

227 Central Avenue  
Metuchen, NJ 08840-1242  
(732) 494-6400 Phone  
(732) 494-6401 Fax

## **Merrill Weiss Group** LLC

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*Consultants in Electronic Media Technology / Management*

### **STA Application for Interim Antenna Operation During Spectrum Repack Transition Cox Television Jacksonville, LLC WFOX Television, Jacksonville, FL File Number: 0000120746**

#### **WFOX Antenna Installation Complications**

WFOX-TV, licensed to Cox Television Jacksonville, LLC, (hereinafter "WFOX") and serving the Jacksonville, Florida market, currently operates on Channel 14 at a site called Hogan Road, owned by SBA Towers II, LLC, in Jacksonville. WFOX has just completed its transition to Channel 14 from Channel 32 in the Post Incentive Auction Spectrum Repack and has filed for a License to Cover its Construction Permit, the File Number of the pending application for which license is 0000120746. The WFOX 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 WFOX installed an Interim antenna in preparation for that event, during which it 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 WFOX antenna covered by its construction permit 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 WFOX transmitter power is unchanged from that needed to meet the terms of the WFOX License to Cover application using the normal WFOX 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

## **WFOX STA Application for Interim Operation using Alternate Antenna during Antenna Replacement**

above mean sea level (RCAMSL), peak effective radiated power (ERP) of 579 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 next page, the pattern and power of the proposed Interim facility at the Hogan Road site are such that the WFOX Interim contour under the STA will be fully contained within the WFOX Channel 14 contour authorized currently in its CP and incorporated into the WFOX application for License to Cover cited above.

### **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 0.535 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, Cox Television Jacksonville, LLC 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 WFOX Authorized Facility and WFOX Proposed Interim STA**

Figure 1 below shows the Channel 14 contours of the authorized WFOX facility at the Hogan Road site in dark red, and the proposed Interim WFOX facility in violet, overlaid upon one another. The map was produced using EDX Signal software, version 11.6.8.

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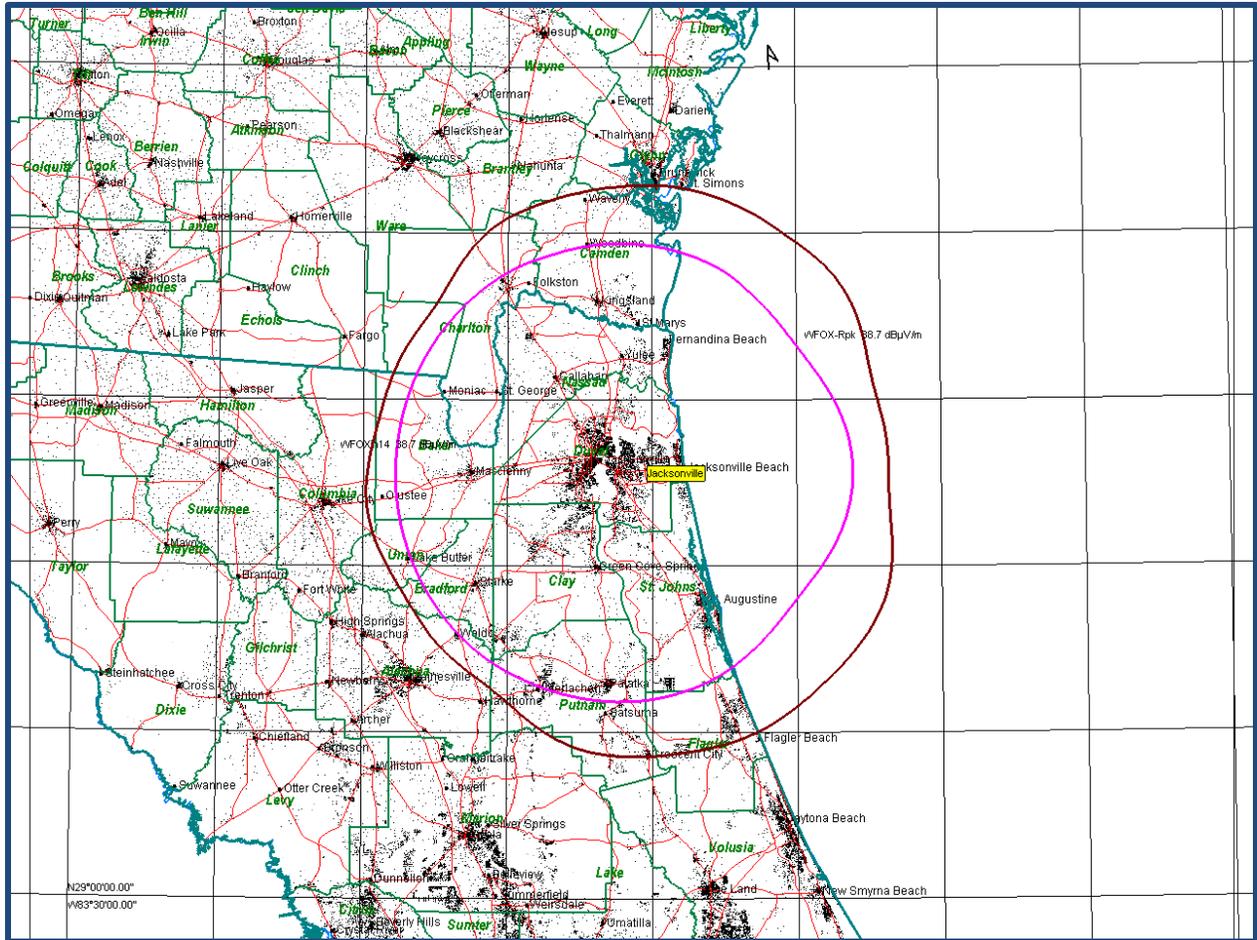


Figure 1 – Comparison of WFOX-TV 38.9 dBu Contours – Pending License to Cover (Dark Red) vs. Proposed STA (Violet)