

**AMENDMENT
ENGINEERING STATEMENT**

prepared for

Victory Christian Center, Inc.
WGTB-CD Charlotte, North Carolina
Facility ID 70097
Ch. 28 (Digital) 10 kW

Victory Christian Center, Inc. (“*Victory*”) is the licensee of digital Class A television station WGTB-CD, Channel 28, Charlotte, NC, Facility ID 70097 (BLDTA-20121102ABD). The instant application (File Number 0000036111) herein proposed a minor modification of the current (Pre-Repack) License to increase its Effective Radiated Power (“ERP”) to 10 kW. This Engineering Statement is in response to a 30 day letter from the Video Division of the Media Bureau dated January 23, 2018, in which it was stated that predicted interference to two facilities (W28EP-D and WMYV) requires attention.

W28EP-D (BDCCDTT-20140611AAF) Interference

W28EP-D is currently an unbuilt Construction Permit as a Digital Companion Channel for analog translator W06AQ, Channel 6, Bat Cave, Etc., North Carolina. *It is believed that the W28EP-D Construction Permit is intended to be built after the Repack transition.*

Digital Class A television stations are required to protect translators with a maximum of two percent predicted interference from a proposal. In the case of W28EP-D, the instant proposal is predicted to cause 19.81 percent interference to the authorized W28EP-D. However, it is believed that W28EP-D *should be considered as being displaced for purposes of Post-Repack operation* due to an application filed by WUNW (file number 0000036076), which proposes conversion to a Distributed Transmitter System (“DTS”), and a maximization of service based on the “Largest Station” coverage in the market. An independent TV Study of this facility (using the requested 1 km cell size and 0.1 km terrain increment) suggests that the WUNW application is grantable, as it does not cause undesirable interference to full service facilities. However, a TV Study of the W28EP-D Construction Permit shows that it will receive an estimated 40 percent interference from the DTS/Maximization application after the transition. Therefore, the W28EP-D Construction Permit should be considered displaced. If a waiver of the protection rules is needed with regard to W28EP-D in this instance, it is hereby respectfully requested on behalf of *Victory* for the instant application.

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WMYV (0000027771) Interference

As discussed in the introductory paragraph and in the original Engineering Statement, the instant application is intended to modify the current license for operation before the Channel Repack transition. Therefore, *facilities authorized for operation after the Repack* should not be considered for interference. In the case of WMYV (file number 0000027771), this authorization is for operation post-Repack, and it is scheduled for transition in Phase 5 of the Repack, with a deadline of September 9, 2019 for a coordinated transition with nearby facilities. Class A WGTB-CD is also assigned to Phase 5 of the transition, and will coordinate with WMYV during the transition to its Post-Repack assignment of Channel 27 with an ERP of 1.27 kW. If a waiver of the interference rules is required for this proposal, then it is herein respectfully requested on behalf of the applicant.