

ENGINEERING STATEMENT

This exhibit supports this application to modify the licensed facility of WIAV-CD on channel 44 in Washington, DC, Facility ID 168063, FCC File Number 0000001572. The Applicant proposes to operate on a new channel with modified facilities to enable the station to remain on the air as it is being displaced.

WIAV-CD is a Class A station that did not receive protection and is displaced from channel 44 in the repacking process. Pursuant to the *Broadcast Transition Procedures Public Notice (DA 17-106)*, WIAV-CD is eligible to file a displacement application in the First Priority Window.

The Applicant proposes to operate WIAV-CD on channel 30. We are moving to the tower immediately adjacent to the licensed facility in the same antenna farm. We are proposing a non-directional antenna with no rotations¹. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility.

The proposed facility was studied using TVStudy v2.2.3 using Study Cell Size of 2.00 km and Profile Point Spacing of 0.40 km and the results are as follow:

- No non-directional AM stations found within 0.8 km
- No directional AM stations found within 3.2 km
- Distance to Canadian border: 459.4 km
- Distance to Mexican border: 2344.6 km
- The proposed facility is within coordination distance of FCC monitoring station
Conditions at FCC monitoring station: Laurel MD
Bearing: 41.8 degrees Distance: 33.6 km
ERP: 30.0 kW HAAT: 136.4 m Field strength: 64.4 dBu, 1.7 mV/m

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

Waiver Request

The Applicant hereby requests a waiver of §74.735(b)(2) of the Rules and Regulations of the Federal Communications Commission to operate the proposed facility at a ERP of 30 kW.

Post-Incentive Auction Expedited Processing

The Post-Incentive Auction Expedited Processing questions in this application are not relevant to the proposed facility because no DTV channel was established for the WIAV-CD in the post-incentive auction. Nonetheless, the Applicant respectfully request that the Commission grants favorable consideration and expedite the processing of this application.

¹ For reasons unknown to the Applicant, the LMS generated a rotation of 138 degrees in the Draft Copy and it is incorrect. The Applicant is proposing a non-directional antenna with no rotations.

Phase 8 Request

The Applicant hereby request this proposed facility of WIAV-CD to be placed in Phase 8 of the transition schedule to eliminate interference to other facilities that are being coordinated in the repack, including:

Call Sign	Pre-Auction Channel	Post-Auction Channel	City and License	FCC File Number	Post-Auction Transition Phase
WMPB	Channel 29	Channel 22	Baltimore, MD	BLEDT-20090330AEX	Phase 8
WGCB-DV	Channel 30	N/A. Sold in auction	Red Lion, PA	BLCDT-20050615AAB	N/A. Sold in auction
WNVY	Channel 30	N/A. Sold in auction	Goldvein, VA	BLEDT-20031230AAR	N/A. Sold in auction

Being placed in Phase 8 of the transition schedule allows WIAV-CD to be in the same phase as WMPB. We will not transition to channel 30 until WMPB transitions to channel 22.

Digital TV and Class A Station Protection and Interference Acceptance

The proposed facility is predicted to cause the following interference to WAZT-CD, Facility ID 57905, which is co-owned by Applicant herein, and the Applicant hereby accepts such interference.

- 51.23% in Scenario 2 to FCC File Number 0000027758
- 51.61% in Scenario 2 to DTVBL57905, WAZT-CD's post-auction reassignment channel

Except for referenced above, the proposed facility causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., "*de minimis*") based on TVStudy v2.2.3. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Low Power TV and TV Translator Station Protection

Based on TVStudy v2.2.3 with the Build Option to Protect LPTVs, the proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Environment Effect

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.