

**PURPOSE OF ENGINEERING STA (WAIVER & EXPEDITED PROCESSING REQUESTED)**

The purpose of this Engineering STA application is to allow the WVNY-DT facility to temporarily operate with alternate parameters on its post-auction channel (7) using a side-mounted directional interim antenna (TLS-V4-BB-R) while the new post-auction main antenna is installed and the main facility continues to be built-out. In order for the WVNY-DT Channel 7 post-auction interim facility to adequately serve its viewers while the main post-auction facility is built-out, it must operate with a minimum ERP of 10 kW as demonstrated in the enclosed contour map (See Exhibit 1). The WVNY post-auction Channel 7 facility is authorized to operate with an ERP of 14 kW using a broad cardioid azimuth pattern with a deep backside null and an antenna height radiation center of 30.5 m AGL (100 ft); however, the post-auction interim facility proposes to operate with an ERP of only 10 kW using an off-the-shelf narrow skull azimuth pattern having significantly less of a backside null and an antenna height radiation center of only 19.2 m AGL (63 ft) which will not come close to replication; however, even with considerably reduced parameters, it will exceed the authorized F(50,90) 36.0 dBu protected noise limited contour along a few radials toward Canada as shown in Exhibit 1 (See highlighted area) due to azimuth pattern disparities. The areas where the proposed interim facility would exceed the authorized F(50,90) 36. dBu protected noise limited contour would not result in impermissible interference as demonstrated in the enclosed TVStudy exhibit.

**WAIVER REQUEST (§73.622(e)(1))**

Referring to enclosed Exhibit 1, it can be seen that the proposed post-auction interim facility's F(50,90) 36.0 dBu protected noise limited contour (red) will be completely encompassed by the authorized post-auction facility's F(50,90) 36.0 dBu protected noise limited contour (green) except along azimuths from approximately 320° through 65°; **therefore, a waiver of §73.622(e)(1) is hereby requested for this Engineering STA.**

The enclosed TVStudy exhibit demonstrates that the proposed interim facility will not cause impermissible interference to any station, including stations in Canada, and the public interest is benefited since significantly more off-air viewers who currently receive

the WVNY pre-auction signal will be able to continue receiving an off-air signal via the post-auction frequency. Since the interim antenna pattern and main antenna pattern are not the same, it is unavoidable for the interim facility's contour to be fully encompassed by the main facility's contour in all azimuthal directions without having to reduce the power significantly which would adversely impact existing viewers who currently enjoy receiving the WVNY signal off the air. The proposed interim facility's F(50,90) 43.0 dBuV/m principal community contour will completely encompass its community of license.

**TVSTUDY**

The enclosed TVStudy report demonstrates that the proposed WVNY-DT Channel 7 post-auction interim facility will not cause impermissible interference to any station, including stations in Canada. The station will accept the 2.11% inbound interference as predicted in the enclosed TVStudy exhibit.

**CERTIFICATION**

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

A handwritten signature in blue ink that reads 'William T. Godfrey, Jr.'.

WILLIAM T. GODFREY, JR., CBT  
Kessler and Gehman Associates, Inc.  
Consulting Engineers

June 22, 2020