

TECHNICAL SUMMARY

TELEVISION STATION WRAL-TV RALEIGH, NORTH CAROLINA CHANNEL 17 833.7 KW (H), 314.8 KW (V) 625 M HAAT

1. The instant application is for a modification of construction permit for WRAL-TV, Raleigh, NC (Channel 17).^{*} By means of this application the authorized effective radiated power (ERP) of WRAL-TV will be decreased to 833.7 kW. There are minor adjustments to the proposed WRAL-TV facility to account for the slight change in the proposed antenna system.

2. The proposed facility is compliant with the ‘largest station in the market’ provision of Section 73.622(f)(5) of the FCC Rules. It is proposed to operate on Channel 17 with a nominal non-directional ERP of 833.7 kW and an antenna height above average terrain (HAAT) of 625 meters. These facilities exceed the normal maximum permissible facilities specified in Section 73.622(f)(8)(i) of the FCC Rules. However, the proposed facilities have been calculated in accordance with the largest station provision of Section 73.622(f)(5) of the FCC Rules. Specifically, the largest station in the Raleigh-Durham (Fayetteville) market is WTVD(TV), Durham, NC, Channel 11, which is licensed to provide noise-limited 36 dBu, f(50,90) service to an area of 51,700 square kilometers.[†] The proposed WRAL-TV operation is predicted to provide noise-limited 41 dBu, f(50,90) service to an area of 45,310 square kilometers.[‡] Therefore, the proposed WRAL-TV facility is compliant with the largest station provision of the FCC Rules.

3. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC’s *TVStudy* analysis are attached hereto as an exhibit.

^{*} See FCC File No. 0000034032.

[†] WTVD is licensed for operation with a non-directional ERP of 45 kW and an antenna HAAT of 615 m.

[‡] Clarification of the largest station provision is provided in the *Report and Order and Further Notice of Proposed Rule Making* in MM Docket No. 00-39 at paragraphs 73-74.