Consulting Engineers
CTJC
CARL T. JONES CORPORATION

STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR A
MINOR MODIFICATION TO THE WLOS LICENSED FACILITY
FOR RELOCATION TO A DIFFERENT TRANSMITTER SITE
WLOS - ASHEVILLE, NORTH CAROLINA
CH. 13 - 160 kW - 552 meters HAAT

Prepared for: WLOS LICENSEE, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

GENERAL

This office has been authorized by WLOS LICENSEE, LLC, licensee of WLOS, channel 13, facility ID number 56537, license file number 0000190297, licensed to Asheville, North Carolina, to prepare this statement, FCC Form 2100, Schedule A, its technical sections, and the associated exhibits in support of an application for a minor modification of license to relocate WLOS's transmitter and antenna site to a tower more favorably positioned within its DMA so that many areas within its DMA not currently being served can be added to its service area. The DMA map exhibit shows the proposed relocated coverage to the DMA. The network service map shows the proposed "loss area" outside the DMA, that except for 13 persons, fully maintains ABC network coverage for that area. The service maintenance map shows that the entire "loss area" is covered by 5 or more full service DTV stations, except for a small area containing 128 persons which is covered by only four services. These population numbers are considered to be *de minimis*.

The WLOS licensee believes the proposed relocation of the WLOS transmitter site will allow WLOS to more favorably serve the viewing population that is located within its Designated Market Area.

DIRECTIONAL ANTENNA

The applicant intends to install a Dielectric model THV-7A13/VP-R C150 elliptically polarized directional antenna at an existing tower, ASR 1023079. The antenna's center of radiation will be located at a height above ground of 211.8 meters, and a height above average terrain of 552 meters. The antenna's horizontal azimuth radiation patterns for both its horizontally and vertically polarized components and its vertical elevation pattern, showing its radiation characteristics above and below the horizontal plane are shown and tabulated in the antenna exhibit.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. The map exhibit shows the predicted Noise Limited (36 dBu) contour, and the principal community (43 dBu) contour which completely encompasses the principal community of license, Asheville, North Carolina.

DETERMINATION OF THE "LARGEST STATION IN THE MARKET"

It appears from an analysis of the stations licensed to communities located within the Greenville-Spartanburg-Asheville-Anderson North Carolina-South Carolina Designated Market Area (DMA) that the largest station in geographic area is WLOS itself, license file number, 0000190297, for channel 13 Asheville, North Carolina with a 36 dBu noise limited contour coverage area of 53,263 square kilometers. The instant application to relocate WLOS's transmitter site results in a predicted 36 dBu noise limited contour coverage area of 53,988 square kilometers. The proposed relocated facility is intended to replicate WLOS's license authorization while improving its viewership within its DMA. Therefore according to Section 73.622(f)(5) WLOS should be entitled to the proposed facility.

ALLOCATION CONSIDERATIONS

Post-Transition DTV Considerations

A study was performed, using the FCC's application processing software, *tvstudy*, v. 2.2.5, to determine if the instant application for construction permit is predicted to cause new prohibited interference to post reassignment DTV stations, construction permits, DTV allotments or Class A DTV stations. The study results, shown in Appendix B, indicate that the instant application for construction permit is predicted to cause no new interference exceeding 0.5% to the populations served by any post reassignment DTV station, construction permit, allotment or Class A DTV stations. (See Appendix B)

International DTV Considerations

The WLOS site is located more than 700 kilometers from the nearest point on the US-Canadian border and is located more than 1700 kilometers from the nearest point on the US-Mexican border. Therefore no international coordination is necessary.

Class A Television Allocation Considerations

As required in Section 73.616(f) of the FCC's Rules, the study results in Appendix B shows no Class A station predicted to be affected by the re-allotment of WLOS.

Land Mobile and FM radio Considerations

The *tvstudy* results found no Land Mobile violations for this site, and the site is deemed OK toward AM radio stations. .

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 kilometers of the proposed WLOS site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT, SAFETY & STATEMENT OF COMPLIANCE

The licensee of WLOS is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WLOS antenna and will reduce power or cease operation, when necessary, to ensure protection to personnel.

The proposed WLOS channel 13 facility, as proposed herein, will operate with a maximum ERP of 160 kW from an elliptically polarized directional transmitting antenna with

a centerline height of 211.8 meters above ground level (AGL). Considering the antenna's elevation pattern provided elsewhere in this submission, the vertical plane relative field factor is less than 0.175 at all depression angles greater than 10 degrees. The proposed WLOS channel 13 facility is predicted to produce a worst-case power density at two meters above ground level, at 146.9 meters from the tower base, of 3.332 $\mu W/cm^2$, which is 1.67% of the FCC guideline value of 200.0 $\mu W/cm^2$ for an "uncontrolled" environment, and 0.33% of the FCC's guideline value for "controlled" environments. Therefore, pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed 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 excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

SUMMARY

It is submitted that the instant application for a minor modification of WLOS's license to relocate its transmitter and antenna to a more favorably positioned site within its DMA to provide service to more of the areas within the DMA that are not currently being served by WLOS, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement was prepared by me, or under my direct supervision, and its contents are believed to be true and correct to the best of my knowledge and belief.

DATED: March 3, 2023