

#### **ENGINEERING EXHIBIT**

## **Application for Minor Modification of Digital Low Power Television Station Construction Permit**

prepared for

**Gray Television Licensee, LLC** 

W22CY Clarksburg, WV Facility ID 125359 Ch. 22 (digital) 3.5 kW

Gray Television Licensee, LLC ("Gray") is the licensee of analog Low Power Television station W22CY, Channel 22, Clarksburg WV, Facility ID 125359 (BLTTL-20060120ADM). A Construction Permit ("CP", 0000068832) authorizes W22CY to flashcut to digital operation on its current Channel 22 at 15 kW effective radiated power ("ERP") with a nondirectional antenna. Gray herein seeks a minor modification of the flashcut CP to specify a decrease in ERP to 3.5 kW and use of a directional transmitting antenna. No change in site location or antenna height is proposed.

As with the current authorization, the W22CY flashcut facility will utilize the tower structure associated with FCC Antenna Structure Registration number 1034466, located 5.0 km from the W22CY licensed analog site. The proposed W22CY antenna will be side-mounted on the tower and no change to the overall structure height will result.

The proposed antenna is a Kathrein model K723147 1x2 having horizontal polarization. The ERP is 3.5 kW using a "full service" out of channel emission mask. A plot of the directional antenna's azimuthal pattern is supplied in Figure 1. Figure 2 depicts the relevant coverage contours of the licensed analog facility (74 dB $\mu$ ) and those of the current flashcut CP and proposed digital facilities (51 dB $\mu$ ), demonstrating compliance with §73.3572 for a minor change.

# Engineering Exhibit Gray Television Licensee, LLC (W22CY) (page 2 of 3)



Interference study per OET Bulletin 69<sup>1</sup> shows that the proposal complies with the FCC's interference protection requirements toward all digital television, television translator, LPTV, and Class A stations. FCC processing of this proposal is requested using a <u>1.0 km cell size and 0.2 km terrain profile increment</u>. The results, summarized in Table 1, show that any new interference does not exceed the FCC's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations) to any facility.

#### **Human Exposure to Radiofrequency Electromagnetic Field**

The proposed facility was evaluated for human exposure to RF energy using the procedures outlined in the FCC's OET Bulletin Number. 65. Based on OET-65 equation (10) and 20 percent antenna relative field in downward elevations (pattern data shows less than 20 percent relative field at angles 30 to 90 degrees below the antenna), the calculated power density attributable to the proposed facility at locations near the transmitter site at a height of two meters above ground level is  $10.7 \, \mu \text{W/cm}^2$ , which is  $3.1 \, \text{percent}$  of the general population / uncontrolled maximum permissible exposure limit. This is below the five percent threshold limit described in §1.1307(b) regarding sites with multiple emitters, categorically excluding the applicant from responsibility for taking any corrective action in the areas where the proposal's contribution is less than five percent.

The general public will not be exposed to RF levels attributable to the proposal in excess of the FCC's guidelines. RF exposure warning signs will continue to be posted. With respect to worker safety, the applicant will coordinate exposure procedures with all pertinent stations and will reduce power or cease operation as necessary to protect persons having access to the site, tower, or antenna from RF electromagnetic field exposure in excess of FCC guidelines. This exhibit is limited to the evaluation of exposure to RF electromagnetic field.

implementation of TVStudy show excellent correlation.

<sup>&</sup>lt;sup>1</sup>FCC Office of Engineering and Technology Bulletin number 69, Longley-Rice Methodology for Evaluating TV Coverage and Interference, February 6, 2004 ("OET-69"). This analysis employed the FCC's current "TVStudy" software with the default application processing template settings, 1 km cell size, and 0.2 km terrain increment. Comparisons of various results of this computer program (run on a Mac processor) to the FCCs

## **Engineering Exhibit Gray Television Licensee, LLC** (W22CY)

Chesapeake RF Consultants, LLC

Radiofrequency Consulting Engineers
Digital Television and Radio

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#### List of Attachments

Figure 1 Antenna Azimuthal Pattern
Figure 2 Coverage Contour Comparison
Table 1 TVStudy Analysis of Proposal

Form 2100 Saved Version of Engineering Sections from FCC Form at Time of Upload

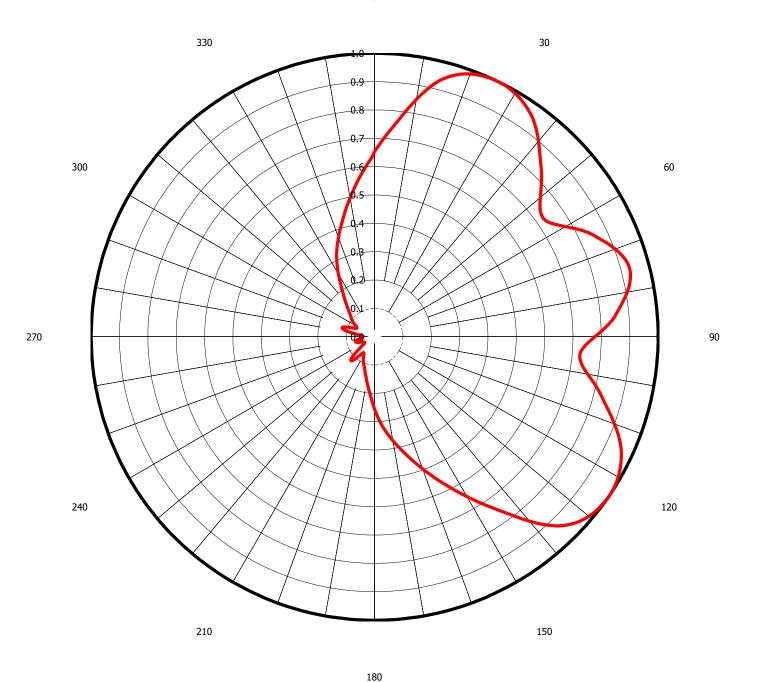
#### Chesapeake RF Consultants, LLC

Joseph M. Davis, P.E. May 18, 2021

207 Old Dominion Road Yorktown, VA 23692 703-650-9600

### Azimuth Pattern - Relative Field (True North)

0



Chesapeake RF Consultants, LLC

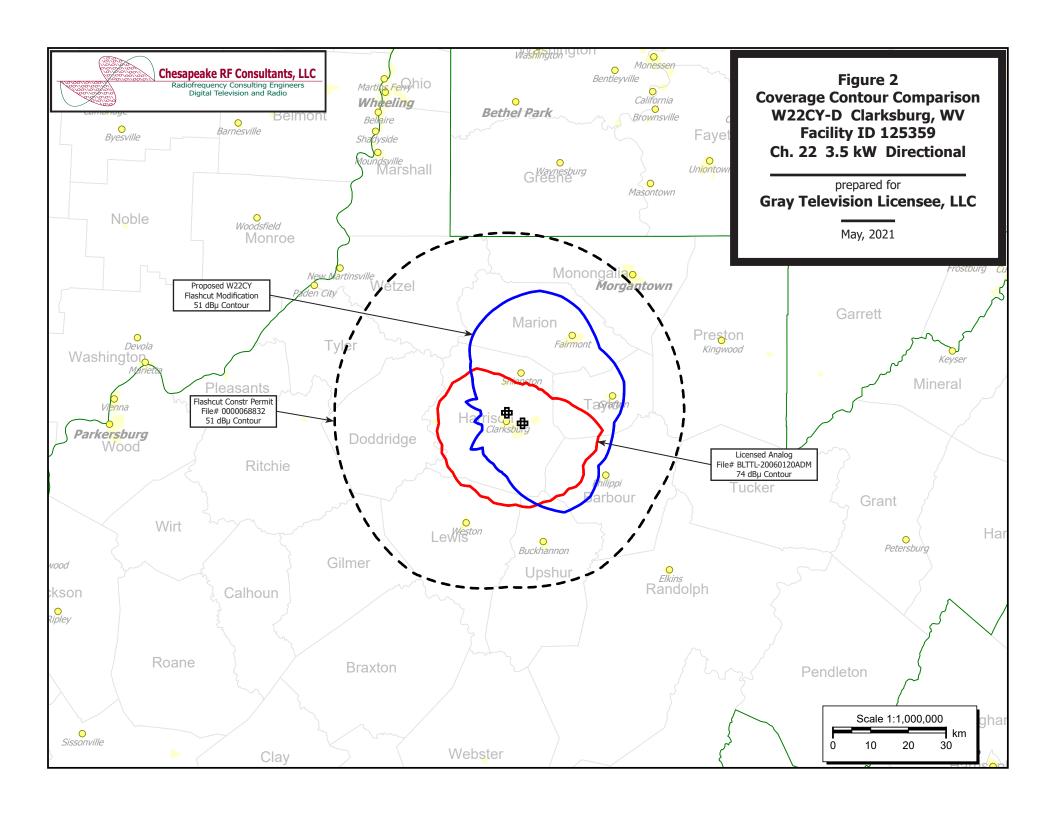
Radiofrequency Consulting Engineers

Digital Television and Radio

Figure 1
Antenna Azimuthal Pattern
W22CY-D Clarksburg, WV
Facility ID 125359
Ch. 22 3.5 kW Directional

prepared for Gray Television Licensee, LLC

May, 2021



### **Table 1 W22CY TVStudy Analysis of Proposal** (page 1 of 4)



tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: W22CY prop mod #11290, Model: Longley-Rice

Start: 2021.05.18 09:29:45

Study created: 2021.05.18 09:29:44

Study build station data: LMS TV 2021-05-14

Proposal: W22CY D22 LD APP CLARKSBURG, WV

File number: W22CY prop mod

Facility ID: 125359

Station data: User record

Record ID: 3635 Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Search options:

Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WJW	D21	LD	CP	CLEVELAND, OH	BDRTCDT20101123AOJ	184.9 km
No	WBNS-TV	D21	DT	LIC	COLUMBUS, OH	BLCDT20021025ABK	241.6
No	WSSS-LP	D21	LD	CP	STEUBENVILLE, OH	BDISDTL20121022AAR	120.3
No	WPNT	D21	DT	LIC	PITTSBURGH, PA	BLANK0000112577	135.9
No	WWCW	D21	DT	LIC	LYNCHBURG, VA	BLANK0000080987	228.6
Yes	W21EB-D	D21	LD	CP	CLARKSBURG, WV	BLANK0000072099	5.0
No	WHWV-LD	D21z	LD	CP	Huntington, WV	BLANK0000143752	203.3
No	WHWV-LD	D21z	LD	LIC	Huntington, WV	BLANK0000143055	173.8
No	W24DS-D	D21	LD	CP	PARKERSBURG, WV	BLANK0000051781	105.2
No	W23DR-D	D21	LD	CP	ROMNEY, WV	BLANK0000054636	139.9
No	WCVN-TV	D22	DT	LIC	COVINGTON, KY	BLANK0000087399	360.0
No	WMPB	D22	DT	LIC	BALTIMORE, MD	BLANK0000107690	306.6
No	WMPB	D22	DT	CP	BALTIMORE, MD	BLANK0000143850	306.6
No	WBOC-LD	D22	LD	CP	Cambridge, MD	BLANK0000140180	416.0
No	WUVC-DT	D22	DT	LIC	FAYETTEVILLE, NC	BLANK0000125505	438.0
No	WECY-LD	D22	LD	LIC	CORNING, NY	BLANK0000024397	418.8
No	WVPX-TV	D22	DT	LIC	AKRON, OH	BLANK0000080180	222.1
No	WBGU-TV	D22	DT	LIC	BOWLING GREEN, OH	BLANK0000063785	364.8
No	W22DE	N22+	TX	LIC	DAYTON, OH	BLTTL20100511AAU	339.2
No	WOCB-CD	D22	DC	LIC	MARION, OH	BLANK0000072129	257.1
No	WTOO-CD	D22	DC	LIC	BOLIVAR, PA	BLANK0000099914	166.2
No	W22FJ-D	D22		LIC	DUBOIS, PA	BLANK0000144215	247.2
No	WOLF-TV	D22		LIC	HAZLETON, PA	BLANK0000086376	433.3
No	WJAC-TV	D22		LIC	JOHNSTOWN, PA	BLCDT20110105ABC	214.9
No	WJAC-TV	D22		LIC	JOHNSTOWN, PA	BLCDT20101105AAU	214.6
Yes	WWKH-CD	D22	DC	CP	PITTSBURG, PA	BLANK0000127565	85.2
Yes	WWKH-CD	D22	DC	LIC	PITTSBURG, PA	BLANK0000079948	85.2
No	WTAE-TV	D22		LIC	PITTSBURGH, PA	BLANK0000088086	131.4
No	WKPT-CD	D22		LIC	KINGSPORT, TN	BLDTA20120420ACJ	365.7
No	WCVE-TV	D22	DT	LIC	RICHMOND, VA	BLANK0000112529	310.7
No	W22EX-D	D22	LD	LIC	STAUNTON, VA	BLANK0000055155	154.6
No	WSAZ-TV	D22	DT	LIC	HUNTINGTON, WV	BLANK0000100249	184.5
No	W22CV-D	D22	LD	LIC	MOOREFIELD, WV	BLDTT20120608ABX	128.7
No	W22ES-D	D22	LD	CP	SUTTON, WV	BNPDTL20100514AAM	81.7
No	WDVM-TV	D23	DT	LIC	HAGERSTOWN, MD	BLANK0000080408	208.0
No	WDVM-TV	D23	DT	APP	HAGERSTOWN, MD	BLANK0000127595	216.9
No	WWHO	D23	DT	LIC	CHILLICOTHE, OH	BLANK0000129743	239.9
No	WPXI	D23	DT	LIC	PITTSBURGH, PA	BLANK0000080213	132.4
No	W23DR-D	D23		LIC	ROMNEY, WV	BLDTT20090609AAZ	139.9
No	WIIC-LD	N29+	TΧ	LIC	PITTSBURGH, PA	BLTTL19981230JB	131.4

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2  $\ensuremath{\text{km}}$ 

Record parameters as studied:

Channel: D22

Mask: Full Service

#### Table 1 W22CY TVStudy Analysis of Proposal (page 2 of 4)

Chesapeake RF Consultants, LLC Radiofrequency Consulting Engineers Digital Television and Radio

Latitude: 39 18 2.00 N (NAD83) Longitude: 80 20 36.00 W

Height AMSL: 437.4 m HAAT: 0.0 m Peak ERP: 3.50 kW

Antenna: KAT-K723147 1X2 (ID 1001019) 75.0 deg

Elev Pattrn: Generic

49.6 dBu contour:

Azimuth     0.0 deg     45.0     90.0     135.0	ERP	HAAT	Distance
	1.51 kW	88.4 m	31.5 km
	2.42	80.9	32.9
	2.18	76.5	31.7
	3.11	93.2	35.8
180.0	0.233	64.2	18.7
225.0	0.050	83.5	14.2
270.0	0.008	57.1	7.5
315.0	0.058	81.4	14.6

Database HAAT does not agree with computed HAAT Database HAAT: 0 m Computed HAAT: 78 m

Distance to Canadian border: 316.0 km Distance to Mexican border: 2138.5 km

Conditions at FCC monitoring station: Laurel MD

Bearing: 91.7 degrees Distance: 303.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone: Bearing: 280.5 degrees Distance: 2122.2 km

Study cell size: 1.00 km Profile point spacing: 0.20 km

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

Maximum new IX to LPTV: 2.00%

Interference to BLANK0000072099 CP scenario 1

Desired:	Call W21EB-D	Chan D21		Status CP	City, State CLARKSBURG, WV		File Numbe		Distance
Undesireds:	W22CY W20DY-D WMPT WBNS-TV WPNT WHWV-LD WWKH-CD	D22 D20 D21 D21 D21 D21z D22z	LD DT DT DT LD	APP CP LIC LIC LIC CP CP	CLARKSBURG, WV ROANOKE, WV ANNAPOLIS, MD COLUMBUS, OH PITTSBURGH, PA Huntington, WV PITTSBURG, PA		W22CY prop BNPDTL2010 BLANK00000 BLCDT20021 BLANK00001 BLANK00001	0514AAR 084314 025ABK .12577 43752	5.0 km 40.4 319.1 246.4 137.8 205.6 84.5
Service area		Terrain-limite		in-limit	ted IX-free, bef	ed IX-free, before		ee, after	Percent New IX
5333.2	195,137	5081	. 9	181,9	946 4976.5 179,	659	4974.5	179,407	0.04 0.14
Undesired W22CY D22 LI W20DY-D D20 WBNS-TV D21 WPNT D21 DT	LD CP DT LIC	8 15	.0		252 64 4.0 162 7.9	45 59 061	Unique 2.0 4.0 7.9 81.6	IX, after 252 45 59 2,061	

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Interference to BLANK0000127565 CP scenario 1

Desired:	Call WWKH-CD	Chan D22	Svc DC		City, State PITTSBURG, PA	File Number BLANK0000127565	Distance
Undesireds:	W22CY WPNT	D22 D21		APP LIC	CLARKSBURG, WV PITTSBURGH, PA	W22CY prop mod BLANK0000112577	85.2 km 77.1

## **Table 1 W22CY TVStudy Analysis of Proposal** (page 3 of 4)

D21 LD CP

Undesireds: W21EB-D



			2010/10/0	
WVPX-TV	D22 DT LIC D22 DC LIC D22 DT LIC	BALTIMORE, MD AKRON, OH BOLIVAR, PA HUNTINGTON, WV PITTSBURGH, PA	BLANK0000107690 BLANK0000080180 BLANK0000099914 BLANK0000100249 BLANK0000080213	250.2 211.4 81.0 266.7 73.8
Service area 6634.5 903,816	Terrain-limi 6335.1 872,	IX-free, before 654 6228.2 837,633	IX-free, after 6220.2 837,346	Percent New IX 0.13 0.03
	30.9 7,1 30.9 3,1 16.0 61.0 26,	IX Unique IX, before 441 347 5.0 1,616 598 7.0 3,810 145 20.0 2,830 714 3.0 171 019 21.0 13,549	5.0 3,240 19.0 2,830 3.0 171 20.0 13,549	
Interference to BLANK				
Call Desired: WWKH-CD	Chan Svc Status D22 DC LIC	City, State PITTSBURG, PA	File Number BLANK0000079948	Distance
WSAZ-TV	D21 DT LIC D22 DT LIC D22 DT LIC D22 DC LIC D22 DT LIC	PITTSBURGH, PA BALTIMORE, MD AKRON, OH BOLIVAR, PA HUNTINGTON, WV	W22CY prop mod BLANK0000112577 BLANK0000107690 BLANK0000080180 BLANK0000099914 BLANK0000100249 BLANK0000100249	85.2 km 77.1 250.2 211.4 81.0 266.7 73.8
Service area 3707.1 413,986	Terrain-limi 3422.9 391,	IX-free, before 3347.7 381,745	IX-free, after 3345.7 381,740	Percent New IX 0.06 0.00
Undesired W22CY D22 LD APP WPNT D21 DT LIC WVPX-TV D22 DT LIC WTOO-CD D22 DC LIC WSAZ-TV D22 DT LIC WPXI D23 DT LIC	23.0 4,1 10.0 45.1 3,	IX Unique IX, before 5 120 3.0 149 742 1.0 148 673 38.1 1,875 135 3.0 131 946 7.0 1,470	3.0 149 1.0 148 37.1 1,875	
Interference to propo 7.53% interference re	sal scenario 1			
Call Desired: W22CY	Chan Svc Status D22 LD APP	City, State CLARKSBURG, WV	File Number W22CY prop mod	Distance
Undesireds: W21EB-D WMPB WVPX-TV WJAC-TV WWKH-CD WSAZ-TV	D22 DT LIC D22 LD LIC	AKRON, OH JOHNSTOWN, PA	BLANK0000072099 BLANK0000107690 BLANK0000080180 BLCDT20110105ABC BLANK0000127565 BLANK0000100249	5.0 km 306.6 222.1 214.9 85.2 184.5
Service area 2035.5 136,068	Terrain-limi 1939.3 131,	ted IX-free 415 1824.4 121,520	Percent IX 5.93 7.53	
Undesired W21EB-D D21 LD CP WVPX-TV D22 DT LIC WWKH-CD D22 DC CP WSAZ-TV D22 DT LIC	Total 52.6 4,1 23.8 28.7 1,1 42.6 3,1	IX Unique IX 872 33.7 4,382 441 7.9 271 953 21.7 1,875 263 25.7 2,845	Prent Unique IX 1.74 3.33 0.41 0.21 1.12 1.43 1.33 2.16	
Interference to propo 6.10% interference re	sal scenario 2			
Call Desired: W22CY	Chan Svc Status D22 LD APP	City, State CLARKSBURG, WV	File Number W22CY prop mod	Distance

CLARKSBURG, WV

BLANK0000072099

5.0 km

### **Table 1 W22CY TVStudy Analysis of Proposal** (page 4 of 4)



	WMPB WVPX-TV WJAC-TV WSAZ-TV	D22 D5 D22 L1 D22 D5	r LIC	AKR( JOH)	FIMORE, ME ON, OH NSTOWN, PA FINGTON, W	7	BLANK0000 BLANK0000 BLCDT2011 BLANK0000	0080180 L0105ABC	306.6 222.1 214.9 184.5
	vice area		rain-limi			IX-free		cent IX	
2035.5	136,068	1939.3	131,	415	1846.1	123,395	4.81	6.10	
Undesired			Total	IX		Unique IX	Prcnt Uni	ique IX	
W21EB-D D21	LD CP	52.6	4,	872	34.7	4,382	1.79	3.33	
WVPX-TV D22	DT LIC	23.8		441	8.9	283	0.46	0.22	
WSAZ-TV D22	DT LIC	42.6	3,	263	27.7	2,855	1.43	2.17	

#### Channel and Facility Information

Section	Question	Response
Facility ID	125359	
State	West Virginia	
City	CLARKSBURG	
LPD Channel	22	

### Antenna Location Data

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1034466
Coordinates (NAD83)	Latitude	39° 18' 02.0" N+
	Longitude	080° 20' 36.0" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	192.7 meters
	Support Structure Height	182.9 meters
	Ground Elevation (AMSL)	414.5 meters
Antenna Data	Height of Radiation Center Above Ground Level	22.9 meters
	Height of Radiation Center Above Mean Sea Level	437.4 meters
	Effective Radiated Power	3.5 kW

#### Antenna Technical Data

Section	Question	Response
Antenna Type	Antenna Type	Directional Custom
	Do you have an Antenna ID?	Yes
	Antenna ID	1001019
Antenna Manufacturer and	Manufacturer:	KAT
Model	Model	K723147 1X2
	Rotation	75 degrees
	Electrical Beam Tilt	Not Applicable
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Horizontal
Elevation Radiation Pattern	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	No
	Uploaded file for elevation antenna (or radiation) pattern data	
	Out-of-Channel Emission Mask:	Full Service

#### **Directional Antenna Relative Field Values (Pre-rotated Pattern)**

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	.931	90	.431	180	.070	270	.431
10	.852	100	.317	190	.045	280	.570
20	.727	110	.199	200	.048	290	.743
30	.832	120	.129	210	.119	300	.943
40	.960	130	.095	220	.069	310	1.00
50	1.00	140	.069	230	.095	320	.960
60	.943	150	.119	240	.129	330	.832
70	.742	160	.048	250	.199	340	.727
80	.570	170	.045	260	.317	350	.850

#### **Additional Azimuths**