

Montclair Communications, Inc.
FRN 0001-7335-18
WZVN-TV, Facility ID 19183
Naples, FL

REQUEST FOR WAIVER

Section 73.1615(a)(2) requires that temporary facilities “not exceed the size of the presently licensed coverage area.” The 41 dBu contour of the proposed STA facilities will exceed the present licensed 41 dBu contour on some azimuths, although only to a minimal extent. To the extent that a waiver of Section 73.1615(a)(2) may be required for the very small excess area, it is hereby requested.

WZVN-TV’s authorized effective radiated power (ERP) from the main antenna is 1,000 kW. This application proposes an ERP of 620 kW from the temporary antenna, at a lower antenna height than the main antenna, on the same tower. The power/height reduction is intended to comply with Section 73.1675(a)(2). However, the licensed main antenna for WZVN-TV has a custom directional pattern. The antenna specified in this Engineering STA request is an off-the-shelf directional model and so does not exactly replicate the coverage of the licensed facility. The STA antenna was selected for temporary use during the repack because it was readily available and reasonably priced, and its impact on the tower in terms of weight and wind load was small enough that it did not have to be removed after the new main antenna was mounted at the top of the tower.

A map is attached showing the licensed and proposed STA 41 dBu service contours. Also attached is a study showing that the proposed STA facilities will not cause interference to any other station.

While the effective radiated power of the station could be reduced further so as to avoid any excursion of the STA coverage outside the licensed coverage area, the result would be a loss of coverage of Marco Island, almost directly due south from the WZVN-TV transmitter site. (Marco Island is close to Goodland, shown just inside the south edge of the 41 dBu contour on the coverage map.) Marco Island is particularly susceptible to hurricane damage, and its residents rely heavily on local television broadcast service during emergency weather conditions. They also rely on TV stations for instructions regarding the coronavirus pandemic. There are no other full power television stations to the south of Marco Island, or any other ABC network affiliate anywhere, that can provide local coverage in place of WZVN-TV.

The excess coverage is to the northeast, in small areas of Highlands and Okeechobee Counties. It is respectfully submitted that the excess coverage is small enough to be deemed *de minimis* and that the importance of maintaining service to Marco Island should be the controlling consideration.

If the Commission concludes that the proposed 620 kW level is not in substantial compliance with Section 73.1675(a)(2) of the Rules, then a waiver of that section is requested.

WZVN LICENSED 41 dBu

WZVN AUXILIARY
620 kW 41 dBu

WZVN SITE

PRELIMINARY
41 dBu CONTOURS
LICENSED WZVN CHANNEL 41
AND
POTENTIAL INTERIM OPERATION
JULY 2019



tvstudy v2.2.5 (4uoc83)
Database: localhost, Study: WZVN-Interim620kW-Ch28-Final-IX, Model: Longley-Rice
Start: 2020.04.29 13:53:23

Study created: 2020.04.29 13:53:22

Study build station data: LMS TV 2020-04-28

Proposal: WZVN-TV D28 DT APP NAPLES, FL
File number: Interim620kW-Ch28
Facility ID: 19183
Station data: User record
Record ID: 14
Country: U.S.
Zone: III

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WSFL-TV	D27	DT	LIC	MIAMI, FL	BLANK0000070454	180.6 km
No	WRDQ	D27	DT	LIC	ORLANDO, FL	BLCDT20111011AJM	206.3
Yes	WHFT-TV	D28	DT	LIC	MIAMI, FL	BLANK0000071957	183.3
Yes	WRBW	D28	DT	CP	ORLANDO, FL	BLANK0000109735	208.9
Yes	WRBW	D28	DT	BL	ORLANDO, FL	DTVBL54940	210.4
Yes	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	121.1
No	WMVJ-CD	D29	DC	LIC	MELBOURNE, FL	BLDTA20121120AEA	173.4
No	WPBT	D29	DT	LIC	MIAMI, FL	BLANK0000067623	182.0

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D28
Latitude: 26 49 22.40 N (NAD83)
Longitude: 81 45 53.60 W
Height AMSL: 437.9 m
HAAT: 429.3 m
Peak ERP: 620 kW
Antenna: Interim 330.0 deg
Elev Pattn: Generic
Elec Tilt: 0.50

40.1 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	413 kW	426.7 m	101.5 km
45.0	608	425.0	105.1
90.0	429	428.9	102.0
135.0	513	432.0	104.0
180.0	567	433.5	105.1
225.0	274	431.1	98.1
270.0	206	429.8	95.7
315.0	121	427.6	91.5

Distance to Canadian border: 1652.0 km

Distance to Mexican border: 1511.3 km

Conditions at FCC monitoring station: Vero Beach FL

Bearing: 51.8 degrees Distance: 141.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 310.3 degrees Distance: 2616.4 km

Study cell size: 2.00 km

Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%

Maximum new IX to LPTV: 2.00%

Interference to BLANK0000071957 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WHFT-TV	D28	DT	LIC	MIAMI, FL	BLANK0000071957	
Undesireds:	WZVN-TV	D28	DT	BL	NAPLES, FL	DTVBL19183	183.3 km
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	183.3
	WSFL-TV	D27	DT	LIC	MIAMI, FL	BLANK0000070454	5.5
	WRBW	D28	DT	CP	ORLANDO, FL	BLANK00000109735	303.8
	WPBT	D29	DT	LIC	MIAMI, FL	BLANK0000067623	5.4

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
21510.4 5,417,409	21510.4 5,417,409	20886.6 5,417,382	21066.5 5,417,394	-0.86 -0.00
Undesired	Total IX	Unique IX, before	Unique IX, after	
WZVN-TV D28 DT BL	619.7 27	619.7 27		
WZVN-TV D28 DT APP	439.8 15		439.8 15	
WSFL-TV D27 DT LIC	4.0 0	0.0 0	0.0 0	
WPBT D29 DT LIC	4.0 0	0.0 0	0.0 0	

Interference to BLANK0000109735 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WRBW	D28	DT	CP	ORLANDO, FL	BLANK0000109735	
Undesireds:	WZVN-TV	D28	DT	BL	NAPLES, FL	DTVBL19183	208.9 km
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	208.9
	WRDQ	D27	DT	LIC	ORLANDO, FL	BLC DT20111011AJM	5.0
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	144.3
	WMVJ-CD	D29	DC	LIC	MELBOURNE, FL	BLDTA20121120AEA	73.8

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
39690.1 4,080,267	39669.9 4,077,341	38218.0 3,937,094	38226.1 3,962,628	-0.02 -0.65
Undesired	Total IX	Unique IX, before	Unique IX, after	
WZVN-TV D28 DT BL	1290.1 115,373	1018.9 66,251		
WZVN-TV D28 DT APP	1249.7 88,083		1010.7 40,717	
WRDQ D27 DT LIC	8.1 21	8.1 21	8.1 21	
WXPX-TV D29 DT LIC	404.7 67,163	133.4 18,041	165.7 19,797	
WMVJ-CD D29 DC LIC	20.3 6,812	20.3 6,812	20.3 6,812	

Interference to DTVBL54940 BL scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WRBW	D28	DT	BL	ORLANDO, FL	DTVBL54940	
Undesireds:	WZVN-TV	D28	DT	BL	NAPLES, FL	DTVBL19183	210.4 km
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	210.4
	WRDQ	D27	DT	LIC	ORLANDO, FL	BLC DT20111011AJM	4.6
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	146.8

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
39653.2 4,025,706	39641.0 4,023,804	38503.3 3,926,974	38507.1 3,939,367	-0.01 -0.32
Undesired	Total IX	Unique IX, before	Unique IX, after	
WZVN-TV D28 DT BL	1040.7 84,826	826.2 49,024		
WZVN-TV D28 DT APP	1012.7 71,686		822.4 36,631	
WRDQ D27 DT LIC	16.1 190	16.1 190	16.1 190	
WXPX-TV D29 DT LIC	295.4 47,616	80.9 11,814	105.1 12,561	

Interference to BLANK0000105367 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	
Undesireds:	WZVN-TV	D28	DT	BL	NAPLES, FL	DTVBL19183	121.1 km
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	121.1
	WRBW	D28	DT	CP	ORLANDO, FL	BLANK0000109735	144.3
	WGFL	D29	DT	LIC	HIGH SPRINGS, FL	BLANK0000100460	203.5
	WMVJ-CD	D29	DC	LIC	MELBOURNE, FL	BLDTA20121120AEA	157.7
	WEFS	D30	DT	LIC	COCOA, FL	BLEDT20130801ABM	146.8

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
31093.2 4,594,588	31085.1 4,592,639	30024.8 4,440,083	30100.4 4,443,907	-0.25 -0.09
Undesired	Total IX	Unique IX, before	Unique IX, after	
WZVN-TV D28 DT BL	79.5 3,824	79.5 3,824		
WZVN-TV D28 DT APP	4.0 0		4.0 0	
WRBW D28 DT CP	763.3 143,751	735.0 141,310	735.0 141,310	
WGFL D29 DT LIC	197.2 5,265	189.1 4,939	189.1 4,939	
WMVJ-CD D29 DC LIC	44.6 51	28.4 42	28.4 42	
WEFS D30 DT LIC	16.1 2,432	0.0 0	0.0 0	

Interference to BLANK0000105367 LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	
Undesireds:	WZVN-TV	D28	DT	BL	NAPLES, FL	DTVBL19183	121.1 km
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	121.1
	WRBW	D28	DT	BL	ORLANDO, FL	DTVBL54940	146.8
	WGFL	D29	DT	LIC	HIGH SPRINGS, FL	BLANK0000100460	203.5

WMVJ-CD	D29	DC	LIC	MELBOURNE, FL	BLDTA20121120AEA	157.7
WEFS	D30	DT	LIC	COCOA, FL	BLEDT20130801ABM	146.8

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
31093.2 4,594,588	31085.1 4,592,639	30344.0 4,511,128	30419.5 4,514,952	-0.25 -0.08

Undesired	Total IX	Unique IX, before	Unique IX, after
WZVN-TV D28 DT BL 79.5	3,824	79.5 3,824	
WZVN-TV D28 DT APP 4.0	0		4.0 0
WRBW D28 DT BL 448.2	72,706	415.9 70,265	415.9 70,265
WGFL D29 DT LIC 197.2	5,265	189.1 4,939	189.1 4,939
WMVJ-CD D29 DC LIC 44.6	51	24.3 42	24.3 42
WEFS D30 DT LIC 16.1	2,432	0.0 0	0.0 0

Interference to proposal scenario 1
1.20% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	
Undesireds:	WHFT-TV	D28	DT	LIC	MIAMI, FL	BLANK0000071957	183.3 km
	WRBW	D28	DT	CP	ORLANDO, FL	BLANK0000109735	208.9
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	121.1

Service area	Terrain-limited	IX-free	Percent IX
31660.1 1,672,193	31660.1 1,672,193	29820.6 1,652,207	5.81 1.20
Undesired	Total IX	Unique IX	Prcnt Unique IX
WHFT-TV D28 DT LIC 851.5	657	843.6 657	2.66 0.04
WRBW D28 DT CP 971.9	19,219	943.7 18,931	2.98 1.13
WXPX-TV D29 DT LIC 44.3	398	24.0 110	0.08 0.01

Interference to proposal scenario 2
1.07% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WZVN-TV	D28	DT	APP	NAPLES, FL	Interim620kW-Ch28	
Undesireds:	WHFT-TV	D28	DT	LIC	MIAMI, FL	BLANK0000071957	183.3 km
	WRBW	D28	DT	BL	ORLANDO, FL	DTVBL54940	210.4
	WXPX-TV	D29	DT	LIC	BRADENTON, FL	BLANK0000105367	121.1

Service area	Terrain-limited		IX-free	Percent IX
31660.1 1,672,193	31660.1 1,672,193	29853.1	1,654,309	5.71 1.07
Undesired	Total IX		Unique IX	Prcnt Unique IX
WHFT-TV D28 DT LIC	851.5 657	843.6	657	2.66 0.04
WRBW D28 DT BL	935.3 17,117	911.1	16,829	2.88 1.01
WXPX-TV D29 DT LIC	44.3 398	28.1	110	0.09 0.01