



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
MODIFICATION OF A CONSTRUCTION PERMIT
FOR A DIGITAL REPLACEMENT TRANSLATOR
WJAC-TV - JOHNSTOWN, PENNSYLVANIA**

Prepared for: WJAC Licensee, LLC

This is an application for a minor modification displacement construction permit to change the channel and make other changes in the facilities of WJAC-TV 29 DRT, Johnstown, Pennsylvania. This digital replacement translator has been displaced on channel 29 by WWPB-TV, Hagerstown, Maryland (facility ID 65943) as a result of the post-incentive auction repack. This application is therefore a displacement application and constitutes a minor modification of technical facilities under Section 74.787(a)(4) of the FCC Rules. The proposed site is a tower registered as ASR 1012938. The proposed site is an existing communications tower.

47 C.F.R. Section 1.1306

A Commission grant of Authorization for this location would not be an action which may have a significant environmental effect. The subject station's predicted power density contribution at the multiple-use site is not considered significant and does not require consideration. As shown in Appendix A the modified WJAC-TV DRT channel 28 facility, as proposed herein, will operate with a maximum ERP of 7 kW from an elliptically polarized directional transmitting antenna with a centerline height of 79 meters above ground level (AGL). Considering the elevation pattern provided elsewhere in this submission, the

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vertical plane relative field factor is less than 0.250 at all depression angles greater than 7 degrees. The modified WJAC-TV DRT channel 28 facility is predicted to produce a worst-case power density at two meters above ground level, at 35.9 meters from the tower base, of $3.25 \mu\text{W}/\text{cm}^2$, which is 0.88% of the FCC guideline value of $371.33 \mu\text{W}/\text{cm}^2$ for an "uncontrolled" environment, and 0.176% of the FCC's guideline value for "controlled" environments. Therefore, pursuant to Section 1.1307(b)(3) of the FCC Rules, because the modified facility would not exceed 5% of the uncontrolled and controlled exposure limits, the proposal's power density contribution is considered insignificant. Further, the Applicant will continue to cooperate/coordinate with other site users and reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

47 C.F.R. 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h)

WJAC-TV DRT as proposed to be modified will operate on UHF channel 28. Section 74.709 addresses land mobile protection requirements for UHF channels 14-20. Therefore the instant application is fully compliant. A copy of the results of an interference analysis using the FCC's tvstudy software is included with this application which demonstrates the full-service mask proposed meets the requirements of 74.793(e) (f) (g) and (h).

October 6, 2022

John E. Hidle, PE