

Technical Summary Exhibit

WIPL(TV) Lewiston Maine Channel 24 16.0 kW 542.25 (HAAT)

ION Media License Company, LLC ("ION") licensee of television station WIPL(TV), Facility ID 48408, Lewiston, Maine (the "Station") submits this Construction Permit Modification application to allow it to relocate its transmitter from the currently authorized site (File Number 0000026108) to a site that will accommodate post-repack operations.

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 WIPL(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 Portland market. 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. ION determined that the proposed tower site, which is the tallest in the area, was the closest site that would provide comparable coverage with minimal or no interference to other broadcast stations.

The new tower is located 34 kilometers to the west of the current site. Accordingly, the Station's proposed noise limited service contour ("NLSC") will shift to the west, creating areas of service gain and loss. Figure 1 shows the loss area and the number of stations predicted to serve the loss areas using the Commission's standard prediction methodology. Under this analysis, the total size of the WIPL(TV) loss area would be 45,932 persons over an area of 1,753.9 sq. km. WIPL(TV) also would have a gain area of 215,755 persons and 6,752.5 sq. km. Thus, under the Commission's traditional contour prediction methodology, WIPL(TV) will have a net gain area of 169,823 persons and 4,999 sq. km. WIPL(TV) currently provides an over-the-air signal to 673,507 persons in its service area, so the predicted service gain using 50/90 curves represents approximately 25% of WIPL(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. Moreover, about half 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.

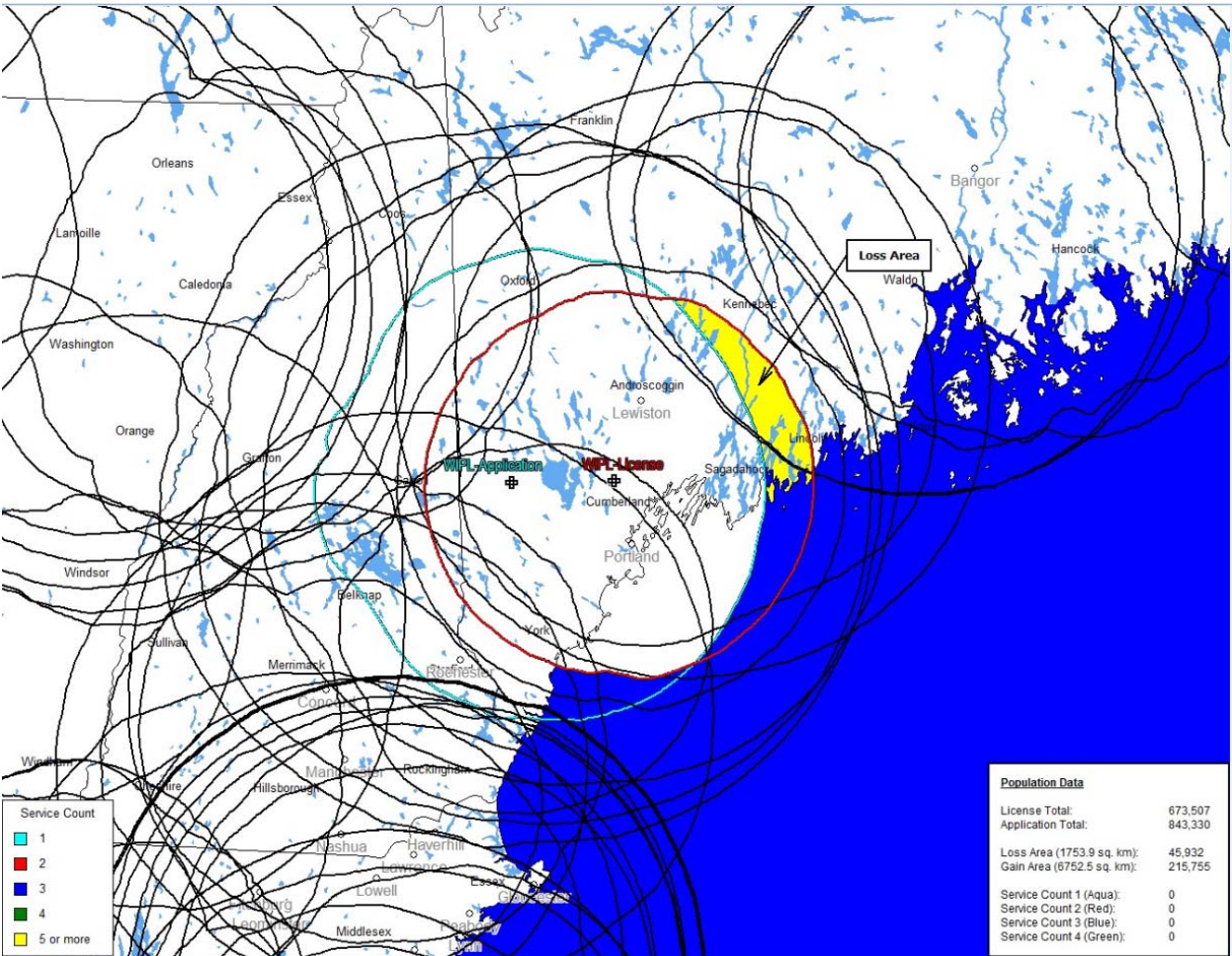
ION has reviewed the impact of this application on low power and Class A television stations in the Portland DMA. The application does not create harmful interference to any low-power television station that participated in the post-auction displacement window that occurred in 2018.

ION's 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 24. 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 June 21, 2019 Phase 3 transition deadline. Second, ION proposes technical facilities that will lead to a significant net service area gain,¹ in part by replacing areas of its contour that currently are over the Atlantic Ocean with service areas over land. Third, the requested tower site change is necessary for WIPL(TV) to continue serving the vast majority of its viewers in the Portland market. Fourth, as a practical matter, very viewers are likely to lose access to the programming available on WIPL(TV). ION network programming will remain from area cable and satellite providers throughout the loss area, which currently provide service to approximately 85% of the viewers in the loss area.

For the foregoing reasons, WIPL(TV) requests that the staff promptly grant this Construction Permit Modification. If the application is not granted, ION's ability to complete its transition to Channel 24 operations before the close of Phase 3 will be jeopardized.

¹ Moreover, standing alone, WIPL(TV)'s service loss area, which represents less than 7% of WIPL(TV)'s current service population, is only slightly larger than the 5% service loss that the Commission permitted when it approved initial post-repack construction permit applications that did not expand service in any direction. See Incentive Auction Task Force and Media Bureau Announce Procedures for the Post-Incentive Auction Broadcast Transition, Public Notice, 32 FCC Rcd 858 (2017); 47 CFR § 73.3700(b)(1)(v)(A)-(C). Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, Report and Order, 29 FCC Rcd 6567, 6792 para. 551 (2014), *aff'd*, *Nat'l Assn. of Broadcasters, et al v. FCC*, 789 F.3d 165 (D.C. Cir. 2015).

Figure 1



Tabulation of other NLSC Services Considered

<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>State</u>
WABI-TV	13	Bangor	ME
WBPX-TV	32	Boston	MA
WBZ-TV	30	Boston	MA
WCAX-TV	22	Burlington	VT
WCBB-D	10	Augusta	ME
WCFE-TV	38	Plattsburgh	NY
WCSH-D	44	Portland	ME
WCVB-TV	20	Boston	MA
WEDN-D	9	Norwich	CT
WEKW-TV	49	Keene	NH
WENH-TV	11	Durham	NH
WETK-D	32	Burlington	VT
WFFF-TV	43	Burlington	VT
WFXT-D	31	Boston	MA
WGBH-TV	19	Boston	MA
WGBX-TV	43	Boston	MA
WGBY-TV	22	Springfield	MA
WGGB-TV	40	Springfield	MA
WGME-TV	38	Portland	ME
WHDH-D	42	Boston	MA
WJAR-D	50	Providence	RI
WLBZ-D	2	Bangor	ME
WLED-TV	48	Littleton	NH
WLNE-TV	49	New Bedford	MA
WMEA-TV	45	Biddeford	ME
WMEB-TV	9	Orono	ME
WMED-TV	10	Calais	ME
WMTW-D	8	Poland Spring	ME
WMUR-TV	9	Manchester	NH
WNAC-TV	12	Providence	RI
WNEU-D	34	Merrimack	NH
WPFO-D	23	Waterville	ME
WPRI-TV	13	Providence	RI
WPTZ-D	14	Plattsburgh	NY
WPXG-TV	33	Concord	NH
WPXQ-TV	17	Newport	RI
WPXT-D	43	Portland	ME
WSBE-TV	21	Providence	RI
WSBK-TV	39	Boston	MA
WUNI-D	27	Marlborough	MA
WUTF-TV	29	Worcester	MA
WVER-D	9	Rutland	VT

WVII-TV	7	Bangor	ME
WVNY-D	13	Burlington	VT
WVTA-D	24	Windsor	VT
WVTB-D	18	St. Johnsbury	VT
WWDP-D	10	Norwell	MA
WWLP-D	11	Springfield	MA

***Licensed Authorization**