



ENGINEERING STATEMENT
IN SUPPORT OF
APPLICATION FOR MINOR AMENDMENT OF A PENDING APPLICATION
AND
REQUEST FOR WAIVERS
WSAH-DT
CHANNEL 42
(BRIDGEPORT, CT)

Background

WSAH License, Inc. (WSAH) filed an application for a construction permit on January 11, 1999 for WSAH-DT (Channel 42) specifying an ERP of 1000 kW and a RCMSL of 248.2m at the Pinnacle Tower site located at the following coordinates:

(NAD27)
41°-16'-44" N
73°-11'-08" W

WSAH had been granted a construction permit, however, the grant has since been rescinded due to the interference the proposed WSAH-DT facility would cause to WEDW-TV (Channel 49) in Bridgeport, CT. WEDW-TV is presently receiving more than 10% interference



from surrounding stations and the WSAH-DT facility as then proposed would cause 0.1% interference to WEDW-TV.

WSAH now wishes to modify its application to collocate its digital facility with its existing analog facility at its allotment site/tower with a higher RCAMSL of 272m.

Site

The proposed facility location is approximately 23 km north northwest of Bridgeport and is located within the Canadian Border Zone and coordination with the Canadian administration is requested. The Antenna Structure Registration Number of the tower is 1046926 and the site coordinates are:

(NAD27)
 41°-21'-43" N
 73°-06'-48" W

Antenna System and Tower

WSAH proposes to use a Dielectric omni-directional antenna (TFU-26GTH O6) which will be top-mounted on the tower at the specified coordinates. The overall height of the tower will remain the same (280.1m AGL with appurtenances) thus no changes to the ASR or filing with the FAA is required. The antenna will have a center of radiation of 272m AMSL with an HAAT of 156m. The omni-directional ERP with this transmitting antenna will be 1000 kW.

Coverage

The entire principal community of Bridgeport, CT is well within the predicted F(50,90) 48 dBu contour using the proposed 1000 kW ERP and omni-directional antenna pattern.



Interference and Request for Waivers

Studies were made of the proposed parameters using software that emulates the software used by the FCC. Those studies indicate that only WEDW (Channel 49) in Bridgeport, CT would receive more than the allowable interference.

As mentioned above, WEDW-TV is presently receiving more than 10% interference from surrounding stations and the proposed WSAH-DT facility (at the allotment location) is predicted to cause 0.1% interference to WEDW-TV. Connecticut Public Broadcasting, Inc., the licensee of WEDW, has stated its intent to accept any interference received from WSAH (based on the interference caused by the seven-channel "taboo" relationship) in the document titled DTV Consent Agreement which is included as an attachment to this amendment to the pending application. Given the above, a waiver of the interference requirements is requested.

Operation as proposed at this site also does not meet the contour overlap requirements of Section 73.613 with respect to Class A station W28AJ-LP (Channel 28) in Allington, CT. As can be seen in Figure 1, attached hereto, the overlap region is very small and contains no population. In support of a request for waiver, an OET-69 interference analysis was conducted. The predicted interference from the proposed WSAH-DT facility to W28AJ was calculated to be 0.00% (as expected considering there is no population contained in the overlap region). Given the above, a waiver of the contour overlap requirement is requested.

Interference studies also indicate no impermissible interference to Canadian facilities per the Canada-US LOU and it is noted that the Canadian administration previously "approved" the 1000 kW facility at the site specified in the pending application.

Environmental/RFR

The proposed construction does not require preparation of an Environmental Assessment as it does not involve any of the factors listed in Section 1.1306.



The additional ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.0045 mW/cm^2 which is less than 5% of the MPE limit for public exposure (0.0214 mW/cm^2) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

WSAH 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 also be 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 RFR hazards are posted.

Summary of Waiver Requests

As mentioned above, WSAH is requesting waivers of the interference requirements to WEDH-TV (Channel 49 – Bridgeport, CT) and W28AJ (Class A, Channel 28 – Allington, CT). Connecticut Public Broadcasting, Inc., the licensee of WEDW, has stated its intent to accept any interference received from WSAH (see DTV Consent Agreement which is included as an attachment to this amendment to the pending application). Also, the overlap region between the proposed WSAH-DT facility and W28AJ is very small and contains no population. In support of a request for waiver, an OET-69 interference analysis was conducted per Section 73.623(c)(5)(iii) and the predicted interference from the proposed WSAH-DT facility to W28AJ was calculated to be 0.00%.

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

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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.

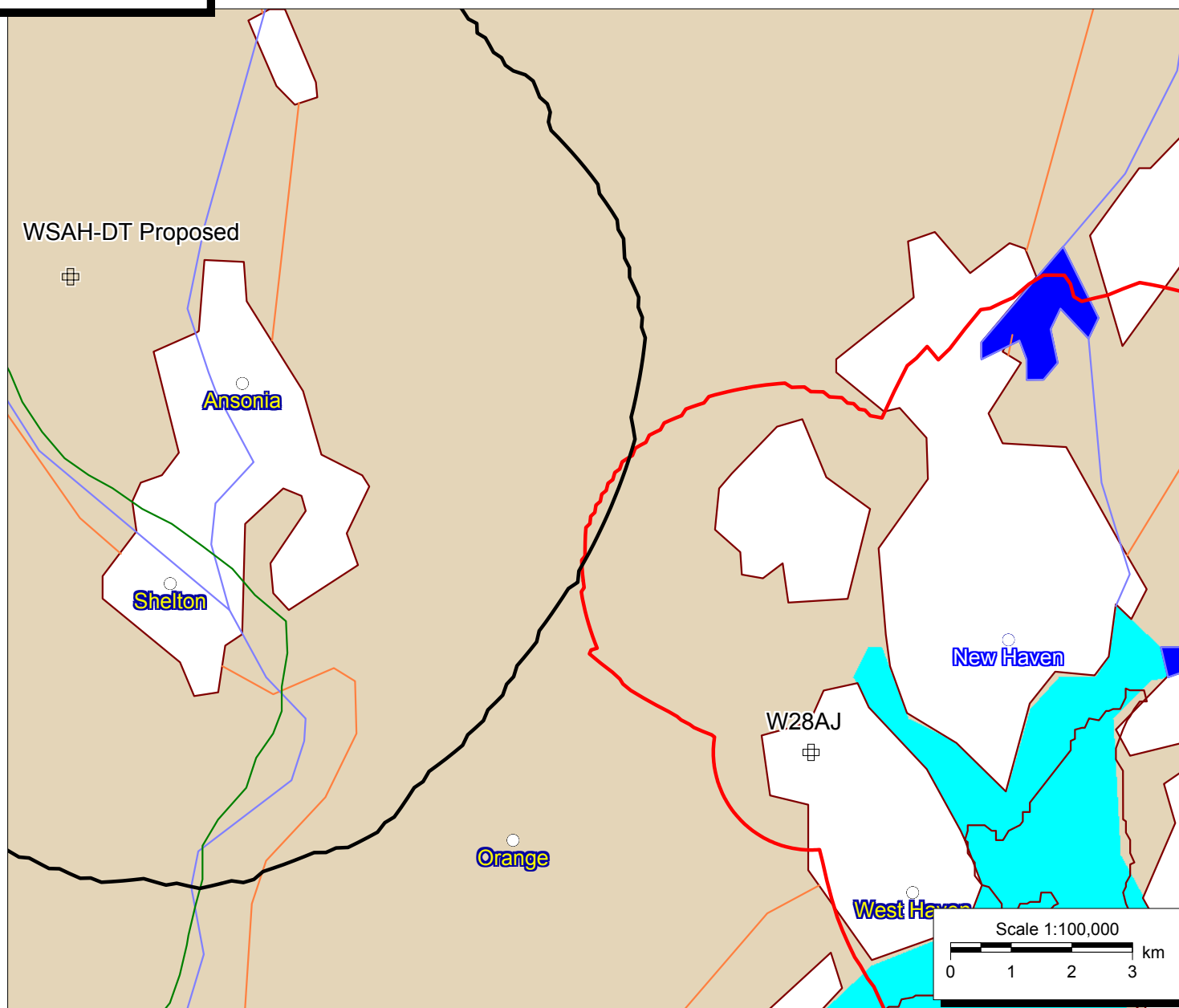
A handwritten signature in cursive script, reading "John F.X. Browne". The signature is written in black ink and is positioned above a horizontal line.

John F.X. Browne, P.E.

Proposed WSAH Contour Overlap of Class A Station W28AJ

WSAH-DT Proposed

Latitude: 41-21-43 N
Longitude: 073-06-48 W
ERP: 1000.00 kW
Channel: 42
Frequency: 641.0 MHz
AMSL Height: 272.0 m
Elevation: 183.0 m
Horiz. Pattern: Omni
Vert. Pattern: Yes



Black - Proposed WSAH-DT (Channel 42) FCC 107 dBu F(50, 10) Interfering Contour
Red - W28AJ-LP (Channel 28) Class A FCC 74 dBu F(50, 50) Protected Contour

Figure 1