

**Engineering Statement  
Minor Modification of Construction  
WTXF-TV Channel 31 Philadelphia, PA  
November 2, 2017**

The purpose of this application is to modify the Post-Incentive Auction Facility Construction Permit of WTXF-TV Channel 31 Philadelphia, PA as permitted during the current "Maximization Filing Window".

The changes proposed in this application are to increase the effective radiated power (ERP) from 499 kW to 1,000 kW and change to a non-directional antenna. In addition to these changes, the proposed antenna will have 3.0 degrees of electrical beam tilt in order to provide interference protection to other stations in the crowded spectrum area of the northeast United States.

An analysis using the FCC's TVStudy software with its default settings has indicated that WTXF-TV can make the above described modifications without causing new interference to other stations above the allowable de minimis limit. Two analyses were performed to take into consideration the proposed channel changes of WMPT channel 31 Annapolis, MD (proposed move to channel 21) and WETA channel 14 Washington, DC (proposed move to channel 31). Copies of both TVStudy analysis result files showing no interference above the allowable de minimis limit are attached to this application.

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