

**ENGINEERING STATEMENT**  
**IN SUPPORT OF**  
**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**  
**WGNT**  
**PORTSMOUTH, VA**

**Request for Special Temporary Authority**

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of WGNT, located at Portsmouth, VA, which is presently authorized to operate its digital facility on Ch. 20 with the following parameters:

Coordinates: 36° 48' 31.8" N (NAD83)  
76° 30' 11.3" W  
ERP: 570 kW (Omni)  
RCAMSL: 380.7m

The station recently began experiencing an issue with the mask filter for its transmitter which resulted in the need to reduce the transmitter output power to 57% of the authorized power. The timetable to complete the repair is currently expected to be at least a month. Therefore, Scripps respectfully requests Special Temporary Authority to operate WGNT at a reduced ERP of 324.9 kW until the issue with the mask filter can be resolved. All other facility parameters will remain the same as authorized.

**Coverage**

As shown in Figure 1, attached hereto, the entire principal community of Portsmouth, VA will remain well within the predicted F(50,90) 48 dBu contour based on the omni-directional 324.9 kW ERP.

**Environmental/RFR**

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; since the structure is existing and registered, such conditions should not be an issue requiring further consideration.

The location of the WGNT Ch. 20 facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). Since WTKR is proposing to operate with an ERP that is lower than the authorized ERP (324.9 kW instead of 570 kW), its contribution to the overall RFR at the site will be reduced.

Scripps agrees to comply with the Commission’s requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure. The tower base is enclosed by a locked security fence and appropriate signage warning of potential RFR hazards is posted.

**Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



---

Benjamin Pidek, P.E.  
June 28, 2022

***Ben Pidek Consulting, LLC***

**WGNT (STA)**  
Latitude: 36-48-31.80 N  
Longitude: 076-30-11.30 W  
ERP: 324.90 kW  
Channel: 20  
Frequency: 509.0 MHz  
AMSL Height: 380.7 m

**WGNT (STA)**  
Latitude: 36-48-31.80 N  
Longitude: 076-30-11.30 W  
ERP: 324.90 kW  
Channel: 20  
Frequency: 509.0 MHz  
AMSL Height: 380.7 m

**Figure 1 - Predicted FCC F(50,90) 48 dBu Contour of Proposed WGNT STA Facility (Red)**

