

**APPLICATION FOR CHANNEL DISPLACEMENT
AND WAIVER REQUEST OF AN
LPTV TRANSLATOR STATION W41DK-D
FACILITY ID: 167356
KEYSER, WV**

PURPOSE AND DISCUSSION

This engineering statement was prepared on behalf of West Virginia Educational Broadcasting Authority (“WVEBA”), licensee of digital TV translator station W41DK-D located at Keyser, WV.

On September 27, 2017 a 120 day advance notification letter was issued to WVEBA which informs that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area (“PEA”) # 114 by February 4, 2018 and W41DK is likely to cause harmful interference to T-Mobile’s operations. The required termination of W41DK from using channel 41 will occur before the Commission opens a special displacement LPTV and translator window.

REQUEST FOR WAIVER

Due to the timing of these circumstances, WVEBA respectfully requests a waiver of the Displacement Freeze, in accordance with the procedures¹ announced by the FCC.

¹ Incentive Auction Task Force and Media Bureau Set Forth Tools Available to LPTV/Translator Stations Displaced Prior to the Special Displacement Window, Public Notice, DA 17-584 (Released June 14, 2017)



The grant of the instant channel displacement application and STA simultaneously filed for channel 16 will allow W41DK to continue providing service to viewers with minimal disruption and thus will best serve the public interest.

ALLOCATION ANALYSIS

Using TVStudy v2.2.3 software in conjunction with the Commission’s Version 2 TVIXCheck.xml template dated May 16, 2017, W41DK was studied for allocation violations. The following build options were enabled to ensure protection of pre and post auction facilities:

- Protect records not on baseline channel
- Protect baseline records from LPTV

Study created: 2017.11.20 11:15:02

Study build station data: LMS TV 2017-11-20 (60)

Proposal: W41DK-D D16 LD LIC KEYSER, WV
 File number: W41dk on channel 16
 Facility ID: 167356
 Station data: User record
 Record ID: 2371
 Country: U.S.

Build options:
 Protect records not on baseline channel
 Protect baseline records from LPTV

Stations affected by proposal:

Call	Chan	Svc	Status	City, State	File Number	Distance
W16CO-D	D16	LD	LIC	MIDDLEBURG, PA	BLDTL20110222ADB	223.4 km
WINP-TV	D16	DT	CP	PITTSBURGH, PA	BLANK0000026984	140.3
WINP-TV	D16	DT	APP	PITTSBURGH, PA	BLANK0000034405	140.3
WINP-TV	D16	DT	BL	PITTSBURGH, PA	DTVBL41314	140.3
WNEP-TV	D16	DT	CP	SCRANTON, PA	BLANK0000025543	337.7
WNEP-TV	D16	DT	APP	SCRANTON, PA	BLANK0000034255	337.7
WNEP-TV	D16	DT	BL	SCRANTON, PA	DTVBL73318	337.7
WVAW-LD	D16	LD	LIC	CHARLOTTESVILLE, VA	BLDTL20090218AEG	163.8
WUSV-LD	D16	LD	LIC	CLARKSBURG, WV	BLDTL20140616AEQ	105.2

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D16
Mask: Stringent
Latitude: 39 22 55.30 N (NAD83)
Longitude: 79 4 45.10 W
Height AMSL: 951.3 m
HAAT: 407.4 m
Peak ERP: 15.0 kW
Antenna: Omnidirectional
Elev Pattnr: Generic
Elec Tilt: 1.5

48.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	401.1 m	63.2 km
45.0	15.0	560.4	69.3
90.0	15.0	590.0	70.3
135.0	15.0	571.6	69.6
180.0	15.0	449.0	65.7
225.0	15.0	151.3	49.2
270.0	15.0	257.1	55.5
315.0	15.0	294.4	57.6

Database HAAT does not agree with computed HAAT
Database HAAT: 408 m Computed HAAT: 407 m

Distance to Canadian border: 345.1 km

Distance to Mexican border: 2230.0 km

Conditions at FCC monitoring station: Laurel MD
Bearing: 96.4 degrees Distance: 195.8 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 280.6 degrees Distance: 2227.4 km

No land mobile station failures found

Proposal is not within the Offshore Radio Service protected area

Study cell size: 1.00 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%

**MX with BLANK0000034405 APP, 2.46% interference, scenario 3
**MX with scenario 4, receives 2.46% interference
**MX with scenario 7, receives 2.46% interference
**MX with scenario 8, receives 2.46% interference

It is noted that the 2.46% interference noted above is caused to W41DK-D and is not prohibited.

CERTIFICATION

I, Ryan Wilhour, am an engineering associate of Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and have been working in the field of radio and television broadcast consulting since 1996. I am a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering. I state that I personally conducted the site survey. The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge.

Ryan Wilhour

A handwritten signature in blue ink that reads 'Ryan Wilhour'.

Consulting Engineer
November 21, 2017