

Technical Summary

WHPX-TV New London, Connecticut Channel 28 500 kW 504.83 (HAAT)

ION Media Hartford License, Inc. ("ION") licensee of television station WHPX-TV, Facility ID 51980, New London Connecticut (the "Station") hereby amends its pending construction permit application seeking authority to relocate its transmitter from the currently authorized site to a site that will accommodate post-repack operations (FCC LMS File No. 0000063882).

This application is necessary because ION does not have access to its current tower for post-repack operations. Following the Commission's assignment of post-repack facilities to WHPX-TV, ION was unable to reach accommodation with the tower landlord that would permit the station to continue operating from its current site. This forced ION to identify a new site for the station's post-repack operations.

Before selecting the proposed tower location, ION performed an analysis of available tower sites in the New London and nearby Hartford markets. In the immediate vicinity of the current tower site, ION's market analysis found no acceptable alternatives that would provide equivalent interference-free coverage as compared to the Station's pre-auction or authorized post-auction facilities. In order to obtain a site with adequate coverage and to avoid interference with other broadcast stations, ION searched in areas to the northwest of its current site and closer to the city of Hartford. ION determined that only the proposed tower site would allow ION to achieve comparable coverage with minimal or no interference to other broadcast stations.

The new tower is located 61.8 kilometers to the northwest of the current site. Accordingly, the Station's proposed noise limited service contour ("NLSC") will shift to the northwest, resulting in some areas of service gain and loss. Figure 1 shows the loss area and the stations predicted to serve the loss areas using the Commission's standard prediction methodology. Under this analysis, the total size of the WHPX-TV loss area would be 1,095,983 persons over an area of 6,030.6 sq. km. WHPX-TV also would have a gain area of 2,065,300 persons and 13,878.7 sq. km. Thus, under the Commission's traditional counter prediction methodology, WHPX-TV would have a net gain area of 969,317 persons and 7,848.1 sq. km.

WHPX-TV currently provides an over-the-air signal to 4,832,166 persons in its service area, so the predicted service gain using 50/90 curves would represent approximately 20.1% of WHPX-TV's service population.

Figure 1 also demonstrates that the Commission's 50/90 curves predict that all of the loss area would remain well served by 5 or more over-the-air full-power television stations.

Two additional points should be considered in analyzing the proposed contour shift. First, the majority of the loss area is over water, where viewers cannot pick up the station's signal; the gain area contains corresponding increases in land coverage. Second, the service loss area over land is located in the Providence and Boston DMAs, where ION already has licensed television stations. Thus, most, if not all, of WHPX-TV's loss area will continue to be served by another ION over-the-air signal that is licensed to the DMA in which the relevant viewers live.

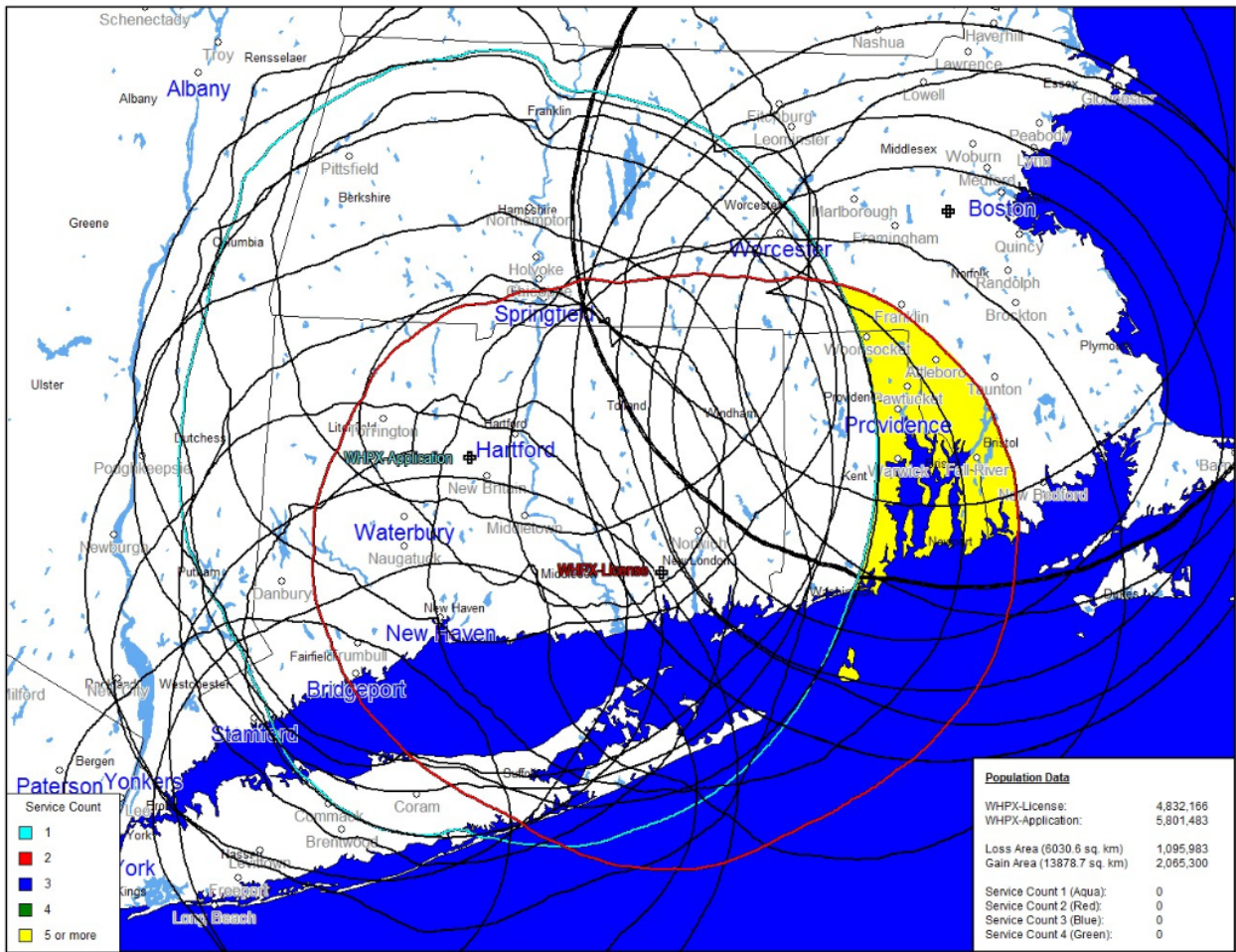
ION has reviewed the impact of this application on low power and Class A television stations in the Hartford DMA. The application does not create harmful interference to any low-power television station that participated in the post-auction displacement window that occurred in 2018.

ION's proposed relocation of WHPX-TV is in the public interest and should be granted. ION's pre-repack tower site is unavailable for post-repack operations, and the current proposal is ION's best solution to implementing its reassignment to Channel 28. Given the loss of its current tower site, grant of authority to construct at the proposed location is necessary to ensure that ION can timely complete construction of the station's facilities by the August 2, 2019 Phase 4 transition deadline. Second, ION proposes technical facilities that will lead to a substantial net service area gain, primarily by replacing areas of its contour that currently are over the Atlantic Ocean and Long Island Sound with service areas over land. Third, the requested tower site change is necessary for WHPX-TV to continue serving the vast majority of its viewers in the Hartford market. Indeed, the proposed change will result in ION continuing to provide service to all of its viewers in the Hartford DMA that currently receive the station's signal over the air, while permitting ION to serve areas in the western portion of the Hartford DMA that previously did not receive an over-the-air signal from WHPX-TV. Fourth, as a practical matter, very few viewers are likely to lose access to the programming available on WHPX-TV. ION network programming also will remain available throughout the loss area both over-the-air from ION's

Boston and Providence stations, and from area cable and satellite providers, which currently provide service to well over 90% of the television households in the loss area.

For the foregoing reasons, WHPX-TV requests that the staff promptly grant this Construction Permit Modification, as hereby amended. If the application is not granted, ION's ability to complete its transition to Channel 28 operations before the close of Phase 4 will be jeopardized.

Figure 1



Tabulation of other NLSC Services Available to WHPX-TV Loss

Call Sign	License	Channel	Community of License	State
WEDN-D	LI	9	Norwich	CT
WPXQ-TV	LI	17	Block Island	RI
WFTY-DT	LI	23	Smithtown	NY
WTIC-TV	LI	31	Hartford	CT
WTNH-D	LI	10	New Haven	CT
WVIT-D	LI	35	New Britain	CT
WCTX-D	LI	39	New Haven	CT
WNAC-TV	LI	12	Providence	RI
WPRI-TV	LI	13	Providence	RI
WLNY-TV	LI	47	RIVERhead	NY
WFSB-D	LI	33	Hartford	CT
WZME-D	LI	49	Bridgeport	CT
WUNI-D	LI	27	Marlborough	MA
WUVN-D	LI	47	Hartford	CT
WEDW-D	LI	49	Bridgeport	CT
WEDY-D	LI	41	New Haven	CT
WLWC-D	LI	17	New Bedford	MA
WSBE-TV	LI	21	Providence	RI
WWDP-D	LI	10	Norwell	MA
WWLP-D	LI	11	Springfield	MA
WGBY-TV	LI	22	Springfield	MA
WLIW-D	LI	21	Garden City	NY
WGBH-TV	LI	19	Boston	MA
WBZ-TV	LI	30	Boston	MA
WCVB-TV	LI	20	Boston	MA
WLNE-TV	LI	49	New Bedford	MA
WJAR-D	LI	50	Providence	RI

***Current Licensed Authorization**