

**DEMONSTRATION OF COMPLAINEE WITH COMMUNITY OF LICENSE COVERAGE RULES**

This application proposes a channel sharing arrangement between WTVE(TV), Reading, PA (Fac. ID 55305) and WPHY-CD, Trenton, NJ (Fac. ID 74464), whereby WTVE will broadcast using WPHY-CD's transmission facilities.

Under Section 73.625(a) of the Commission's Rules, a full power UHF television station's DTV transmitter must provide a 48 dBu contour over the station's entire principal community to be served. As demonstrated in the attached technical statement of engineering consultant Kevin Fisher, WPHY-CD's 48 dBu contour does not cover WTVE's principal community of Reading, Pennsylvania. However, in the Incentive Auction Report and Order, the Commission determined that proposed sharees "may propose licensed community changes if they cannot satisfy signal coverage requirements from their new transmitter sites, provided that the new communities meet the same allotment priorities as the current ones and are located in the same Designated Market Areas." *In the Matter of Expanding the Econ. & Innovation Opportunities of Spectrum Through Incentive Auctions*, Report & Order, 29 FCC Rcd. 6567 ¶¶ 27, 374-77 (2014). The Commission further stated that "[i]n the unlikely event that the sharee cannot identify any community that meets the same or a higher allotment priority at its new shared site, it must choose a new community of license to which it will provide the next highest priority." *Id.* ¶ 376 n. 1117.

Upon commencement of channel sharing, WTVE proposes to change its community of license to Willow Grove, Pennsylvania. Willow Grove has a 2010 U.S. Census population of 15,726 persons, its own local fire department, as well as numerous religious institutions and businesses. *See In the Matter of Amendment of Section 73.622(l), Post-Transition Table of DTV Allotments*, 26 FCC Rcd. 32 (MB 2011). Willow Grove and Reading are both located in the Philadelphia, Pennsylvania Designated Market Area. Moreover, as demonstrated in the attached technical statement of Kevin Fisher, WPHY-CD's 48 dBu contour covers Willow Grove in its entirety.

Finally, Willow Grove meets the same allotment priority as Reading. The Commission's allotment priorities are to: (1) provide at least one television service to all parts of the country; (2) provide each community with at least one television broadcast station; (3) provide a choice of at least two television services to all parts of the country; (4) provide each community with at least two television broadcast stations; and (5) assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities. *Amendment of Section 3.606 of the Commission's Rules and Regulations*, Sixth Report and Order, 41 FCC 148, 167 (1952). As demonstrated in the attached report from BIA/Kelsey, WTVE currently provides a first local service to Reading, placing it in allotment priority 2. With the proposed change, WTVE would provide a first local service to Willow Grove, placing it in the same allotment priority. Accordingly, the proposed change is consistent with the Incentive Auction Rules and Section 307(b) of the Communications Act.

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of NRJ TV PHILLY LICENSE CO., LLC, licensee of digital Class A Television Station WPHY-CD, presently operating on Channel 50 and permittee of a repack facility on Channel 22, both licensed to Trenton, New Jersey, as well as licensee of digital full-power television station WTVE-DT, Channel 25 in Reading, Pennsylvania, in support of its channel-sharing arrangement, whereby WPHY-CD will transmit the programming of WTVE-DT and the latter will relinquish its use of Channel 25 in the market. Both WPHY-CD and WTVE-DT operate in the Philadelphia, Pennsylvania, market or DMA.

One of the stipulations of this arrangement is that WTVE-DT change its city of license to Willow Grove, Pennsylvania.

In Exhibit B, we provide a map on which we have plotted the 48 dBu city-grade coverage contours of WPHY-CD, both on its present Channel 50 as well as on its allotted repack facility on Channel 22. We also include on the map the location of Reading, Pennsylvania, the current city of license for WTVE-DT. As shown, neither the present WPHY-CD 48 dBu contour nor that of the repack allotment facility of WPHY-CD on Channel 22 reaches the community of Reading.

Exhibit C is a more detailed map showing the 48 dBu contours of WPHY-DT (present and repack). As shown, the city of Willow Grove, Pennsylvania, is contained within both of these city-grade contours.

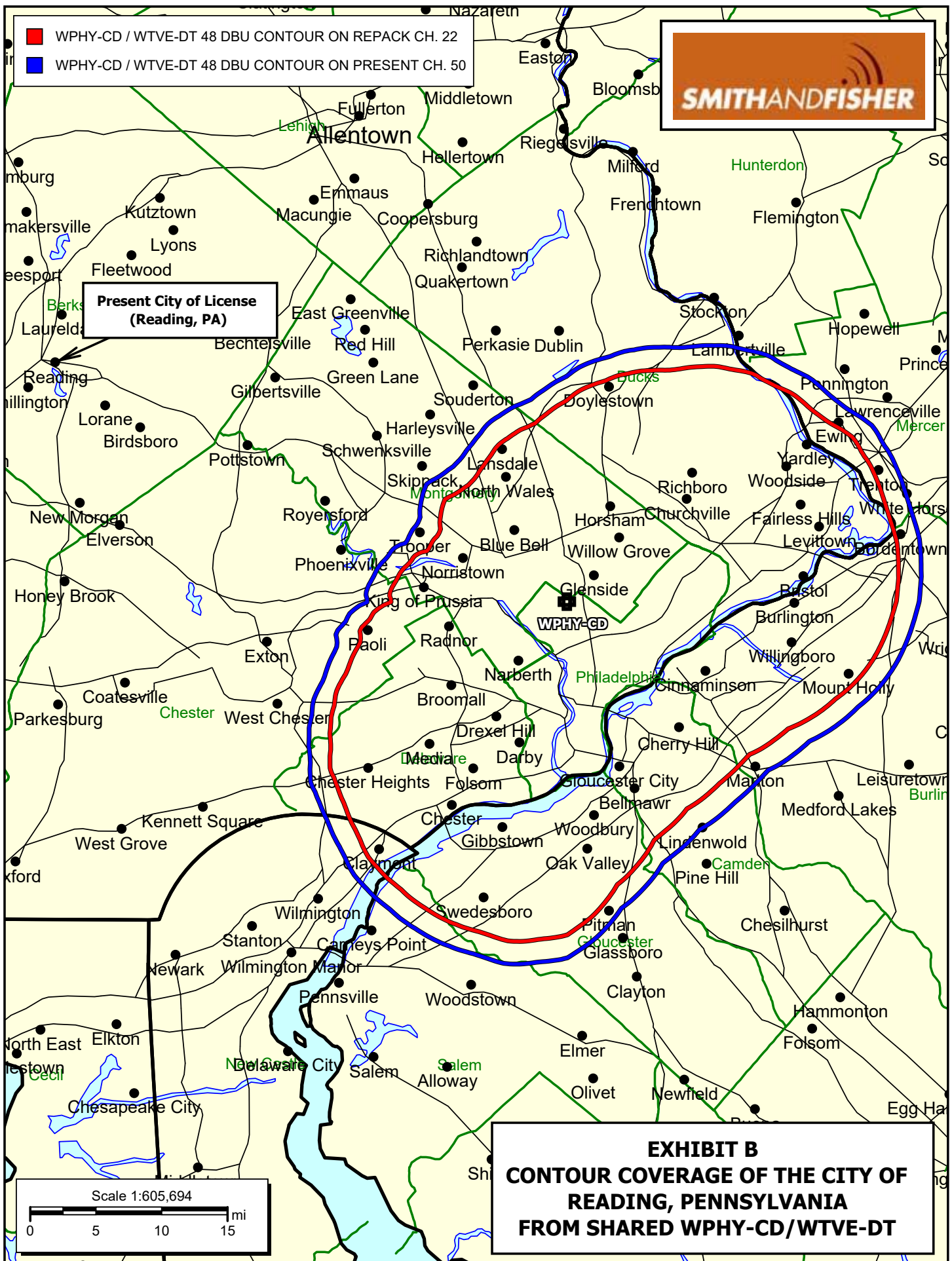
EXHIBIT A (cont.)

I declare, under penalty of perjury, that the foregoing statements and attached exhibits, which were prepared by me, are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K", a small "T", and a long horizontal line for the "F".

KEVIN T. FISHER

September 6, 2017







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2017

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## Facebook Feed



Willow Grove Volunteer Fire Company  
added 3 new photos.  
12 hours ago

Station 10 in service investigating alarm system  
at Luther Park



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👍 3    ➦ 0    💬 0



**Willow Grove Volunteer Fire Company**  
added 10 new photos.  
2 days ago

Station 10 in service on the Pa Turnpike this morning.



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👍 24 ➦ 4 💬 2



**Willow Grove Volunteer Fire Company**  
added 3 new photos.  
3 weeks ago

Today we remember a fallen friend. RIP John.  
Never forgotten





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👍 15 ➦ 0 💬 0



Willow Grove Volunteer ...

3,982 likes

Like Page

Contact Us

## Monthly Calls



Month	Fire
Jan	54
Feb	55
Mar	27
Apr	
May	
Jun	
Jul	
Aug	

Month	Fire
Sep	
Oct	
Nov	
Dec	
TTL	136


## Twitter

RT @firenation: The Job We Do Most Often. The Most Dangerous Job We Do.  
[t.co/aGHT0Ogehpt](https://t.co/aGHT0Ogehpt) [t.co/ZMLBOagERo](https://t.co/ZMLBOagERo)

Time ago 93 Days via Twitter for Android

RT @MontcoPA: Retweet if you voted in the primary election yesterday!    
#MontcoPA

Time ago 104 Days via Twitter for Android

RT @PennDOTNews: It's #NationalWorkZone Awareness Week. Work zone safety protects your life and ours. → [t.co/gJF3quXyF5](https://t.co/gJF3quXyF5)  #Slow4Z...

Time ago 146 Days via Twitter for Android



Follow @WGVEFC10 on twitter.

## Contact Information

Willow Grove  
Volunteer Fire  
Company  
227 Davisville  
Rd.  
Willow Grove,  
PA 19090

## Follow Us



## Phone

Emergency: 911  
Phone: 215-659-  
7633

## Member Links

Member Only  
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## Account

Billing  
Check Email

Site proudly maintained by the Willow Grove  
Volunteer Fire Company

Site designed and hosted by [Tiller10](#)



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## Free Friendship Meals

*1<sup>st</sup> Sunday of the Month at 5pm*

**We welcome you to join us at our free friendship meals!**

**MARK YOUR CALENDARS!**

January 1, 2017 – 5pm  
February 5, 2017 – 5pm  
March 5, 2017 – 5pm  
April 2, 2017 – 5pm  
May 7, 2017 – 5pm

For more information  
call 215-659-4505

Volunteers are  
also needed!

### Before Amen - Max Lucado



### Free Friendship Meals!

First Sunday of the Month at 5pm! Click Here for  
Flyer!

Visit the Events Page for More Detail and to  
Volunteer!

### News

Next Friendship Meal - 1st Sunday of Feb

January 29, 2017

Vacation Bible School 2017 January 29, 2017

Children's Valentines Day Party January 29,  
2017

Christmas Service Schedule December 18,  
2016

Christmas Musicale Tonight, and Aerobic Class  
Fundraiser tomorrow! December 10, 2016

### SEARCH!

Use the search bar below to search for anything  
on our website, from worship times, to locations  
of special events, donation opportunities, and  
more!

SEARCH

### Worship Times - Sundays

365 4 Him!

Contemporary Worship Service - 9:30 AM  
10:15 AM

Fellowship Time - 10:15AM - 10:45 AM

Traditional Worship Service - 10:45 AM-11:45  
AM

**Where are we? Enter off of  
Welsh Rd!**



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Thank you for visiting our church website! We invite you to visit in person and see how we are serving God and welcoming our neighbors. Come join us as we seek to become more faithful followers of Jesus Christ.

**Sunday, August 27**

**10:30 am      Worship Service, Rev. Lorelei Toombs preaching**

**Children's Sunday School (ages 4-4th grade) and**

**Children's Church during worship will resume in September.**

Church Office Hours: Closed Mondays

Open 9 am to 3 pm, Tuesday through Thursday

Open 9 am to 1 pm Fridays

Willow Grove United Methodist Church

34 North York Road

Willow Grove, PA 19090

In our manner of speech, our plans of living, our dealings with others, our conduct and walk in the church and out of it--all should be done as becomes the gospel (Phil. 1:27).  
~ Albert Barnes





## LINKS



(<http://bishoppeggyjohnson.blogspot.com/>)  
 Words on faith and life from Bishop  
 Peggy A. Johnson  
 (<http://bishoppeggyjohnson.blogspot.com/>)



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 Eastern Pennsylvania Conference of The  
 United Methodist Church  
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## BIA/Kelsey TV Analysis Report

ANALOG										DIGITAL				
Calls	Affiliate	National Sales Rep Type	City of License	State of License	Ch	Power (kW)	Tower Height	Power (kW)	Tower Height	Estimated Station Rev '16 (000)	Power Ratio	Acquired	Price (000)	Price Code
KJWP	Me	HRP	MAIN	Wilmington	DE			2.0	9	1,020'	0.37	2016/01	na	
KYW-TV	CBS	CBSTV	MAIN	Philadelphia	PA			26.0	790	1,230'	1.15	2000/05	g	
CP								30.0	960	1,201'				
WACP	IND		MAIN	Atlantic City	NJ			4.0	10	848'				
WBPH-TV	IND	InHse	MAIN	Bethlehem	PA			9.0	81	991'	200			
WCAU	NBC	NBC	MAIN	Philadelphia	PA			34.0	700	1,313'	0.96	2011/01	g	
CP								28.0	618	1,313'				
WFMZ-TV	IND		MAIN	Allentown	PA			46.0	800	1,086'	4,600			
WFPA-CA	UnM	UNI	CL-A	Philadelphia	PA			28.0	6	892'	3,000	2007/03	g1	
CP								35.0	7					
WGTW-TV	TBN		MAIN	Burlington	NJ			27.0	160	1,161'	5,900	2004/10	48,000	
WHYY-TV	PBS		PUB	Wilmington	DE			12.0	30	965'				
CP								13.0	30	965'				
WLV-TV	PBS		PUB	Allentown	PA			39.0	52	968'				
WMCN-TV	IND		MAIN	Atlantic City	NJ			44.0	200	696'	800	2000/08	9,000	
WMGM-TV	SBN		MAIN	Wilwood	NJ			36.0	205	415'	2,900	2017/07	6,000	
WNJS	PBS		PUB	Camden	NJ			22.0	197	866'				
CP								23.0	202	866'				
WNJT	PBS		PUB	Trenton	NJ			43.0	59	873'				
WPHA-CD	IND		CL-A	Philadelphia	PA			24.0	15	784'				
WPHL-TV	My	TelRp	MAIN	Philadelphia	PA			17.0	645	1,063'	38,500	2017/05	g9	
WPHY-CD	SBN		CL-A	Trenton	NJ			50.0	6	417'		2012/06	3,500	
CP								22.0	3					
WPPX-TV	ION	InHse	MAIN	Wilmington	DE			31.0	200	1,227'	5,500	2008/01	g	
CP								34.0	213	1,227'				
WPSG	CW	TelRp	MAIN	Philadelphia	PA			32.0	800	1,312'	24,000	1995/09	g	
CP								33.0	880	1,253'				
WPSJ-CD	INS		CL-A	Hammonton	NJ			38.0	6	902'		2012/12	1,650	
CP								27.0	5	837'				
WPVI-TV	ABC	ABC	MAIN	Philadelphia	PA			6.0	34	1,083'	160,000	1996/02	g	
WQAV-C	IND		CL-A	Glassboro	NJ			50.0	15	377'				
CP								26.0	15	932'				
WTSD-CD	IND		CL-A	Philadelphia	PA			23.0	15	1,086'				
WTVE	SBN		MAIN	Reading	PA			25.0	126	1,242'	2,100	2012/01	30,400	
WTFX-TV	FOX	FOX	MAIN	Philadelphia	PA			42.0	620	1,125'	80,000	1995/08	200,000	
CP								31.0	499	1,125'				
WUVP-DT	UNI	UNI	MAIN	Vineland	NJ			29.0	335	1,306'	8,500	2007/03	g1	
WWSI	TEL	Telmn	MAIN	Atlantic City	NJ			49.0	860	915'	4,000	2013/07	19,000	
WYBE	PUB		PUB	Philadelphia	PA			35.0	450	1,234'				