West Tower at 875 North Michigan Avenue. The new West Tower facility is now completed, and the instant application is for a STA to move that facility.

In order to maintain as much service as possible from this temporary location without causing any new interference above the allowable limit, WFLD is requesting an effective radiated power (ERP) of 1,000 kW. At this power level no new interference above the allowable limit will be caused; however, there will be some contour excursion to the east compared to the current WFLD construction permit; however, the excursion is less than was permitted for the previously granted STA on the East Tower. A plot showing the contour excursion is provided below. In view of the fact that no new interference is created, it is believed the contour excursion should be permitted and the new STA should be granted.

William R. Meintel
Senior Partner
Meintel, Sgrignoli, & Wallace, LLC



**Predicted Noise Limited Service Contours
WFLD Chicago, IL - Channel 24**

Green Post Repack Construction Permit
Willis Tower
1,000 kW

Yellow Current STA
East Tower at 875 North Michigan Avenue
737 kW

Red Proposed STA
West Tower at 875 North Michigan Avenue
1,000 kW