

Digital Class A Engineering STA Application
Application Submitted

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Application Summary

File Number: 0000115954
Application Purpose: Engineering STA
Status: Submitted
Date Submitted: 06/10/2020

Applicant Information

Name: SCRIPPS BROADCASTING HOLDINGS LLC
Title:
Address: C/O SCRIPPS MEDIA, INC.
312 Walnut Street 28th Floor
Cincinnati, OH 45202
United States
Phone: +1 (513) 977-3000
Email: dave.giles@scripps.com

Fees, Waivers, and Exemptions

Exempt from FCC Application Fees? No

| Application Type | Fee Code | Fee Amount |
|------------------|----------|------------|
| Engineering STA | MGT | \$200.00 |
| Total | | \$200.00 |
| | | Pay Fees |

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Digital Class A Engineering STA Application

File Number: 0000115954 | Submit Date: 06/10/2020 | Call Sign: K22JA-D | Facility ID: 51375 | FRN: 0002710192 | State: Texas | City: CORPUS CHRISTI

Service: DCA | Purpose: Engineering STA | Status: Submitted | Status Date: 06/10/2020 | Filing Status: Active

General Information

| Section | Question | Response |
|---------|----------|----------|
|---------|----------|----------|

Fees, Waivers, and Exemptions

| Section | Question | Response |
|---------|--|----------|
| Fees | Is the applicant exempt from FCC application Fees? | No |
| | Indicate reason for fee exemption: | |
| Waivers | Does this filing request a waiver of the Commission's rule(s)? | No |
| | Total number of rule sections involved in this waiver request: | |

| Application Type | Fee Code | Fee Amount |
|------------------|----------|------------|
| Engineering STA | MGT | \$200.00 |
| Total | | \$200.00 |

Applicant
Information

Applicant Name, Type, and Contact Information

| Applicant | Address | Phone | Email | Applicant Type |
|---|--|-------------------|------------------------|---------------------------|
| SCRIPPS BROADCASTING HOLDINGS LLC Doing Business As: SCRIPPS MEDIA, INC. | David Giles C/O SCRIPPS MEDIA, INC. 312 Walnut Street 28th Floor Cincinnati, OH 45202 United States | +1 (513) 977-3000 | dave.giles@scripps.com | Limited Liability Company |

Authorization Holder Name

Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

Contact
Representatives
(3)

| Contact Name | Address | Phone | Email | Contact Type |
|--|---|-----------------------|--------------------------|-----------------------------|
| Christina Burrow COOLEY LLP | Christina Burrow 1299 Pennsylvania Avenue, NW Suite 700 Washington, DC 20004 United States | +1 (202) 776- 2687 | cburrow@cooley.com | Legal Representative |
| Kenneth Howard , Jr . <i>Legal Representative</i> Baker & Hostetler LLP | Kenneth Howard 1050 Connecticut NW Suite 1100 Washington, DC 20036 United States | +1 (202) 861- 1580 | khoward@bakerlaw. com | Legal Representative |
| Benjamin Pidek , P. E . <i>Consulting Engineer</i> Mid-State Consultants | 6197 Miller Rd., Suite 1 Swartz Creek, MI 48473 United States | +1 (810) 226- 0750 | bpidek@mscon.com | Technical Representative |

Channel and Facility Information

| Section | Question | Response |
|-------------------------------|------------------------|----------------|
| Proposed Community of License | Facility ID | 51375 |
| | State | Texas |
| | City | CORPUS CHRISTI |
| | DCA Channel | 22 |
| | Designated Market Area | Corpus Christi |

Antenna Location Data

| Section | Question | Response |
|--------------------------------|---|--|
| Antenna Structure Registration | Do you have an FCC Antenna Structure Registration (ASR) Number? | Yes |
| | ASR Number | 1211245 |
| Coordinates (NAD83) | Latitude | 27° 45' 32.9" N+ |
| | Longitude | 097° 36' 27.3" W- |
| | Structure Type | GTOWER-Guyed Structure Used for Communication Purposes |
| | Overall Structure Height | 254.2 meters |
| | Support Structure Height | 253.0 meters |
| | Ground Elevation (AMSL) | 18.6 meters |
| Antenna Data | Height of Radiation Center Above Ground Level | 114 meters |
| | Height of Radiation Center Above Mean Sea Level | 132.6 meters |
| | Effective Radiated Power | 1.4 kW |

Antenna
Technical Data

| Section | Question | Response |
|--------------------------------|---|-----------------|
| Antenna Type | Antenna Type | Non-Directional |
| | Do you have an Antenna ID? | |
| | Antenna ID | 1006893 |
| Antenna Manufacturer and Model | Manufacturer: | ERI |
| | Model | ALP16L2-ESO-22 |
| | Rotation | |
| | Electrical Beam Tilt | 0.5 |
| | Mechanical Beam Tilt | Not Applicable |
| | toward azimuth | |
| | Polarization | Elliptical |
| Elevation Radiation Pattern | Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt? | No |
| | Uploaded file for elevation antenna (or radiation) pattern data | |
| | Out-of-Channel Emission Mask: | Stringent |

Certification

| Section | Question | Response |
|----------------------------------|--|---|
| General Certification Statements | The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.). | |
| | The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002 (c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith. | |
| Authorized Party to Sign | FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503). | |
| | I certify that this application includes all required and relevant attachments. | Yes |
| | I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above. | Ray Thurber <i>Vice President / Engineering</i> 06/10/2020 |

Attachments

| File Name | Uploaded By | Attachment Type | Description |
|---|-------------|---------------------|-----------------------------|
| <u>K22JA-D Ch. 22 STA EngSta 6-9-20.pdf</u> | Applicant | General Information | Explanation for STA Request |



ENGINEERING STATEMENT

IN SUPPORT OF
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
K22JA-D
CORPUS CHRISTY, TX

Background

Scripps Broadcasting Holdings LLC (Scripps) is the licensee of digital Class A station K22JA-D which has been authorized to operate on Ch. 22 at Corpus Christi, TX (BLCDT-20050825AAQ, Facility ID: 51375).

On the morning of April 29, 2020, high winds generated during a storm caused the Scripps owned tower (ASR#1045871) supporting the full-service station KRIS-TV and Class A station K22JA-D antenna to collapse. Scripps has installed a new antenna for K22JA-D on a nearby American Tower Corporation (ATC) site (ASR#1211245). Scripps intends the ATC site to be the permanent transmit location for K22JA-D and has applied to modify the licensed facility accordingly (LMS File No. 0000115734); however, the modification application is still pending as it must go through Mexican coordination.

Scripps requests Special Temporary Authority to operate K22JA-D while it awaits concurrence from Mexico on the proposed final facility.

**PROVIDING COMMUNICATION
SYSTEMS ENGINEERING**

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750



STA Parameters

K22JA-D is proposing the following parameters for digital operation on Ch. 22:

| | |
|--------------|--|
| Coordinates: | 27° 45' 32.9" N (NAD83) 97° 36' 27.3" W |
| ERP: | 1.4 kW |
| RCAMSL: | 132.6m |
| RCAGL: | 114.0m |
| ASR#: | 1211245 |
| Antenna: | ERI ALP16L2-ESO-22 |
| Mask: | Stringent |

As shown in Figure 1, attached hereto, the protected service contour of the proposed K22JA-D STA facility will not exceed the protected service contour of the licensed facility in any azimuth.

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 is existing and registered, such conditions should not be an issue requiring further consideration.

The location of the proposed facility is assumed to currently be “in compliance” with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst-case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.000045 mW/cm², which is less than 5% of the MPE for public exposure (0.347333 mW/cm²) at Ch. 22 (518-524 MHz). Per Section 1.1307(b) of the FCC Rules, the proposed operation would be categorically

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NEPHI, UT 84648

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SWARTZ CREEK, MI 48473

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excluded from taking corrective action in areas with levels above the MPE limit where the contribution to the RFR from the proposed facility is less than 5%.

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.

A handwritten signature in black ink, appearing to read "B. Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.
June 9, 2020

Attached:

Figure 1 – Map of Protected Service of Licensed K22JA-D Ch. 11 Facility vs. Service Contour of Proposed STA Facility

PROVIDING COMMUNICATION SYSTEMS ENGINEERING

CORPORATE OFFICE
1475 NORTH 200 WEST
NEPHI, UT 84648

TEL: (435) 623-8601
FAX: (435) 623-8610

REGIONAL OFFICE
6197 MILLER RD.
SWARTZ CREEK, MI 48473

TEL: (810)-226-0750

Mid-State Consultants

K22JA-D

BLDTL-20120103ABS
Latitude: 27-44-30 N
Longitude: 097-36-10 W
ERP: 15.00 kW
Channel: 22
Frequency: 521.0 MHz
AMSL Height: 69.0 m

K22JA-D (STA)

0000115734
Latitude: 27-45-32.90 N
Longitude: 097-36-27.30 W
ERP: 1.40 kW
Channel: 22
Frequency: 521.0 MHz
AMSL Height: 132.6 m

FCC Protected Service Contour of Licensed K22JA Facility (Black) vs. Protected Service Contour of Proposed K22JA STA Facility at Nearby ATC Tower Site (Red)

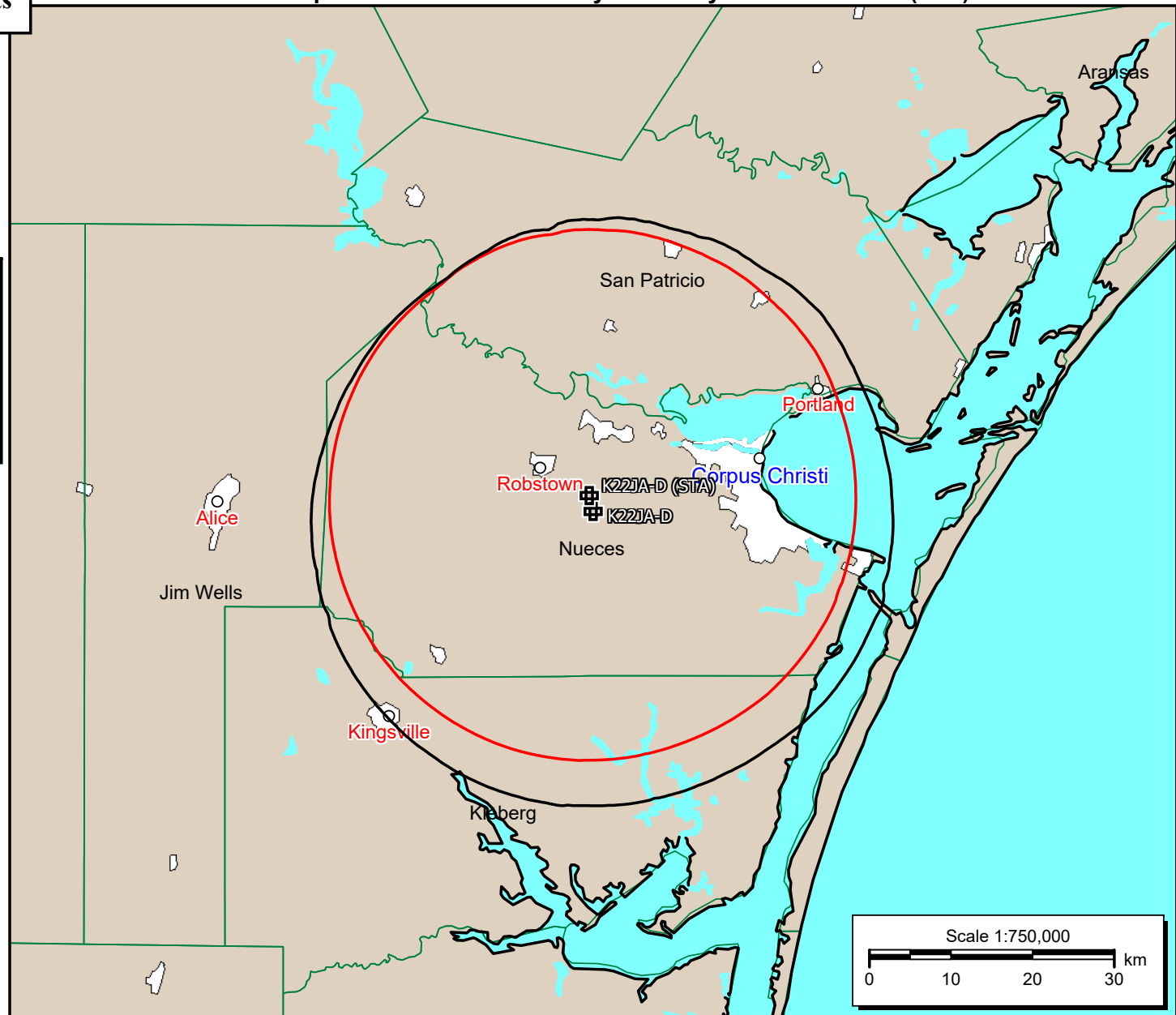


Figure 1
6-9-20



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| (14) STREET ADDRESS LINE NO. 1 C/O SCRIPPS MEDIA, INC. | | |
| (15) STREET ADDRESS LINE NO. 2 312 Walnut Street 28th Floor | | |
| (16) CITY Cincinnati | (17) STATE OH | (18) ZIP CODE 45202 |
| (19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) +1 (513) 977-3000 | | (20) COUNTRY CODE (IF NOT IN U.S.A.) US |
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