

**ENGINEERING TECHNICAL STATEMENT**  
**COMPLIANCE WITH §73.3801 OF FCC RULES**  
***SIMULCASTING DURING ATSC 3.0 TRANSITION***

The WNLO-DT full-power digital television broadcast facility (File Number 0000115723) is licensed to operate on Channel 36 with an ERP of 800 kW using a directional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1006689 located in Colden, NY. WIVB-DT is a channel sharing station with WNLO-DT and therefore operates with the exact same parameters. The WNYO-DT full-power television facility (File Number 0000120821) is licensed to operate on Channel 16 with an ERP of 575 kW using a directional antenna mounted on a tower with ASRN 1019110 located in Grand Island, NY. The stations plan to partner in a simulcasting arrangement for purposes of airing one of WNYO's ATSC 1.0 programming streams where WNLO-DT is the ATSC 1.0 "Host" station and WNYO-DT is the ATSC 1.0 "Tenant" station. Additionally, WNYO-DT shall be an ATSC 3.0 Host station and WIVB-DT (channel sharing station with WNLO-DT) shall be an ATSC 3.0 Tenant station where WNYO-DT will air WIVB-DT in in ATSC 3.0 format. All three stations are assigned to the same DMA (Buffalo, NY).

Pursuant to section 73.3801(f)(6)(i) of FCC Rules, the following information is required for this type of application.

- Station serving as the ATSC 1.0 Host: WNLO-DT (0000115723)
- WNLO-DT is the channel sharing host for WIVB-DT (0000115773)
- Technical facilities of the host station:
  - Frequency: 605 MHz (Channel 36)
  - ERP: 800 kW
  - Antenna: Directional (Trilobe)
  - Antenna Center Height: 313.0 m AGL
  - Antenna Model: TFU-29ETT/VP-R 3T170
  - Antenna Polarization: Elliptical

- Antenna Beam Tilt: 1.00°
- Coordinates: 42° 39' 33.0" N, 078° 37' 32.0" W
- ASRN: 1006689
- DMA: Buffalo, NY (all three stations)

Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the following information is also required for this type of application.

- Predicted population within the licensed WNYO-DT (ATSC 1.0 Tenant) protected noise limited service contour served by the station's original ATSC 1.0 signal: **1,430,614 persons (See Exhibit 2)** based on U.S. Census 2010 data.
- Predicted population within the licensed WNLO-DT (ATSC 1.0 Host) protected noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **0 Persons (See Exhibits 3-4)**
  - ***NOTE: The unserved areas where the contours do not overlap are primarily over water and portions not over water are not in the United States.***
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 100% (See Exhibits 1-4).**

Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Referring to Exhibit 3, it can be seen that the WNYO-DT ATSC 1.0 "Tenant" station will continue to completely encompass its community of license (Buffalo, NY) with the WNLO-DT F(50,90) 48.0 dBu "Host" station's principal community contour. Also pursuant to §73.3801(c) and §73.3801(d) of FCC Rules, the WNYO-DT "Tenant" station, the WNLO-DT "Host" station and the WIVB-DT "Channel Sharing" station are all assigned to the same DMA (Buffalo, NY).

Accordingly, as demonstrated above and in enclosed Exhibits 1-4, the proposed WNYO-DT “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing the frequency with the WNLO-DT “ATSC 1.0 Host” facility (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed WIVB-DT “ATSC 3.0 Tenant” facility operating with an ATSC 3.0 signal and sharing the frequency with the WNYO-DT “ATSC 3.0 Host” facility (Coverage requirements for ATSC 3.0 signals) fully satisfies the FCC rules specified in §73.3801 and the application should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

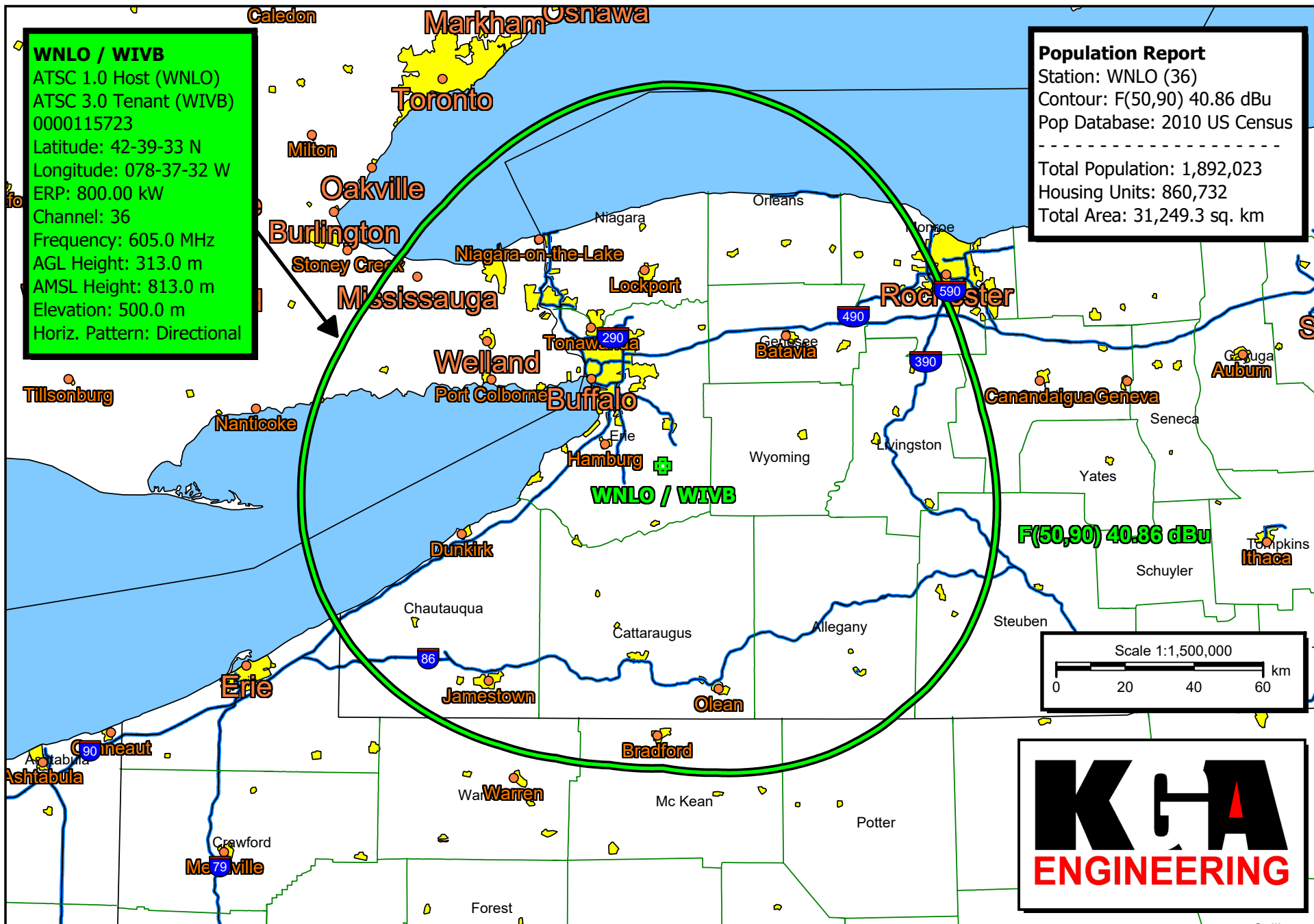
**CERTIFICATION**

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

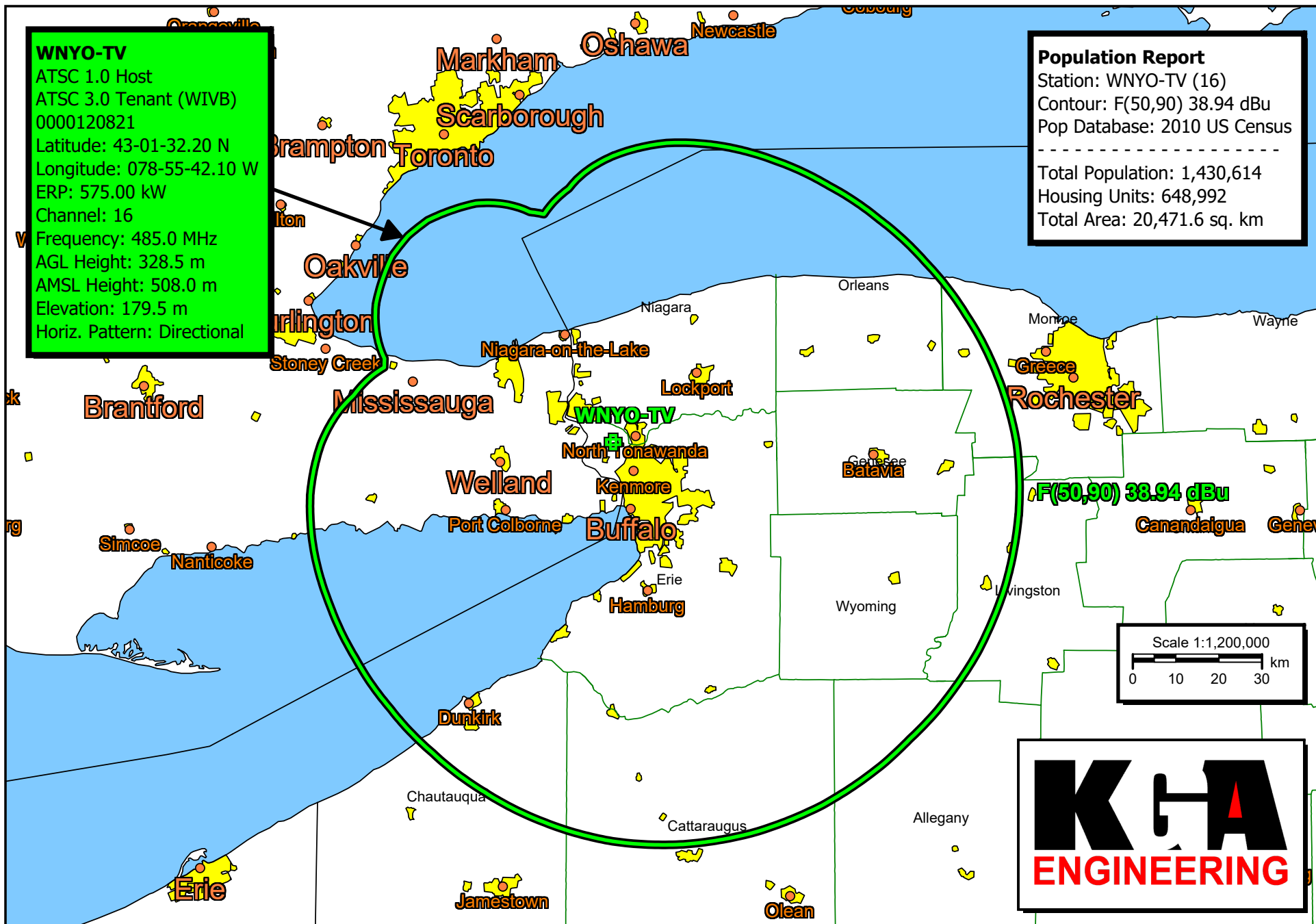


WILLIAM T. GODFREY, JR., CBT  
Kessler and Gehman Associates, Inc.  
Consulting Engineers

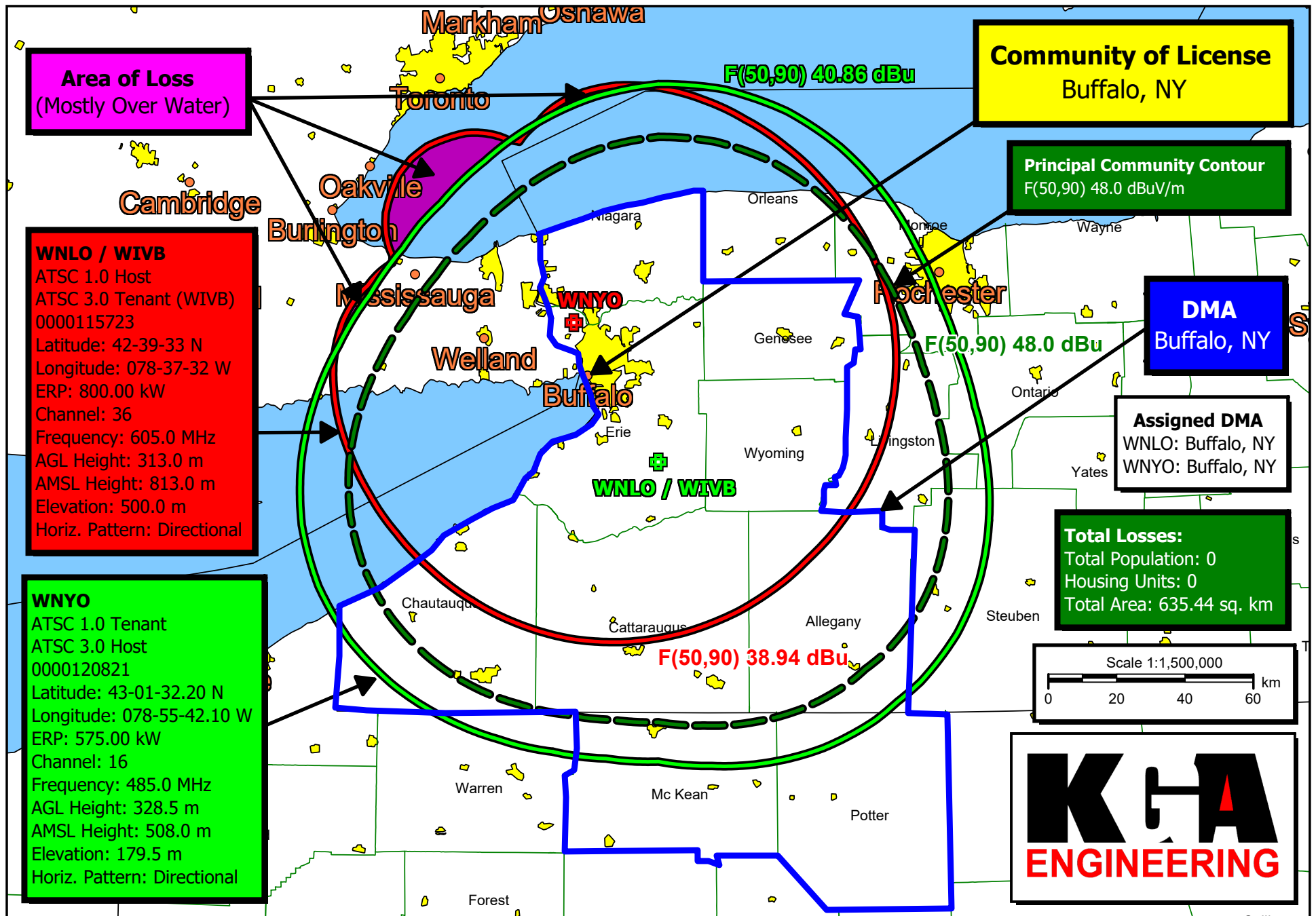
February 19, 2021



Population Within WNLO Protected Noise Limited Service Contour



*Population Within WNYO-TV Protected Noise Limited Service Contour*



WNYO Original ATSC 1.0 Population Loss as Tenant Station (0% Loss)

Overlap Population Report  
WNYO (16) / WNLO (36)



**Kessler and Gehman Associates**  
Consultants • Broadcast • Wireless

Overlap Area Type: Intersection  
Areas Included:

WNYO (16): FCC F(50-90) 38.94 dBu (8 Radial HAAT) (FCC HAAT)  
WNLO (36): FCC F(50-90) 40.86 dBu (8 Radial HAAT) (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 0

Overlap Area: 635.44 sq. km (Area determined using 0.41 km cells)

-----  
Total Breakdown

White:	0
Black:	0
Hispanic:	0
Native American:	0
Asian:	0
Pacific Islander:	0
Mixed Race:	0
Other:	0
Total:	0