

Technical Summary
WWPX-TV Martinsburg, WV
Channel 13 4.2 kW 327.53 (HAAT)

ION Media Martinsburg License, Inc. ("ION") licensee of television station WWPX-TV, Facility ID 23264, Martinsburg, West Virginia (the "Station") submits this Construction Permit Modification application to allow it to relocate its transmitter from the currently authorized site (FCC LMS File No. 0000034933) 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 WWPX-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 a comprehensive analysis of available tower sites in the Washington market. Due to the market's geographic limitations, ION faced significant challenges in finding an alternate site that would accommodate the Station's broadcast operations. However, ION was able to identify an acceptable tower site approximately 32 kilometers to the southeast of the current authorized site that would provide comparable coverage without causing impermissible interference to other television stations.

The Station's proposed move to the new transmitter location will result in some coverage loss area due to geographic challenges. Using the Commission's standard 50/90 prediction methodology, ION analyzed the pre-repack Noise Limited Service Contour (NLSC) licensed facilities of nearby full power television stations which overlap that of the proposed WWPX-TV facilities. As depicted by Figure 1, the vast majority of the loss area would continue to be served by 5 or more stations. However, the 50/90 analysis indicates that 19,265 persons in the predicted WWPX-TV loss area would be in areas that would continue to be served by between 1 and 4 stations.

ION also used the 50/90 curves to analyze the authorized post-repack NLSC construction permit authorizations of nearby full power television stations which overlap that of the proposed WWPX-TV facilities. As depicted by Figure 2, this analysis indicates that, once the permitted stations are operating, the WWPX-TV loss area would continue to have areas served by fewer than five stations. However, the analysis indicates that, post-repack, all areas would be served by 2 or more services. Moreover, the analysis indicates that, post-repack, where there are fewer

than 3 services, the loss of over-the-air service in the WWPX-TV loss area would be reduced to just 5,171 persons.

The 50/90 curves also predict an overall service area loss of 1,611,822 persons spread over 13,392.1 sq. km, which amounts to about 41% as compared with the station's current predicted service population. That predicted service loss is illusory, however, because the unique topography of WWPX-TV's service area significantly limits the number of persons that can receive the station's signal today.¹ Using the Longley-Rice Propagation Model to compare pre- and post-tower move population impact ("Longley-Rice") indicates that today, WWPX-TV serves approximately 2,138,746 persons, which is only a little more than half of its 50/90 curve predicted service population of 3,897,095 persons. Following construction of the station's proposed facilities, WWPX-TV service population will grow to 2,663,995, a net *gain* of 525,249 persons.

ION has also reviewed the impact of this application on low power television stations in the Washington DMA. This application does not expand the station NLSC, therefore, no impact to any low powers television stations is anticipated.

ION's proposed relocation of WWPX-TV is in the public interest and should be granted. First, 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 13. 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 May 1, 2020 Phase 9 transition deadline. Second, the requested tower site change is necessary for WWPX-TV to continue serving the vast majority of its viewers in the Washington market. Third, as a practical matter, very few viewers are likely to lose access to the programming available on WWPX-TV. ION network programming will remain available on area cable and satellite providers throughout the loss area, and approximately 92% of the viewers in the loss area subscribe to one of such services.

For the foregoing reasons, WWPX-TV requests that the staff promptly grant this Construction Permit Modification, as herby amended. If the application is not granted, ION's ability to complete its transition to Channel 13 operations before the close of Phase 9 may be jeopardized.

¹ WWPX-TV's community of license is located in a mountainous region of West Virginia known as the "Ridge-and-Valley Appalachians." This is a portion of the Appalachian mountain chain that forms an arc between the Blue Ridge Mountains and the Appalachian Plateau. The area is characterized by long, even ridges, with long, continuous valleys in between. These natural features block the station's signal from reception in homes beyond the ridges formed by these mountains, which dramatically restricts WWPX-TV's actual signal

Figure 1

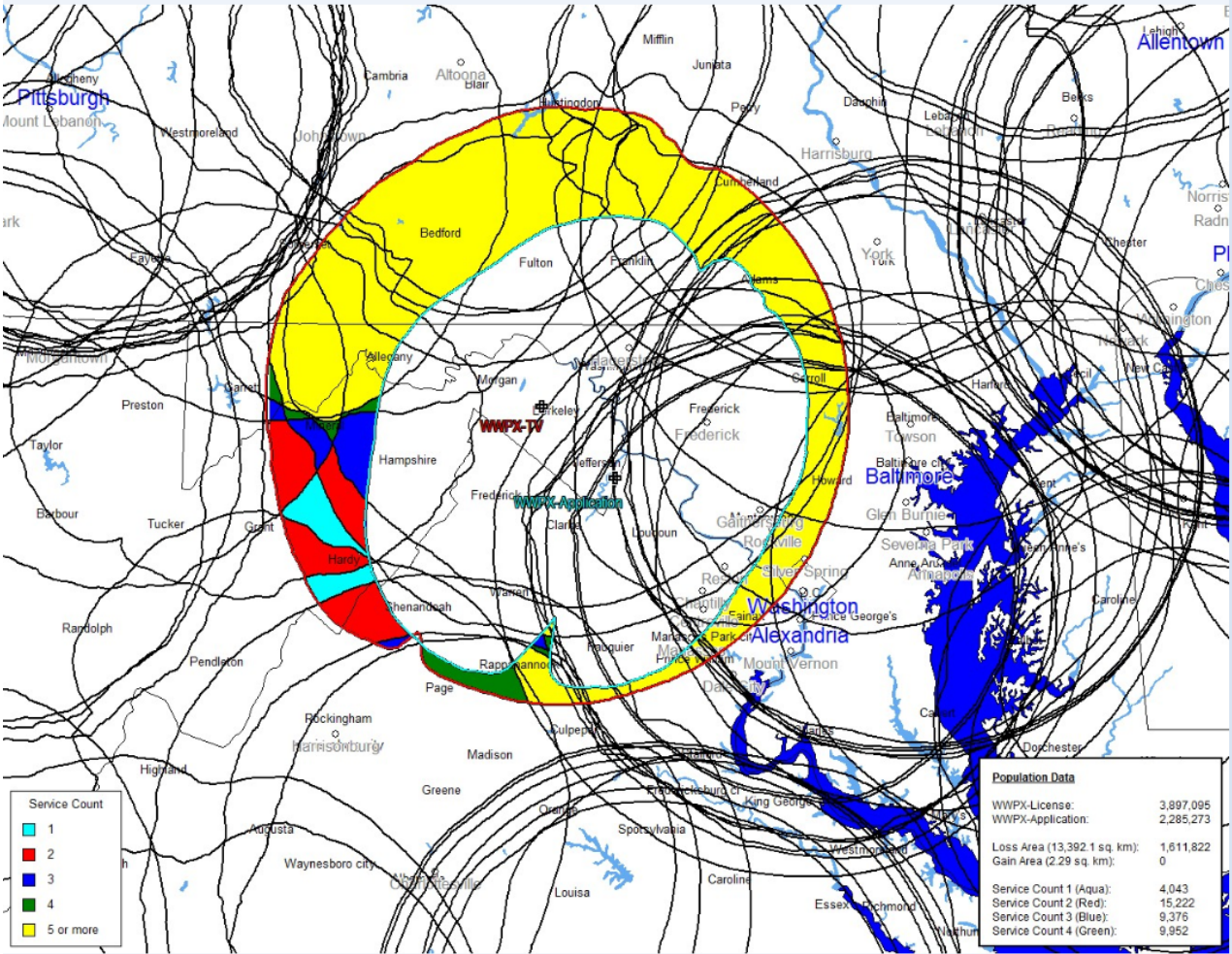


Figure 2

