

**Larry H. Will, P.E.**

**Broadcast Engineering**

---

1055 Powderhorn Drive  
Glen Mills, PA 19342-9504

PH (610) 399-1826  
E-Mail lhwill@verizon.net

**WHYY INCORPORATED**

**PHILADELPHIA, PA**

**PERMITTEE OF WHYY-DT CHANNEL 12**

**WILMINGTON, DELAWARE**

**FCC Facility ID #72338**

**FCC FILE No. BMPEDT-20080619AHU**

**APPLICATION FOR A FURTHER MODIFICATION OF  
CONSTRUCTION PERMIT FOR POST DTV TRANSITION  
OPERATION ON CHANNEL 12**

**ENGINEERING EXHIBIT 37**

**December 4, 2009**

**WHYY INCORPORATED**

**PERMITTEE OF WHYY-DT CHANNEL 12**

**APPLICATION FOR A FURTHER MODIFICATION ON CP FOR POST  
TRANSITION DIGITAL OPERATION ON CHANNEL 12**

**FCC FILE No. BMPEDT-20080619AHU**

**ENGINEERING EXHIBIT 37**

**RFR STATEMENT**

This application for a Further Modification of Construction Permit for WHYY-DT to return to its analog channel, Channel 12 post transition. As outlined below, WHYY Incorporated, Licensee of WHYY-DT is currently in full compliance with the RFR energy requirements of 47 CFR 1.1310.

The maximized post transition operation of WHYY-DT will be on Channel 12 with 30 kW MAX-DT ERP and with horizontal polarization. This operation, when combined with the previous shutdown of WHYY-TV operating on Channel 12 at 309 kW visual MAX DA, the pre-transition WHYY-DT operating on Channel 50 with 50 kW (DA), and the simultaneous shut-off of WPHL-TV, Channel 17 at 2,340 kW results in a net reduction of existing RFR levels of 2,669 kW on and in the immediate vicinity of the multiple use tower.

Further, as part of the 2006 WHYY License renewal process for co-located companion WHYY-FM, WHYY Incorporated commissioned a complete RFR measurement study at the WHYY-TV/DT/FM antenna site. The results of that study, which are in the station engineering files, indicated there were no locations where RFR levels, in the immediate vicinity of the multiple use antenna structure, exceeded the

allowable RFR exposure levels for the general public/uncontrolled environment.

Since the total RFR energy from the multiple use tower has already been reduced by approximately 2,639 kW and no antenna heights have been altered, the resultant RFR energy levels on and near this multiple use tower was reduced significantly as of June 12, 2009 and WHY Y Incorporated will continue to be in full compliance with FCC OET-69 and FCC 47 CFR 1.1310.