

***COMPREHENSIVE TECHNICAL EXHIBIT  
APPLICATION FOR CONSTRUCTION PERMIT***

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**W16AL - BURLINGTON, VERMONT  
FACILITY ID: 67941**

**DIGITAL NETWORKS—NORTHEAST, LLC**

**MAY 2018**

## **APPLICATION FOR CONSTRUCTION PERMIT - DISPLACEMENT**

The following engineering statement and attached exhibits have been prepared for **Digital Networks-Northeast, LLC** ("Northeast"), licensee of analog TV translator station W16AL at Burlington, Vermont, and are in support of their application for construction permit.<sup>1</sup> This application is being filed as a displacement application for the licensed facility due to realignment of the television band from the Commission's *Incentive Auction*.

W16AL is licensed to operate on channel 16 as an analog translator facility with a maximum effective radiated power of 43.2 kW at a center of radiation of 633 meters above mean sea level utilizing a directional antenna. The proposed facility would operate on channel 27 as a digital translator station with a maximum effective radiated power of 15 kW at 633 meters above mean sea level utilizing a directional antenna. The proposed antenna is a Propagation Systems (PSI) model PSILP12OI oriented at an azimuth of 315 degrees. Despite the change in the directional antenna pattern, no change in the antenna location or elevation is proposed under this application.

Exhibit E-1 provides the output from *TVStudy* for the proposed facility. This information demonstrates that the proposed facility would have no interference check failures to any proposed or authorized facility.

The proposed facility would not constitute a significant environmental impact, and is exempt from environmental processing. The proposed antenna would utilize an existing antenna mounted to an existing tower that does not require registration with the Commission. Using the equations

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<sup>1</sup> The Facility ID for W16AL at Burlington, Vermont is 67941.

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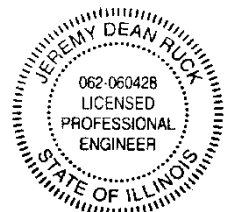
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in Supplement A of *OET Bulletin 65*, the calculated worst-case power density at ground level assuming a downward radiation relative field of 0.1 is  $139 \mu\text{W}/\text{cm}^2$ . This value is less than the upper limit of the uncontrolled environment condition. Northeast certifies it will coordinate with all other users of the site to ensure that workers and other personnel are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Coordination activities will include, but are not necessarily limited to, a reduction in transmitter power or cessation of operation.

The proposed facility complies with the provisions of Section 74.709 of the Commission's Rules. No land mobile protection issues have been identified based on the tables in that section of the rules, or on the output of *TVStudy*. The proposed facility also complies with Section 74.793(g) and 74.793(h) of the Commission's Rules. Section 74.793(f) is no longer applicable due to the sunset of full-power analog television broadcasting.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2019

Jeremy D. Ruck, PE  
May 30, 2018

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## Exhibit E-1 - TVStudy Interference Study

tvstudy v2.2.5 (4uoc83)

Database: 127.0.0.1, Study: BDFCDTT20060313AAM #130, Model: Longley-Rice

Start: 2018.05.29 17:05:18

Study created: 2018.05.29 17:05:18

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

Proposal: W16AL D27 LD CP BURLINGTON, VT

File number: BDFCDTT20060313AAM

Facility ID: 67941

Station data: User record

Record ID: 132

Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Search options:

Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WGGB-TV	D26	DT	CP	SPRINGFIELD, MA	BLANK0000024834	237.1 km
No	WYCU-LD	D26	LD	LIC	CHARLESTOWN, ETC., NH	BLDTL20121214ABJ	119.0
No	WTEN	D26	DT	LIC	ALBANY, NY	BLCDT20060104ACC	212.0
No	W26EP-D	D26	LD	CP	POTSDAM, NY	BNPDTL20090825BCA	168.4
No	WPBS-DT	D26	DT	CP	WATERTOWN, NY	BLANK0000034513	230.0
No	WUNI	D27	DT	LIC	MARLBOROUGH, MA	BLANK0000030092	248.9
No	WUNI	D27	DT	APP	MARLBOROUGH, MA	BLANK0000035720	267.7
No	W27BL	N27+	TX	LIC	BERLIN, NH	BLTTL19950530IQ	140.5
Yes	WNYT	D27	LD	APP	ALBANY, NY	BLANK0000053981	184.2
No	WIVT	D27	DT	CP	BINGHAMTON, NY	BLANK0000028447	353.6
No	WIXT-CD	D27	DC	CP	DEWITT, NY	BLANK0000034942	295.6
No	WVBG-LP	D27+	LD	APP	GREENWICH, NY	BLANK0000054509	219.2
No	WNYW	D27	DT	CP	NEW YORK, NY	BLANK0000034611	415.4
Yes	WFXV	D27	DT	LIC	UTICA, NY	BLCDT20090331ADG	225.5
No	WNYT	D28	LD	APP	ALBANY, NY	BLANK0000053982	134.9
No	WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	225.6
No	WWDG-CD	D28	DC	APP	UTICA, NY	BLANK0000035669	225.7
Yes	WVTB	D28	DT	CP	ST. JOHNSBURY, VT	BLANK0000029682	85.5
No	W28DQ-D	D28	LD	LIC	WINDSOR, VT	BLDTL20120507ABK	109.2
No	WMUR-LP	N29-	TX	LIC	LITTLETON, NH	BLTTL20000601AEG	100.8
No	CIVM-DT	D26	DT	LIC	MONTRAL, QC	BLANKCANADA277	141.5
Yes	CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	228.3
No	CIII-DT-27D	27	DT	LIC	PETERBOROUGH, ON	BLANKCANADA213	416.4
No	CKTM-DT	D28	DT	LIC	TROISRIVIERES, QC	BLANKCANADA315	238.7

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D27

Mask: Full Service

Latitude: 44 21 52.10 N (NAD83)

Longitude: 72 55 51.40 W

Height AMSL: 634.6 m (Adjusted based on actual ground elevation calculation)

HAAT: 269.1 m

Peak ERP: 15.0 kW

Antenna: PSILP120I 315.0 deg

Elev Pattn: Generic

Elec Tilt: 1.00

50.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	11.9 kW	323.9 m	56.6 km
45.0	6.53	56.5	33.4

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90.0	5.58	413.6	56.6
135.0	6.73	6.9	26.6
180.0	5.58	100.3	39.0
225.0	6.53	369.8	55.7
270.0	11.9	383.8	59.5
315.0	15.0	511.2	66.0

Database HAAT does not agree with computed HAAT  
 Database HAAT: 269 m    Computed HAAT: 271 m

\*\*Proposal 25.05 dBu contour crosses Canadian border, coordination required  
 Distance to Canadian border: 72.3 km

Distance to Mexican border: 2967.3 km

Conditions at FCC monitoring station: Belfast ME  
 Bearing: 87.0 degrees    Distance: 305.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
 Bearing: 271.3 degrees    Distance: 2679.6 km

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%

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### Interference to BLANK0000053981 APP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WNYT	D27	LD	APP	ALBANY, NY	BLANK0000053981	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	184.2 km
	WUNI	D27	DT	LIC	MARLBOROUGH, MA	BLANK0000030092	180.3
	WIVT	D27	DT	CP	BINGHAMTON, NY	BLANK0000028447	206.3
	WVBG-LP	D27+	LD	APP	GREENWICH, NY	BLANK0000054509	39.3
	WNYW	D27	DT	CP	NEW YORK, NY	BLANK0000034611	232.6
	W28DA-D	D28	LD	LIC	PITTSFIELD, MA	BLDTT20090604ABU	50.0
	WNYT	D28	LD	APP	ALBANY, NY	BLANK0000053982	58.5
	WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	132.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
10958.4    1,145,483	9189.3    1,028,783	6777.2    699,393	6776.2    699,393	0.01    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	2.0	0	1.0    0
WUNI D27 DT LIC	7.1	7	2.0    0
WIVT D27 DT CP	10.1	7	2.0    0
WVBG-LP D27+ LD APP	2392.1    328,650	2332.9    326,454	2332.9    326,454
WNYW D27 DT CP	1.0	0	1.0    0
W28DA-D D28 LD LIC	12.1    127	3.0    0	3.0    0
WNYT D28 LD APP	51.0    2,795	11.0    740	11.0    740

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### Interference to BLANK0000053981 APP scenario 2

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WNYT	D27	LD	APP	ALBANY, NY	BLANK0000053981	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	184.2 km
	WUNI	D27	DT	APP	MARLBOROUGH, MA	BLANK0000035720	204.5
	WIVT	D27	DT	CP	BINGHAMTON, NY	BLANK0000028447	206.3
	WVBG-LP	D27+	LD	APP	GREENWICH, NY	BLANK0000054509	39.3
	WNYW	D27	DT	CP	NEW YORK, NY	BLANK0000034611	232.6
	W28DA-D	D28	LD	LIC	PITTSFIELD, MA	BLDTT20090604ABU	50.0

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WNYT	D28	LD	APP	ALBANY, NY	BLANK0000053982	58.5
WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	132.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
10958.4    1,145,483	9189.3    1,028,783	6769.1    699,035	6768.1    699,035	0.01    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	2.0    0	1.0    0	
WUNI D27 DT APP	23.2    644	10.1    358	
WIVT D27 DT CP	10.1    7	1.0    0	
WVBG-LP D27+ LD APP	2392.1    328,650	2325.8    326,175	
WNYW D27 DT CP	1.0    0	1.0    0	
W28DA-D D28 LD LIC	12.1    127	3.0    0	
WNYT D28 LD APP	51.0    2,795	11.0    740	

### Interference to BLCDDT20090331ADG LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WFXV	D27	DT	LIC	UTICA, NY	BLCDDT20090331ADG	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	225.5 km
	WTEN	D26	DT	LIC	ALBANY, NY	BLCDDT20060104ACC	111.2
	WUNI	D27	DT	LIC	MARLBOROUGH, MA	BLANK0000030092	312.2
	WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	0.3
	CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	232.3
	CIII-DT-27D27	DT	LIC		PETERBOROUGH, ON	BLANKCANADA213	260.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
18694.4    642,736	16868.8    555,326	16538.5    547,282	16538.5    547,282	0.00    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	1.0    0	0.0    0	
WTEN D26 DT LIC	137.9    2,352	136.9    2,352	
WUNI D27 DT LIC	1.0    0	0.0    0	
CFMT-DT-2 D27 DT LIC	37.5    119	10.1    62	
CIII-DT-27 D27 DT LIC	182.3    5,630	154.9    5,573	

### Interference to BLCDDT20090331ADG LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WFXV	D27	DT	LIC	UTICA, NY	BLCDDT20090331ADG	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	225.5 km
	WTEN	D26	DT	LIC	ALBANY, NY	BLCDDT20060104ACC	111.2
	WUNI	D27	DT	APP	MARLBOROUGH, MA	BLANK0000035720	336.4
	WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	0.3
	CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	232.3
	CIII-DT-27D27	DT	LIC		PETERBOROUGH, ON	BLANKCANADA213	260.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
18694.4    642,736	16868.8    555,326	16537.5    547,268	16537.5    547,268	0.00    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	1.0    0	0.0    0	
WTEN D26 DT LIC	137.9    2,352	135.9    2,352	
WUNI D27 DT APP	3.0    14	1.0    14	
CFMT-DT-2 D27 DT LIC	37.5    119	10.1    62	
CIII-DT-27 D27 DT LIC	182.3    5,630	154.9    5,573	

### Interference to BLCDDT20090331ADG LIC scenario 3

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WFXV	D27	DT	LIC	UTICA, NY	BLCDDT20090331ADG	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	225.5 km
	WTEN	D26	DT	LIC	ALBANY, NY	BLCDDT20060104ACC	111.2
	WUNI	D27	DT	LIC	MARLBOROUGH, MA	BLANK0000030092	312.2

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## Exhibit E-1 - TVStudy Interference Study

WWDG-CD	D28	DC	APP	UTICA, NY	BLANK0000035669	0.3
CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	232.3
CIII-DT-27D	27	DT	LIC	PETERBOROUGH, ON	BLANKCANADA213	260.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
18694.4    642,736	16868.8    555,326	16532.5    547,256	16532.5    547,256	0.00    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	1.0    0	0.0    0	0.0    0
WTEN D26 DT LIC	137.9    2,352	136.9    2,352	136.9    2,352
WUNI D27 DT LIC	1.0    0	0.0    0	0.0    0
WWDG-CD D28 DC APP	6.0    26	6.0    26	6.0    26
CFMT-DT-2 D27 DT LIC	37.5    119	10.1    62	10.1    62
CIII-DT-27 D27 DT LIC	182.3    5,630	154.9    5,573	154.9    5,573

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Interference to BLCDT20090331ADG LIC scenario 4

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WFXV	D27	DT	LIC	UTICA, NY	BLCDT20090331ADG	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	225.5 km
	WTEN	D26	DT	LIC	ALBANY, NY	BLCDT20060104ACC	111.2
	WUNI	D27	DT	APP	MARLBOROUGH, MA	BLANK0000035720	336.4
	WWDG-CD	D28	DC	APP	UTICA, NY	BLANK0000035669	0.3
	CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	232.3
	CIII-DT-27D	27	DT	LIC	PETERBOROUGH, ON	BLANKCANADA213	260.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
18694.4    642,736	16868.8    555,326	16531.5    547,242	16531.5    547,242	0.00    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	1.0    0	0.0    0	0.0    0
WTEN D26 DT LIC	137.9    2,352	135.9    2,352	135.9    2,352
WUNI D27 DT APP	3.0    14	1.0    14	1.0    14
WWDG-CD D28 DC APP	6.0    26	6.0    26	6.0    26
CFMT-DT-2 D27 DT LIC	37.5    119	10.1    62	10.1    62
CIII-DT-27 D27 DT LIC	182.3    5,630	154.9    5,573	154.9    5,573

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Interference to BLANK0000029682 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WVTB	D28	DT	CP	ST. JOHNSBURY, VT	BLANK0000029682	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	85.5 km
	WHPX-TV	D28	DT	CP	NEW LONDON, CT	BLANK0000034398	351.3
	WEPT-CD	D28	DC	CP	NEWBURGH, NY	BLANK0000034537	359.9
	WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	307.2
	CKTM-DT	D28	DT	LIC	TROISRIVIERES, QC	BLANKCANADA315	222.3

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
29113.7    578,069	21025.0    316,312	20867.1    313,967	20829.0    313,443	0.18    0.17
6521.3    322,724	4868.1    229,890	4289.2    212,273	4289.2    212,273	0.00    0.00 (in Canada)

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	44.1    782	38.1    524	38.1    524
WHPX-TV D28 DT CP	41.5    692	41.5    692	41.5    692
CKTM-DT D28 DT LIC	116.4    1,653	116.4    1,653	110.4    1,395
CKTM-DT D28 DT LIC	579.0    17,617	579.0    17,617	579.0    17,617 (in Canada)

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Interference to BLANK0000029682 CP scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WVTB	D28	DT	CP	ST. JOHNSBURY, VT	BLANK0000029682	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	85.5 km
	WHPX-TV	D28	DT	BL	NEW LONDON, CT	DTVBL51980	351.3

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WEPT-CD	D28	DC	CP	NEWBURGH, NY	BLANK0000034537	359.9
WWDG-CD	D28	DC	LIC	UTICA, NY	BLANK0000001609	307.2
CKTM-DT	D28	DT	LIC	TROISRIVIERES, QC	BLANKCANADA315	222.3

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
29113.7    578,069	21025.0    316,312	20882.3    314,475	20844.2    313,951	0.18    0.17
6521.3    322,724	4868.1    229,890	4289.2    212,273	4289.2    212,273	0.00    0.00 (in Canada)

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	44.1    782	38.1    524	
WHPX-TV D28 DT BL	26.3    184	26.3    184	
CKTM-DT D28 DT LIC	116.4    1,653	110.4    1,395	
CKTM-DT D28 DT LIC	579.0    17,617	579.0    17,617	(in Canada)

### Interference to BLANKCANADA204 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	CFMT-DT-2	D27	DT	LIC	OTTAWA, ON	BLANKCANADA204	
Undesireds:	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	228.3 km
	WPBS-DT	D26	DT	CP	WATERTOWN, NY	BLANK0000034513	151.1
	WIVT	D27	DT	CP	BINGHAMTON, NY	BLANK0000028447	352.1
	WIXT-CD	D27	DC	CP	DEWITT, NY	BLANK0000034942	249.3
	CIIT-DT-27D27	D27	DT	LIC	PETERBOROUGH, ON	BLANKCANADA213	240.5

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
650.7    21,647	650.7    21,647	650.7    21,647	650.7    21,647	0.00    0.00 (in U.S.)
9447.1    1,353,239	9313.8    1,352,706	9306.8    1,352,706	9304.8    1,352,706	0.02    0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
W16AL D27 LD CP	2.0    0	2.0    0	
CIIT-DT-27 D27 DT LIC	7.0    0	7.0    0	

### Interference to proposal scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	
Undesireds:	WUNI	D27	DT	LIC	MARLBOROUGH, MA	BLANK0000030092	248.9 km
	WNYT	D27	LD	APP	ALBANY, NY	BLANK0000053981	184.2
	WVBG-LP	D27+	LD	APP	GREENWICH, NY	BLANK0000054509	219.2
	WVTB	D28	DT	CP	ST. JOHNSBURY, VT	BLANK0000029682	85.5

Service area	Terrain-limited	IX-free	Percent IX
8036.9    342,772	6595.9    306,751	6571.8    306,284	0.37    0.15
Undesired	Total IX	Unique IX	Pront Unique IX
WNYT D27 LD APP	9.0    429	8.0    429	0.12    0.14
WVBG-LP D27+ LD APP	4.0    0	3.0    0	0.05    0.00
WVTB D28 DT CP	12.1    38	12.1    38	0.18    0.01

### Interference to proposal scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	W16AL	D27	LD	CP	BURLINGTON, VT	BDFCDTT20060313AAM	
Undesireds:	WUNI	D27	DT	APP	MARLBOROUGH, MA	BLANK0000035720	267.7 km
	WNYT	D27	LD	APP	ALBANY, NY	BLANK0000053981	184.2
	WVBG-LP	D27+	LD	APP	GREENWICH, NY	BLANK0000054509	219.2
	WVTB	D28	DT	CP	ST. JOHNSBURY, VT	BLANK0000029682	85.5

Service area	Terrain-limited	IX-free	Percent IX
8036.9    342,772	6595.9    306,751	6571.8    306,284	0.37    0.15
Undesired	Total IX	Unique IX	Pront Unique IX

**JEREMY RUCK & ASSOCIATES, INC.**

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**5.30.2018**

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## Exhibit E-1 - TVStudy Interference Study

WUNI D27 DT APP	1.0	0	0.0	0	0.00	0.00
WNYT D27 LD APP	9.0	429	8.0	429	0.12	0.14
WVBG-LP D27+ LD APP	4.0	0	3.0	0	0.05	0.00
WVTB D28 DT CP	12.1	38	11.1	38	0.17	0.01

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