

DEMONSTRATION OF COMPLIANCE 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.

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" and "F" and a smaller "T".

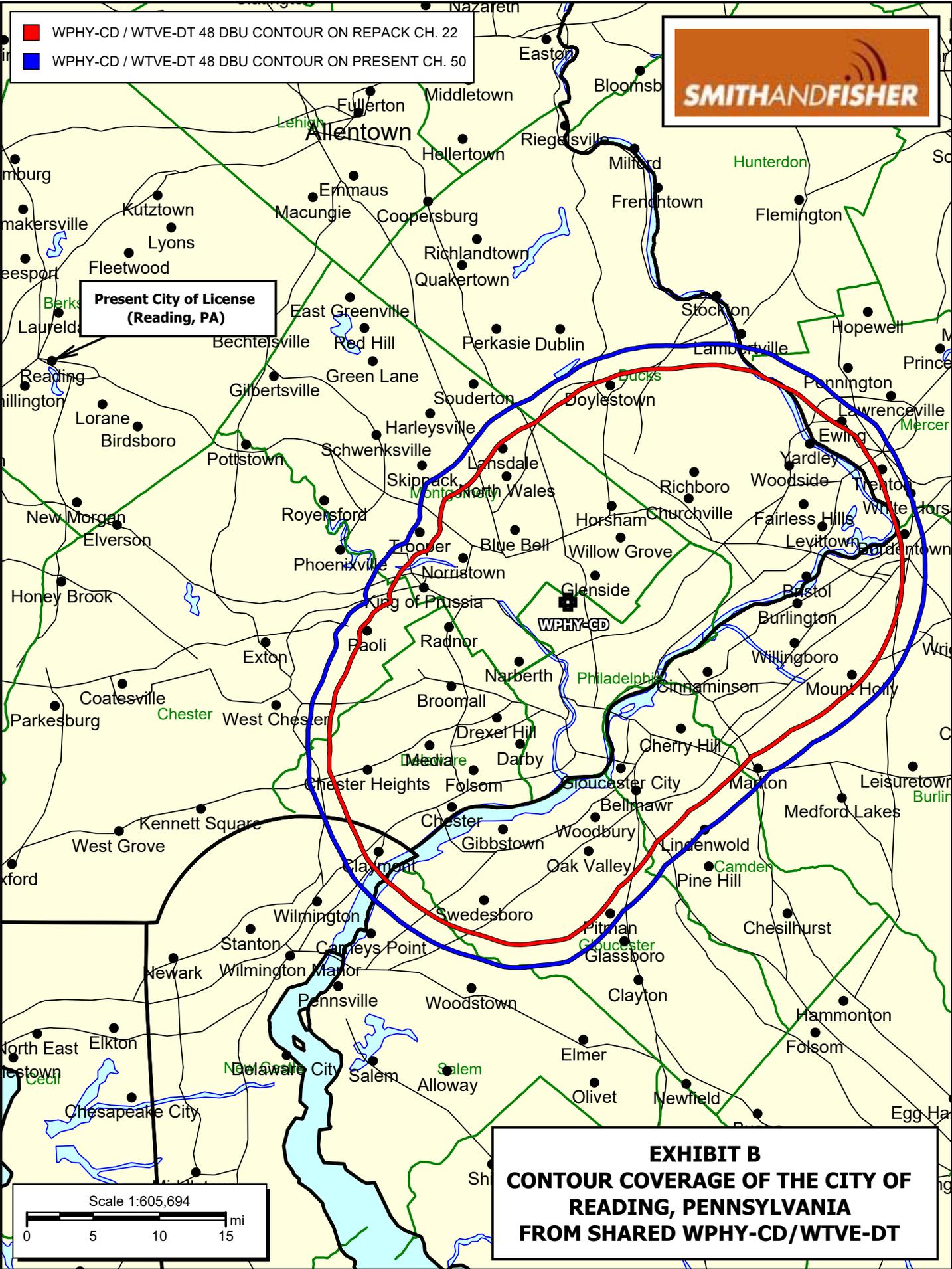
KEVIN T. FISHER

September 6, 2017

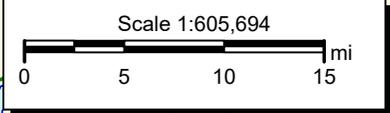


- WPHY-CD / WTVE-DT 48 DBU CONTOUR ON REPACK CH. 22
- WPHY-CD / WTVE-DT 48 DBU CONTOUR ON PRESENT CH. 50

**Present City of License
(Reading, PA)**



**EXHIBIT B
CONTOUR COVERAGE OF THE CITY OF
READING, PENNSYLVANIA
FROM SHARED WPHY-CD/WTVE-DT**



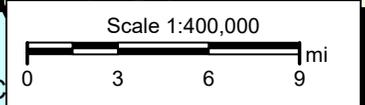


-  WPHY-CD / WTVE-DT 48 DBU CONTOUR ON REPACK CH. 22
-  WPHY-CD / WTVE-DT 48 DBU CONTOUR ON PRESENT CH. 50



**New City of License
Willow Grove, PA**

**EXHIBIT C
CONTOUR COVERAGE OF THE CITY OF
WILLOW GROVE, PENNSYLVANIA
FROM SHARED WPHY-CD/WTVE-DT**



WILLOW GROVE FIRE COMPANY

Protecting Upper Moreland Township since 1907



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up to date with the WGVFC

2017

to friend us on Facebook to keep up to date with our activities!! Click [HERE](#) ... [Read more...]



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

Station 10 in service investigating alarm system at Luther Park



[View on Facebook](#) · [Share](#)

👍 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.



[View on Facebook](#) · [Share](#)

👍 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



View on Facebook · Share

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/aGHT0Ogeh t.co/ZMLBOagER

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  #Slow4Z...

Time ago 146 Days via Twitter for Android



Follow @WGVFC10 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
News
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Account

Billing
Check Email

Site proudly maintained by the Willow Grove
Volunteer Fire Company

Site designed and hosted by



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Free Friendship Meals

1st 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 - This Sunday (Jan 1) - 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!

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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365 4 Him! Contact Us First Time? From the Pastors'
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Beliefs Contribute

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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/>)



(<http://www.epaumc.org/>)
 Eastern Pennsylvania Conference of The
 United Methodist Church
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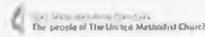
(<http://www.rerunshoes.com/>)
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(<http://www.umcmmission.org/>)
 General Board of Global Ministries
 (<http://www.umcmmission.org/>)



(<http://archives.umc.org/Directory/ChurchDetails.asp?FAC=14428>)
 Find a Church
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(http://www.umc.org/site/c.lwL4Kn1LIH/b.1353935/k.85E4/General_Conference_2012_The_United_Methodist_Church.htm)



(http://www.umcom.org/site/c.mrLZJ9PFKMG/b.2730433/k.FF0F/Church_Marketing_and_Communications)
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BIA/Kelsey TV Analysis Report

ANALOG DIGITAL

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