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BY E-MAIL CPENDARV@FCC.GOV

March 11, 2002

Mr. Clay Pendarvis
Chief, TV Branch
Mass Media Bureau
Federal Communications Commission
2033 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Pendarvis:

I am writing in response to your letter of March 5, 2002, to Telemundo of Florida License Corporation, licensee of TV Station WSCV, Channel N51, Fort Lauderdale, Florida, and permittee of Station WSCV-DT, Channel D52, in which you indicate that the proposed WSCV-DT facilities (FCC File No. BMPCDT-20020301ABC) fail to protect Class A TV Station WFUN-LP, Channel N48, at Miami, Florida.

Our calculations show that the proposed WSCV-DT facilities fully protect WFUN-LP, as demonstrated by the attached "before" and "after" OET-69 coverage studies for that station. In this case, both the "before" WSCV-DT facilities (*i.e.*, the construction permit with FCC File No. BMPT20010301ABZ) and the proposed WSCV-DT facilities cause new interference to zero persons when studied using OET-69 protocols, as specifically allowed by Section 73.625(c)(5)(iii) of the FCC Rules. If a rule waiver is deemed necessary, it is hereby requested.

Should you require any additional information or documentation regarding the pending WSCV-DT application, please let me know.

Sincerely,

Dane E. Ericksen

mc

Enclosures

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Station WSCV-DT • DTV Channel 52 • Fort Lauderdale, Florida

“Before” OET-69 Coverage Study for Class A TV Station WFUN-LP, N48, Miami, Florida

Coverage analysis
tvcovstudy 2.3.13

Station parameters:

Station: N48 WFUN-LP LIC
City: MIAMI, ETC., FL
Coordinates: N 25-58-03.0
W 80-12-34.0
Height AMSL: 161.0 m
Maximum ERP: 30.0 kW
Azimuth pattern: omnidirectional
Elevation pattern: OET-69 generic
Service level: 74.8 dBu

Interfering station		Total IX		Unique IX	
		Area,km2	Population	Area,km2	Population
N51 WSCV CP	FORT LAUDERDALE, FL	0.0	0	0.0	0
N45 WHFT-TV LIC	MIAMI, FL	0.0	0	0.0	0
D48 WOPX-DT CP	MELBOURNE, FL	0.0	0	0.0	0
N63 WPPB-TV LIC	BOCA RATON, FL	4.0	4,756	0.0	0
D46 WHFT-DT CP	MIAMI, FL	0.0	0	0.0	0
D44 WPPB-TV CP	BOCA RATON, FL	0.0	0	0.0	0
D52 WSCV-DT CP	FORT LAUDERDALE, FL	0.0	0	0.0	0
D47 WAMI-DT CP	HOLLYWOOD, FL	280.8	473,986	276.8	469,230
D49 WFGC-DT CP	PALM BEACH, FL	0.0	0	0.0	0

Service conditions	Area,km2	Population
Noise-limited service	1331.6	1,875,276
Terrain-limited service	1331.6	1,875,276
Interference-free service	1050.9	1,401,290

Longley-Rice errors 32.1 62,388

Note: The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.



Station WSCV-DT • DTV Channel 52 • Fort Lauderdale, Florida

“After” OET-69 Coverage Study for Class A TV Station WFUN-LP, N48, Miami, Florida

Coverage analysis
tvcovstudy 2.3.13

Station parameters:

Station: N48 WFUN-LP LIC
City: MIAMI, ETC., FL
Coordinates: N 25-58-03.0
W 80-12-34.0
Height AMSL: 161.0 m
Maximum ERP: 30.0 kW
Azimuth pattern: omnidirectional
Elevation pattern: OET-69 generic
Service level: 74.8 dBu

Interfering station		Total IX		Unique IX	
		Area,km2	Population	Area,km2	Population
N51 WSCV CP	FORT LAUDERDALE, FL	0.0	0	0.0	0
N45 WHFT-TV LIC	MIAMI, FL	0.0	0	0.0	0
D48 WOPX-DT CP	MELBOURNE, FL	0.0	0	0.0	0
N63 WPPB-TV LIC	BOCA RATON, FL	4.0	4,756	0.0	0
D46 WHFT-DT CP	MIAMI, FL	0.0	0	0.0	0
D44 WPPB-DT CP	BOCA RATON, FL	0.0	0	0.0	0
D52 WSCV-DT CP*	FORT LAUDERDALE, FL	0.0	0	0.0	0
D47 WAMI-DT CP	HOLLYWOOD, FL	280.8	473,986	276.8	469,230
D49 WFGC-DT CP	PALM BEACH, FL	0.0	0	0.0	0

* Station parameters modified:

--Modified-----	--Original-----
Station: D52 WSCV CP	D52 WSCV CP
City: FORT LAUDERDALE, FL	FORT LAUDERDALE, FL
Coordinates: N 25-59-08.7	N 25-58-46.5
W 80-11-37.1	W 80-11-46.3
Height AMSL: 306.3 m	302.3 m
Maximum ERP: 500 kW	400 kW
Azimuth pattern: CH52-H-P2az.pat	AND-30133_ATW26HS5
Orientation: 0.0	0.0
Elevation pattern: OET-69 generic	OET-69 generic
Service level: 42.1 dBu	42.1 dBu

Service conditions	Area,km2	Population
Noise-limited service	1331.6	1,875,276
Terrain-limited service	1331.6	1,875,276
Interference-free service	1050.9	1,401,290
Longley-Rice errors	32.1	62,388

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**“After” OET-69 Coverage Study for
Class A TV Station WFUN-LP, N48, Miami, Florida**

Note: The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

