



ENGINEERING STATEMENT

IN SUPPORT OF

APPLICATION FOR DISPLACEMENT OF TRANSLATOR AND WAIVER REQUEST

W07BJ

ITHACA, NY

Background

Lilly Broadcasting, L.L.C (Lilly) is the licensee of television translator station W07BJ (BLTTV-19911126JL, Facility ID. 71512) near Ithaca, NY. The station currently operates on Ch. 7. The station is filing an instant application to displace W07BJ from Ch. 7 to Ch. 33 in the Special Displacement Window (Per FCC Public Notice DA-17-422 and DA 18-124).

W07BJ is eligible to file in the Special Displacement Window under the following criteria:

1. The current facility on Ch. 7 is predicted by the FCC TVStudy interference software to cause 4.30% interference to the post-repack full-service facility WICZ-TV (at Binghamton, NY) which has been assigned Ch. 7 (LMS File #0000034576).
2. The station was licensed for operation prior to April 13, 2017

Lilly is proposing that W07BJ displace to a channel that is adjacent to the pre-auction channel for WIVT (Ch. 34) which is scheduled to transition to its post-auction channel (Ch. 27) in Phase 4 (construction deadline of August 2, 2019). The proposed W07BJ facility on Ch. 33 is predicted to cause WIVT (on Ch. 34) more than the allowable 0.5% interference. Lilly respectfully

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requests a waiver of the contingent application rule (Part 73.3517). Displacing W07BJ to Ch. 33 is necessary as no other available channel could be identified for W07BJ which satisfies the FCC interference requirements to full-service, Class A and non-displaced LPTV/translator stations. Lilly agrees to the condition that is will not begin operating W07BJ on Ch. 33 prior to WIVT discontinuing its operation on Ch. 34.

Displacement Parameters

Lilly is proposing the following parameters for the W07BJ digital operation on Ch. 33:

Coordinates: 42° 25' 11.8" N (NAD83)
76° 25' 48.8" W
ERP: 15.0 kW
RCAMSL: 456.9m
RCAGL: 32.0m
Antenna: ERI ALP4L1-HSNR-19
Mask: Full-Service

Note, during the process of preparing the displacement application, it was discovered that the original construction permit application for the W07BJ analog low power facility contained typographical errors in the tower coordinates and site elevation which were listed as:

Tower Coordinates: 42° 25' 15.2" N (NAD83)
76° 25' 44.7" W
Site Elevation AMSL: 418m

The actual coordinates of the tower and site elevation are:

Tower Coordinates: 42° 25' 11.8" N (NAD83)
76° 25' 48.8" W
Site Elevation AMSL: 424.9m

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These discrepancies have been corrected on the displacement application.

Interference

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5). The WIVT (Ch. 34) pre-auction record (BLCDT-20090819AGR) was excluded from the TVStudy analysis since W07BJ would not be allowed to begin operating on Ch. 33 until WIVT has ceased its pre-auction operation on Ch. 34.

The results of the study (copy attached hereto) show that potential interference is not predicted to exceed 0.49% to any full-service DTV or Class A stations or 1.99% to any low power stations as required by the Commission's Rules.

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report.

The location of the proposed post-incentive auction facility is assumed to currently be "in compliance" with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.029713 mW/cm², which is substantially less than the MPE for public exposure (0.391333 mW/cm²) at Ch. 33 (584-590 MHz); therefore, the site will remain "in compliance" with FCC guidelines.

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Lilly agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access. Workers will be trained on RFR issues and encouraged to wear personal RFR monitors when on the structure.

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Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

A handwritten signature in black ink, appearing to read "Ben Pidek", is written over a horizontal line.

Benjamin L. Pidek, P.E.
May 29, 2018

Attached:
TVStudy Interference Check Report

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TVStudy TV Interference Check Report for W07BJ on Ch. 33

Study created: 2018.05.29 23:11:46

Study build station data: LMS TV 2018-05-29

Proposal: W07BJ D33 LD LIC ITHACA, NY
 File number: W07BJ-W-Ch33-SM-15k
 Facility ID: 71512
 Station data: User record
 Record ID: 1209
 Country: U.S.
 Zone: I

Build options:
 Protect pre-transition records not on baseline channel

Search options:
 Non-U.S. records included

Individual records excluded:
20090819AGR WIVT D34 DT LIC BINGHAMTON, NY BLCDDT20090819AGR

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	W26BF	N26-	TX	LIC	ELMIRA, NY	BLTTTL19960111AB	43.6 km
No	W31BP	N31+	TX	LIC	BURLINGTON, ETC., NY	BLTTTL19980120JE	110.3
No	WNLO	D32	DT	APP	BUFFALO, NY	BLANK0000036123	214.8
No	WNLO	D32	DT	LIC	BUFFALO, NY	BLANK0000053502	214.3
No	WUCB-LD	D32	LD	APP	COBLESKILL, NY	BLANK0000053835	158.3
Yes	W59DG	D32	LD	CP	ELMIRA, NY	BDISDTL20110829AAJ	47.9
No	WLIW	D32	DT	CP	GARDEN CITY, NY	BLANK0000034431	276.4
No	WTKO-CD	D32	DC	CP	ONEIDA, NY	BLANK0000034943	95.0
No	WCUL-LD	D32	LD	CP	SYLVAN BEACH, NY	BDCCDTL20130903AAR	106.3
No	WTAJ-TV	D32	DT	LIC	ALTOONA, PA	BLCDDT20051018ACE	265.4
No	WHP-TV	D32	DT	CP	HARRISBURG, PA	BLANK0000027770	233.5
No	WHP-TV	D32	DT	APP	HARRISBURG, PA	BLANK0000033781	233.5
Yes	WQPX-TV	D32	DT	LIC	SCRANTON, PA	BLCDDT20060629AFR	124.0
No	WFSB	D33	DT	LIC	HARTFORD, CT	BLCDDT20041029AIL	307.4
No	WCCT-TV	D33	DT	CP	WATERBURY, CT	BLANK0000034241	307.4
No	WHUT-TV	D33	DT	APP	WASHINGTON, DC	BLANK0000035679	389.5
No	WHUT-TV	D33	DT	LIC	WASHINGTON, DC	BLEDT20071018AIJ	389.5
No	WHUT-TV	D33	DT	CP	WASHINGTON, DC	BPEDT20120627AAD	389.5
No	WCVB-TV	D33	DT	CP	BOSTON, MA	BLANK0000034567	426.6
No	WPXG-TV	D33	DT	LIC	CONCORD, NH	BLANK0000053337	425.3
Yes	WGRZ	D33	DT	APP	BUFFALO, NY	BLANK0000035664	177.7
Yes	WGRZ	D33	DT	LIC	BUFFALO, NY	BLCDDT20050705AAG	177.7
No	WCBS-TV	D33	DT	CP	NEW YORK, NY	BMPCDT20080619AAZ	276.4
No	WCBS-TV	D33	DT	LIC	NEW YORK, NY	BLANK0000048556	276.4
No	WCBS-TV	D33	DT	LIC	NEW YORK, NY	BLCDDT20090612AFN	275.3
No	WNGX-LD	D33	LD	APP	SCHENECTADY, NY	BLANK0000051695	246.5
No	WVVC-LD	D33	LD	LIC	UTICA, NY	BLDTL20110829AAZ	122.0
No	WFMJ-TV	D33	DT	CP	YOUNGSTOWN, OH	BLANK0000033638	379.5
No	W33CR-D	D33	LD	LIC	CHAMBERSBURG, PA	BLDTT20100503ACB	285.5
No	WPSG	D33	DT	CP	PHILADELPHIA, PA	BLANK0000034323	282.3
No	WZPA-LD	D33	LD	CP	PHILADELPHIA, PA	BDFCDTL20100915ABB	282.6

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No	WZPA-LD	D33	LD	LIC	PHILADELPHIA, PA	BLDTL20120615AAK	282.6
No	WPXI	D33	LD	APP	PITTSBURGH, PA	BLANK0000054534	359.5
No	WPXI	D33	LD	LIC	PITTSBURGH, PA	BLCDDT20130111ABQ	359.5
Yes	WQPX-TV	D33	DT	CP	SCRANTON, PA	BLANK0000034918	124.0
No	W33DZ-D	D33	LD	CP	WILLIAMSPORT, PA	BDCCDTT20130103ACT	143.9
No	WNPB-TV	D33	DT	LIC	MORGANTOWN, WV	BLEDT2012121205ACJ	411.8
No	WKBW-TV	D34	DT	CP	BUFFALO, NY	BLANK0000034829	181.0
No	WPXN-TV	D34	DT	CP	NEW YORK, NY	BLANK0000034356	276.4
No	WVTT-CD	D34	DC	LIC	OLEAN, NY	BLDTA20141217ABD	174.1
No	WMHT	D34	DT	LIC	SCHENECTADY, NY	BLEDT20040108ALV	199.5
No	WONO-CD	D34	DC	LIC	SYRACUSE, ETC., NY	BLANK000001647	74.2
No	WFXV	D34	DT	CP	UTICA, NY	BLANK0000029986	130.2
Yes	WSWB	D34	DT	CP	SCRANTON, PA	BLANK0000034421	123.8
No	WWLF-LP	N35z	TX	LIC	Syracuse, NY	BLTTA20050922ACH	74.2
No	W41DB	N41-	TX	LIC	CORNING, NY	BLTTL20080729AFT	61.5
No	CBOFT-DT	D33	DT	LIC	OTTAWA, ON	BLANKCANADA205	345.8
No	CKNX-TV	D33	DT	LIC	WINGHAM, ON	BLANKCANADA245	428.9

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D33
 Mask: Simple
 Latitude: 42 25 11.80 N (NAD83)
 Longitude: 76 25 48.80 W
 Height AMSL: 456.9 m
 HAAT: 0.0 m
 Peak ERP: 15.0 kW
 Antenna: ERI ALP-W Ch33 0.0 deg
 Elev Pattn: Generic

50.6 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	97.3 m	42.9 km
45.0	13.4	51.0	35.0
90.0	12.8	-3.6	29.0
135.0	4.66	31.2	24.6
180.0	0.871	-8.5	16.5
225.0	4.66	78.9	34.7
270.0	12.8	166.1	47.5
315.0	13.4	271.3	53.7

Database HAAT does not agree with computed HAAT
 Database HAAT: 0 m Computed HAAT: 85 m

**Proposal 25.60 dBu contour crosses Canadian border, coordination required
 Distance to Canadian border: 137.9 km

Distance to Mexican border: 2611.6 km

Conditions at FCC monitoring station: Canandaigua NY
 Bearing: 309.0 degrees Distance: 87.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
 Bearing: 273.8 degrees Distance: 2406.5 km

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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%

---- Below is IX received by proposal W07BJ-W-Ch33-SM-15k ----

**MX with BLANK0000035664 APP scenario 1, 4.87% interference received
Proposal receives 4.86% interference from scenario 2

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