

ENGINEERING STATEMENT
IN SUPPORT OF
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
KSBY
SAN LUIS OBISPO, CA

Request for Special Temporary Authority

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of KSBY, located at San Luis Obispo, CA, which is presently authorized to operate its digital facility on Ch. 15 with the following parameters:

Coordinates: 35° 21' 37.0" N (NAD27)
120° 39' 21.0" W
ERP: 1000 kW (DA)
RCAMSL: 857.0m

The KSBY transmitter site has experienced several utility outages in the last few months that have caused problems with the main KSBY IOT transmitter. As such, the station has had to reduce the transmitter output power to 65% of the licensed output power. The transmitter is scheduled to be replaced in late September. Therefore, Scripps respectfully requests Special Temporary Authority to operate KSBY at a reduced ERP of

650 kW until the transmitter is replaced. All other facility parameters will remain the same as authorized.

It should be noted that the current KSBY facility was licensed in 2008 through the CDBS database. As such, the coordinates listed on the original Construction Permit application were in the NAD27 datum (as required at the time) and were rounded to the nearest second. The antenna RCAMSL was also rounded to the nearest meter (both a common occurrence at the time and specified in the FCC Rules).

Due to the rounding in the coordinates and antenna RCAMSL, when the license record was converted from the CDBS database to the new LMS database, both the coordinates (which were converted from NAD27 to NAD83) antenna RCAMSL were not an exact match to the tower ASR data (ASR#1018365). The STA request is now being filed in the Commission's LMS database which automatically pulls the coordinate information and site elevation into the application from the tower's ASR record. As a result, the STA application lists slightly different coordinates and antenna RCAMSL (due to rounding in the site elevation) than those listed on the station's license:

KSYB Licensed Coordinates and RCAMSL:

Tower Coordinates:	35° 21' 37.0" N (NAD83)
	120° 39' 21.0" W
RCAMSL:	857.0m

LMS STA Application Coordinates and RCAMSL:

Tower Coordinates:	35° 21' 37.2" N (NAD83)
	120° 39' 21.0" W
Site Elevation AMSL:	857.2m

Despite these differences, the only parameter on the STA request that actually differs from the parameters of the licensed facility is the ERP.

Coverage

As shown in Figure 1, attached hereto, the entire principal community of San Luis Obispo will remain well within the predicted F(50,90) 48 dBu contour based on the directional 650 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 exists and is registered, such conditions should not be an issue requiring further consideration.

The location of the KSBY Ch. 15 facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). Since KSBY is proposing to operate with an ERP that is lower than the authorized ERP (650 kW instead of 1000 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.
August 23, 2023

Attached:

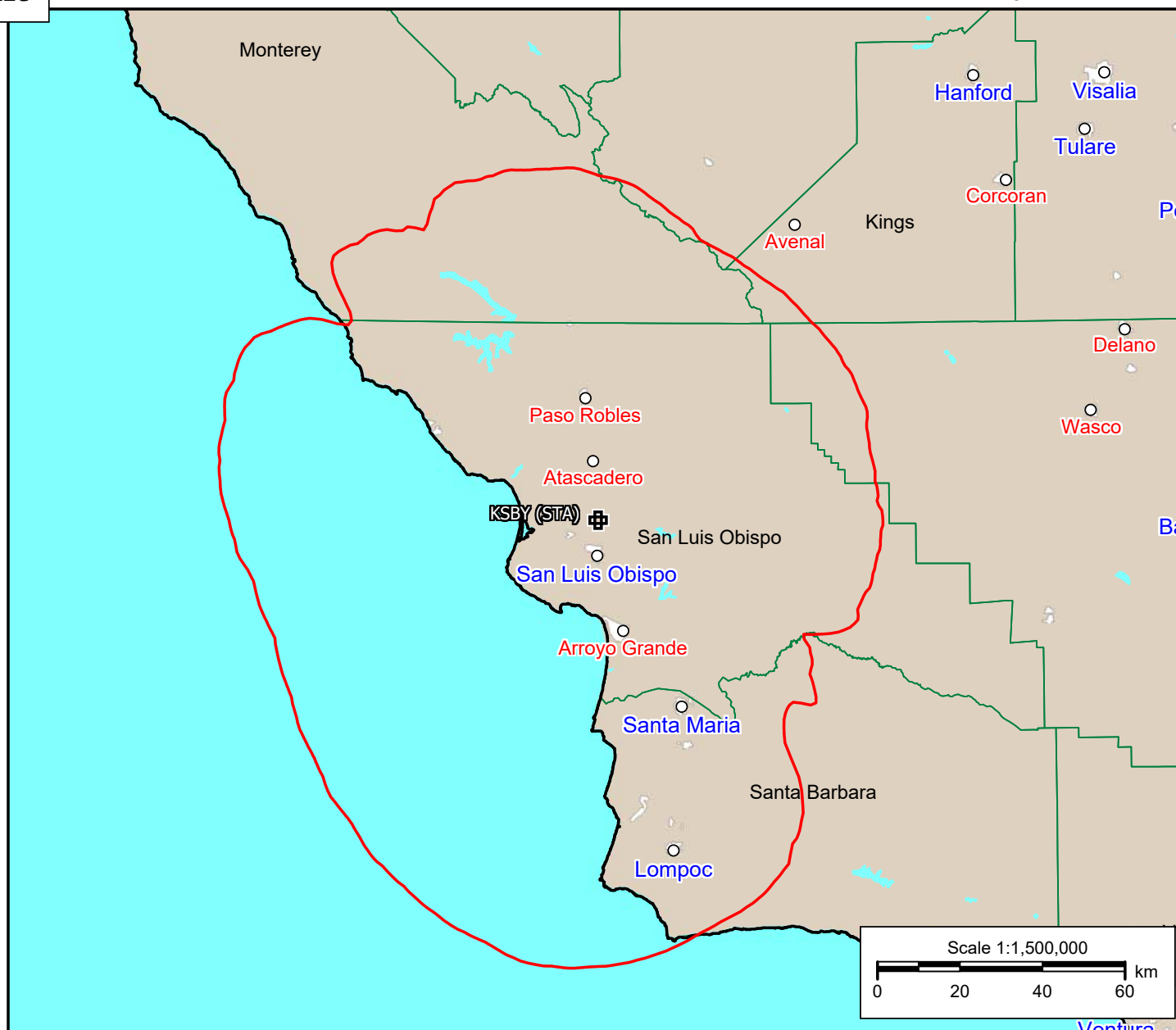
Figure 1 – Coverage Map of Predicted 48 dBu Contour of Proposed KSBY STA Facility

Ben Pidek Consulting, LLC

Predicted FCC F(50,90) 48 dBu Contour (Red) of Proposed KSBY STA Facility

KSBY (STA)

BLCDT-20081118AEW
Latitude: 35-21-37 N
Longitude: 120-39-22 W
ERP: 650.00 kW
Channel: 15
Frequency: 479.0 MHz
AMSL Height: 857.0 m
Elevation: 745.0 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 1.75
Prop Model: None



8-23-23