



**ENGINEERING STATEMENT**  
**OF**  
**JOHN F.X. BROWNE, P.E.**  
**IN SUPPORT OF**  
**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**  
**WCML-DT**  
**ALPENA, MI**

**Background**

Central Michigan University (CMU) is the licensee of WCML-DT and has been authorized to operate its post-transition "Appendix B" DTV facility on Channel 24 (BPEDT-20080222ABH, Facility ID # 9917) at Alpena, MI with an ERP of 106kW and an antenna radiation center height of 673m AMSL. The tower is located at the following coordinates:

(NAD27)  
45° 08' 18" N  
84° 09' 45" W

Following the termination of the analog service of WCML-TV on March 31st, CMU became aware of a significant service loss to viewers who reportedly cannot receive the station's pre-transition digital signal. Thus, CMU now seeks an STA to immediately commence operation of its post-transition Channel 24 DTV facility in order to restore service to existing viewers. This engineering statement has been prepared in support of that request.



### **Interference**

Studies were conducted with the proposed parameters using software that emulates the software used by the FCC (OET-69 analysis). The results of the studies indicate that the facility was predicted to cause no other pre-transition domestic stations (analog or digital) more than the de minimus interference limits (2% or 10% total).

### **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  $0.001147\text{mW/cm}^2$  which is less than 5% of the MPE for public exposure ( $0.355333\text{ mW/cm}^2$ ) at the proposed frequency and, therefore, the proposal is excluded from further consideration.

CMU 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 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 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.

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John F. X. Browne, P.E.  
April 6, 2009