



**STATEMENT OF JOHN E. HIDLE, P.E.  
IN SUPPORT OF AN APPLICATION FOR  
POST REPACK CONSTRUCTION PERMIT  
WJAR - PROVIDENCE, RHODE ISLAND  
DTV - CH. 25 - 530 kW - 306 m HAAT**

Prepared for: WJAR LICENSEE, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

#### **GENERAL**

This office has been authorized by WJAR LICENSEE, LLC, licensee of WJAR, channel 50, facility ID number 50780, licensed to Providence, Rhode Island, to prepare this statement, FCC Form 2100, Schedule A, its technical sections, and the associated exhibits in support of an application for construction permit, in accordance with the Incentive Auction Closing and Channel Reassignment Public Notice, DA 17-314, and the technical information provided in the confidential reassignment letter from the FCC announcing the substitution for DTV channel 50 with new DTV channel 25 to be used by WJAR for its post-reassignment broadcasting.

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**DIRECTIONAL ANTENNA**

The applicant proposes to install a new Dielectric model TFU-18ETT/VP-R 4C160 elliptically polarized directional transmitting antenna with its center of radiation located at a height above ground of 274.3 meters, and a height above average terrain of 306 meters. The antenna manufacturer's directional horizontal plane azimuth radiation pattern for the horizontally polarized component is shown and tabulated in exhibit 2. The manufacturer's horizontal plane azimuth pattern for the vertically polarized component is shown and tabulated in exhibit 3. The manufacturer's vertical plane elevation radiation pattern, illustrating the antenna's radiation characteristics above and below the horizontal plane is shown and tabulated in Exhibit 4.

**PREDICTED COVERAGE CONTOURS**

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 1 shows the predicted Noise Limited (39.85 dBu) contour, and the principal community (48 dBu) contour. The 48 dBu contour completely encompasses the principal community of license, Providence, Rhode Island.

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**ALLOCATION CONSIDERATIONS**

***Post-Transition DTV Considerations***

A study was performed, using the FCC's software, tv\_study, v. 2.2.2, to determine if the instant application for construction permit is predicted to cause new prohibited interference to post reassignment DTV stations, construction permits, DTV allotments or Class A DTV stations. The study results, shown in Appendix B, indicate that the instant application for construction permit is predicted to cause no new interference exceeding 0.5% to the populations served by any post reassignment DTV station, construction permit, allotment or Class A DTV stations. The study also shows that WJAR's proposed service area is within the baseline plus 1%.

***International DTV Considerations***

The WJAR site is located 312.4 kilometers from the nearest point on the US-Canadian border. The study included all Canadian DTV facilities within the coordination distance. (See Appendix B)

**BLANKETING AND INTERMODULATION INTERFERENCE**

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the proposed WJAR site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

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**RADIO FREQUENCY IMPACT**

The FCC's guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines define a maximum permissible exposure (MPE) level for occupational or "controlled" situations, and for "uncontrolled" environments that apply in all other cases that might affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance to determine whether FCC-regulated transmitting facilities, operations or devices comply with guidelines for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. OET Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC's policies and guidelines.

The Maximum Permitted Exposure (MPE) level for broadcast facilities that operate on a frequency between 30 MHZ and 300 MHZ is 200 microwatts per centimeter squared ( $\mu\text{W}/\text{cm}^2$ ) for an "uncontrolled" environment, and is 1000 microwatts per centimeter squared ( $\mu\text{W}/\text{cm}^2$ ) for a "controlled" environment. The MPE level for broadcast facilities that operate on a frequency between 300 MHZ and 1500 MHZ, primarily UHF TV stations, is determined for an "uncontrolled" environment by dividing the operating frequency in MHZ by 1.5, and is similarly determined for a "controlled" environment by dividing the operating

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frequency in MHZ by 0.3.

The predicted emissions of WJAR must be considered, in addition to predicted emissions from any other proposed or existing stations at the site. For WJAR, which will operate on television Channel 25 (536-542 MHZ), the MPE is 359.33 microwatts per centimeter squared ( $\mu\text{W}/\text{cm}^2$ ) in an "uncontrolled" environment and 1,796.7  $\mu\text{W}/\text{cm}^2$  in a "controlled" environment. The proposed WJAR facility will operate with a maximum ERP of 530 kW from an elliptically polarized directional transmitting antenna with a centerline height of 274.3 meters above ground level (AGL). Considering a conservative predicted vertical plane relative field factor of 0.300 the WJAR facility is predicted to produce a power density at two meters above ground level of 42.986  $\mu\text{W}/\text{cm}^2$ , which is 11.96% of the FCC guideline value for an "uncontrolled" environment, and 2.392% of the FCC's guideline value for "controlled" environments. There is one other full-power DTV facility, two LPTV DTV facilities and one FM station that are located at the WJAR site. The total estimated percentage of the ANSI value at the proposed site, including the cumulative radiation from all authorizations located within the relevant proximity, is 20.55% of the limit applicable to "uncontrolled" environments, and 4.11% of the limit for "controlled" environments. (See Appendix A)

**OCCUPATIONAL SAFETY**

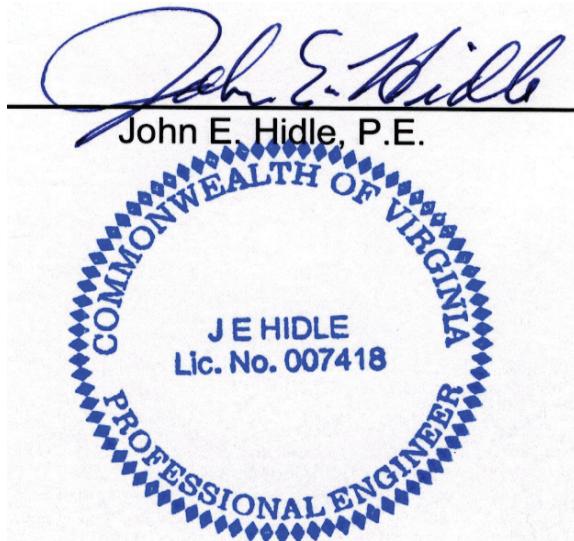
The licensee of WJAR is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WJAR antenna, and is committed to reducing power or ceasing operation during times of maintenance of the transmission systems, when necessary, to ensure protection to personnel.

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**SUMMARY**

It is submitted that the instant application for construction permit to change WJAR from channel 50 to channel 25, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement, FCC Form 2100, its technical sections, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: June 20, 2017





## PREDICTED COVERAGE CONTOURS

WJAR - PROVIDENCE, RHODE ISLAND  
 DTV Channel 25 - 530 kW ERP - 306 M HAAT  
 JUNE, 2017

Predicted Noise Limited 39.85 dBu  
 F(50,90) Coverage Contour



Predicted Principal Community 48 dBu  
 F(50,90) Coverage Contour





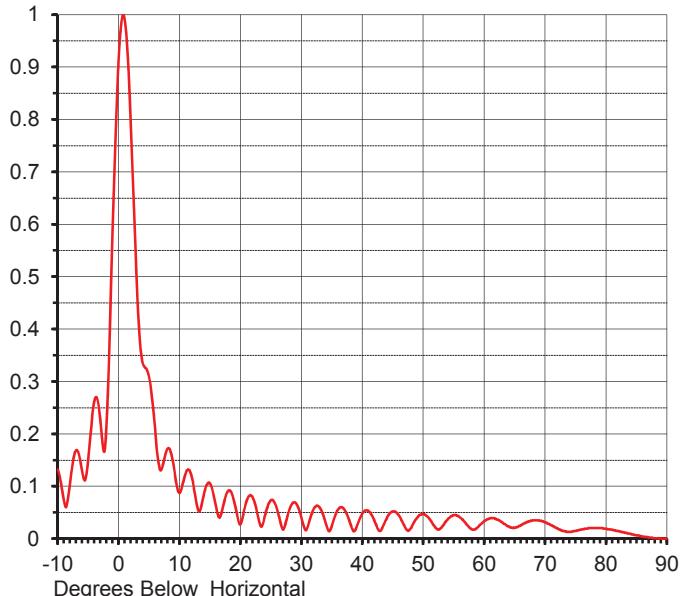
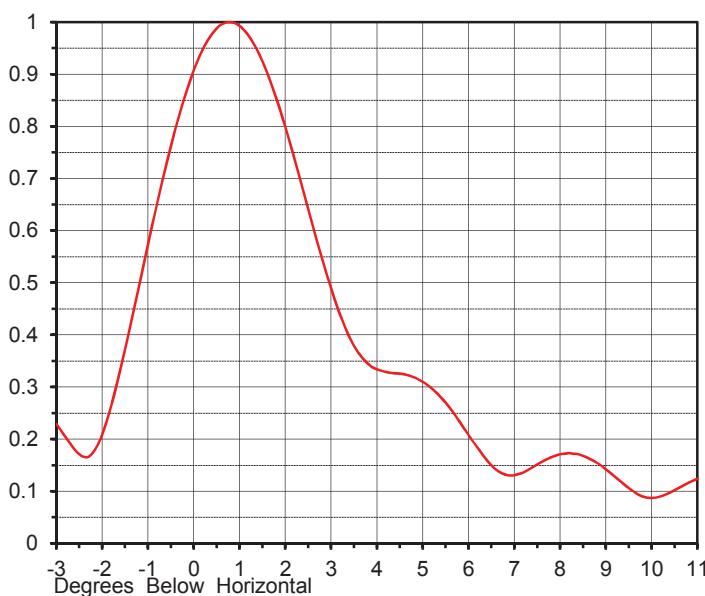
## ELEVATION PATTERN

Proposal No. **C-70055**  
 Date **10-Feb-17**  
 Call Letters **WJAR 25**  
 Frequency **539 MHz**  
 Antenna Type **TFU-18ETT/VP-R 4C160**

RMS Directivity at Main Lobe  
 RMS Directivity at Horizontal

**17.00 ( 12.30 dB )**  
**14.00 ( 11.46 dB )**  
**Calculated**

Beam Tilt **0.80 deg**  
 Drawing Number **18E170080**



Angle	Field								
-10.0	0.132	10.0	0.087	30.0	0.041	50.0	0.047	70.0	0.031
-9.0	0.075	11.0	0.124	31.0	0.021	51.0	0.038	71.0	0.026
-8.0	0.102	12.0	0.119	32.0	0.056	52.0	0.021	72.0	0.020
-7.0	0.168	13.0	0.057	33.0	0.060	53.0	0.021	73.0	0.015
-6.0	0.131	14.0	0.083	34.0	0.030	54.0	0.036	74.0	0.013
-5.0	0.147	15.0	0.105	35.0	0.024	55.0	0.045	75.0	0.015
-4.0	0.260	16.0	0.062	36.0	0.055	56.0	0.041	76.0	0.017
-3.0	0.229	17.0	0.053	37.0	0.057	57.0	0.029	77.0	0.019
-2.0	0.208	18.0	0.091	38.0	0.030	58.0	0.018	78.0	0.020
-1.0	0.572	19.0	0.070	39.0	0.020	59.0	0.022	79.0	0.020
0.0	0.907	20.0	0.027	40.0	0.048	60.0	0.033	80.0	0.019
1.0	0.993	21.0	0.071	41.0	0.053	61.0	0.039	81.0	0.017
2.0	0.799	22.0	0.079	42.0	0.034	62.0	0.037	82.0	0.014
3.0	0.489	23.0	0.037	43.0	0.015	63.0	0.031	83.0	0.012
4.0	0.334	24.0	0.042	44.0	0.038	64.0	0.023	84.0	0.009
5.0	0.310	25.0	0.073	45.0	0.052	65.0	0.021	85.0	0.006
6.0	0.208	26.0	0.057	46.0	0.044	66.0	0.025	86.0	0.004
7.0	0.131	27.0	0.017	47.0	0.022	67.0	0.031	87.0	0.002
8.0	0.171	28.0	0.054	48.0	0.020	68.0	0.035	88.0	0.001
9.0	0.142	29.0	0.069	49.0	0.040	69.0	0.035	89.0	0.000

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**SUMMARY OF RADIOFREQUENCY  
RADIATION STUDY**

WJAR, Providence, RI  
Channel 25, 530 kW, 306 m HAAT  
June, 2017

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLAR- IZATION</u>	<u>ANTENNA HEIGHT</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>WORST-CASE PREDICTED POWER DENSITY (mW/cm<sup>2</sup>)</u>	<u>WORST-CASE PREDICTED POWER DENSITY (μW/cm<sup>2</sup>)</u>	<u>FCC UNCONTROLLED LIMIT (μW/cm<sup>2</sup>)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WJAR	DT	25	539	H & V	274.3	530.000	0.300	0.04299	42.986	359.33	11.96%
WSBE-TV	DT	2	57	H & V	236	0.459	0.300	0.00005	0.050	200.00	0.03%
WRIW-CD	DT	36	605	H	189.7	15.000	0.300	0.00128	1.280	403.33	0.32%
WLNE-TV	DT	24	533	H	253	213.000	0.300	0.01017	10.166	355.33	2.86%
WSNE-FM	FM	227	98.3	H & V	144	31.000	<note 1>	0.01077	10.769	200.00	5.38%
<b>TOTAL PERCENTAGE OF FCC GUIDELINE VALUE =</b>											<b>20.55%</b>

\* For television stations a very conservative vertical relative field factor of 0.3 was assumed pursuant to OET Bulletin 65.

note 1: FM Model Antenna: EPA Type 3; ERI Rototiller Type, 3-bay, full-wave spaced antenna



## WJAR - PROVIDENCE, RHODE ISLAND Longley-Rice Interference Analysis

tvstudy v2.2.2

Database: localhost, Study: WJAR\_25\_DIE\_335H\_530K, Model: Longley-Rice  
Start: 2017.06.05 15:58:22

Study created: 2017.06.05 15:58:17

Study build station data: LMS TV 2017-06-02 (13)

Proposal: WJAR D25 DT LIC PROVIDENCE, RI  
File number: WJAR\_25\_DIE\_335H\_530K  
Facility ID: 50780  
Station data: User record  
Record ID: 537  
Country: U.S.  
Zone: I

Non-U.S. records included

Stations potentially affected:

Call	Chan	Svc	Status	City, State	File Number	Distance
WLNE-TV	D24	DT	BL	NEW BEDFORD, MA	DTVBL22591	0.0 km
WTEN	D24	DT	BL	ALBANY, NY	DTVBL74422	239.5
WNYE-TV	D24	DT	LIC	NEW YORK, NY	BLEDT20071228ABM	256.9
WWOR-TV	D25	DT	BL	SECAUCUS, NJ	DTVBL74197	257.3
WMHT	D25	DT	BL	SCHEECTADY, NY	DTVBL73263	239.5
WGGB-TV	D26	DT	BL	SPRINGFIELD, MA	DTVBL25682	119.9
WFUT-DT	D26	DT	BL	NEWARK, NJ	DTVBL60555	257.3

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25  
Latitude: 41 51 55.40 N (NAD83)  
Longitude: 71 17 12.70 W  
Height AMSL: 334.6 m  
HAAT: 306.0 m  
Peak ERP: 530 kW  
Antenna: DIE-TFU-18ETT/VP-R-4C160 0.0 deg

39.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	377 kW	291.2 m	89.0 km
45.0	530	301.9	93.6
90.0	377	307.7	91.2
135.0	428	306.6	92.2
180.0	202	330.0	88.5
225.0	149	322.2	85.3
270.0	202	300.1	84.9
315.0	428	287.1	89.5

**Appendix B - Interference Analysis**  
**WJAR - Providence, Rhode Island**  
**Channel 25 - 530 kW - Page 2**

Proposal service area is within baseline plus 1.0%  
 Proposal service area population is more than 95.0% of baseline

Distance to Canadian border: 312.4 km

Distance to Mexican border: 2932.0 km

Conditions at FCC monitoring station: Belfast ME  
 Bearing: 31.2 degrees Distance: 337.9 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
 Bearing: 277.6 degrees Distance: 2834.4 km

Study cell size: 2.00 km

Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
 Maximum new IX to LPTV: 2.00%

**Interference to DTVBL22591 BL, scenario 1**

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WLNE-TV	D24	DT	BL	NEW BEDFORD, MA	DTVBL22591	
Undesireds:	WJAR	D25	DT	BL	PROVIDENCE, RI	DTVBL50780	0.0 km
	WJAR	D25	DT	LIC	PROVIDENCE, RI	WJAR_25_DIE_335H_530K	0.0
	WPXG-TV	D23	DT	BL	CONCORD, NH	DTVBL48406	146.7
	WFTY-DT	D23	DT	LIC	SMITHSTOWN, NY	BLCDT20120427ABO	176.2
	WPME	D24	DT	BL	LEWISTON, ME	DTVBL48408	234.2
	WTEN	D24	DT	BL	ALBANY, NY	DTVBL74422	239.5
	WNYE-TV	D24	DT	LIC	NEW YORK, NY	BLEDT20071228ABM	256.8
	W24DB-D	D24z	DC	LIC	CLARKS SUMMIT, PA	BLANK0000004543	371.9
	W24BB-D	D24	DC	LIC	EAST STROUDSBURG, PA	BLANK0000001453	363.5

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
19842.6	5,705,441	19541.1	5,665,597	19243.9	5,612,322	19267.8	5,612,673	-0.12	-0.01

Undesired	Total IX	Unique IX, before	Unique IX, after
WJAR D25 DT BL	83.9	15,700	83.9
WJAR D25 DT LIC	60.0	15,349	60.0
WPME D24 DT BL	4.0	5,006	4.0
WTEN D24 DT BL	148.7	18,605	92.2
WNYE-TV D24 DT LIC	117.0	20,119	60.6

**Interference to DTVBL74422 BL, scenario 1**

Proposal causes no interference.

**Interference to BLEDT20071228ABM LIC, scenario 1**

Proposal causes no interference.

**Interference to DTVBL74197 BL, scenario 1**

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WWOR-TV	D25	DT	BL	SECAUCUS, NJ	DTVBL74197	

**Appendix B - Interference Analysis**  
**WJAR - Providence, Rhode Island**  
**Channel 25 - 530 kW - Page 3**

Undesireds:	WJAR	D25	DT	BL	PROVIDENCE, RI	DTVBL50780	257.3 km
	WJAR	D25	DT	LIC	PROVIDENCE, RI	WJAR_25_DIE_335H_530K	257.3
	WNYE-TV	D24	DT	LIC	NEW YORK, NY	BLEDT20071228ABM	0.9
	W24DB-D	D24z	DC	LIC	CLARKS SUMMIT, PA	BLANK0000004543	164.8
	W24BB-D	D24	DC	LIC	EAST STROUDSBURG, PA	BLANK0000001453	131.3
	WPHA-CD	D24	DC	LIC	PHILADELPHIA, PA	BLDTA20130920ADK	131.8
	WNUV	D25	DT	BL	BALTIMORE, MD	DTVBL7933	275.7
	WSKA	D25	DT	BL	CORNING, NY	DTVBL78908	300.5
	WMHT	D25	DT	BL	SCHENECTADY, NY	DTVBL73263	208.6
	WTVU-CD	D25	DC	BL	SYRACUSE, NY	DTVBL617	313.8
	WQAV-CD	D26	DC	BL	GLASSBORO, NJ	DTVBL191822	147.5
	WFUT-DT	D26	DT	BL	NEWARK, NJ	DTVBL60555	0.0
	WYLN-LP	D26	DC	BL	HAZLETON, PA	DTVBL68135	167.5

Service area	Terrain-limited			IX-free, before		IX-free, after		Percent New IX
25976.7	20,060,241	24530.6	19,758,600	24063.4	19,675,963	24083.5	19,682,568	-0.08 -0.03

Undesired	Total IX	Unique IX, before		Unique IX, after	
WJAR D25 DT BL	72.4	18,801	32.2	7,183	
WJAR D25 DT LIC	48.3	11,581		12.1	578
WNYE-TV D24 DT LIC	88.6	19,530	84.5	18,915	88.6 19,530
WNUV D25 DT BL	64.2	3,833	48.1	2,899	48.1 2,899
WSKA D25 DT BL	4.1	0	0.0	0	0.0 0
WMHT D25 DT BL	294.3	52,367	242.0	40,430	242.0 40,430
WFUT-DT D26 DT BL	4.0	658	4.0	658	4.0 658

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Interference to DTVBL73263 BL, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WMHT	D25	DT	BL	SCHENECTADY, NY	DTVBL73263	
Undesireds:	WJAR	D25	DT	BL	PROVIDENCE, RI	DTVBL50780	239.5 km
	WJAR	D25	DT	LIC	PROVIDENCE, RI	WJAR_25_DIE_335H_530K	239.5
	WTEN	D24	DT	BL	ALBANY, NY	DTVBL74422	0.0
	WONO-CD	D24	DC	BL	SYRACUSE, ETC., NY	DTVBL14315	182.2
	WWOR-TV	D25	DT	BL	SECAUCUS, NJ	DTVBL74197	208.6
	WSKA	D25	DT	BL	CORNING, NY	DTVBL78908	257.5
	WTVU-CD	D25	DC	BL	SYRACUSE, NY	DTVBL617	182.2
	WGGB-TV	D26	DT	BL	SPRINGFIELD, MA	DTVBL25682	119.5
	CBOT-DT	D25	DT	LIC	OTTAWA, ON	BLANKCANADA203	352.0

Service area	Terrain-limited			IX-free, before		IX-free, after		Percent New IX
30354.1	1,622,403	25353.1	1,481,644	24649.3	1,467,964	24657.3	1,468,205	-0.03 -0.02

Undesired	Total IX	Unique IX, before		Unique IX, after	
WJAR D25 DT BL	435.9	8,891	231.9	4,983	
WJAR D25 DT LIC	423.9	8,648		223.9	4,742
WWOR-TV D25 DT BL	296.0	6,445	184.1	3,602	188.1 3,604
WSKA D25 DT BL	16.0	118	12.0	118	12.0 118
WTVU-CD D25 DC BL	27.9	324	15.9	288	15.9 288
WGGB-TV D26 DT BL	171.8	2,174	31.9	550	31.9 550
CBOT-DT D25 DT LIC	4.0	157	4.0	157	4.0 157

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Interference to DTVBL25682 BL, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WGGB-TV	D26	DT	BL	SPRINGFIELD, MA	DTVBL25682	
Undesireds:	WJAR	D25	DT	BL	PROVIDENCE, RI	DTVBL50780	119.9 km

**Appendix B - Interference Analysis**  
**WJAR - Providence, Rhode Island**  
**Channel 25 - 530 kW - Page 4**

WJAR	D25	DT	LIC	PROVIDENCE, RI	WJAR_25_DIE_335H_530K	119.9
WMHT	D25	DT	BL	SCHENECTADY, NY	DTVBL73263	119.5
WQAV-CD	D26	DC	BL	GLASSBORO, NJ	DTVBL191822	346.7
WFUT-DT	D26	DT	BL	NEWARK, NJ	DTVBL60555	199.8
WPBS-DT	D26	DT	BL	WATERTOWN, NY	DTVBL62136	308.2
WYLN-LP	D26	DC	BL	HAZLETON, PA	DTVBL68135	309.1
WUTF-DT	D27	DT	LIC	MARLBOROUGH, MA	BLCDT20120821ABC	96.3
WBIN-TV	D27	DT	CP	DERRY, NH	BLANK0000024461	96.3
CIVM-DT	D26	DT	LIC	MONTRAL, QC	BLANKCANADA277	375.8

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
22098.2	3,443,199	19507.2	3,039,115	18327.4	2,821,590	18335.4	2,821,981	-0.04	-0.01

Undesired	Total IX	Unique IX, before	Unique IX, after			
WJAR D25 DT BL	220.2	78,066	72.1	29,430		
WJAR D25 DT LIC	212.1	77,675		64.1	29,039	
WMHT D25 DT BL	72.0	1,273	68.0	1,004	68.0	1,004
WFUT-DT D26 DT BL	619.4	64,240	575.4	55,081	575.4	55,081
WUTF-DT D27 DT LIC	456.3	131,671	0.0	0	0.0	0
WBIN-TV D27 DT CP	456.3	131,671	0.0	0	0.0	0

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 Interference to DTVBL60555 BL, scenario 1  
 Proposal causes no interference.

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 Interference to proposal, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WJAR	D25	DT	LIC	PROVIDENCE, RI	WJAR_25_DIE_335H_530K	
Undesireds:	WLNE-TV	D24	DT	BL	NEW BEDFORD, MA	DTVBL22591	0.0 km
	WWOR-TV	D25	DT	BL	SECAUCUS, NJ	DTVBL74197	257.3
	WMHT	D25	DT	BL	SCHENECTADY, NY	DTVBL73263	239.5
	WGGB-TV	D26	DT	BL	SPRINGFIELD, MA	DTVBL25682	119.9
Service area	Terrain-limited				IX-free	Percent IX	
25083.8	6,486,740	24621.9	6,423,409	24392.8	6,397,099	0.93	0.41
Undesired	Total IX				Unique IX	Prcnt Unique IX	
WWOR-TV D25 DT BL	132.8	18,888	60.4	6,370	0.25	0.10	
WMHT D25 DT BL	136.7	18,253	64.3	5,735	0.26	0.09	
WGGB-TV D26 DT BL	44.0	2,767	32.0	1,687	0.13	0.03	