

Technical Summary

WPXR-TV Roanoke, Virginia Channel 27 609 kW 623.6 (HAAT)

ION Media License Company, LLC (“ION”) licensee of television station WPXR-TV, Facility ID 70251, Roanoke, Virginia (the “Station”) hereby submits modification to 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. 0000034915).

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 WPXR-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 Roanoke market. Fortunately, ION was able to acquire an acceptable alternative in the immediate vicinity of the current tower site that will allow ION to achieve comparable coverage with minimal or no interference to other broadcast stations.

The new tower is located less than one kilometer from the current site. Although the transmitter sites are in close proximity, the Station’s proposed noise limited service contour (“NLSC”) results 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 WPXR-TV loss area would be 19,910 persons over an area of 424.53 sq. km. WPXR-TV also would have a gain area of 94,915 persons and 4,129.4 sq. km. Thus, under the Commission’s traditional counterprediction methodology, WPXR-TV would have a net gain area of 75,005 persons and 3,704.87 sq. km. WPXR-TV currently provides an over-the-air signal to 1,300,783 persons in its service area, so the predicted service gain using 50/90 curves would represent approximately 5.8% of WPXR-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.

The Commission's 50/90 curves also predict that, within the gain area, following construction of all repack facilities in this market, 2,668 persons would receive 4 services. See Figure 2. If this application is approved, WPXR-TV would add an additional service for persons in these areas, with the result that all of the gain area would be served by 5 or more services. See Figure 3.

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

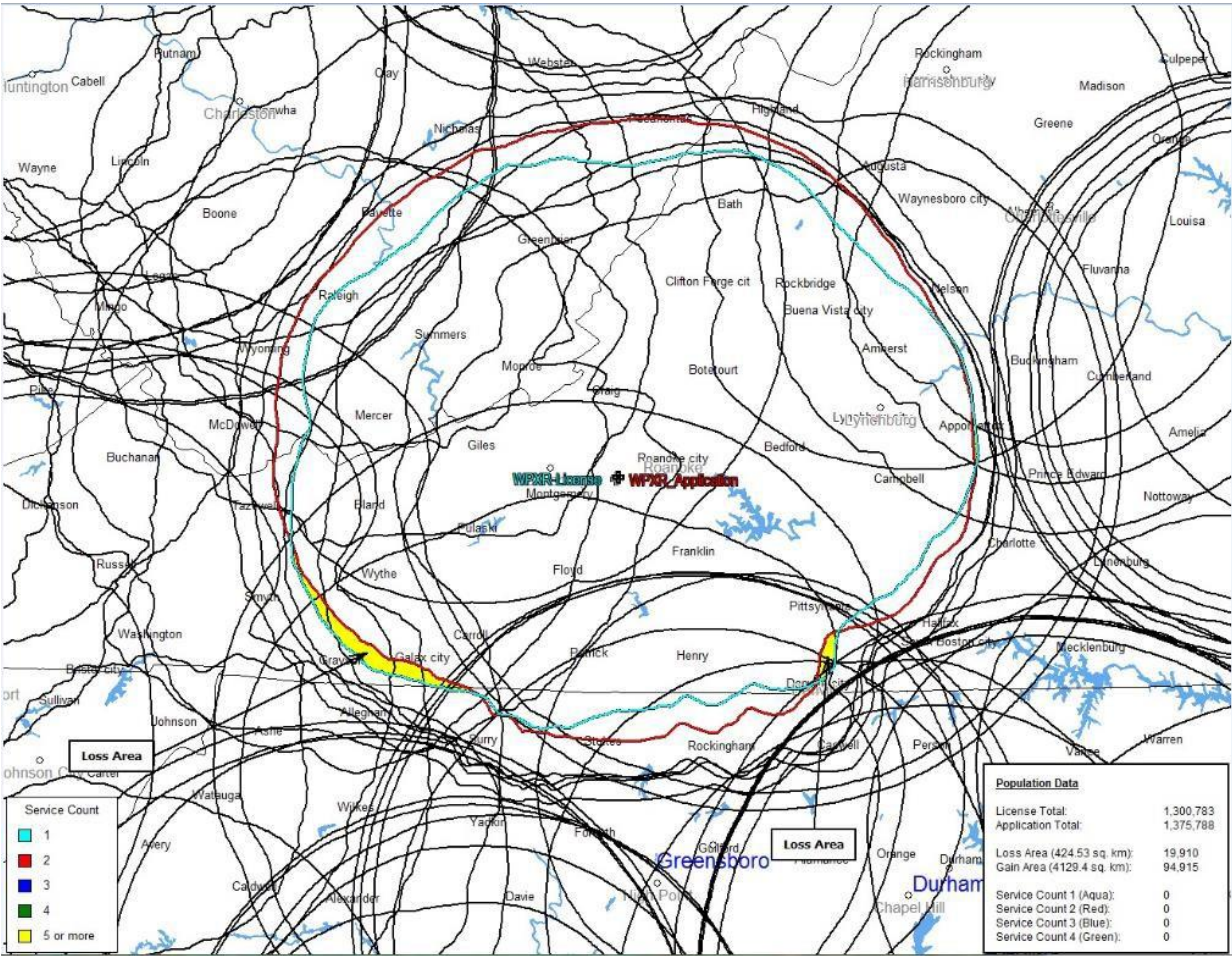
ION's pre-repack tower site is unavailable for post-repack operations, and the current proposal is ION's best solution to implementing its reassignment to Channel 27. Given the loss of its current tower site, grant of authority to construct at the proposed location is necessary to ensure that ION can timely complete construction of the station's facilities by the September 6, 2019 Phase 5 transition deadline. Second, the loss area proposed by ION, when considered on its own, is well within the 5% tolerance the Commission adopted for initial post-repack construction permit applications that propose to serve fewer viewers than their pre-repack or initially allotted post-auction facilities.¹ Third, the requested tower site change is necessary for WPXR-TV to continue serving the vast majority of its viewers in the Roanoke market. Fourth, as a practical matter, very few viewers are likely to lose access to the programming available on WPXR-TV. ION network programming will remain available on area cable and satellite providers throughout the loss area, and approximately 85% of the viewers in the loss area subscribe to one of such services.

For the foregoing reasons, WPXR-TV requests that the staff promptly grant this Construction Permit Modification, as hereby amended. If the application is not granted, ION's

¹ 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 Assoc. of Broadcasters, et al v. FCC, 789 F.3d 165 (D.C. Cir. 2015). While this allowance applied only to stations that did not propose to expand their contour in any direction, the fact is that the loss area here is less than what the Commission recently considered an acceptable service loss for repack stations.

ability to complete its transition to Channel 27 operations before the close of Phase 5 will be jeopardized.

Figure 1



Tabulation of other NLSC Services Considered

<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>State</u>
WAXN-TV	50	Kannapolis	NC
WBOY-TV	12	Clarksburg	WV
WBRA-TV	3	Roanoke	VA
WBTB-D	23	Charlotte	NC
WCAV-D	19	Charlottesville	VA
WCCB-D	27	Charlotte	NC
WCHS-TV	29	Charleston	WV
WCNC-TV	22	Charlotte	NC
WCVB-TV	42	Richmond	VA
WCVW-D	44	Richmond	VA
WCYB-TV	5	Bristol	VA
WDBJ-D	18	Roanoke	VA
WDTV-D	5	Weston	WV
WEMT-D	38	Greeneville	TN
WETP-TV	41	Sneedville	TN
WFMY-TV	51	Greensboro	NC
WFXR-D	17	Roanoke	VA
WGHP-D	35	High Point	NC
WGPT-D	36	Oakland	MD
WGPX-TV	14	Burlington	NC
WHSV-TV	20	Harrisonburg	VA
WHTJ-D	46	Charlottesville	VA
WJHL-TV	11	Johnson City	TN
WJZY-D	47	Belmont	NC
WKAS-D	26	Ashland	KY
WKHA-D	16	Hazard	KY
WKPI-TV	24	Pikeville	KY
WKPT-TV	27	Kingsport	TN
WLFB-D	40	Bluefield	WV
WLFL-D	27	Raleigh	NC
WLPX-TV	39	Charleston	WV
WMYV-D	33	Greensboro	NC
WNCN-D	17	Goldsboro	NC
WNPB-TV	33	Morgantown	WV
WNSC-TV	15	Rock Hill	SC
WOAY-TV	50	Oak Hill	WV
WOUB-TV	27	Athens	OH
WOWK-TV	13	Huntington	WV
WQCW-D	17	Portsmouth	OH
WRAL-TV	48	Raleigh	NC
WRAZ-D	49	Raleigh	NC
WRDC-D	28	Durham	NC

WRIC-TV	22	Petersburg	VA
WRLH-TV	26	Richmond	VA
WRPX-TV	15	Rocky Mount	NC
WSAZ-TV	23	Huntington	WV
WSET-TV	13	Lynchburg	VA
WSLS-TV	30	Roanoke	VA
WSOC-TV	34	Charlotte	NC
WSPA-TV	7	Spartanburg	SC
WSWP-TV	10	Grandview	WV
WTAP-TV	49	Parkersburg	WV
WTSE-D	44	Ashland	KY
WTVB-D	11	Durham	NC
WTVI-D	11	Charlotte	NC
WTVR-TV	25	Richmond	VA
WUNC-TV	25	Chapel Hill	NC
WUNE-TV	17	Linville	NC
WUNG-TV	44	Concord	NC
WUNK-TV	23	Greenville	NC
WUNL-TV	32	Winston-Salem	NC
WUNP-TV	36	Roanoke Rapids	NC
WUNU-D	31	Lumberton	NC
WUPV-D	47	Ashland	VA
WUVC-DT	38	Fayetteville	NC
WVAH-TV	19	Charleston	WV
WVFX-D	10	Clarksburg	WV
WVIR-TV	32	Charlottesville	VA
WVNS-TV	8	Lewisburg	WV
WVPB-TV	34	Huntington	WV
WVVA-D	46	Bluefield	WV
WWBT-D	12	Richmond	VA
WWCW-D	20	Lynchburg	VA
WXII-TV	31	Winston-Salem	NC
WXLV-TV	29	Winston-Salem	NC
WYMT-TV	12	Hazard	KY

***Licensed Authorization**

Figure 2

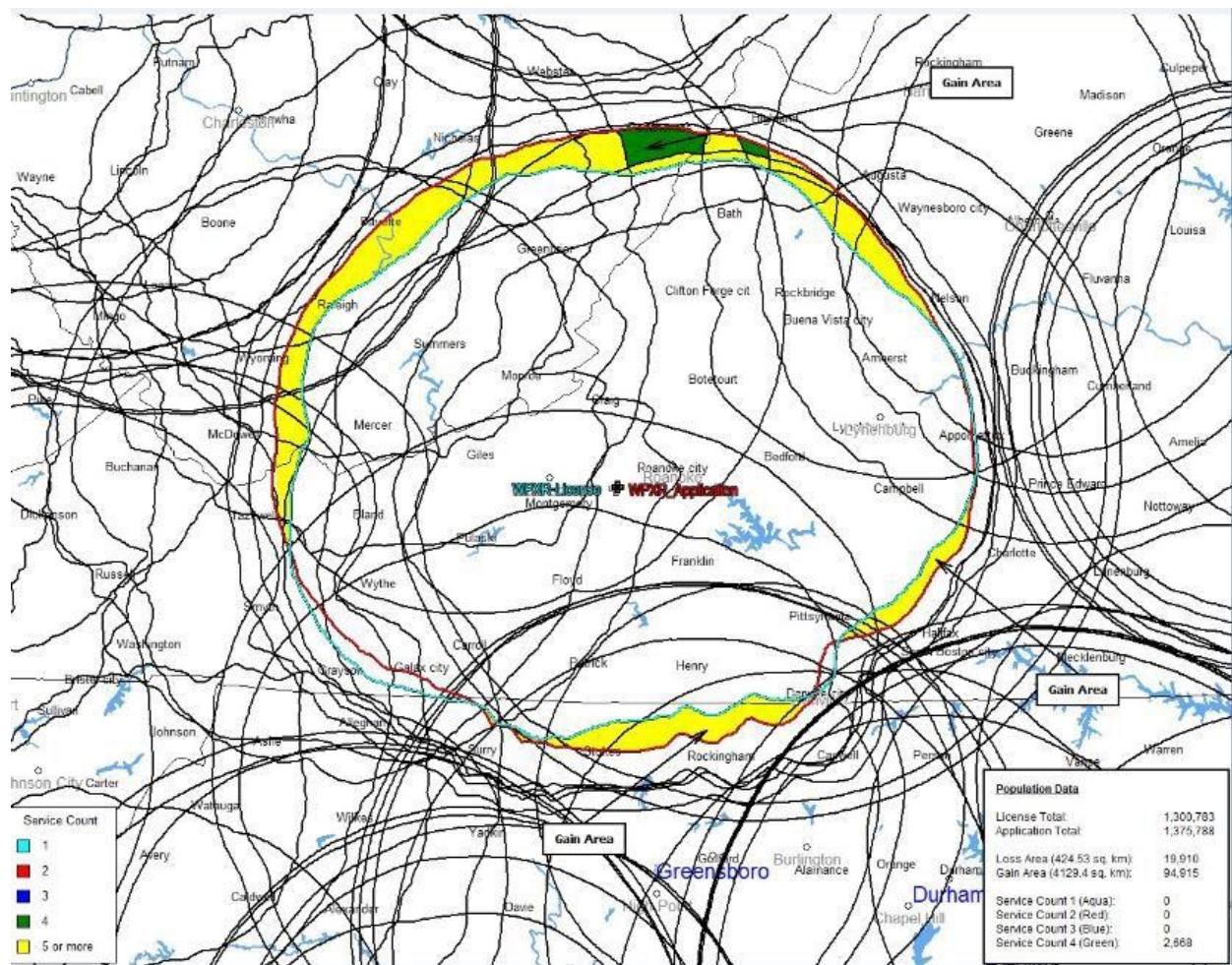


Figure 3

