

TECHNICAL SUMMARY

DIGITAL REPLACEMENT TRANSLATOR WTLW-DRT-32
FINDLAY, OHIO
CHANNEL 32 15 KW (MAX-DA) 345 M AMSL
(AS AMENDED*)

1. The instant application is for a new digital-to-digital replacement translator (DRT) for WTLW, Lima, Ohio (Ch. 4) to serve the Findlay, Ohio area, including Hancock and Hardin Counties. The FCC established the DRT service to allow for stations that were repacked in the Incentive Auction to restore service that was lost due to the change in channel. In this case WTLW accepted a bid to change from UHF Channel 44 to the low VHF band.[†] (WTLW is now licensed on low-VHF Channel 4.[‡])

2. As explained in detail in the attached exhibit, *Statement of Kevin Bowers, President of WTLW TV*, the WTLW Channel 4 facility has been subject to poor reception since its activation in July 2019. The station has received hundreds of communications from viewers in the former Channel 44 service area. While many of these reception issues have been addressed by the acquisition of low power television stations in certain areas, the Findlay area, and the areas including Hancock and Harding counties, still have a gap in coverage. These areas are to be addressed by this DRT facility.

3. As has been well documented in numerous cases, the FCC has received many reports of poor DTV performance on the VHF television channels. In recognition of the problems with reception for digital VHF television stations, the FCC issued a *Notice of Proposed Rulemaking* on November 30, 2010 to address the VHF reception issues of DTV stations.[§] Furthermore, in the FCC's Incentive Auction *Report and Order* released in June 2014, the FCC specifically recognized difficulty with reception of low-VHF channels. The FCC stated that 'broadcasting on "low VHF channels" (channels 2-6) is often difficult due to increased signal interference caused by the higher levels of ambient noise from electronic devices operating on or near the low VHF frequency

* See FCC File No. 0000150679.

[†] WTLW was formerly licensed on UHF Channel 44 with a nominal non-directional ERP of 165 kW with an antenna height above average terrain of 207 m. See FCC File No. BLCDDT-20081209AAB.

[‡] See FCC File No. 0000078570.

[§] See *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, ET Docket No. 10-235, 25 FCC Red 16498 (2010).

range.’** It is estimated that the additional man-made and sky noise in the low VHF band could exceed 20 dB, which is not accounted for in the FCC’s standard DTV planning factors.†† One of the primary reasons that the FCC established the DRT service was to address the loss of service that could be experienced by low-VHF band stations.‡‡

4. WTLW has identified an existing government owned tower structure that would support the proposed DRT transmitting antenna. This location is well located to serve Hancock and Hardin County areas, while allowing for some *de minimis* contour extension.§§ The proposed antenna supporting structure to be employed for the facility is authorized under FCC antenna structure registration number 1026917. There will be no change in the overall height of the existing tower structure.

5. The *TVStudy* interference analysis results are shown in an exhibit included with the instant application. As indicated, the proposed facility passes all interference requirements. It is noted that the WTLW-DRT-32 proposal, as amended, does not require coordination with Canada.

** See *Report and Order, In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268, Released: June 2, 2014.

†† See Bendov, Oded, et al., ‘Planning Factors for Fixed and Portable DTTV Reception’, *IEEE Transactions on Broadcasting*, Vol. 50. No. 3 (2004), wherein it was reported that the median residential man-made and sky noise at the terminals of an outdoor receive antenna could exceed 20 dB for the low-VHF television band.

‡‡ See *Third Notice of Proposed Rulemaking, In the Matter of Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television and Television Translator Stations*, MB Docket No. 03-185, Released: October 10, 2014.

§§ See attached *Predicted Coverage Contours* map exhibit herewith, as amended.