

TECHNICAL SUMMARY

TELEVISION STATION WTIN-TV PONCE, PUERTO RICO CHANNEL 14 750 KW (MAX-DA) 848 M HAAT

1. The instant application is for an expanded facility for the authorized facility of WTIN-TV, Ponce, PR (Channel 14).^{*} By means of this application[†] (as hereby amended) the maximum effective radiated power (ERP) of WTIN-TV will be increased to 750 kW. In addition, the proposed antenna will be changed to a different model with a different azimuth pattern design and different electrical beam tilt.

2. The proposed facility is compliant with the ‘largest station in the market’ provision of Section 73.622(f)(5) of the FCC Rules. It is proposed to operate on Channel 14 with a maximum directional ERP of 750 kW and an antenna height above average terrain (HAAT) of 848 meters. These facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Puerto Rico market is WAPA-TV, San Juan, PR, Channel 27, which is licensed to provide noise-limited 41 dBu, f(50,90) service to an area of 53,020 square kilometers.[‡] The proposed WTIN-TV operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 45,630 square kilometers.[§] Therefore, the proposed WTIN-TV facility is compliant with the largest station provision of the FCC Rules.

3. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC’s *TVStudy* analysis are attached hereto as an exhibit. It is noted that use of a higher resolution cell size of 1 km and a higher resolution terrain profile increment of 0.5 km are requested for the *TVStudy* analysis.

^{*} See FCC File No. 0000028558.

[†] See FCC File No. 0000034579.

[‡] WAPA-TV is authorized for operation with a non-directional ERP of 1000 kW and an antenna HAAT of 794 m.

[§] Clarification of the largest station provision is provided in the *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39 at paragraphs 73-74.

4. The instant proposal is compliant with the coverage contour requirements of the principal community of Ponce, Puerto Rico. See Predicted Coverage Contours exhibit.