

**STA Application for Interim Antenna Operation
During Spectrum Repack Transition
Hoffman Communications, Inc.
WJAX Television, Jacksonville, FL
File Number: BLCDT-20030328ANV**

WJAX Antenna Installation Complications

WJAX-TV, licensed to Hoffman Communications, Inc., (hereinafter "WJAX") and serving the Jacksonville, Florida market, currently operates on Channel 19 at a site called Hogan Road, owned by SBA Towers II, LLC, in Jacksonville. The WJAX antenna is mounted on top of a three-arm candelabra tower (ASR No. 1235223) shared with several other television stations and numerous land mobile radio operations. The antenna of one of the other television stations sharing the Hogan Rd tower candelabra (WJCT, with an amended construction permit in File No. 0000112908) must be replaced as part of the Post Incentive Auction Spectrum Repack. The work was intended to be performed during WJCT's assigned Spectrum Repack Phase 7, and an Interim antenna was installed in preparation for that event, during which WJAX will have to shut down its operations on the candelabra for the safety of workers replacing the antenna there. Installation of the WJCT antenna was delayed by lack of tower crew and helicopter availability. It now is scheduled to be replaced within days of the filing of this application for Special Temporary Authorization. Consequently, expedited processing of this application for STA is respectfully requested.

Request for Operation using an Interim Antenna Under STA

It is anticipated that replacement of the WJCT antenna will take about one day. To enable a quick transfer from the WJAX antenna covered by its license to the antenna covered by the current STA application, the ERP requested is that which will be emitted by the RF system and Interim antenna when the WJAX transmitter power is unchanged from that needed to meet the terms of the WJAX License using the normal WJAX antenna. Unless unforeseen circumstances cause the WJCT antenna installation (which currently is scheduled for Friday, 28 August 2020) to go awry, need for the STA will be relatively short, on the order of one week from the time of filing of the current application.

Facilities Requested Under STA

Requested facilities for the Interim Antenna are detailed technically in the LMS form to which this description is attached. In summary, they include operation with a directional antenna having a radiation center height of 152.4 m (500.0 ft) above ground level (RCAGL), corresponding to 154.8 m above mean sea level (RCAMSL), peak effective radiated power (ERP) of 851 kW, and an azimuth orientation of the axis of symmetry of the antenna toward 270 degrees True. As can be seen on the map on the last page hereof, the pattern and power of the proposed Interim facility at the Hogan Road

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site are such that the WJAX Interim contour under the STA will be fully contained within the WJAX Channel 19 contour authorized by the station's License.

Environmental Impact and Radio Frequency Radiation

None of the conditions specified in Section 1.1307 of the FCC rules that would require the preparation of an Environmental Assessment pertain with respect to the proposed facility. In particular, because the proposed facility will be installed on a tower at an existing site, the proposed operation does not implicate many of the causes for further investigation and preparation of further reports.

With respect to Radio Frequency Radiation exposure, OET Bulletin No. 65 provides methods for evaluating the level of exposure for both employees (occupational/controlled situations) and non-employees (general population/uncontrolled situations). The combination of the antenna radiation pattern, as provided in the manufacturer's technical specifications, with the antenna height above ground level and the operating power level indicate that the potential exposure would be less than 5 percent of the Maximum Permissible Exposure (MPE) limit for general population/uncontrolled situations at the site.

To be precise, OET-65 methods produce an exposure estimate of approximately 2.278 percent of the limit for general population/uncontrolled situations. Since the facility has a calculated exposure value of less than 5 percent of the relevant exposure limit, it is categorically excluded from requirements for detailed RF exposure analyses of the site.

Notwithstanding the foregoing, Hoffman Communications, Inc., recognizes its responsibility for the safety and health of employees and contractors when exposed to RF radiation conditions. It will take the steps necessary to assure that personnel working in its facilities and on the tower and antennas are protected from exposure to RF radiation levels exceeding those specified in the Commission's rules. It will work cooperatively with other users of the site to assure a safe working environment for all. Added steps to be taken may include measurements and monitoring as well as power reduction or turning off the transmitter, if necessary to ensure a safe working environment.

Contour Comparison of WJAX Authorized Facility and WJAX Proposed Interim STA

Figure 1 below shows the Channel 19 contours of the licensed WJAX facility at the Hogan Road site in dark red, and the proposed Interim WJAX facility in violet, overlaid upon one another. The map was produced using EDX Signal software, version 11.6.8.

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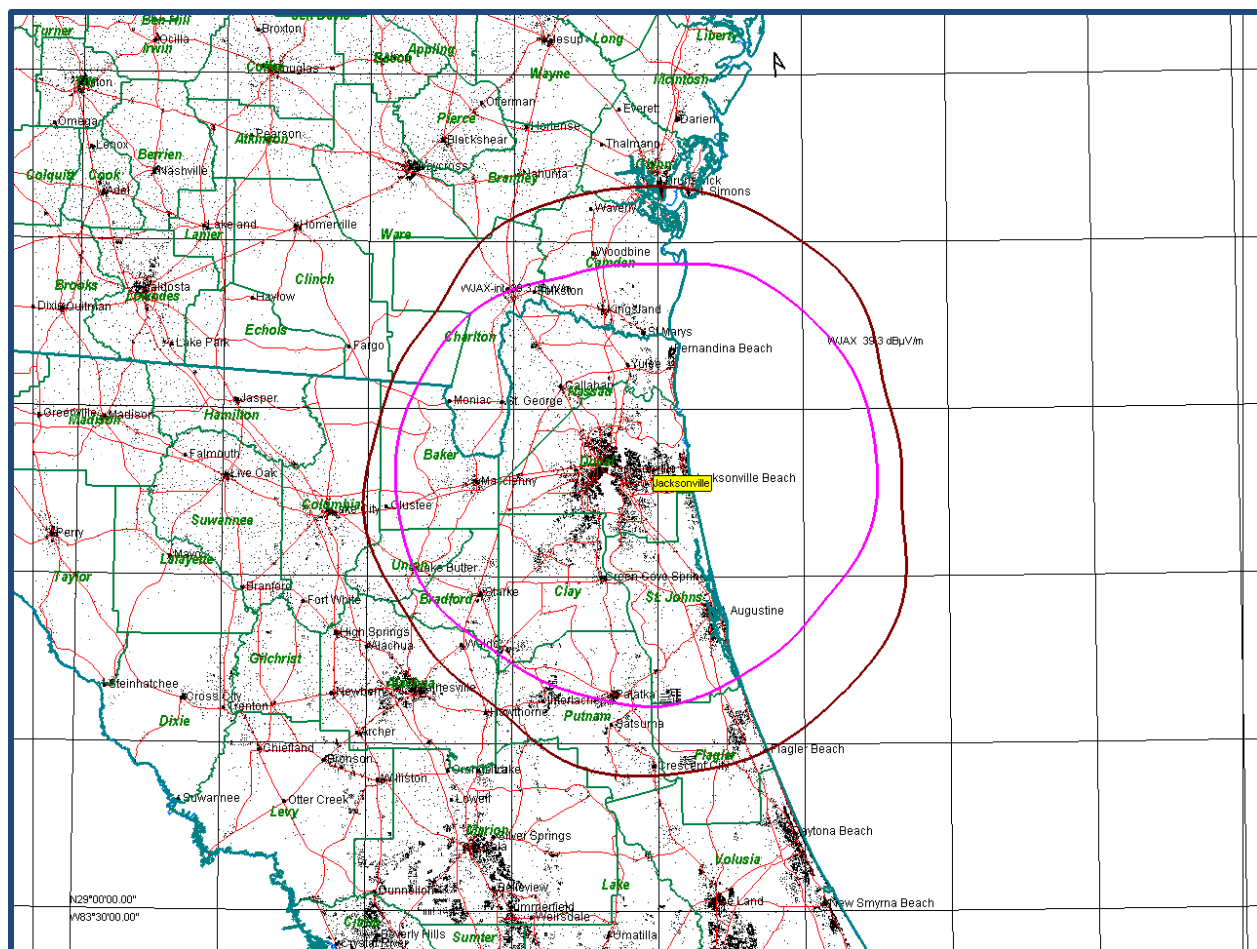


Figure 1 – Comparison of WJAX 39.3 dBu Contours – Licenset (Dark Red) vs. Proposed STA (Violet)