Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Amendment of Section 73.622(j),	)	MB Docket No. 22-__
the Table of Allotments for	)	
Digital Television Stations,	)	Rulemaking No. _____
For WBRA-TV, Roanoke, Virginia	)	
Facility ID No. 5981	)	

To: Office of the Secretary, Federal Communications Commission

Attn: Chief, Media Bureau

PETITION FOR RULEMAKING

Blue Ridge Public Television, Inc. ("Blue Ridge PBS"), licensee of noncommercial educational television station WBRA-TV, Roanoke, Virginia, Facility ID No. 5981 ("WBRA" or the "Station"), by counsel, hereby respectfully petitions the Commission to institute a rulemaking proceeding pursuant to Section 1.401 of the Commission's Rules[1] for the purpose of amending the digital television Table of Allotments set forth in Section 73.622(j) of the Rules ("DTV Table").[2] Specifically, Blue Ridge PBS requests that the Commission amend the DTV Table to substitute high-band VHF Channel *13 for Roanoke, Virginia, in lieu of low-band VHF Channel *3 (on which the Station currently operates), in accordance with the technical parameters set forth in the Engineering Statement attached hereto as Exhibit 1.[3] The operation of WBRA on low-band WHF Channel 3 has proven to be highly ineffective for satisfactory viewership. As demonstrated below, the proposed substitution meets the applicable technical

[1] 47 C.F.R. § 1.401.
[2] 47 C.F.R. § 73.622(j).
[3] *See* Engineering Statement of William T. Godfrey, Jr., Kessler and Gehman Associates, Inc., dated November 17, 2022 ("Engineering Statement") (attached as Exhibit 1 hereto).

requirements set forth in 73.616 (post-transition DTV station interference protection), 73.623 (DTV applications and changes to DTV allotments) and 73.625 (DTV coverage of principal community and antenna systems) for post-transition DTV channel changes,[4] and would serve the public interest by (1) addressing ongoing reception complaints WBRA has received from viewers regarding its operations on Channel 3; (2) optimizing Roanoke, Virginia's DTV allotments by improving the Station's "over-the-air" ("OTA") reception within its community of license and core service area; and (3) enabling the Station to better serve the Roanoke community by substantially improving viewer access to the Station's noncommercial educational and public affairs programming, as well as access to emergency notifications transmitted through WBRA-TV's participation in PBS's Warning, Alert Response Network ("PBS WARN").

WBRA is licensed to Roanoke, Virginia, to transmit on reserved low-band VHF Channel *3 at 9.8 kW ERP.[5] WBRA is the only full-power noncommercial educational digital television stations serving the Roanoke-Lynchburg DMA.[6] WBRA is a PBS affiliate, and many residents of WBRA's core viewing area depend on WBRA's OTA transmissions in order to receive PBS' outstanding educational, cultural, and public affairs programming. Through PBS WARN, WBRA's signal also provides an essential emergency notification tool. Apart from WBRA, only one of the seven other full-power television stations in the Roanoke-Lynchburg DMA operates on a VHF channel, and it operates on high-band Channel 7.[7] As set forth below,

---

[4] 47 C.F.R. §§ 73.616, 73.623, and 73.625.

[5] The Station is currently operating at 22.0 kW ERP from its licensed tower location pursuant to Special Temporary Authority. *See* LMS File No. 0000202532. *See also* LMS File Nos. 0000112916, 0000125205, 0000145009, 0000163538, and 0000189600.

[6] https://www.stationindex.com/tv/markets/Roanoke-Lynchburg. Blue Ridge notes, however, that the service contour for WBRA has significant overlap with WSWP-TV, Grandview, WV (Facility ID No. 71680). WSWP-TV is a noncommercial educational station licensed to West Virginia Educational Broadcasting Authority that airs PBS programming.

[7] https://rabbitears.info/market.php?request=print_market&mktid=82.

and in Blue Ridge's President and CEO's declaration attached as Exhibit 2, since the digital transition and commencement of DTV operations on low-band VHF Channel *3 in 2003, WBRA has consistently received viewer complaints of poor reception and interference, many of whom complain that WBRA is the only Roanoke station they cannot receive reliably over the air.[8] These persistent low-VHF reception issues put WBRA at a severe disadvantage in reaching viewers, compared with the other full power DTV stations in the Roanoke market.

Generally, the Commission will grant a proposed reallotment when the change will result in a "preferential arrangement of allotments."[9] The Commission will consider a proposal to change the DTV Table to be in the public interest if it satisfies one of the Commission's five allotment priorities.[10] The Commission's stated objective of the post-transition DTV Table is ensuring the provision of digital television service "to the American people in an expeditious and efficient manner."[11] The Commission has recognized repeatedly that substitution of UHF and high-VHF channels for low-VHF channels under parameters meeting applicable technical requirements may serve the public interest and the Commission's DTV Table priorities, where

---

[8] Statement of Will Anderson, Blue Ridge PBS's President & CEO ("Anderson Statement"), attached hereto as Exhibit 2.

[9] *See generally Amendment of Section 3.606 of the Commission's Rules and Regulations*, Sixth Report and Order, 41 F.C.C. 148, 167-173 (1952).

[10] *Id.* The five allotment priorities are: (1) to provide at least one television service to all parts of the United States; (2) to provide each community with at least one television broadcast station; (3) to provide a choice of at least two television services to all parts of the United States; (4) to provide each community with at least two television broadcast stations; and (5) to assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities. *Id.*

[11] *See, e.g., In the Matter of Amendment of Section 73.622(B), Table of Allotments, Digital Television Broadcast Stations (Nampa, Idaho)*, Report and Order, 19 FCC Rcd. 4491, 4493 (2004); *In the Matter of Amendment of Section 73.622(B), Table of Allotments, Digital Television Broadcast Stations (In the Matter of Amendment of Section73.622(B), Table of Allotments, Digital Television Broadcast Stations (Albany, New York)*, 19 FCC Rcd. 4329, 4331 (2004); *see also In the Matter of Advanced Television Systems & Their Impact Upon the Existing Television Broadcast Service*, 12 FCC Rcd. 14588 ¶ 76 (1997).

the channel change would address viewer reception and interference issues caused by the relatively poor signal propagation characteristics of DTV low-band VHF operations.[12]

Reliable high-quality reception of free DTV programming over the air has become more important than ever as more people rely increasingly on OTA reception in this era of pandemic-induced economic uncertainty and "cord cutting."[13] And the Commission continues to recognize that, although VHF reception issues are not universal, "environmental noise blockages affecting [VHF] signal strength and reception exist" and "[vary] widely from service area to service area."[14]

WBRA's real-world experience since the DTV transition has been consistent with the Commission's observations. As set forth in the Anderson Statement, attached hereto as Exhibit 2, since WBRA began full power DTV operations, the Station consistently has received a large number of complaints of poor reception and interference from OTA viewers. Anderson Statement, at ¶¶ 4-5. A sampling of typical reports includes complaints like "I get all of the Roanoke stations . . . but I do not get any signal from WBRA" and "We have noticed that PBS channels often pixilate badly, though our reception of other channels is pretty good." *Id.* at ¶ 5.

---

[12] *See, e.g., In Re Amendment of Section 73.622(i),) Post-Transition Table of DTV Allotments, Television Broadcast Stations, (Portland, Oregon),* Notice of Proposed Rulemaking, MB Docket No. 20-334, *RM-11864* (rel. Oct. 13, 2020); *In Re Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Mesa, Arizona)*, Notice of Proposed Rulemaking, MB Docket No. 20-331, RM-11863, DA-20-1192 (rel. Oct. 13, 2020); *In Re Amendment of Section 73.622(b), Table of Allotments, Digital Television Broad. Stations, Ontario, CA, Notice of Proposed Rulemaking*, 16 FCC Rcd. 2276 (2001); *In Re Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations, Moscow, Idaho*, Notice of Proposed Rulemaking, 17 FCC Rcd. 19447 (2002).

[13] *See, e.g.*, Jon Lafayette, "Cord-Cutting Hit Record Levels in First Quarter," Broadcasting + Cable, https://www.broadcastingcable.com/news/cord-cutting-hit-record-levels-in-first-quarter (May 8, 2020); Aaron Pressman, "Cord cutting is speeding up as the coronavirus pandemic squeezes consumers," Fortune, https://fortune.com/2020/05/05/cord-cutting-coronavirus-cable-satellite-tv-comcast-verizon-charter-altice-att-dish/ (May 5, 2020).

[14] *Assessment and Collection of Regulatory Fees for Fiscal Year 2020*, MD Docket No. 20-105, FCC 20-64, at ¶ 52 (rel. May 13, 2020).

These continuing propagation problems put WBRA at a severe competitive disadvantage compared to other full-power DTV stations broadcasting in the Roanoke-Lynchburg DMA, all but one of which operates on a UHF channel.

In sum, the technical limitations of low-band VHF Channel *3 for DTV use in the Roanoke viewing area are manifestly inconsistent with the DTV Table's public interest objective of delivering the full benefits of DTV service to the American public, efficiently and expeditiously.

Attached hereto as Exhibit 1 is the Engineering Statement of William T. Godfrey, which sets forth in detail the proposed high-band VHF Channel *13 DTV Table specifications and technical parameters, to be used in the construction permit application for WRBA's proposed Channel *13 facilities. This proposal is in compliance with all relevant technical requirements for amendment of the post-transition DTV Table, including the interference protection requirements of 47 C.F.R. §73.616 and the 0.5% *de minimis* interference standard with respect to all allotments and assignments, existing and proposed. As further reflected in the Engineering Statement, the proposed Channel *13 facility will provide full principal community coverage to Roanoke, Virginia.

Engineering analysis using the Commission's TVStudy tool indicates that, compared to current WBRA-TV Channel *3 operations, the Channel *13 facilities and operating parameters that Blue Ridge proposes for WBRA would create a predicted interference-free coverage resulting a PBS population loss of only 94 persons when compared with the current predicted coverage area of Channel 3.[15]

[15] Engineering Statement, at 4-5. This PBS population loss would likely be zero if using Longley-Rice coverage. Engineering Statement, at 5.

Accordingly, for the foregoing reasons, Blue Ridge respectfully requests that the Commission grant this Petition and commence a rulemaking proceeding to change the digital allotment for WBRA-TV from Channel *3 to Channel *13, as proposed herein.

Respectfully submitted,

BLUE RIDGE PUBLIC TELEVISION, INC.

By its counsel:

Brad Deutsch
FOSTER GARVEY P.C.
1000 Potomac Street, N.W., Suite 200
Washington, D.C. 20007
Tel. (202) 298-1793
Brad.Deutsch@foster.com

Dated: November 18, 2022

EXHIBIT 1

ENGINEERING STATEMENT OF WILLIAM GODFREY, JR., KESSLER AND GEHMAN ASSOCIATES, INC., IN SUPPORT OF PETITION OF BLUE RIDGE PUBLIC TELEVISION, INC., TO AMEND THE TABLE OF ALLOTMENTS FOR WBRA-TV, ROANOKE, VIRGINIA

ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR. OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS CONSULTING ENGINEERS ON BEHALF OF BLUE RIDGE PUBLIC TELEVISION, INC. ("BRPTV"), LICENSEE OF WBRA-TV (FILE NUMBER 0000047419) IN SUPPORT OF A PETITION FOR RULE MAKING TO AMEND THE DTV TABLE OF ALLOTMENTS TO SUBSTITUTE CHANNEL *13 FOR WBRA-TV IN LIEU OF CHANNEL *3, ROANOKE, VA.

SUMMARY

BRPTV is the licensed to operate on reserved low-band VHF Channel *3 with an ERP of 9.8 kW using a nondirectional antenna with an antenna height radiation center of 55.0 m AGL. The operation of WBRA-TV Channel *3 in the low-band VHF spectrum has proven to be highly ineffective for satisfactory viewership. A comprehensive engineering analysis revealed that the proposed high-band VHF channel is suitable for substitution since it would comply with all FCC rules and requirements including §73.616 post-transition DTV station interference protection, §73.622 DTV Table of Allotments, §73.623(e) Protection of land mobile operations, §73.625 DTV coverage of principal community, §73.1030 Notifications concerning interference to radio astronomy, and §73.1125 Station telephone number. Therefore, Channel *13 can be allotted to WBRA-TV in lieu of channel *3.

BRPTV wishes to change from allotted low-band VHF Channel *3 to high-band VHF Channel *13 in order to provide superior over-the-air service to its viewers. Propagation and reception issues for television stations operating on low-band VHF channels are well documented. In addition to substandard propagation issues, other inherent problems associated with the low-VHF band include environmental noise, lower power levels, and unavailability of quality low-band VHF receive antennas to the public. Substituting channel *13 for channel *3 at the same transmitter site will provide a more robust indoor and outdoor signal and would therefore serve the public interest. Accordingly, BRPTV requests to move from Channel *3 to Channel *13 with the specifications set forth below, so that Roanoke-area viewers may benefit from substantially improved over-the-air digital television broadcast service.

City/State	Channel	DTV Power (kW)	Antenna HAAT (m)
Roanoke, VA	*13	66	630.6

REQUESTED CHANGES

- Change the channels from *3 to *13
- Increase the ERP from 9.8 kW to 66.0kW
- Increase antenna height radiation center from 55.0 m AGL to 68.4 m AGL
- Change antenna azimuth pattern from nondirectional to directional
- Change antenna from Dielectric THA-O4-2L/8H-1-R to Dielectric THV-10A13/VP-R C150
- Change electrical beam tilt from 0.0 to 1.0
- Change polarization from horizontal to elliptical

POWER AND HEIGHT

Section 73.622(f)(7) of the FCC Rules states that the maximum allowable ERP (kW) for a DTV station located in Zone II operating on channel 13 with an HAAT that exceeds 610 meters is determined using the following formula, with HAAT expressed in meters:

$ERPmax = 62.34-17.08*\log_{10}(HAAT)$

Therefore, since the proposed Channel *13 Zone II facility will have an HAAT of 630.6 m, the maximum allowable ERP is $62.34-17.08*\log_{10}(630.6) = 14.52$ dBk which equates to 28.3 kW.

LARGEST STATION IN MARKET

In order for WBRA-TV to replicate its licensed F(50,90) 28.0 dBuV/m protected noise limited service contour as closely as possible, it will need to operate with an ERP of 66 kW which will exceed the maximum allowable ERP limit pursuant to Section 73.622(f)(7) of the FCC Rules; however, Section 73.622(f)(5) of the FCC rules states that licensees and permittees assigned a DTV channel in the initial DTV Table of Allotments may request an increase in either ERP in some azimuthal direction or antenna HAAT, or both, that exceed the initial technical facilities specified in Appendix B, up to that needed to provide the same geographic coverage

area as the largest station within their market, whichever would allow the largest service area. It was determined that the licensed WBRA-TV Channel *3 (9.8 kW ERP) facility is the largest station in the Roanoke-Lynchburg, VA market. The licensed WBRA-TV Channel *3 facility's F(50,90) 28.0 dBuV/m protected noise limited service contour encompasses an area of 51,076.4 sq. km. With an ERP of 66 kW, the WBRA-TV Channel *13 facility will encompass an area of only 51,044.6 sq. km which is 31.8 sq km less than the licensed WBRA-TV Channel *3 allowable limit of 51,076.4 sq. km.

TVSTUDY – REQUEST 0.1 KM PROFILE SPACING

BRPTV proposes to operate with an elliptically polarized Dielectric model THV-10A13/VP-R C150 directional, top-mount antenna tuned specifically for Channel 13 at the licensed WBRA-TV transmitter site (ASRN 1017598) with a centerline height above mean sea level of 1,208.4 meters and 630.6 meters above average terrain (See Exhibit 1). The proposed changes include a new antenna from nondirectional to directional, electrical beam tilt from 0.0 to 1.0 degrees, a 56.2 kW increase in ERP from 9.8 kW to 66.0 kW, a 13.4 m increase in antenna height from 55.0 m AGL (side-mount) to 68.4 m AGL (top-mount) and a change in frequency from low-band VHF channel *3 to high-band VHF channel *13. All other station parameters shall remain unchanged.

Section 73.616(d) of the FCC Rules states that an application will not be accepted if it is predicted to cause interference to more than an additional 0.5 percent of the population served by another DTV station. The attached TVStudy (v2.2.5) report was calculated using a 0.1 km profile point spacing and a 2.0 km study cell size and demonstrates that the proposed WBRA-TV Channel *13 facility would not cause impermissible interference to any stations. Referring to the attached TVStudy, it can be seen that the WVPT Channel 12 facility was intentionally removed from the study. VPM Media Corporation ("VPM") is the licensee of WVPT which requested a rulemaking proceeding for the purpose of amending the DTV Table of Allotments to substitute Channel 15 for Channel 11 which would also release VPM's Channel 12 authorization (DTS) and clear the way for WBRA to operate on Channel *13. The

FCC released a Report and Order on September 1, 2022 (MB Docket No. 21-248) which adopted and ordered amendment of the DTV Table of Allotments effective immediately designating Channel 15 at Staunton, VA for the WVPT facility. Accordingly, BPPTV hereby requests amendment of the DTV Table of Allotments to substitute channel *13 for WBRA-TV in lieu of channel *3, for Roanoke, VA. As previously mentioned, WBRA-TV has experienced a substantial loss of viewers within its protected noise limited service contour due to the poor propagation characteristics of the low-band VHF channel as well as the surrounding area's rugged terrain not to mention that it is the only low-band VHF station in the Roanoke-Lynchburg, VA DMA. Therefore, the proposed channel substitution from *3 to *13 would significantly serve the public interest. BRPTV is willing to accept the predicted 1.15% receive interference (See TVStudy Report).

PRINCIPAL COMMUNITY

Referring to Exhibit 2, it can be seen that the proposed facility's F(50,90) 43.0 dBuV/m principal community contour (dashed magenta contour) fully encompasses the entire Roanoke, VA community in all directions pursuant to §73.625 of the FCC Rules (DTV Coverage of Principal Community and Antenna System).

PBS POPULATION LOSS ANALYSIS

The FCC weighs the public interest when a television broadcast facility proposes a service area reduction. As demonstrated in Exhibit 2, the proposed facility's F(50,90) 36.0 dBuV/m protected noise limited service contour slightly decreases from approximately the 120° radial through the 240° radial clockwise relative to the licensed facility's F(50,90) 28.0 dBuV/m protected noise limited service contour; therefore, it is subject to a population loss analysis. As previously mentioned, modifying the WBRA-TV facility from its licensed facility operating with a low-band VHF frequency to the proposed facility operating with a high-band VHF frequency will significantly serve the public interest, especially since the lost PBS population will be de minimis as shown in Exhibit 3. The contours depicted in Exhibit 3 were generated from TVStudy. The blue contour represents the licensed WBRA-TV Channel *3 facility's F(50,90) 28.0 dBuV/m protected noise limited service contour (PNLSC) and the green

contour represents the proposed WBRA-TV Channel *13 facility's F(50,90) 36.0 dBuV/m PNLSC. The black contours depicted in Exhibit 3 represent surrounding PBS stations with PNLSCs that overlap the WBRA-TV licensed and proposed PNLSCs. Longley-Rice studies were conducted using TVStudy to identify terrain limited population centroiods within the licensed WBRA-TV Channel *3 facility's PNLSC. All centroids were then eliminated with the exception of those that are covered by the licensed WBRA-TV Channel *3 PNLSC but not by the proposed WBRA-TV Channel *13 PNLSC. Furthermore, centroids located within the surrounding PBS station's PNLSCs were also eliminated which resulted in only three unserved population centroids containing a total of only 94 people which is well within the 500 person de minimis threshold. It should be noted that the three unserved population centroids for this PBS population loss study depicted in Exhibit 3 would likely be fully covered with a signal greater than the minimum threshold required for reception if Longley-Rice coverage were used instead of contours which would then show a zero (0.0) PBS population loss. Accordingly, the proposed channel change should be granted since it would significantly benefit the public interest.

RADIO FREQUENCY RADIATION COMPLIANCE

The proposed WBRA-TV Channel *13 full-service NCE digital television broadcast facility will have no significant environmental impact as defined in §1.1307 of the FCC Rules. The digital transmitter, transmission line and antenna system shall produce a horizontally polarized ERP of 66 kW and a vertically polarized ERP of 62.7 kW (E-pol). It was determined that the maximum lobe of radiation will occur at approximately 92.7 feet from the base of the tower (237.3 ft radial distance from the antenna center). At 92.7 feet from the base of the tower, the depression angle of the main lobe will be approximately 67° below the horizontal. At that point, the relative field is 0.173 and the power density six feet above the ground will be 0.02461 mW/cm². This equates to only 2.46% of the Maximum Permissible Exposure (MPE) limits for Occupational/Controlled Exposure and only 12.30% of the MPE limits for General Population/Uncontrolled Exposure authorized by the American National Standards Institute (ANSI). Since operation of the proposed WBRA-TV Channel *13 full-service NCE digital

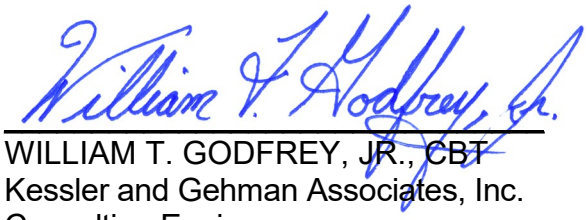
television broadcast facility would exceed 5.0% of the MPE limit for Occupational/Controlled Exposure or General Population/Uncontrolled Exposure at any point on the ground, the proposed WBRA-TV Channel *13 full-service NCE digital television broadcast facility is considered a “contributor” to the RF exposure environment pursuant to OET Bulletin 65, Edition 97-01. Therefore, contributions of exposure from other sources were accounted for in this analysis. Therefore, all broadcast antennas on the WBRA-TV tower must be analyzed and a composite study is required to demonstrate that the total power density of all antennas on the tower would not exceed 100% of the MPE allowable.

Since the only broadcast antenna mounted on the WBRA-TV support structure is the WBRA-TV antenna, the composite power density on the support structure is equal to the power density produced by the WBRA-TV facility. Therefore, the total RF energy emanating from the single antenna mounted on the WBRA-TV support structure will be 2.46% of the MPE limits for Occupational/Controlled Exposure and 12.30% of the MPE limits for General Population/Uncontrolled Exposure. Accordingly, the total exposure, which would be generated by the WBRA-TV facility alone, would result in exposure levels well below the allowable exposure threshold authorized by the ANSI and the FCC. Accordingly, it is safe to conclude that the emissions would be insignificant and well within the maximum allowable requirements.

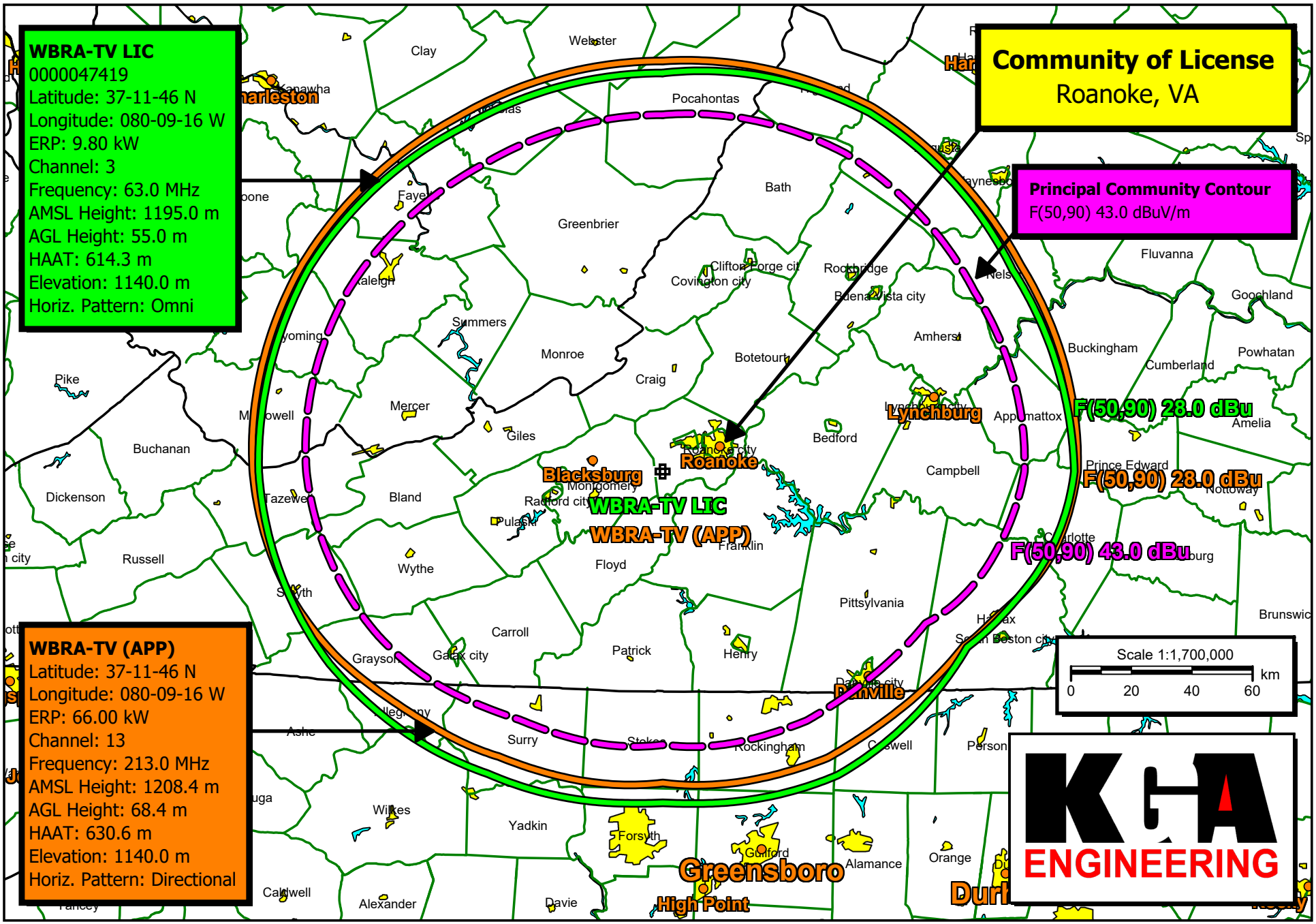
If other antennas are placed on the tower in the future, the licensee will cooperate with those users by reducing or completely terminating the power to the antenna when maintenance workers are in danger from the electromagnetic radiation emanating from the antenna. It is also understood that additional antennas on the support structure could increase the overall RF exposure levels and it is the responsibility of each licensee to ensure that the total RF exposure resulting from the operation of all antennas on the support structure do not exceed the MPE level at any point on the ground.

CERTIFICATION

This engineering technical statement was prepared by William T. Godfrey, Jr., with the professional firm Kessler and Gehman Associates, Inc., Telecommunications Consulting Engineers having offices in Gainesville, Florida, and has been working with the firm in the field of television and radio broadcast consulting since 1998 and his qualifications are a matter of record with the Federal Communications Commission. Mr. Godfrey is 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 — November 17, 2022
Kessler and Gehman Associates, Inc.
Consulting Engineers



WBRA-TV Channel *3 License vs. WBRA-TV Channel *13 APP

EXHIBIT 2

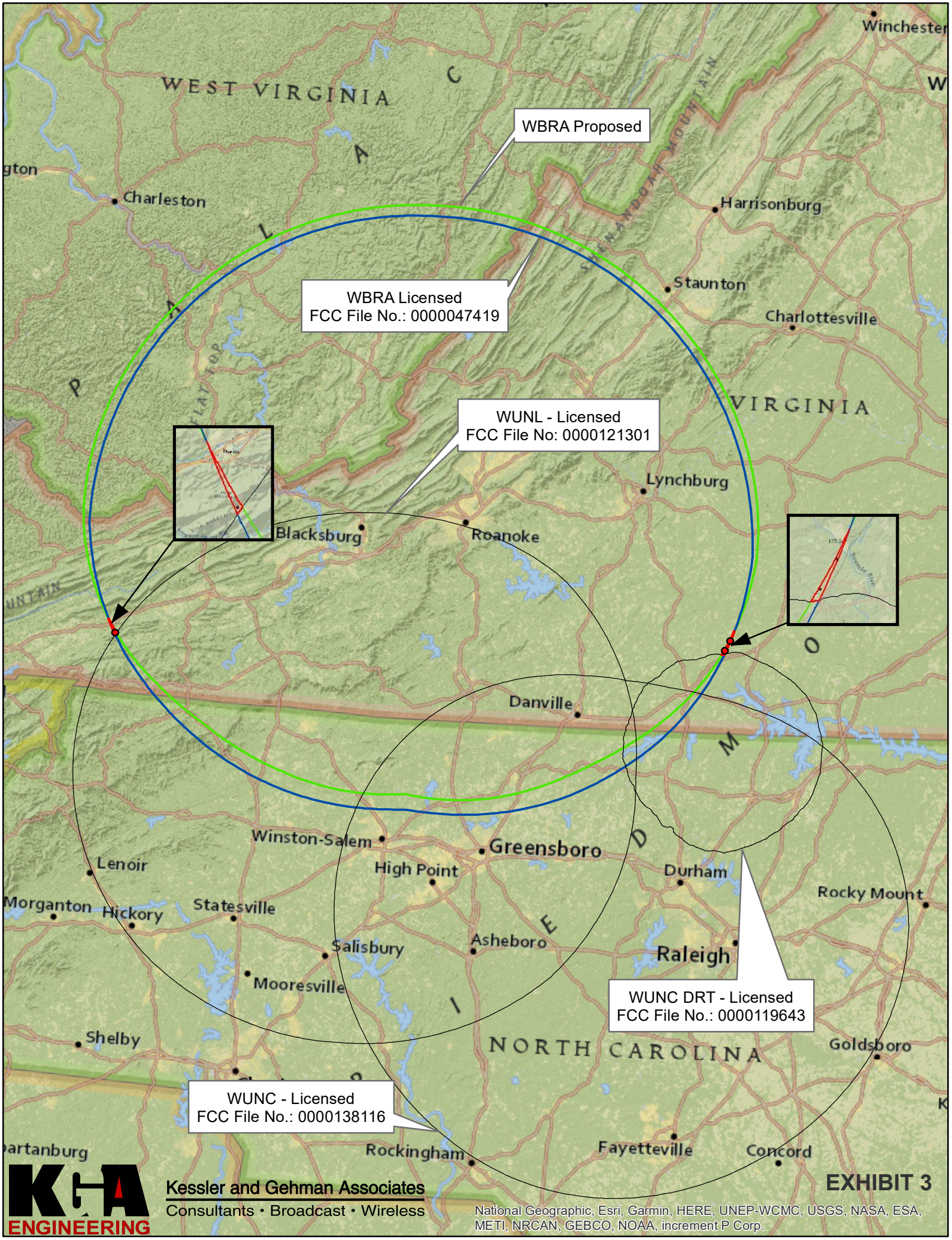

WBRA Proposed
WBRA Licensed
FCC File No.: 0000047419
WUNL - Licensed
FCC File No: 0000121301
WUNC DRT - Licensed
FCC File No.: 0000119643
WUNC - Licensed
FCC File No.: 0000138116
WEST VIRGINIA
VIRGINIA
NORTH CAROLINA
Winchester
Charleston
Harrisonburg
Staunton
Charlottesville
Lynchburg
Blacksburg
Roanoke
Danville
Winston-Salem
Greensboro
High Point
Durham
Rocky Mount
Lenoir
Morganton
Hickory
Statesville
Salisburg
Asheboro
Raleigh
Mooresville
Shelby
Goldsboro
Rockingham
Fayetteville
Concord
Kessler and Gehman Associates
Consultants • Broadcast • Wireless
EXHIBIT 3
National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

EXHIBIT 2

STATEMENT OF WILL ANDERSON, BLUE RIDGE PUBLIC TELEVISION, INC., PRESIDENT & CEO IN SUPPORT OF PETITION OF BLUE RIDGE PUBLIC TELEVISION, INC., TO AMEND THE TABLE OF ALLOTMENTS FOR WBRA-TV, ROANOKE, VIRGINIA

EXHIBIT 2

STATEMENT OF WILL ANDERSON, BLUE RIDGE PUBLIC TELEVISION, INC.,
PRESIDENT & CEO
IN SUPPORT OF PETITION OF BLUE RIDGE PUBLIC TELEVISION, INC.,
TO AMEND THE TABLE OF ALLOTMENTS FOR
WBRA-TV, ROANOKE, VIRGINIA

1. My name is Will Anderson. I make this statement, on the basis of my own personal knowledge, in support of the Petition of Blue Ridge Public Television, Inc. ("Blue Ridge PBS"), licensee of digital television station WBRA-TV, Roanoke, Virginia, to Amend the Table of Allotments to substitute high-band VHF Channel 13 in lieu of low-band VHF Channel 3.

2. I am Blue Ridge PBS's President & CEO. I have served in that position since June 2019, and previously was employed by Blue Ridge PBS as Executive Vice President since March 2008. In those positions, my responsibilities have included oversight of Blue Ridge PBS's efforts to resolve viewer complaints of poor reception and interference. My responsibilities also included oversight WBRA-TV's implementation of the FCC-ordered "repacking" of the television band and transition to DTV service.

3. Prior to the "repack" and DTV transition, WBRA-TV operated in analog mode on UHF Channel 15. WBRA-TV was assigned a DTV channel on VHF Channel 3 by the FCC. WBRA-TV commenced DTV operations on VHF Channel 3 in 2003, and completed its digital transition and terminated its analog UHF Channel 15 operations in June 2009.

4. Ever since WBRA-TV began full power DTV operations from VHF Channel 3, Blue Ridge PBS has consistently received a large number of complaints of poor reception and interference from over-the-air (OTA) viewers.

5. I have attached to this statement 19 representative complaints that were received by Blue Ridge PBS between 2015 and 2022. The following is a representative sampling of the nature and substance of complaints received from viewers within WBRA-TV's service area between:

- "I cannot get [WBRA-TV] on my HD antenna."
- "I get all of the Roanoke stations . . . but I do not get any signal from WBRA."
- "[W]e can get every TV stations out of Roanoke . . . but we cannot pick up Blue Ridge PBS."
- "[W]e have noticed that we are able to watch WBRA in the mornings, and by evening there is nothing showing."

- "Sometimes I can see PBS, still breaks up at different times."
- "Sometimes we can get a weak signal but with glitches right now we are getting no signal."
- "We have noticed that PBS channels often pixilate badly, though our reception of other channels is pretty good."

6. In assisting viewers with rescan and other instructions, we found that many had purchased indoor OTA antennas sold as suitable for both UHF/VHF use, which simply did not receive WBRA-TV's VHF DTV signal well. Some indoor UHF antennas have built-in amplifiers to improve UHF reception, and these amplifiers also increase the noise floor causing potential problems for VHF signals. *See* https://www.tvtechnology.com/opinions/solving-vhf-dtv-reception-problems.

7. Many viewers tie their financial support of Blue Ridge PBS, an NCE licensee which depends on donations and support from its viewers, to their ability to receive WBRA-TV's programming OTA. The poor propagation and reception characteristics of our low-band VHF signal are placing us at a severe disadvantage compared to other full power DTV stations in our market, the vast majority of which operate on UHF frequencies.

I hereby certify under penalties of perjury that the foregoing statements are true and correct to the best of my knowledge, and made in good faith.

Dated: November 18, 2022

Will Anderson, President & CEO
Blue Ridge Public Television, Inc.

From: Kaleigh [redacted]
Sent: Wednesday, November 04, 2015 2:55 PM
To: info <info@blueridgepbs.org>
Subject: Channel 15 Issues

I love watching PBS, but recently I cannot get it on my HD antenna. I live in downtown Roanoke and can still get all the other channels. Why isn't PBS, channel 15, on the air anymore?

Thank you!

Kaleigh [redacted]

From: Thomas [redacted]
Date: February 17, 2016 at 8:43:01 AM EST
To: <info@blueridgepbs.org>
Subject: TV Reception

Hello - I recently converted to over the air tv reception. I get all of the Roanoke stations, Lynchburg, and Blluefield very well. But, I do not get any signal from WBRA. Why is that and is there a way that I can get your signal?

Thanks Tom [redacted]

-----Original Message-----
From: Carol Jennings [mailto:c_jenning@blueridgepbs.org]
Sent: Monday, June 20, 2016 1:21 PM
To: Cory, Suzanna
Subject: Blue Ridge PBS: Over the AIR reception

This is an enquiry email via https://protect-us.mimecast.com/s/WcdbC5ylMKF06xA8TOJL4I?domain=blueridgepbs.org/ from:
Anthony [redacted]

We canceled our satellite reception.. I bought new smart TVs with digital tuners, one of the top rated outdoor antenna for our house, and we can get every TV Station out of Ronoake, Lynchbirg and even some others out of North Carolina... But.. we can not pick up Blue Ridge PBS.. what gives? Is your signal that low?

From: Steven [redacted]
Date: July 25, 2016 at 1:19:00 PM EDT
To: <info@blueridgepbs.org>
Subject: Poor antenna reception

I live in Radford and have switched to over-the-air television. My antenna is able to pick up WDBJ, WSLS, WFXR, and WPXR from the Roanoke area. Only on occasion can I tune in WBRA.

I will also be trying another location for my antenna, but wanted to understand why I have problems with the WBRA broadcast, but not the other stations.

The WBRA Power is listed as 9.8 kW, far below those of the other stations. Is that the likely explanation?

Are there any plans to increase the broadcast power for WBRA?

Thanks!

Steve [redacted]
Radford

From: edward [redacted]
Date: September 4, 2016 at 8:25:34 AM EDT
To: "info@blueridgepbs.org" <info@blueridgepbs.org>
Subject: coverage?
Reply-To: edward whyte <etwhyte43@yahoo.com>

We can not get PBS in Union Hall, VA (near Rocky Mount) using our antenna and a new digital TV.

When we run the setup function, channels 15.1 and 15.2 are not captured.

The TVs are digital flat screen and the antenna brings in all the Roanoke channels.

Previously we could receive PBS.

Now our only option is cable. What changed?

Edward [redacted]

[redacted]
Union Hall, VA 24176

From: Marie [redacted]
Date: October 19, 2016 at 6:27:33 AM EDT
To: "info@blueridgepbs.org" <info@blueridgepbs.org>
Subject: WBRA reception/signal in Forest VA
Reply-To: Marie [redacted]

Dear Friends,

We have noticed that we are able to watch WBRA in the mornings, and by evening there is nothing showing. Why are we not able to view WBRA in the afternoon/evenings?
Thank you,
Marie [redacted]
Forest, VA

From: Jamie [redacted]
Date: April 13, 2017 at 11:53:17 PM EDT
To: "info@blueridgepbs.org" <info@blueridgepbs.org>
Subject: PBS over the air signal help
Reply-To: [redacted]

I live in Concord, VA and rceive my television service by using over the air signals. I am able to get all of the local stations; wset, wsls, wdbj, fox21/27, along with some other stations. Unfortunately, for some reason, I am unable to get pbs. My tuner says the signal is at 100% but pbs will not come in. Would you know of any reason for that or could you provide help in securing the pbs stations? My family and I would sure like to enjoy the amazing pbs content.

Thanks,

James

Sent from Yahoo Mail on Android

From: "Mark [redacted]
Date: April 18, 2017 at 6:28:24 PM EDT
To: <info@blueridgepbs.org>
Subject: Spectrum Auction Funds

Good evening,

Congratulations on your spectrum auction winnings.

I was wondering if the "capital improvements" mentioned in the current.org article include more power for the WBRA-DT signal (once the FCC freeze is lifted) and a new encoder that would allow you to restore World to a full-time channel of its own. Both would be significantly helpful to the viewers like my parents who find WBRA's current signal to be unreliable to the point that they don't really watch it much anymore--any they're people who generally love PBS. If you could get the power up from 9.8 kW to something closer to 30 kW, I suspect that would help them significantly.

Thank you, and have a great day.

Mark [redacted]

From: Jim [redacted]
Sent: Monday, September 18, 2017 1:04 PM
To: Dan Ullmer <dullmer@blueridgepbs.org>
Subject: signal problems

Hi ,

Wonder if you have any suggestions. I got the Terk HDTVAZ antenna recommended on your website and still can't get you signal at all. I have pointed it at poor mountain transmitter site and get every other station from 38 down to 7 perfectly. We are located in Bedford county.

Appreciate any ideas you might have
.
Thanks,
Jim

From: Beth [redacted]
Date: November 10, 2017 at 2:34:52 AM EST
To: <Info@blueridgepbs.org>
Subject: 15.1, 15.2
Reply-To: Beth [redacted]

Blue Ridge PBS 15.1 and 15.2 over the air seems to be having technical issues from time to time over the last week. 15.2 especially. I thought I would inform you of the problem . Since these channels are over the air , I am aware that weather conditions can hamper the type of reception I will get. But I'm an old pro at this, so a good portion of the lack of reception is technical I assume . Hate missing my shows
Thanks for your help

Sincerely
[redacted]

From: Tommy [redacted]
Date: December 25, 2017 at 9:44:24 PM EST
To: <info@blueridgepbs.org>
Subject: Signal reception

I have an engineering question for you. I am a former broadcast engineer. I used to work for y'all just prior to your transition to digital TV transmission. I just discovered that my parents aren't able to receive y'alls broadcast on 15.1 - 15.3. They can receive all the other digital transmissions from Poor Mountain. I am absolutely puzzled about this. Please let me know of anything that you can think of that would cause my parents to not get your broadcast. Just so you know, I have already tried rescanning and direct channel entry. And, they live just south of Rocky Mount and the tower lights are directly visible from their house. Hopefully, you will be able to guide me in the right direction.

Thank you for your time,
Tommy [redacted]

From: Sue [redacted]
Date: January 28, 2018 at 9:35:56 AM EST
To: <info@blueridgepbs.org>
Subject: Reception

I live in Forest, VA. For years we have watched PBS. We use digital tv antennas for our tv channel reception. We have been unable to receive the PBS tv signal for the last 3 or 4 years. We used to get a great signal, then for an unknown reason, we couldn't. We receive all Lynchburg and Roanoke stations over the air no problems with our antennas, but not PBS.
Do you have any suggestions?
Thanks for your help.
Susan [redacted]

Sent from my iPhone

-----Original Message-----
From: BRPBS web site [mailto:web@blueridgepbs.org]
Sent: Monday, February 19, 2018 10:30 AM
To: Dan Ullmer <dullmer@blueridgepbs.org>
Subject: Blue Ridge PBS: To Mr. Ullmer Question re: broadcast power

This is an enquiry email via https://protect-us.mimecast.com/s/sXp1CzpBAYFR4xKDfYSHG2?domain=wbra.org from:
Tam [redacted]

Hi. I converted to an over-the-air indoor digital antenna about three months ago and tried three antennas until I found one that enabled me to get WBRA channels (15.1, 15.2 and 15.3). I need my public television!!

Everything worked well -- very good reception -- until perhaps a week ago. Now I can't get WBRA at all. (Except for Sat. when we had rain -- I can't figure THAT out!!)

I really miss my WBRA programs. Has something changed recently that would have effected my ability to get your signal? Do you have any suggestions that might help? I've tried moving the antenna all over my living room and the signal might come in for a couple of seconds, then I lose it. BTW, I'm using a Mohu Leaf 50 indoor antenna.

Thank you,

Tam[redacted]

From: Timothy [redacted]
Sent: Friday, February 23, 2018 3:03 PM
To: Dan Ullmer <dullmer@blueridgepbs.org>
Subject: Re: Blue Ridge PBS: signal strength

Sometimes I can see PBS, still breaks up at different times. When will the FCC be contacted about signal strength?

Tim

From: [redacted]
Sent: Tuesday, February 27, 2018 4:22 PM
To: Dan Ullmer <dullmer@blueridgepbs.org>
Subject: Your Article On Antennas

I hope this reaches you this time. I had your email wrong. I'm hope to get a copy of your piece on choosing the right antenna...I receive your signal 'through the air," and have used rabbit ears for years, but because your signal has lost some power, I get a picture that is "broken" up. Let me know how to contact the FCC so I can urge them to allow you to boost your signal.I know lots of people who have no cable/dish and are probably wondering what has happened to PBS.

Thanks for your help.

Elizabeth [redacted] in Blacksburg

[redacted]

From: Allen[redacted]
Date: July 10, 2019 at 1:20:50 PM EDT
To: BRPBS Information <info@blueridgepbs.org>
Subject: coverage in Lynchburg

I was wondering if WBRA was going o switch back to a UHF frequency form its current LO-VHF. So we can receive a stronger signal in the Lynchburg area? Sometimes we can get a weak signal but with glitches right now we are getting no signal. Thanks for your reply,
Allen[redacted]

From: Cathey [redacted]
Sent: Thursday, September 12, 2019 9:17 AM
To: BRPBS Information <info@blueridgepbs.org>
Subject: Reception of your channels via antenna

We watch local channels with a TV antenna. We have noticed that PBS channels often pixelate badly, though our reception of other channels is pretty good. I do notice that you are VHF while most of the others are UHF. Do you have any words of wisdom or experience with this situation? Would we improve our PBS reception by making sure our antenna is both UHF and VHF AND that it can receive from more than 50 miles away? Or is this a problem that would probably continue regardless of an antenna upgrade? We live in the Bonsack area, just off 460 behind Lowes/Walmart complex.

Thank you
Cathey

Sent from Mail for Windows 10

From: Margaret [redacted]
Date: September 13, 2019 at 8:36:57 AM EDT
To: BRPBS Information <info@blueridgepbs.org>
Subject: No channel

Hello my name is Margaret and I live at [redacted] Pembroke Va, 24136.
We recently purchased an antenna and for some reason we can't get you guys..We get 7, 10, fox, cw, and several others but not you, We have rescannned several times and changed the direction of the antenna every which way...
What can we do??
Thanks Margaret

From: Alice [redacted]
Sent: Monday, July 11, 2022 9:00 AM
To: Eric Dickens <edickens@blueridgepbs.org>
Subject: Re: reception issues

Dear Mr. Dickens:

I am a loyal fan of and contributor to WBRA-TV! I live in Blacksburg, and I'm writing to tell you that the reception is usually alright *except for shows that I truly value and watch daily or weekly on 15.1 or 15.2.*

I can turn to any one of my favorites and "expect" to see jagged color blocks interrupting the visual as well as the audio! It is most aggravating and they do NOT disappear if I switch to 15.2-4 and back to 15.1. Sometimes, the "display" disappears in 10+ minutes. The CBS and NBC channels, based in Roanoke, have NO problem! What is it w/your station??

Most affected are the following: the PBS Newshour, the Sunday night series (most recently Grantchester last night, but all others prior to this that appear at 9 or 10PM), and the Friday night news shows (Washington Week, Firing Line).

Sometimes, I think it may be stormy or cloudy weather; but that doesn't always hold true! And "weather" doesn't affect the two other stations mentioned. Yes, I have an antenna on my roof, fyi.

I am not sure whether you are aware of this issue, but now you are! I sincerely hope that you can address this in some meaningful way!
Thank you.

Yours truly,

Alice [redacted]