

Supplement to 47 C.F.R. § 73.3801(f)(6)(iii) Showing

Baltimore (WNUV-TV) Licensee, Inc., licensee of WNUV(TV), Baltimore, MD (Facility ID 7933) (“Licensee”), hereby provides additional information in support of its proposal to designate WMPT(TV), Annapolis, MD (Facility ID 65042) as the licensed ATSC 1.0 simulcast host for WNUV(TV)’s primary programming stream.

As detailed in the 47 C.F.R. § 73.3801(f)(6)(iii) Exhibit submitted with the Licensee’s original application, WMPT(TV) covers 90.3% of the predicted population within WNUV(TV)’s noise-limited service contour. To minimize the service loss to existing WNUV(TV) over-the-air viewers, Licensee has proposed to simulcast its CW-affiliated primary stream using the facilities of “supplemental” ATSC 1.0 host station WMPB(TV), Baltimore, MD. Combined, WMPT(TV) and WMPB(TV) cover 97.7% of the predicted population within WNUV(TV)’s noise-limited service contour, exceeding the coverage standard set forth in Section 73.3801(f)(6)(ii) of the Rules.

Licensee is filing this supplement and accompanying supplemental engineering exhibit to demonstrate that, while WMPT(TV) standing alone falls slightly short of the 95% coverage standard set forth in 47 C.F.R. § 73.3801(f)(6)(ii), any loss of access to WNUV(TV)’s CW stream in the ATSC 1.0 standard will occur almost entirely outside the Baltimore, MD designated market area (“DMA”), and even outside the Baltimore DMA, will be almost entirely offset by the availability of CW programming broadcast in ATSC 1.0 by stations licensed to adjacent DMAs. To begin with, the service contour of WMPT(TV)’s facility covers 99.9% of WNUV(TV)’s DMA. *See* attached Supplemental Engineering Exhibit. The predicted “loss area” population resulting from the proposed simulcasting arrangement is located almost entirely in the neighboring Harrisburg-Lancaster-Lebanon-York, PA, Philadelphia, PA, and Washington, D.C. (Hagerstown) DMAs, which are served by the following CW-affiliated stations, respectively: WHP-TV, Harrisburg, PA; WPSG(TV), Philadelphia, PA; and WDCW(TV), Washington, D.C. Indeed, of the 945,468 people residing in the “loss area” created by the relocation of WNUV(TV)’s primary stream to WMPT(TV)’s facilities, only 3,801 reside within the Baltimore, DMA, and those 3,801 people are covered by the noise-limited service contour of WPSG(TV), Philadelphia, PA. Combined, the CW-affiliated stations licensed to these three neighboring DMAs cover all but 0.1% of the loss area, and that 0.1% falls outside of the Baltimore DMA. The public interest benefits of permitting WNUV(TV) to transition to the ATSC 3.0 standard as proposed can therefore be achieved with virtually no harm to ATSC 1.0 viewers.