

**CP Mod Engineering Statement
Displacement Application
WTXF-TV DRT Philadelphia, PA
Channel 25**

WTXF-TV (DRT) currently holds a construction permit to operate on channel 25 after being displaced from channel 38 due to the now concluded Incentive Auction and the resulting spectrum repacking. The antenna pattern listed in the current construction permit is a replication of the licensed channel 38 WTXF-TV (DRT) antenna pattern. However, it was not possible to construct an antenna that would replicate the channel 38 pattern, fit within the available tower aperture and provide the required protection to other authorized stations. In view of that, this application requests a change in the antenna parameters and a power reduction from 14.6 kW to 10.2 kW in order to satisfy the tower aperture availability and provide the required interference protections. The proposed facility will not cause any new interference to other stations beyond the de minimis limit. A copy of the TVStudy interference analysis showing compliance is attached.