



**STATEMENT OF JOHN E. HIDLE, P.E.  
IN SUPPORT OF AN APPLICATION FOR  
A CONSTRUCTION PERMIT FOR A NEW STATION  
IN MB DOCKET NUMBER 21-155 RM-11900  
NEW(TV) - Syracuse, New York  
DTV - CH. 15 - 450 kW - 442.6 m HAAT**

Prepared for: WSTQ LICENSEE, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, No. 7418, and in New York State, No. 63418.

**GENERAL**

This office has been authorized by WSTQ LICENSEE, LLC, selected applicant for NEW(TV) channel 15, facility ID Number 776176, allotted to Syracuse, New York, to prepare this statement, FCC Form 2100, its technical sections, and the associated exhibits in support of an application for a new construction permit.

**DIRECTIONAL ANTENNA**

The applicant intends to utilize the former WNYS-TV site, and the existing Dielectric model TFU-20DSC/VP-R T140 DC elliptically polarized directional antenna. The antenna's center of radiation is located at a height above ground of 301.8 meters, and a height above average terrain of 442.6 meters. The antenna's horizontal azimuth radiation patterns for both its horizontally and vertically polarized components and its vertical elevation pattern, showing its radiation characteristics above and below the horizontal plane are shown and tabulated in the antenna exhibit.

## **PREDICTED COVERAGE CONTOURS**

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated Power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. The map exhibit shows the predicted Noise Limited (38.83 dBu) contour, and the principal community (48 dBu) contour which completely encompasses the principal community of license, Syracuse, New York.

## **ALLOCATION CONSIDERATIONS**

### ***Post-Transition DTV Considerations***

A study was performed, using the FCC's software, *tvstudy* v2.2.5, to determine that the instant application for new construction permit will cause no new prohibited interference to DTV stations and/or Class A LPTV stations, construction permits or allotments. Results of the study predict no new interference greater than the 0.5% limit for new post-repack interference set forth in §73.616(e) of the Commission's Rules.

### ***International DTV Considerations***

The NEW(TV) site is located within coordination distance of the Canadian border at 96.4 kilometers, and more than 2,600 kilometers from the US-Mexican border.

## **BLANKETING AND INTERMODULATION INTERFERENCE**

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 kilometers of the former WNYS-TV site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

## **RADIO FREQUENCY IMPACT, SAFETY & STATEMENT OF COMPLIANCE**

The applicant for the NEW(TV) construction permit is committed to the protection of station personnel and/or tower contractors working in the vicinity of the NEW(TV) antenna and will reduce power or cease operation, when necessary, to ensure protection to personnel.

As shown in Appendix A the NEW(TV) channel 15 facility, as proposed herein, will operate with a maximum ERP of 450 kW from an elliptically polarized directional transmitting antenna with a centerline height of 301.8 meters above ground level (AGL). Considering the elevation pattern provided elsewhere in this submission, the vertical plane relative field factor is less than 0.100 at all depression angles greater than 7 degrees. The proposed NEW(TV) channel 15 facility is predicted to produce a worst-case power density at two meters above ground level, at 2209.9 meters from the tower base, of  $1.583 \mu\text{W}/\text{cm}^2$ , which is 0.50% of the FCC guideline value of  $319.33 \mu\text{W}/\text{cm}^2$  for an "uncontrolled" environment, and 0.099% of the FCC's guideline value for "controlled" environments. Therefore, pursuant to Section 1.1307(b)(3) of the FCC Rules, because the proposed facility would not exceed 5% of the uncontrolled and controlled exposure limits, the proposal's power density contribution is considered insignificant. Further, the Applicant will

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**NEW(TV) - Syracuse, New York**  
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cooperate/coordinate with other site users and reduce power and/or cease operation during times of service or maintenance of the transmission systems as necessary to avoid potentially harmful exposure to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

**SUMMARY**

It is submitted that the instant application for a new construction permit for NEW(TV), facility ID number 776176, to broadcast on channel 15, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement was prepared by me, or under my direct supervision, and its contents are believed to be true and correct to the best of my knowledge and belief.

DATED: July 21, 2022

  
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John E. Hidle, P.E.





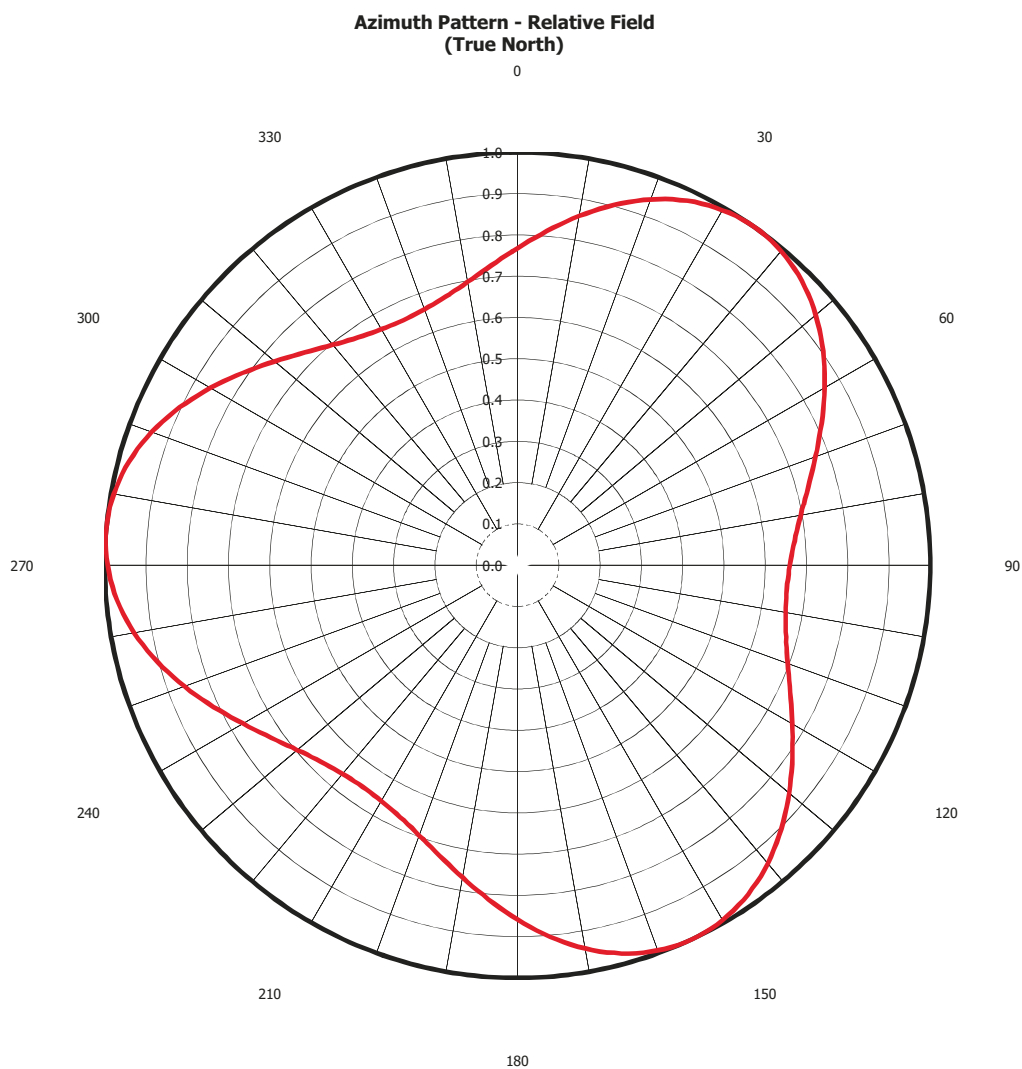
## PREDICTED COVERAGE CONTOURS

**WNYS-TV - SYRACUSE, NEW YORK**  
**DTV Channel 15 - 450.0 kW ERP - 442.6 M HAAT**  
**JULY, 2022**

Predicted Noise Limited 38.83 dBu  
 F(50,90) Coverage Contour

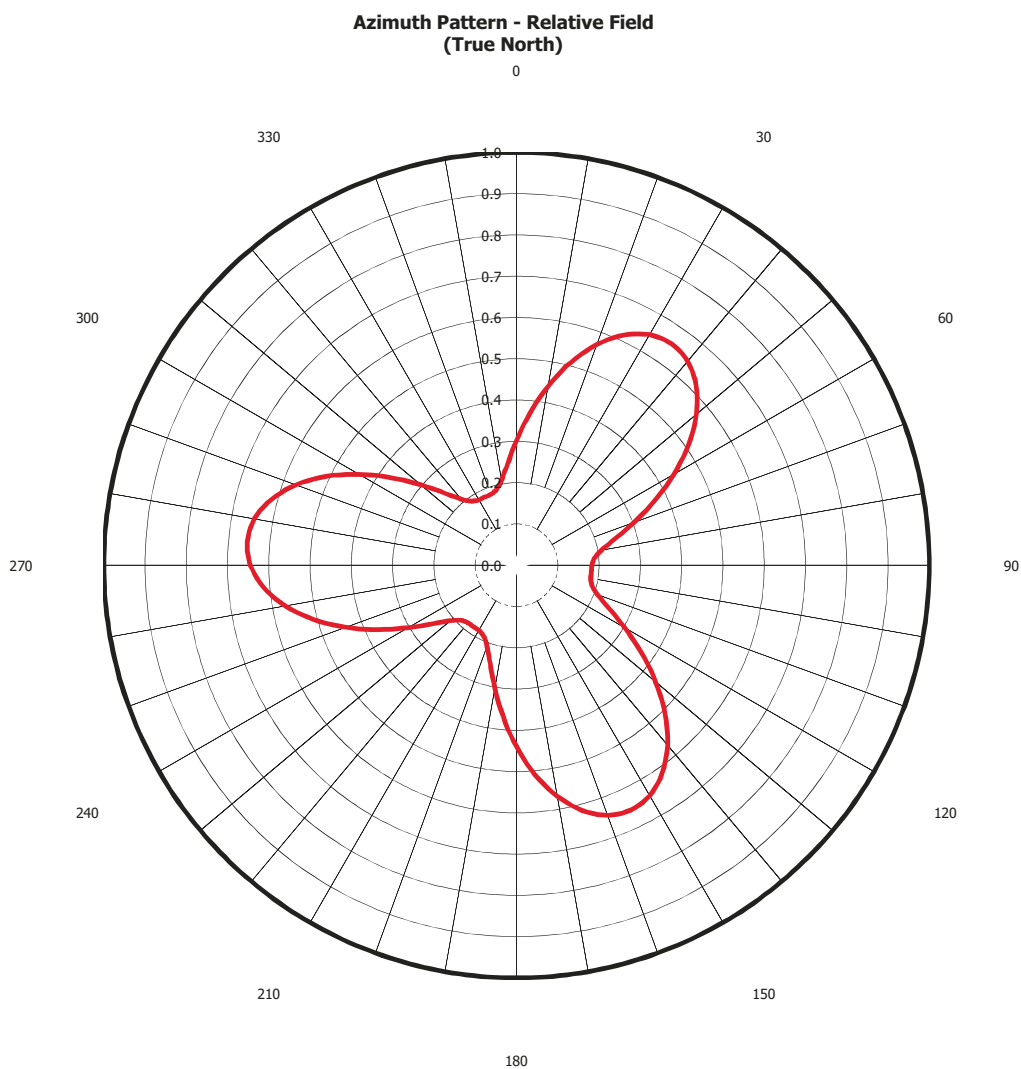


Predicted Principal Community 48 dBu  
 F(50,90) Coverage Contour



## AZIMUTH PATTERN Horizontal Polarization

Proposal No.	<b>C-70579-2</b>
Date	<b>2-Oct-17</b>
Call Letters	<b>WNYS</b>
Channel	<b>15</b>
Frequency	<b>479 MHz</b>
Antenna Type	<b>TFU-20DSC/VP-R T140 DC</b>
Gain	<b>1.45 (1.63dB)</b>
	Calculated



## **AZIMUTH PATTERN Vertical Polarization**

Proposal No.	<b>C-70579-2</b>
Date	<b>2-Oct-17</b>
Call Letters	<b>WNYS</b>
Channel	<b>15</b>
Frequency	<b>479 MHz</b>
Antenna Type	<b>TFU-20DSC/VP-R T140 DC</b>
Gain	<b>2.33 (3.68dB)</b>
	Calculated

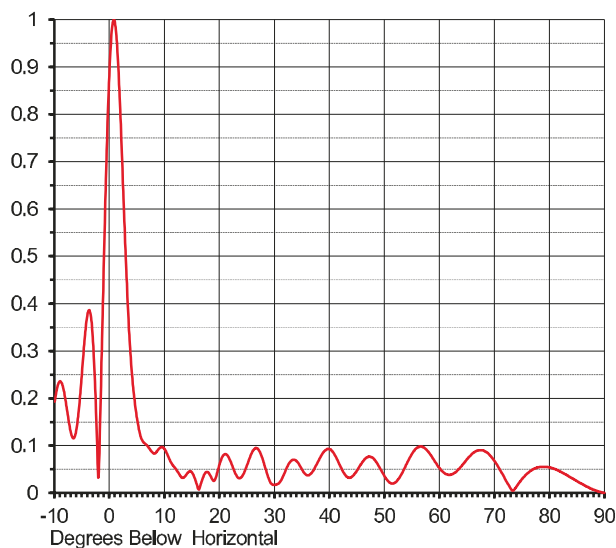
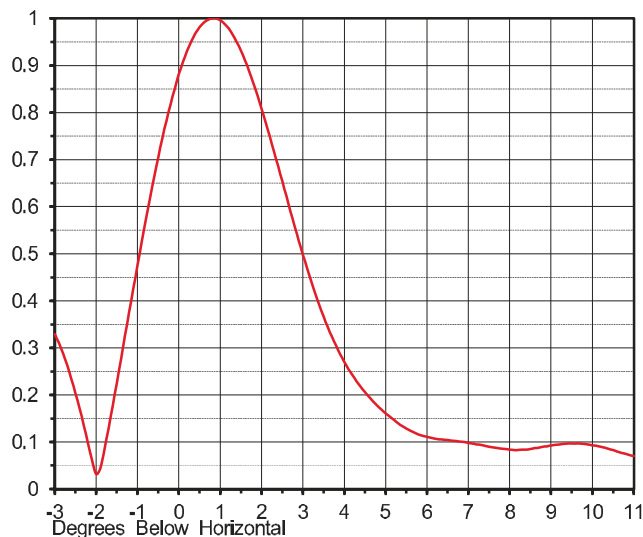


## ELEVATION PATTERN

Proposal No.	C-70579-2
Date	2-Oct-17
Call Letters	WNYS
Channel	15
Frequency	479 MHz
Antenna Type	TFU-20DSC/VP-R T140 D

RMS Directivity at Main Lobe	17.0 ( 12.30 dB )
RMS Directivity at Horizontal	14.0 ( 11.46 dB )
	<b>Calculated</b>

Beam Tilt	<b>0.75 deg</b>
Pattern Number	<b>20Q170075</b>

[illegible]

**NEW(TV)**  
**Channel 15 - Syracuse, New York**  
**ERP = 450000.00 WATTS**

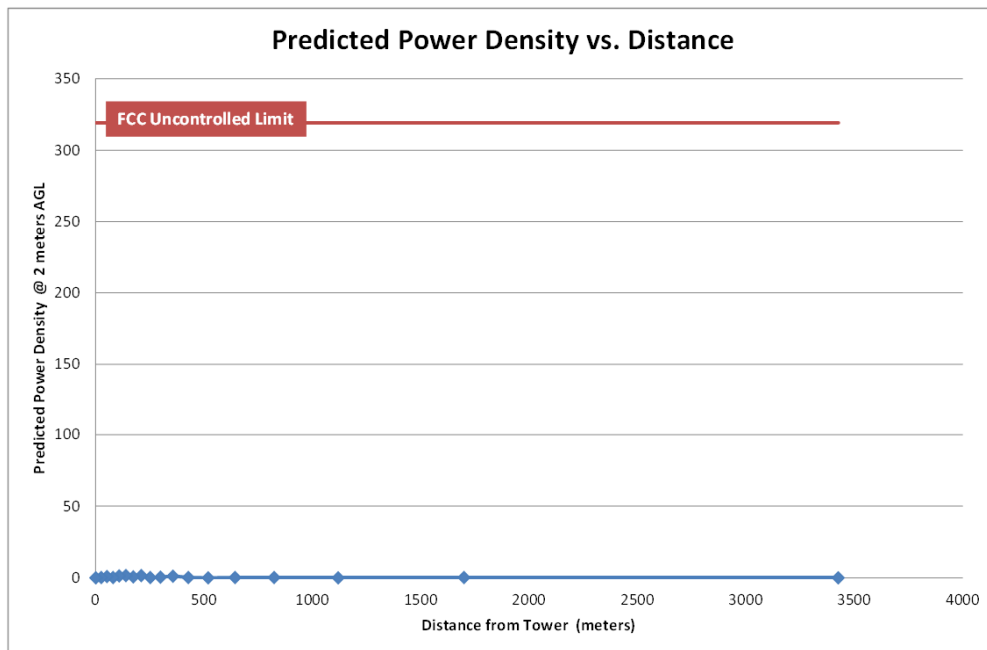
## APPENDIX A

**Maximum ERP** 450 kW

Polarization ----- 2 Circular  
 Antenna Height Above Ground -- 301.8 meters 990.2 feet  
 FCC Uncontrolled RFR Limit ---- 319.33  $\mu\text{W}/\text{cm}^2$

Maximum Computed Power Density 1.583  $\mu\text{W}/\text{cm}^2$   
 0.50% of limit

Angle Below Horizontal (degrees)	<Point X> Horiz Distance from tower to 2 m AGL (meters)	Slant Distance from antenna to Point X (meters)	Vertical Pattern (REL. FIELD)	NEW(TV) ERP (kW)	NEW(TV) Calculated Power Density $\mu\text{W}/\text{cm}^2$	Percent Limit	Limit Exceeded?
0			1.000	450.0000			
5	3426.7	3439.8	0.154	10.6722	0.060	0.02%	No
10	1700.3	1726.5	0.092	3.8088	0.085	0.03%	No
15	1118.9	1158.3	0.042	0.7938	0.040	0.01%	No
20	823.7	876.6	0.062	1.7298	0.150	0.05%	No
25	642.9	709.4	0.060	1.6200	0.215	0.07%	No
30	519.3	599.6	0.017	0.1301	0.024	0.01%	No
35	428.2	522.7	0.048	1.0368	0.254	0.08%	No
40	357.3	466.4	0.092	3.8088	1.170	0.37%	No
45	299.8	424.0	0.048	1.0368	0.385	0.12%	No
50	251.6	391.4	0.034	0.5202	0.227	0.07%	No
55	209.9	366.0	0.084	3.1752	1.583	0.50%	No
60	173.1	346.2	0.051	1.1705	0.652	0.20%	No
65	139.8	330.8	0.072	2.3328	1.424	0.45%	No
70	109.1	319.0	0.066	1.9602	1.286	0.40%	No
75	80.3	310.4	0.030	0.4050	0.281	0.09%	No
80	52.9	304.4	0.054	1.3122	0.946	0.30%	No
85	26.2	300.9	0.024	0.2592	0.191	0.06%	No
90	0.0	299.8	0.000	0.0000	0.000	0.00%	No





# NEW(TV) - SYRACUSE, NEW YORK

## JULY 2022

### APPENDIX B

### Longley-Rice Interference Analysis

tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: WNYS-TV 15 AP 450K 798p6C, Model: Longley-Rice  
Start: 2022.07.21 13:42:35

Study created: 2022.07.21 13:42:35

Study build station data: LMS TV 2022-07-21

Proposal: WNYS-TV D15 DT APP Syracuse, NY  
File number: WNYS-TV 15 AP 450K 798p6C  
Facility ID: 58725  
Station data: User record  
Record ID: 255  
Country: U.S.  
Zone: I

Build options:

Protect pre-transition records not on baseline channel

Search options:

Non-U.S. records included

Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	WSYT	D14	DT	LIC	SYRACUSE, NY	BLANK0000086898	0.0 km
No	WGME-TV	D15	DT	LIC	PORTLAND, ME	BLANK0000080225	475.3
Yes	WBNF-CD	D15	DC	LIC	BUFFALO, NY	BLDTA20111130LWW	222.6
Yes	WPSU-TV	D15	DD	LIC	CLEARFIELD, PA	BLEDT20130614ACC	269.2
No	WFDC-DT	D15	DT	LIC	ARLINGTON, VA	BLANK0000041206	444.2
No	WNYO-TV	D16	DT	LIC	BUFFALO, NY	BLANK0000136976	222.6
No	WFNY-CD	D16	DC	LIC	GLOVERSVILLE, NY	BLANK0000068459	150.7
Yes	WNYS-CD	D16	DC	LIC	ITHACA, NY	BLANK0000001083	55.7
Yes	CHCH-DT	D15	DT	LIC	HAMILTON, ON	BLANKCANADA173	292.6
Yes	CITS-DT-1	D15	DT	LIC	OTTAWA, ON	BLANKCANADA206	264.6
No	CKMI-DT-1	D15	DT	LIC	MONTRAL, QC	BLANKCANADA274	358.2
No	CJOH-TV-6	D16	DT	LIC	DESERONTO, ON	BLANKCANADA170	157.0

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D15  
Latitude: 42 52 50.50 N (NAD83)  
Longitude: 76 11 58.70 W  
Height AMSL: 798.6 m  
HAAT: 442.6 m  
Peak ERP: 450 kW  
Antenna: DIE TFU 20 DSC/VP-R T140 DC 0.0 deg  
Elev Pattn: Generic

38.8 dBu contour:

Azimuth	ERP	HAAT	Distance
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**Appendix B - Interference Analysis**  
**NEW(TV) - Syracuse, New York**  
**Channel 15 -450 kW - Page 2**

0.0 deg	273 kW	506.3 m	107.3 km
45.0	423	490.2	110.3
90.0	205	438.8	99.0
135.0	369	418.1	102.8
180.0	337	344.0	96.2
225.0	216	399.7	96.7
270.0	450	473.0	109.5
315.0	249	471.3	103.5

\*\*Proposal is within coordination distance of Canadian border  
Distance to Canadian border: 96.4 km

Distance to Mexican border: 2658.0 km

Conditions at FCC monitoring station: Canandaigua NY  
Bearing: 272.8 degrees Distance: 86.9 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 272.7 degrees Distance: 2422.4 km

No land mobile station failures found

Study cell size: 2.00 km  
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to BLANK0000086898 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WSYT	D14	DT	LIC	SYRACUSE, NY	BLANK0000086898	
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	0.0 km
	WPTZ	D14	DT	LIC	PLATTSBURGH, NY	BLANK0000058609	327.6
	CITS-DT	D14	DT	LIC	HAMILTON, ON	BLANKCANADA175	292.6
	CIIT-DT-6	D14	DT	LIC	OTTAWA, ON	BLANKCANADA198	292.8
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	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
34702.7	1,970,721	32344.0	1,739,071	31976.2	1,730,035	31964.2 1,729,949	0.04 0.00
120.4	0	120.4	0	120.4	0	120.4 0	0.00 0.00 (in
Canada)							

Undesired	Total IX	Unique IX, before	Unique IX, after
WNYS-TV D15 DT APP	12.0	86	12.0 86
WPTZ D14 DT LIC	155.7	2,361	92.0 1,691
CITS-DT D14 DT LIC	59.9	4,726	59.9 4,726
CIIT-DT-6 D14 DT LIC	215.9	2,619	152.1 1,949

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Interference to BLDTA20111130LWW LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WBNF-CD	D15	DC	LIC	BUFFALO, NY	BLDTA20111130LWW	
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	222.6 km
	WPSU-TV	D15	DD	LIC	CLEARFIELD, PA	BLDT20130614ACC	215.3
	WNYO-TV	D16	DT	LIC	BUFFALO, NY	BLANK0000136976	0.0
	CITS-DT	D14	DT	LIC	HAMILTON, ON	BLANKCANADA175	71.5
	CHCH-DT	D15	DT	LIC	HAMILTON, ON	BLANKCANADA173	71.5
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	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
4092.4	1,067,640	4076.3	1,066,331	1887.7	888,659	1887.7 888,659	0.00 0.00

**Appendix B - Interference Analysis**  
**NEW(TV) - Syracuse, New York**  
**Channel 15 -450 kW - Page 3**

315.7	29,288	315.7	29,288	151.9	18,968	151.9	18,968	0.00	0.00	(in Canada)
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Undesired		Total IX	Unique IX, before	Unique IX, after	
WNYS-TV D15 DT APP	4.0	2		0.0	0
WNYS-TV D15 DT APP	4.0	0		0.0	0 (in Canada)
WPSU-TV D15 DD LIC	23.8	454	0.0	0.0	0
WNYO-TV D16 DT LIC	483.2	42,687	91.9	5,113	91.9 5,113
WNYO-TV D16 DT LIC	107.9	2,565	0.0	0.0	0 (in Canada)
CITS-DT D14 DT LIC	4.0	2	0.0	0.0	0
CHCH-DT D15 DT LIC	2096.7	172,559	1685.6	134,533	1685.6 134,533
CHCH-DT D15 DT LIC	163.9	10,320	56.0	7,755	56.0 7,755 (in Canada)

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Interference to BLEDT20130614ACC LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WPSU-TV	D15	DD	LIC	CLEARFIELD, PA	BLEDT20130614ACC	
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	269.2 km
	WBNF-CD	D15	DC	LIC	BUFFALO, NY	BLDTA20111130LWW	215.3
	WEWS-TV	D15	DT	LIC	CLEVELAND, OH	BLCDT20091211ACS	275.2
	WFDC-DT	D15	DT	LIC	ARLINGTON, VA	BLANK0000041206	268.8
	WVPT	D15	DT	APP	STAUNTON, VA	BLANK00000149712	337.1
	WINP-TV	D16	DT	LIC	PITTSBURGH, PA	BLANK0000098050	148.5
	CHCH-DT	D15	DT	LIC	HAMILTON, ON	BLANKCANADA173	256.5

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
36299.1 1,055,133	32592.1 868,013	31575.4 839,370	31511.2 839,188	0.20 0.02

Undesired		Total IX	Unique IX, before	Unique IX, after
WNYS-TV D15 DT APP	108.5	318		64.2 182
WBNF-CD D15 DC LIC	12.0	105	4.0 6	0.0 0
WEWS-TV D15 DT LIC	522.3	11,079	430.2 9,034	422.1 9,003
WFDC-DT D15 DT LIC	410.1	16,438	341.8 14,999	329.7 14,999
WVPT D15 DT APP	88.5	2,458	40.2 702	40.2 702
WINP-TV D16 DT LIC	59.9	1,290	24.0 680	24.0 680
CHCH-DT D15 DT LIC	72.3	674	40.2 348	24.1 348

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Interference to BLANK0000001083 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WNYS-CD	D16	DC	LIC	ITHACA, NY	BLANK0000001083	
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	55.7 km
	WSYR-TV	D17	DT	CP	SYRACUSE, NY	BLANK00000127611	69.1
	CJOH-TV-6	D16	DT	LIC	DESERONTO, ON	BLANKCANADA170	196.0

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
594.5 79,725	570.3 78,445	566.4 78,361	562.4 78,176	0.70 0.24

Undesired		Total IX	Unique IX, before	Unique IX, after
WNYS-TV D15 DT APP	4.0	185		4.0 185
CJOH-TV-6 D16 DT LIC	4.0	84	4.0 84	4.0 84

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Interference to BLANKCANADA173 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	CHCH-DT	D15	DT	LIC	HAMILTON, ON	BLANKCANADA173	
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	292.6 km
	WDCQ-TV	D15	DT	LIC	BAD AXE, MI	BLEDT20030922ABG	316.1
	WBNF-CD	D15	DC	LIC	BUFFALO, NY	BLDTA20111130LWW	71.5
	WEWS-TV	D15	DT	LIC	CLEVELAND, OH	BLCDT20091211ACS	259.0
	WNYO-TV	D16	DT	LIC	BUFFALO, NY	BLANK00000136976	71.5

**Appendix B - Interference Analysis**  
**NEW(TV) - Syracuse, New York**  
**Channel 15 -450 kW - Page 4**

CITY-DT-2 D16		DT	LIC	WOODSTOCK, ON		BLANKCANADA246		82.6	
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	(in
2201.8	299,103	2201.8	299,103	1442.0	95,927	1442.0	95,927	0.00	0.00
U.S.)									
18217.3	7,200,013	18133.0	7,182,713	17837.4	7,154,247	17833.4	7,154,247	0.02	0.00
Undesired		Total IX		Unique IX, before		Unique IX, after			
WNYS-TV D15 DT APP		4.0	0			4.0	0		
WDCQ-TV D15 DT LIC		4.0	0	0.0	0	0.0	0		
WBNF-CD D15 DC LIC		759.8	203,176	608.4	61,130	608.4	61,130	(in U.S.)	
WBNF-CD D15 DC LIC		255.8	26,772	143.9	9,228	143.9	9,228		
WEWS-TV D15 DT LIC		39.8	1,694	31.8	1,694	31.8	1,694		
WNYO-TV D16 DT LIC		151.5	142,046	0.0	0	0.0	0	(in U.S.)	
WNYO-TV D16 DT LIC		111.9	17,544	0.0	0	0.0	0		
CITY-DT-2 D16 DT LIC		8.0	0	0.0	0	0.0	0		

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Interference to BLANKCANADA206 LIC scenario 1

Desired:	Call CITS-DT-1	Chan D15	Svc DT	Status LIC	City, State OTTAWA, ON	File Number BLANKCANADA206	Distance		
Undesireds:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798	264.6 km		
	CIII-DT-6	D14	DT	LIC	OTTAWA, ON	BLANKCANADA198	38.9		
	CKMI-DT-1	D15	DT	LIC	MONTRAL, QC	BLANKCANADA274	157.3		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
866.1	36,983	866.1	36,983	866.1	36,983	866.1	36,983	0.00	0.00 (in
U.S.)									
10560.6	1,378,448	10401.3	1,376,995	10073.6	1,371,275	10069.7	1,371,275	0.04	0.00
Undesired				Total IX	Unique IX, before	Unique IX, after			
WNYS-TV D15 DT APP				4.0	0	4.0		0	
CIII-DT-6 D14 DT LIC				295.5	5,202	291.5		5,202	
CKMI-DT-1 D15 DT LIC				36.2	518	32.2		518	

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Interference to proposal scenario 1  
2.52% interference received

	Call	Chan	Svc	Status	City, State	File Number	Distance		
Desired:	WNYS-TV	D15	DT	APP	Syracuse, NY	WNYS-TV 15 AP 450K 798			
Undesireds:	WBNF-CD	D15	DC	LIC	BUFFALO, NY	BLDTA20111130LWW	222.6 km		
	WPSU-TV	D15	DD	LIC	CLEARFIELD, PA	BLEDT20130614ACC	269.2		
	WFNY-CD	D16	DC	LIC	GLOVERSVILLE, NY	BLANK0000068459	150.7		
	WNYS-CD	D16	DC	LIC	ITHACA, NY	BLANK0000001083	55.7		
	CHCH-DT	D15	DT	LIC	HAMILTON, ON	BLANKCANADA173	292.6		
	CITS-DT-1	D15	DT	LIC	OTTAWA, ON	BLANKCANADA206	264.6		
	CJOH-TV-6	D16	DT	LIC	DESERONTO, ON	BLANKCANADA170	157.0		
Service area		Terrain-limited		IX-free		Percent IX			
33416.1	1,916,079	31257.7	1,684,925	30893.6	1,642,526	1.16	2.52		
76.1	0	76.1	0	76.1	0	0.00	0.00		
(in Canada)									
Undesired				Total IX	Unique IX	Prcnt Unique IX			
WBNF-CD	D15	DC	LIC	28.0	932	4.0	65	0.01	0.00
WPSU-TV	D15	DD	LIC	260.0	12,704	244.0	11,571	0.78	0.69
WFNY-CD	D16	DC	LIC	8.0	146	8.0	146	0.03	0.01
WNYS-CD	D16	DC	LIC	16.1	28,689	16.1	28,689	0.05	1.70
CHCH-DT	D15	DT	LIC	39.9	1,638	12.0	306	0.04	0.02
CITS-DT-1	D15	DT	LIC	48.0	285	48.0	285	0.15	0.02
CJOH-TV-6	D16	DT	LIC	4.0	5	4.0	5	0.01	0.00