

DELAWDER COMMUNICATIONS, INC.

P.O. Box 1095
Ashburn, Virginia 20146-1095
(703) 299-9222

ENGINEERING SUPPORTING VIRTUAL CHANNEL 11 REQUEST FOR WMGM-LD

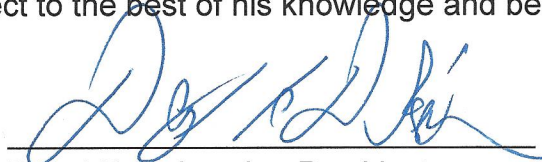
WMGM-LD, Atlantic City, NJ, channel 10 digital (Facility ID 191421) is currently being assigned with virtual channel 21 by the FCC¹. This Engineering Statement supports a request to permit WMGM-LD the use of available channel 11 as its virtual channel.

Figure EE1, attached, lists all primary TV stations located within 200 kilometers of the WMGM-LD channel 10 transmitter site. The virtual channel for each listing is shown in parenthesis. From this list, the only TV stations that use virtual channel 11 within 200 kilometers of the WMGM-LD transmitter site are WPIX(TV), New York, NY (transmitting on channel 11) and WBAL-TV, Baltimore, MD (also transmitting on channel 11). Also, there are no known Class A or LPTV stations within 100 kilometers that use channel 11 as a virtual channel.

Figure EE2, attached, is a map showing the noise-limited 36 dBu F50,90 contours for WPIX(TV) and WBAL-TV. Neither station's noise-limited contour extends into the Atlantic City area.

As demonstrated above, virtual channel 11 is available to WMGM-LD.

The undersigned, whose qualifications are a matter of record before the Commission, hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.



Darryl K. DeLawder, President
DeLawder Communications, Inc.

Date: October 19, 2018

¹ Channel 10 is the virtual channel for WCAU, Philadelphia, PA and is unavailable to WMGM-LD. WMGM-LP (the analog facility of WMGM-LD) is licensed for channel 7. Channel 7 is the virtual channel of WFEF-LD, Philadelphia, PA (transmitting on channel 21) and is unavailable to WMGM-LD.

FIGURE EE1: PRIMARY TV STATIONS WITHIN 200 KM OF WMGM-LD CHANNEL 10 D SITE

NOTE: THE VIRTUAL CHANNEL FOR EACH STATION IS SHOWN IN PARENTHESIS

PAGE 1 OF 4

WDPN-TV	2	(2)	DT	LIC	WILMINGTON	DE US	BLCDDT-20131129AIH	-	1283	9.36 kw	310.8
m 48.36 km	30.05	mi	43.70°	CP	MARANATHA BROADCASTING COMPANY, INC.						
WJLP	3	(33)	DT	CP	MIDDLETOWN TOWNSHIP	NJ US	BPCDDT-20130528AJP	-	86537	6.96 kw	340.2
m 135.50 km	84.19	mi	327.79°	PMCM TV, LLC							
WJLP	3	(33)	DT	LIC	MIDDLETOWN TOWNSHIP	NJ US	- 0000001037	-	86537	6.96 kw	340.2
m 135.50 km	84.19	mi	327.79°	PMCM TV, LLC							
WACP	4	(4)	DT	LIC	ATLANTIC CITY	NJ US	BMLCDDT-20140304AAS	-	189358	10. kw	258.4
m 0.76 km	0.47	mi	339.80°	WESTERN PACIFIC WACP, LLC							
WMDE	5	(36)	DT	LIC	DOVER	DE US	- 0000001038	-	189357	10. kw	145.
m 137.69 km	85.55	mi	128.28°	RNN D.C. LICENSE CO., LLC							
WPVI-TV	6	(6)	DT	LIC	PHILADELPHIA	PA US	BLCDDT-20111019ACJ	-	8616	34. kw	330.
m 48.78 km	30.31	mi	44.06°	ABC, INC.							
WABC-TV	7	(7)	DT	LIC	NEW YORK	NY US	BLCDDT-20121031ABC	-	1328	34. kw	405.
m 134.78 km	83.75	mi	327.58°	AMERICAN BROADCASTING COMPANIES, INC							
WABC-TV	7	(7)	DT	CP MOD	NEW YORK	NY US	BMPCDDT-20080620AMV	-	1328	34. kw	506.
m 130.24 km	80.92	mi	327.48°	AMERICAN BROADCASTING COMPANIES, INC							
WNJB	8	(58)	DT	LIC	NEW BRUNSWICK	NJ US	BLEDT-20110427ABF	-	48457	40.82 kw	218.
m 103.33 km	64.21	mi	343.89°	NEW JERSEY PUBLIC BROADCASTING AUTHORITY							
WGAL	8	(8)	DT	LIC	LANCASTER	PA US	BLCDDT-20110323ABF	-	53930	32.2 kw	419.
m 155.58 km	96.67	mi	76.75°	HEARST PROPERTIES INC.							
WGAL	8	(8)	DT	CP	LANCASTER	PA US	- 0000021206	-	53930	32.2 kw	419.
m 155.58 km	96.67	mi	76.75°	HEARST PROPERTIES INC.							
WGAL	8	(8)	DT	CP	LANCASTER	PA US	- 0000027210	-	53930	32.2 kw	419.
m 155.58 km	96.67	mi	76.75°	HEARST PROPERTIES INC.							
WBPH-TV	9	(60)	DT	LIC	BETHLEHEM	PA US	BLCDDT-20100907AAF	-	60850	80.6 kw	302.
m 105.89 km	65.80	mi	28.08°	SONSHINE FAMILY TELEVISION, INC.							
WHTM-TV	10	(27)	DT	LIC	HARRISBURG	PA US	BLCDDT-20040812AAH	-	72326	16.2 kw	311.1
m 191.28 km	118.86	mi	69.29°	NEXSTAR BROADCASTING, INC.							
WBAL-TV	11	(11)	DT	LIC	BALTIMORE	MD US	BLCDDT-20111102ACP	-	65696	26.6 kw	299.
m 161.35 km	100.26	mi	105.19°	WBAL HEARST TELEVISION INC.							
WJZ-TV	11	(13)	DT	CP MOD	BALTIMORE	MD US	- 0000032917	-	25455	30. kw	305.
m 161.35 km	100.26	mi	105.19°	CBS TELEVISION LICENSES LLC							
WPIX	11	(11)	DT	CP MOD	NEW YORK	NY US	BMPCDDT-20080620ALB	-	73881	5.5 kw	506.
m 130.24 km	80.92	mi	327.48°	WPIX, LLC							
WPIX	11	(11)	DT	LIC	NEW YORK	NY US	BLCDDT-20090911ABN	-	73881	7.5 kw	405.
m 134.78 km	83.75	mi	327.58°	WPIX, LLC							
WBRE-TV	11	(28)	DT	LIC	WILKES-BARRE	PA US	BLCDDT-20051123AJX	-	71225	30. kw	471.
m 183.64 km	114.11	mi	27.97°	NEXSTAR BROADCASTING, INC.							
WHYY-TV	12	(12)	DT	LIC	WILMINGTON	DE US	BLEDT-20110907ADS	-	72338	30. kw	294.
m 48.57 km	30.18	mi	43.91°	WHYY, INC.							
WYOU	12	(22)	DT	CP	SCRANTON	PA US	- 0000028347	-	17010	30. kw	471.
m 183.64 km	114.11	mi	27.97°	MISSION BROADCASTING, INC.							
WJZ-TV	13	(13)	DT	LIC	BALTIMORE	MD US	BLCDDT-20110914AAS	-	25455	33.8 kw	295.
m 161.35 km	100.26	mi	105.19°	CBS TELEVISION LICENSES LLC							
WNET	13	(13)	DT	LIC	NEWARK	NJ US	BLEDT-20090612ADI	-	18795	9.3 kw	405.
m 134.78 km	83.75	mi	327.58°	WNET							

FIGURE EE1: PRIMARY TV STATIONS WITHIN 200 KM OF WMGM-LD CHANNEL 10 D SITE

NOTE: THE VIRTUAL CHANNEL FOR EACH STATION IS SHOWN IN PARENTHESIS

PAGE 2 OF 4

WYOU	13 (22)	DT	LIC	SCRANTON	PA US	BLCDDT-20051123AJU	-	17010	30. kw	471.
m 183.64 km	114.11 mi	27.97°	MISSION BROADCASTING, INC.							
WCPB	16	DT	CP MOD	SALISBURY	MD US	- 0000029877	-	40618	320. kw	154. m
162.47 km	100.95 mi	156.36°	MARYLAND PUBLIC BROADCASTING COMMISSION							
WPHL-TV	17 (17)	DT	LIC	PHILADELPHIA	PA US	BLCDDT-20090918ABV	-	73879	645. kw	324.
m 48.57 km	30.18 mi	43.91°	WPHL, LLC							
WMBC-TV	18 (63)	DT	LIC	NEWTON	NJ US	BLCDDT-20060803AMO	-	43952	1000. kw	250.
m 137.56 km	85.47 mi	336.86°	MOUNTAIN BROADCASTING CORPORATION							
WMBC-TV	18 (63)	DD	LIC	NEWTON	NJ US	BLCDDT-20101130AAX	-	43952	90. kw	0.
m 137.57 km	85.48 mi	336.86°	MOUNTAIN BROADCASTING CORPORATION							
WBOC-TV	21 (16)	DT	LIC	SALISBURY	MD US	BLCDDT-20090618ABK	-	71218	740. kw	279.
m 152.40 km	94.69 mi	152.86°	WBOC, INC.							
WMPT	21 (22)	DT	CP MOD	ANNAPOLIS	MD US	- 0000029874	-	65942	1000. kw	284.
m 171.71 km	106.70 mi	117.19°	MARYLAND PUBLIC BROADCASTING COMMISSION							
WLIW	21 (21)	DT	LIC	GARDEN CITY	NY US	BLEDT-20090612AEP	-	38336	89.9 kw	111.
m 167.00 km	103.77 mi	315.40°	WNET							
WHP-TV	21 (21)	DT	LIC	HARRISBURG	PA US	BLCDDT-20130703ACZ	-	72313	750. kw	369.
m 185.93 km	115.53 mi	67.64°	HARRISBURG LICENSEE, LLC							
WMPB	22 (67)	DT	CP MOD	BALTIMORE	MD US	- 0000029875	-	65944	90. kw	307.
m 169.21 km	105.14 mi	100.04°	MARYLAND PUBLIC BROADCASTING COMMISSION							
WNJS	22 (23)	DT	LIC	CAMDEN	NJ US	BLEDT-20070611AAY	-	48481	197. kw	264.
m 0.00 km	0.00 mi	0.00°	NEW JERSEY PUBLIC BROADCASTING AUTHORITY							
WOLF-TV	22 (56)	DT	CP	HAZLETON	PA US	- 0000027934	-	73375	220. kw	510.
m 183.49 km	114.02 mi	27.89°	NEW AGE MEDIA OF PENNSYLVANIA LICENSE, LLC							
WXBU	23 (15)	DT	LIC	LANCASTER	PA US	BLCDDT-20040922AAC	-	23338	500. kw	381.
m 150.54 km	93.54 mi	66.18°	HSH LANCASTER (WLYH) LICENSEE, LLC							
WNYE-TV	24 (25)	DT	LIC	NEW YORK	NY US	BLEDT-20071228ABM	-	6048	151. kw	309.7
m 135.50 km	84.19 mi	327.79°	NEW YORK CITY DEPT. OF INFO TECHNOLOGY & TELECOMMUNICATIONS							
WTVE	25 (51)	DT	LIC	READING	PA US	BLCDDT-20081117ADZ	-	55305	126. kw	378.4
m 48.36 km	30.05 mi	43.70°	NRJ TV PHILLY LICENSE CO., LLC							
WTVE	25 (51)	DD	LIC	READING	PA US	BLCDDT-20100405ABM	-	55305	0.763 kw	225.3
m 98.77 km	61.37 mi	46.92°	NRJ TV PHILLY LICENSE CO., LLC							
WBFF	26 (45)	DT	CP	BALTIMORE	MD US	- 0000025699	-	10758	420. kw	372.8
m 161.21 km	100.17 mi	105.14°	CHESAPEAKE TELEVISION LICENSEE, LLC							
KYW-TV	26 (3)	DT	LIC	PHILADELPHIA	PA US	BLCDDT-20090326ABH	-	25453	790. kw	375.
m 48.78 km	30.31 mi	44.06°	CBS BROADCASTING INC.							
WMAR-TV	27 (2)	DT	CP	BALTIMORE	MD US	- 0000026796	-	59442	830. kw	307.
m 161.35 km	100.26 mi	105.19°	SCRIPPS BROADCASTING HOLDINGS LLC							
WGTW-TV	27 (48)	DT	LIC	BURLINGTON	NJ US	BLCDDT-20060105AAR	-	7623	160. kw	354.
m 48.36 km	30.05 mi	43.70°	TCCSA, INC., D/B/A TRINITY BROADCASTING NETWORK							
WCPB	28 (28)	DT	LIC	SALISBURY	MD US	BLEDT-20090209AEM	-	40618	132. kw	155.
m 162.47 km	100.95 mi	156.36°	MARYLAND PUBLIC BROADCASTING COMMISSION							
WNBC	28 (4)	DT	LIC	NEW YORK	NY US	BLCDDT-20080409AAM	-	47535	200.2 kw	397.
m 134.78 km	83.75 mi	327.58°	NBC TELEMUNDO LICENSE LLC							
WMPB	29 (67)	DT	LIC	BALTIMORE	MD US	BLEDT-20090330AEX	-	65944	42.6 kw	309.
m 169.21 km	105.14 mi	100.04°	MARYLAND PUBLIC BROADCASTING COMMISSION							
WMDT	29 (47)	DT	CP	SALISBURY	MD US	- 0000027459	-	16455	246. kw	307.
m 156.45 km	97.22 mi	150.29°	MARQUEE BROADCASTING INC.							
WUVP-DT	29 (65)	DT	LIC	VINELAND	NJ US	BLCDDT-20090923ADS	-	60560	335. kw	398.
m 48.36 km	30.05 mi	43.70°	UNIVISION PHILADELPHIA LLC							

FIGURE EE1: PRIMARY TV STATIONS WITHIN 200 KM OF WMGM-LD CHANNEL 10 D SITE

NOTE: THE VIRTUAL CHANNEL FOR EACH STATION IS SHOWN IN PARENTHESIS

PAGE 3 OF 4

WFUT-DT	30 (68)	DT	LIC	NEWARK	NJ US	BLCDDT-20090618ABZ	-	60555	200. kw	429.
m 134.78 km	83.75	mi	327.58°	UNIVISION NEW YORK LLC						
WGCB-TV	30 (49)	DT	LIC	RED LION	PA US	BLCDDT-20050615AAB	-	55350	500. kw	174.2
m 150.16 km	93.31	mi	81.89°	RED LION 49 MEDIA, LLC						
KYW-TV	30 (3)	DT	CP MOD	PHILADELPHIA	PA US	- 0000033618	-	25453	1000. kw	370.8
m 48.78 km	30.31	mi	44.06°	CBS BROADCASTING INC.						
WPPX-TV	31 (61)	DT	LIC	WILMINGTON	DE US	BLCDDT-20031203AFL	-	51984	200. kw	374.
m 48.36 km	30.05	mi	43.70°	ION MEDIA PHILADELPHIA LICENSE, INC.						
WPXN-TV	31 (31)	DT	LIC	NEW YORK	NY US	BLCDDT-20110729AAQ	-	73356	180. kw	360.
m 134.78 km	83.75	mi	327.58°	ION MEDIA LICENSE COMPANY, LLC						
WBOC-TV	32 (16)	DT	CP MOD	SALISBURY	MD US	- 0000033790	-	71218	1000. kw	284.1
m 152.37 km	94.68	mi	152.86°	WBOC, INC.						
WPSG	32 (57)	DT	LIC	PHILADELPHIA	PA US	- 0000001047	-	12499	800. kw	400.
m 48.36 km	30.05	mi	43.70°	PHILADELPHIA TELEVISION STATION WPSG, INC.						
WCBS-TV	33 (2)	DT	LIC	NEW YORK	NY US	BLCDDT-20090612AFN	-	9610	284. kw	397.
m 134.78 km	83.75	mi	327.58°	CBS BROADCASTING INC.						
WCAU	34 (10)	DT	LIC	PHILADELPHIA	PA US	BLCDDT-20090914AAX	-	63153	700. kw	400.1
m 48.36 km	30.05	mi	43.70°	NBC TELEMUNDO LICENSE LLC						
WPPT	35 (35)	DT	LIC	PHILADELPHIA	PA US	BLEDT-20091222ARE	-	28480	450. kw	376.
m 48.36 km	30.05	mi	43.70°	LEHIGH VALLEY PUBLIC TELECOMMUNICATIONS CORP.						
WMGM-TV	36 (40)	DT	LIC	WILWOOD	NJ US	BLCDDT-20060626ABE	-	61111	205. kw	126.5
m 67.35 km	41.85	mi	185.78°	UNIVISION LOCAL MEDIA, INC.						
WGTW-TV	36 (48)	DT	CP	MILLVILLE	NJ US	- 0000026792	-	7623	205. kw	126.5
m 67.35 km	41.85	mi	185.78°	TCCSA, INC., D/B/A TRINITY BROADCASTING NETWORK						
WCBS-TV	36 (2)	DT	CP MOD	NEW YORK	NY US	- 0000033867	-	9610	548. kw	520.
m 130.24 km	80.92	mi	327.48°	CBS BROADCASTING INC.						
WMAR-TV	38 (2)	DT	LIC	BALTIMORE	MD US	BLCDDT-20090619ACA	-	59442	1000. kw	312.
m 161.35 km	100.26	mi	105.19°	SCRIPPS BROADCASTING HOLDINGS LLC						
WLVT-TV	39 (39)	DT	LIC	ALLENTOWN	PA US	BLEDT-20090605ABD	-	36989	52. kw	295.
m 105.85 km	65.77	mi	28.39°	LEHIGH VALLEY PUBLIC TELECOMMUNICATIONS CORP.						
WNUV	40 (54)	DT	LIC	BALTIMORE	MD US	BMLCDDT-20110131ASB	-	7933	845. kw	372.8
m 161.21 km	100.17	mi	105.14°	BALTIMORE (WNUV-TV) LICENSEE, INC.						
WXTV-DT	40 (41)	DT	LIC	PATERSON	NJ US	BLCDDT-20050214AGS	-	74215	300. kw	421.
m 134.78 km	83.75	mi	327.58°	WXTV LICENSE PARTNERSHIP, G.P.						
WUTB	41 (24)	DT	LIC	BALTIMORE	MD US	BLCDDT-20100809CHT	-	60552	290. kw	313.
m 171.93 km	106.83	mi	105.98°	DEERFIELD MEDIA (BALTIMORE) LICENSEE, LLC						
WMPT	42 (22)	DT	LIC	ANNAPOLIS	MD US	BLEDT-20100813BHC	-	65942	516. kw	290.
m 171.71 km	106.70	mi	117.19°	MARYLAND PUBLIC BROADCASTING COMMISSION						
WTFX-TV	42 (29)	DT	LIC	PHILADELPHIA	PA US	BLCDDT-20120511ADN	-	51568	620. kw	343.
m 48.40 km	30.07	mi	43.96°	FOX TELEVISION STATIONS, LLC						
WNJT	43 (52)	DT	LIC	TRENTON	NJ US	BLEDT-20110427ABE	-	48465	59.4 kw	266.
m 63.05 km	39.18	mi	347.76°	NEW JERSEY PUBLIC BROADCASTING AUTHORITY						
WDPB	44 (64)	DT	LIC	SEAFORD	DE US	BLEDT-20050624AAK	-	72335	98. kw	196.
m 136.42 km	84.77	mi	150.77°	WHYY, INC.						
WMCN-TV	44 (44)	DT	LIC	ATLANTIC CITY	NJ US	BLCDDT-20060707ACS	-	9739	200. kw	212.
m 0.00 km	0.00	mi	0.00°	RNN PHILLY LICENSE CO., LLC						
WNYW	44 (5)	DT	LIC	NEW YORK	NY US	BLCDDT-20080618AOC	-	22206	990. kw	367.
m 134.78 km	83.75	mi	327.58°	FOX TELEVISION STATIONS, LLC						
WNYW	44 (5)	DT	CP	NEW YORK	NY US	BPCDDT-20110718AAP	-	22206	500. kw	424.
m 134.78 km	83.75	mi	327.58°	FOX TELEVISION STATIONS, LLC						

FIGURE EE1: PRIMARY TV STATIONS WITHIN 200 KM OF WMGM-LD CHANNEL 10 D SITE

NOTE: THE VIRTUAL CHANNEL FOR EACH STATION IS SHOWN IN PARENTHESIS

PAGE 4 OF 4

WOLF-TV	45 (56)	DT	LIC	HAZLETON	PA US	- 0000011051	-	73375	420. kw	488.
m 183.49 km	114.02	mi	27.89°	NEW AGE MEDIA OF PENNSYLVANIA LICENSE, LLC						
WBFF	46 (45)	DT	LIC	BALTIMORE	MD US	BLCDDT-20110131ASE	-	10758	655. kw	372.8
m 161.21 km	100.17	mi	105.14°	CHESAPEAKE TELEVISION LICENSEE, LLC						
WFMZ-TV	46 (69)	DT	LIC	ALLENTOWN	PA US	BMLCDDT-20111230AAF	-	39884	800. kw	331.
m 105.85 km	65.77	mi	28.39°	MARANATHA BROADCASTING COMPANY, INC.						
WFMZ-TV	46 (69)	DD	LIC	ALLENTOWN	PA US	- 0000001524	-	39884	0. kw	0.
m 48.78 km	30.31	mi	44.06°	MARANATHA BROADCASTING COMPANY, INC.						
WMDT	47 (47)	DT	LIC	SALISBURY	MD US	BLCDDT-20090319ADC	-	16455	350. kw	307.
m 156.45 km	97.22	mi	150.29°	MARQUEE BROADCASTING INC.						
WPMT	47 (43)	DT	LIC	YORK	PA US	BMLCDDT-20041025ABI	-	10213	933. kw	385.
m 153.86 km	95.60	mi	76.88°	WPMT, LLC						
WWSI	49 (62)	DT	LIC	ATLANTIC CITY	NJ US	BLCDDT-20131210CEO	-	23142	860. kw	279.
m 0.76 km	0.47	mi	339.80°	NBC TELEMUNDO LICENSE LLC						
WNEP-TV	50 (16)	DT	LIC	SCRANTON	PA US	BMLCDDT-20120410ABT	-	73318	500. kw	517.
m 183.49 km	114.02	mi	27.91°	LOCAL TV PENNSYLVANIA LICENSE, LLC						
WNJN	51 (16)	DT	LIC	MONTCLAIR	NJ US	BLEDT-20061121ADG	-	48477	200. kw	233.
m 137.56 km	85.47	mi	336.86°	NEW JERSEY PUBLIC BROADCASTING AUTHORITY						

*** TV Records within 200.00 km distance of 39° 43' 41.00" N, 74° 50' 38.00" W ***

[Return to TV Query Data Entry screen](#)

**FIGURE EE2: MAP SHOWING WPIX(TV) & WBAL-TV's
NOISE-LIMITED (36 DBU F50,90) CONTOURS**

