

**A Report To The
Corporation for Public Broadcasting
Regarding

Potential Impacts To
Public Radio Transmission Facilities
From
Post-Auction TV Band Repacking**



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Executive Summary

The firm of Meintel, Sgrignoli, and Wallace, LLC (MSW) is pleased to provide the following report to the Corporation for Public Television (CPB) in response to its Scope of Work to provide Post-Auction Spectrum Planning services to CPB. Specifically, MSW was tasked with studying the potential impacts to Public Radio Station Transmitter Facilities that may result from the TV Band Repack and associated DTV Station channel changes and facility modifications.

With the FCC's Incentive Auction now complete, Digital Television stations will be repacked to channels 2-36. These channel changes are likely to impact some Public Radio stations that share a tower or are near-co-located with a television station.

There are several possible impacts ranging from down-time during rigging and derigging operations to loss of tower space and possible relocation due to tower structural limits. The specific impact is highly dependent upon the specific tower situation as well as the new channel assigned to the co-located TV Station(s).

A. Potentially Impacted Radio Stations

With the completion of the FCC's Incentive Auction, MSW has updated its study to determine the number of CPB Eligible Radio Stations that are co-located on the same tower as one or more TV Stations. The study indicates that approximately 92 CPB-Eligible radio stations are co-located with a Full Power TV station or Class A TV station that will be repacked as part of the FCC's repacking process. This list includes stations being repacked from out-of-core channels 38-51 as well as those stations that are in-core channels 2-36 and are being repacked to accommodate stations moving into the core spectrum. See Appendix A for a list of stations meeting this criterion.

In addition, MSW conducted a study to determine the number of CPB Eligible Radio Stations that are near-co-located (within 250 Meters) of one or more TV Stations that are being repacked. The study indicated that approximately 75 CPB-Eligible radio stations are near-co-located within 250 meters of a full-power or class A TV station that is being repacked to a new channel. These near-co-located stations may also be impacted to a lesser extent. However, there is still some potential for impact to these stations such as reduced power operation to meet RFR compliance requirements. See Appendix B for a list of these stations.

B. Possible Repack Effects

There are a number of possible scenarios and situations that could lead to an impact on a public radio station. These impacts range the gamut from some off-air or reduced power operation to loss of the stations antenna location due to overloading of the tower structure

and the need to remove loads to accommodate the new DTV antennas on the tower structure.

Below we've attempted to list the most likely situations or scenarios that radio stations will likely face with the facility modifications required for the DTV repack.

- **RF Radiation Compliance** – The radio station may need to reduce power or go off the air during rigging and derigging operations on a shared tower structure. Stations may also find that reduced power or off-air time is required for tower crews working in or near the aperture of the FM radio station.
- **Tower Rigging in Aperture of FM Antenna** – Stations may find that gin poles, transmission lines, or other rigging requires the temporary removal of the FM antenna in order to accommodate the construction or installation of the new DTV antenna.
- **Transmission Line Changes** – FM Stations may find that transmission lines for their facilities or those of the DTV station need to be relocated on the tower to accommodate new loads, changes in routing, or other necessary changes.
- **Tower Structural Loading Changes** – Stations may find that new DTV antennas are much larger structural loads (lower frequency) which require the removal of other loads in order to accommodate the new DTV antenna. Several scenarios are possible here such as reduced FM antenna aperture, removal of the FM Antenna in order to free up structural capacity, or possibly the need to change the height or location of the FM antenna in order to meet the structural loading limits of the tower.
- **New Structural Loading Standard** – There are new structural standards in place now that EIA-222-G is the current standard. Many structures will not pass the loading analysis under the new standard and may need to be significantly modified in order to support the new DTV antenna. In the worst case scenario, for some towers it may not be feasible to modify them to meet the new structural standards in which case, they may need to be completely replaced with a new tower. There exist many towers that were built under the EIA-222-C revision and may not be candidates for structural modifications without significant reduction in loading.
- **Removal of Old Antennas and Transmission Lines** – Some TV stations that have “won” in the auction and have agreed to give up their existing TV Channel, may need to remove their decommissioned equipment and this process of equipment removal may impact radio stations significantly.
- **TV Station Auxiliary or Temporary Antennas** – The FCC has a very aggressive schedule for the TV Band Repack. This schedule is broken into 10 phases over 39 months. Many TV Stations are unlikely to be able to complete the construction of the final DTV Facilities within the 39 month (or shorter) construction window. Therefore, many TV stations are likely to build “temporary” facilities with side-mounted antennas. In this case, additional space may be needed on the tower to accommodate the temporary facilities that many TV stations are likely to build.

- **Helicopter Lifts** – For some of the very large community tower structures (such as Willis Tower and others), the most efficient antenna removal and installation technique may involve using Helicopter Cranes for some of the work. These operations generally require stations to go off the air or significantly reduce power during these operations.
- **All Stations on the same tower may not be scheduled together** – The FCC has laid out a 10-phase transition schedule for TV Stations to build their new facilities and place them on the air in a staggered fashion. At this time, however, it is not known if all stations on the same tower would be scheduled in the same phase. Therefore, radio stations may find that they have several stations making changes at different times and therefore may have to accommodate two or three different facility changes that are scheduled months apart.
- **Facility AC Power System Modifications** – Stations may find the in order to accommodate new transmitters, some electrical distribution system modifications are necessary for the site. Consequently, stations may find that some off-air time is required in order to allow electrical system modifications and construction as well as transitioning to new AC circuits.
- **Tower Crew Availability Will Be Limited** – Stations should be prepared for constraints in the availability of tower crews during the 39 month construction period. Tower Crews will likely be unavailable for regular maintenance operations as well as for emergency antenna or transmission line burn outs or repairs. Since most crews will be busy working on the TV station projects, radio stations may find it difficult to find crews to work with on their antenna projects and other tower work. Any tower or antenna work that radio stations anticipate completing in the next three years should be completed immediately or deferred until after the TV Repack is completed. See Appendix C for sample Station Phase Assignment and Construction Schedule.

C. No FCC Reimbursement for Radio Station Costs

The FCC has made it clear that there will be no reimbursement of costs for radio station changes unless there is a written contractual obligation for the TV station to pay for the radio station facility modifications. Consequently, it is not expected that any of the FCC Relocation Funds will be available to radio stations for their expenses.

Consequently, radio stations should prepare for the expenses that are likely to be incurred by them and not reimbursable from the FCC. Budgeting for these scenarios would be prudent, given that the FCC schedule is very aggressive and will not likely be sympathetic to TV or radio stations that cause delays in their repacking schedule.

D. Mitigation of Station Disruption

As noted above, there will be various situations and scenarios that may develop on the shared tower structures occupied by both Radio and TV Stations. Planning for these impacts and potential service disruptions should be undertaken immediately to ensure that stations are prepared. There are some potential options that radio stations should consider to minimize the impact on their operations.

The best mitigation will vary from station-to-station and market-to-market, however, the following solutions may be useful for stations to consider:

- **Off Site Auxiliary or Temporary Operations** – The best logistical solution would be to operate from another site and tower some distance away while construction is underway on the main tower structure.
- **Off Site Auxiliary or Temporary Operations on Combined Antenna** – Another possibility would be to operate temporarily on a combined antenna system that is on another structure away from the main tower site.
- **Auxiliary Antenna Mounted in Location Away from Tower Workers** – If another tower site is not an option, and operations must continue at the existing site. A temporary or Aux antenna mounted at a lower height or in a location that would allow workers to work in the FM Aperture would allow continued operations during modification work. Options such as a single bay mounted on a lower section of the tower may be viable or at least minimize the off-air time.
- **Combine with Other Stations for Temporary / Aux Antenna on the same tower** – Combining with other stations on a temporary antenna on another structure would allow stations to continue to operate without the need to power up/down during the times workers are near the main antenna. By spreading the costs across several stations, this may be an economical solution.

E. Suggested Station Preparation Steps

Stations should be prepared for possible impacts and disruptions from the DTV repack. It is suggested that stations take the following steps to prepare their facilities and stations in case the disruption to station operations becomes unavoidable.

- Research which DTV stations are on your shared tower and where they are located relative to your radio station antenna.
- Understand which stations will be repacked such as stations on channels 38-51 as well as those stations on channels 2-36 that will be changing channels to accommodate stations moving to in-core channels.
- Understand which stations were “winners” in the spectrum auction and will be vacating their existing channel – and antenna aperture.
- Understand that the FCC will repack approximately 987 TV stations as part of the repacking process. Determine which stations on your shared tower will be changing channels.

- Understand the FCC Phase Assignment process and which phases have been assigned to the DTV stations on your shared tower. These are the deadlines the TV Stations must meet for their project. (See Appendix C).
- What is the plan for the DTV station antenna and transmission line change out?
- What is the rigging plan and will there be a requirement to remove any FM Antenna sections?
- What is required of your station to power up/down when workers are on the tower?
- Is relocation of the FM Station antenna or other equipment required?
- Will there be any changes to the AC Power Distribution?

Conclusions:

Based upon the forgoing study, there are a significant number of CPB-Eligible public radio stations that may potentially be impacted by the FCC TV Spectrum Repacking.

The MSW study indicates that approximately 75 CPB-Eligible radio stations are near-co-located (within 250 meters) with a full power or class A TV station that will be repacked.

Furthermore, approximately 92 CPB-Eligible radio stations are co-located on the same tower structure as a full power or class A TV station that is being repacked.

The constraints on tower crews and other resources may make any changes or modifications to radio facilities problematic as tower crews with broadcast experience will likely be otherwise engaged with TV Repack projects.

Public Radio Stations should understand the potential impacts to their operations, develop a plan on how to accommodate those impacts, as well as develop a budget for the expenses that are likely to be incurred and not reimbursed by the FCC.

APPENDIX A

**CPB Eligible Radio Stations Co-Located
With Full Power or Class A TV Stations
That Are Being Repacked**

APPENDIX B

**CPB-Eligible Radio Stations Near Co-Located
(Within 250 Meters)
With Full Power or Class A TV Stations
That Are Being Repacked**

APPENDIX C

DTV REPACK PHASED TRANSITION SCHEDULE

