



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF A REQUEST FOR
SPECIAL TEMPORARY AUTHORIZATION
WKEF - DAYTON, OHIO
DTV - CH. 51 - 515 kW - 351 m HAAT**

Prepared for: WKEF Licensee L.P.

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 Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WKEF Licensee L.P., licensee of WKEF, channel 51, licensed to Dayton, Ohio, to prepare this statement, and the associated exhibits in support of a request for Special Temporary Authorization (STA) seeking to be permitted to increase the Effective Radiated Power of WKEF, as described in its pending application for construction permit, BPCDT-20090320AGS, as amended on November 23, 2009, prior to the completion of coordination with Industry Canada. The licensee of WKEF has been bombarded with complaints from viewers who wish to watch WKEF, but claim that they are unable to satisfactorily receive the station's signal over-the-air.

WKEF broadcasts on channel 51 with an ERP of 138 kW. WDTN, which is located 0.655 km south of WKEF, broadcasts on channel 50 with an ERP of 1000 kW. Although stations separated by such a small distance are considered to be co-located, and the desired to undesired signal ratios for first adjacent channels are such that any interference

that might be caused to each other by these stations is predicted to be non-existent, nonetheless the viewer complaints continue.

WKEF's authorized ERP of 138 kW is 8.6 dB below WDTN's ERP of 1000 kW. It appears that local variations at potential receive sites, especially indoor sites, might be contributory to the reception difficulties reported by those who desire to watch WKEF, however, the 8.6 dB signal disadvantage suffered by WKEF must be a primary contributor to the reported viewer reception difficulties. These reception problems constitute the primary reason that WKEF seeks to increase its ERP from 138 kW to 515 kW, an increase of 5.7 dB.

It has been confirmed by FCC staff that the proposed increase in ERP for WKEF to 515 kW is acceptable domestically, and will not cause impermissible interference to any other domestic facility. WKEF herein submits its own international Longley-Rice study to confirm that the proposed ERP increase can not impermissibly affect any Canadian TV facility. There are no adjacent channel Canadian facilities located within 475 km of the WKEF site. There is only one co-channel Canadian facility, a vacant allotment on channel 51 in London, Ontario, Canada, which is located 400.12 km from the WKEF site. The attached exhibit shows that there is absolutely no predicted interference anywhere near the protected coverage area of the Canadian vacant allotment on channel 51.

REQUESTED RELIEF

In order to ameliorate continuing viewer complaints of inability to receive WKEF, the applicant herein seeks only to be able, as soon as possible, to increase its ERP according to its pending application for construction permit prior to the completion of coordination with

Industry Canada. It is well established that no interference is expected, and that a vacant allotment will suffer no interference. Even so, the applicant will reduce WKEF's temporary increase in ERP should there be any valid complaints of interference.

SUMMARY

It is submitted that the instant request for STA seeking permission to increase WKEF's ERP from 138 kW to 515 kW prior to the completion of coordination with Industry Canada, as described herein, complies with the Rules, Regulations, relevant Policies and international agreements of the Federal Communications Commission. This statement and the attached exhibit were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: January 27, 2010



VACANT

Latitude: 42-50-27 N
Longitude: 081-51-30 W
ERP: 300.00 kW
Channel: 51
Frequency: 695.0 MHz
AMSL Height: 476.0 m
Elevation: 213.0 m
Horiz. Pattern: Omni
Vert. Pattern: Yes
Elec Tilt: 1.0
Prop Model: Longley/Rice
Climate: Mar temp land
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 90.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

WKEF-D.A

BPCDT20090320AGS
Latitude: 39-43-28 N
Longitude: 084-15-18 W
ERP: 515.00 kW
Channel: 51
Frequency: 695.0 MHz
AMSL Height: 616.0 m
Elevation: 269.52 m
Horiz. Pattern: Omni
Vert. Pattern: Yes
Elec Tilt: 0.75
Prop Model: Longley/Rice
Climate: Mar temp land
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 10.0 m
Receiver Gain: 0 dB
Time Variability: 10.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

