

Request for Special Temporary Authorization

Pursuant to Section 73.1635 of the Federal Communications Commission's ("FCC") Rules¹, ION Media License Company LLC ("ION"), the licensee of full power television station WPXN-TV, New York, New York ("WPXN") requests Special Temporary Authority to broadcast television signals by licensed stations from the World Trade Center ("WTC") on channel 32 for a limited thirty day period. The MTVA² on behalf of the New York City area television member stations listed below (the "Broadcasters") pursuant to this STA will test digital television signal coverage from the WTC location. Testing will occur during the first two weeks of December, 2014, and during various dates in January, 2015. Temporary antennas and transmitters will be installed to test UHF signals as described below in compliance with the Commission's Rules and in furtherance of the public interest. A similar STA request has been filed by American Broadcasting Companies, Inc. to evaluate VHF signals from the WTC during the same period.

As the Commission is aware, since September 11, 2001 and the collapse of the North Tower of the original WTC, many Broadcasters relocated their antennas to side mounted positions on the Empire State Building ("ESB"). However, as the Commission is also aware, coverage from ESB does not in many cases duplicate signal coverage from the original WTC. Specifically, measurements were taken of several side mounted antennas at ESB in 2005 showing significant service losses within the 41 dBu noise limited contour. Especially hard hit are areas with significant numbers of over the air viewers when compared with their signal reception from the original WTC. In 2007, the Commission granted MTVA experimental authority to test a low power digital repeater network operating at five specific locations within the city. Those efforts did not present meaningful solutions.

Since 9-11, significant construction in mid-town Manhattan may have an adverse impact on signals from WTC to areas north of ESB. Accordingly, this STA authorization will permit the collection of data to assist Broadcasters in making their decision on whether to relocate from ESB back to WTC or continue to broadcast from ESB.³ Operation from the WTC may offer a way to re-connect with certain over the air

¹ 47 C.F.R § 73.1635.

² The MTVA is a consortium of television stations operating in New York City formed to represent the broadcasters as a group in the search for a replacement of the WTC transmission facilities. These stations are: WABC-TV (New York City); WPIX(DT) (New York City); WNET(DT) (New York City); WNBC(DT) (New York City); WFUT-DT (Newark); WCBS-TV (New York City); WPXN-TV (New York City);WNJU(DT) (Linden, NJ); WWOR-TV (Secaucus, NJ); WXTV-TV (Paterson, NY); and WNYW(DT) (New York City)

³ See *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket 12-268 Report and Order, FCC 14-50 (rel. June 2, 2014) at para 219 and 220. Stations affected by the destruction of the original WTC will be permitted to elect signal protection in the repacking process at either their licensed ESB

viewers and otherwise strengthen the Broadcasters' signal thereby reclaiming coverage areas for both UHF and VHF stations. A grant of the STA authorization will generate data representing a significant element, among others, that each Broadcaster must consider in making its decision on whether to relocate or not.

The public interest will be served from the results of this experimental authorization. The delivery of quality digital signals to viewers over the air in the nation's number one market, could be significantly improved based upon the findings developed thru this STA authorization and should be supported and authorized.

ION Media LPTV, Inc. the licensee of low power television station WPXU-LD, Amityville, NY, channel 12, and New York Spectrum Holding Company, Inc., the permittee of low power television station WXNY-LD, New York, NY, channel 32, have agreed to temporarily suspend operations from their existing authorized transmission sites to permit the MTVA to conduct this exercise. Additionally, several broadcast vendors will be supplying equipment and services to facilitate these temporary transmissions from WTC. Transmitters, line and filters will be installed on the 104th floor connecting to the antenna inputs. Once broadcasting begins, MTVA will conduct field measurements for approximately a 30-day period.

The attached Engineering Exhibit from Chesapeake RF Consultants, LLC reviews the process that will be followed during the STA period. An RFS broadband antenna with circular polarization will be installed at 519m HAAT. This experimental facility will operate on UHF channel 32 with a maximum effective radiated power of 230 kW. Given the congested UHF spectrum in the DMA, five stations will receive new temporary interference of more than 0.5% and each affected station has agreed to accept such interference.

The data to be collected in this project will add to each Broadcaster's decision making process and should provide the public with an impressive collection of superior television signals. For these reasons, the Broadcasters urge the Commission to adopt an STA for this necessary testing.

facility or facilities at WTC authorized by CP. This facility protection election must be made prior to the Pre-Auction Licensing Deadline and for those stations choosing WTC, they must have obtained a CP for WTC prior to that date.