

***AMENDMENT TO REQUEST
FOR SPECIAL TEMPORARY AUTHORITY***

**WMNE-LP – PORTLAND, MAINE
FACILITY ID: 47717 / LMS FILE 0000120414**

DIGITAL NETWORKS – NORTHWEST, LLC

SEPTEMBER 2020

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9.8.2020

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AMENDMENT TO REQUEST FOR SPECIAL TEMPORARY AUTHORITY

The following engineering statement and attached exhibits have been prepared for **Digital Networks-Northeast, LLC** (“Northeast”), licensee of low power television station WMNE-LP at Portland, Maine, and are in support of their amendment to request for special temporary authority.¹ This submission seeks to amend the pending STA request for WMNE under LMS File No. 0000120414.

WMNE-LP is licensed to operate on channel 32 with a maximum effective radiated power of 25 kW at a center of radiation of 250 meters above mean sea level utilizing a directional antenna.² The current construction permit for the facility is a flash-cut from analog to digital. The current construction permit for WMNE species operation on channel 32 with a maximum effective radiated power of 15 kW at a center of radiation of 314.5 meters above mean sea level, or 175 meters above ground level. The proposed special temporary authority seeks to operate with a temporary antenna at the authorized with a maximum effective radiated power of 2 kW.

Due to the current conditions in the post-repack industry, including the impact on labor and supply chains that the COVID-19 pandemic has caused, Southeast will be unable to complete the installation of the transmitter in time to preserve the license, which is currently silent. Southeast therefore respectfully requests operation at with the technical parameters proposed in this request for up to 180 days to complete the necessary construction of the facility displaced by the spectrum repack.

¹ The Facility ID for WMNE is 47717.

² See BLTT-20020429AAV.

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The proposed technical parameters represent a reduction in the maximum effective radiated power and center of radiation elevation relative to the parameters authorized under the outstanding construction permit. As a result, the STA technical parameters would not result in any prohibited interference to other proposed and authorized facilities. Additionally, the 51 dBu F(50,90) service contour resulting from the STA parameters would be wholly contained within the authorized 51 dBu F(50,90) contour. Exhibit A-1 illustrates these two contours.

The proposed technical parameters would not result in a significant environmental impact, and are exempt from environmental processing. The antenna structure to be utilized is registered with the Commission, and the addition of the proposed antenna would not increase the existing environmental impact already present. Additionally, the proposed technical parameters would not result in human exposure to radiofrequency radiation in excess of the applicable safety standards. Using the equations in Appendix A of *OET Bulletin 65*, the calculated power density at ground level based on a downward relative field of 0.3 is $7.67 \mu\text{W}/\text{cm}^2$, which complies with the uncontrolled environment condition of the Commission's safety standard.

Northeast certifies that it will coordinate with all other users of the site to ensure that workers and other persons are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power output or cessation of operation as necessary to protect persons at the site.

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The preceding statement, and attached exhibits, have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2021

Jeremy D. Ruck, PE
September 8, 2020

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WMNE-LD/WMNE-LP.C

000063724
Latitude: 43-51-06 N
Longitude: 070-19-37.50 W
ERP: 15.00 kW
Channel: 32
Frequency: 581.0 MHz
AMSL Height: 314.5 m
Horiz. Pattern: Directional
Prop Model: FCC Contour

WMNE-LP.X

0000120414
Latitude: 43-51-06 N
Longitude: 070-19-37.50 W
ERP: 2.00 kW
Channel: 32
Frequency: 581.0 MHz
AMSL Height: 169.5 m
Horiz. Pattern: Directional
Prop Model: FCC Contour

Jeremy Ruck & Associates, Inc.

- Proposed STA 51 dBu F(50,90) Contour
- Authorized CP 51 dBu F(50,90) Contour

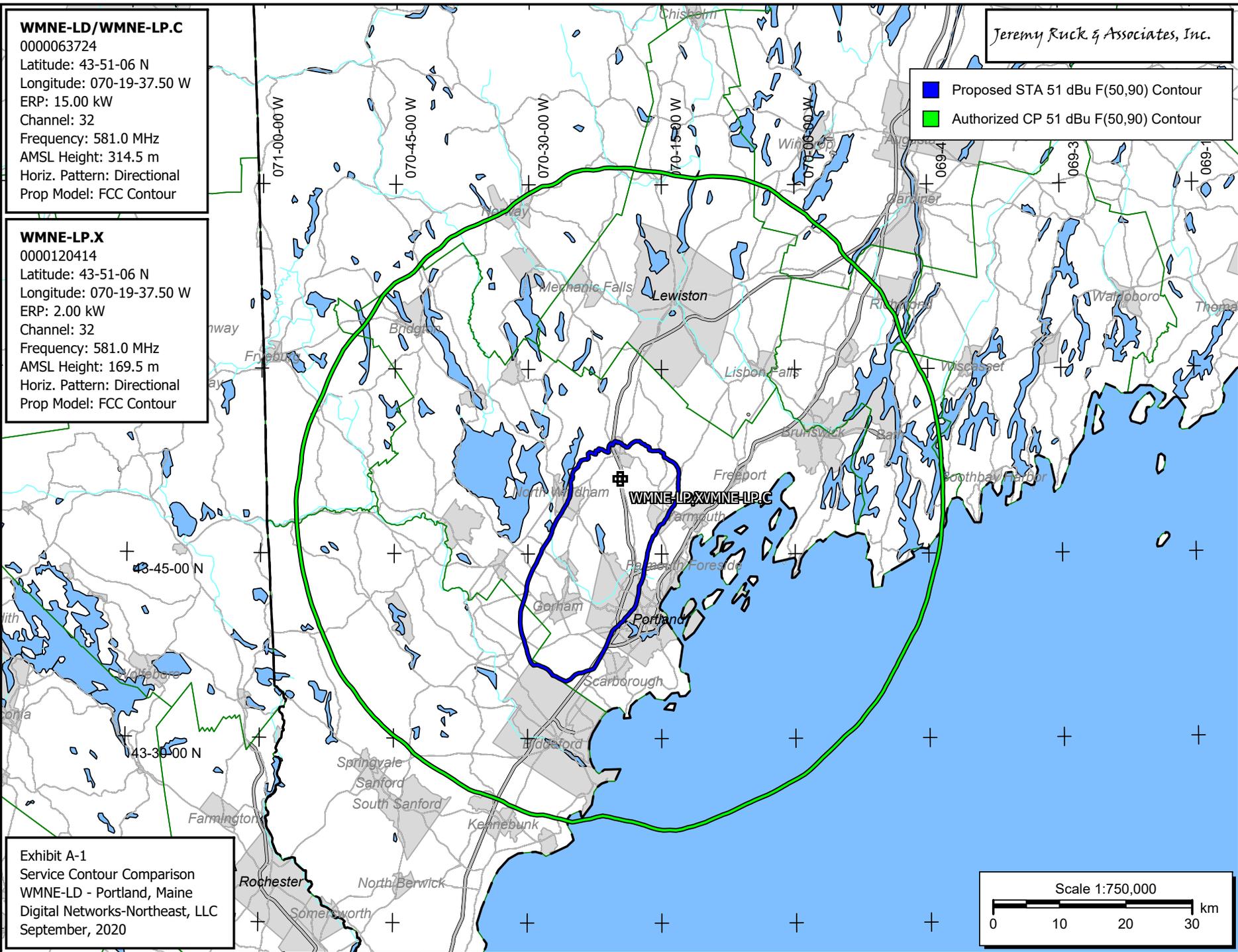


Exhibit A-1
Service Contour Comparison
WMNE-LD - Portland, Maine
Digital Networks-Northeast, LLC
September, 2020

