

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WTTO LICENSEE, LLC, licensee of full-power digital television station WTTO(TV), Channel 21 in Homewood, Alabama, in support of its Application for Modification of License to operate the station with the ATSC 3.0 transmission standard. It is proposed that during the time that the facility will be transmitting in ATSC 3.0, the primary ATSC 1.0 programming of WTTO(TV) will be transmitted by station WIAT(TV), Channel 30 in Birmingham, Alabama. In addition, WTTO(TV) will transfer its secondary ATSC 1.0 programming streams to the following stations: WABM(TV), Channel 20 in Birmingham, Alabama; WVTM-TV, Channel 7 in Birmingham; and, WBRC(TV), Channel 29 in Birmingham.

Exhibit B is a map upon which the WTTO(TV) and WIAT(TV) noise-limited service contours are plotted. As shown, a significant majority of the WTTO(TV) service contour lies within that of WIAT(TV). Indeed, the "loss area" population that will be created as a result of the transfer of WTTO(TV)'s primary ATSC 1.0 programming to WIAT(TV) is only 4.3% of the total service population of WTTO(TV). Conversely, the additional area served by WIAT(TV) that is presently not served by WTTO(TV) contains 41,668 people, according to the 2020 U.S. Census data.

Therefore, this proposal meets Section 73.3801(f)(6)(ii) of the FCC Rules which requires that the new ATSC 1.0 host station cover at least 95% of the service population of the station that elects to operate under the new ATSC 3.0 format. As a result, expedited processing of this proposal is respectfully requested and believed to be justified.

EXHIBIT A

It is also important to note that WIAT(TV) places a city-grade service contour over the entirety of the WTTO(TV) city of license, Homewood, Alabama, as shown in Exhibit C. This is not entirely unexpected, since WIAT(TV) is licensed to a community within the same Designated Market Area (DMA) as WTTO(TV) (Birmingham, Alabama) and has a transmitter site co-located with that of WTTO(TV). Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

Exhibit D is a map upon which the WABM(TV) and WTTO(TV) noise-limited service contours are plotted. As shown, the majority of the WTTO(TV) service contour is contained within that of WABM(TV). Indeed, the "loss area" population that will be created as a result of the transfer of WTTO(TV)'s secondary ATSC 1.0 programming to WABM-TV is small, amounting to only 6.9% of the total service population of WTTO(TV), according to the 2020 U.S. Census. In addition, the gain area served by WABM(TV) that is presently not served by WTTO(TV) contains 136,420 people, according to the 2020 U.S. Census database.

It is also important to note that WABM(TV) places a 48 dBu city-grade service contour over the entirety of the WTTO(TV) city of license, Homewood, Alabama, as shown in the attached Exhibit E. This is not entirely unexpected, since WABM(TV) is licensed to a community within the same Designated Market Area (DMA) as WTTO(TV), Birmingham, Alabama, and operates from a transmitter site adjacent to that of WTTO(TV). Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

Exhibit F is a map upon which the WTTO(TV) and WVTM-TV noise-limited service contours are plotted. As shown, nearly the entire WTTO(TV) service contour is contained within that of WVTM-TV. The "loss area" population that will be created as a result of the transfer of

EXHIBIT A

WTTO(TV)'s secondary ATSC 1.0 programming to WVTM-TV is insignificant, amounting to less than 0.1% of the total service population of WTTO(TV), according to the 2020 U.S. Census. In addition, a significant amount of gain area, containing 139,869 people, will be created by a move of the ATSC 1.0 secondary streams to station WVTM-TV.

WVTM-TV also places a 43 dBu city-grade service contour over the entirety of the WTTO(TV) city of license, Homewood, Alabama, as shown in Exhibit G. Like WABM(TV), WVTM-TV is licensed to a community within the same Designated Market Area (DMA) as WTTO(TV), and operates from a site very close to that of WTTO(TV). Thus, the instant proposal meets the requirements of Section 73.3801(c) of the Commission's Rules.

Exhibit H is a map upon which the WTTO(TV) and WBRC(TV) noise-limited service contours are plotted. As shown, a significant majority of the WTTO(TV) service contour overlaps that of WBRC(TV). Indeed, the "loss area" population that will be created as a result of the transfer of WTTO(TV)'s secondary ATSC 1.0 programming to WBRC(TV) is extremely small, amounting to only 1.8% of the total service population of WTTO(TV), according to the 2020 U.S. Census. In addition, a significant amount of gain area, containing 37,266 people, will be created by a move of the ATSC 1.0 secondary streams to station WBRC(TV).

WBRC(TV) also places a 48 dBu city-grade service contour over the entirety of the WTTO(TV) city of license, Homewood, Alabama, as shown in Exhibit I. This is not entirely unexpected, since WBRC(TV) is licensed to a community within the same Designated Market Area (DMA) as WTTO(TV), Birmingham, Alabama, and operates from a transmitter site adjacent to that of WTTO(TV). Thus, the instant proposal meets the requirements of Section 73.3801(c) of the Commission's Rules.

EXHIBIT A

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

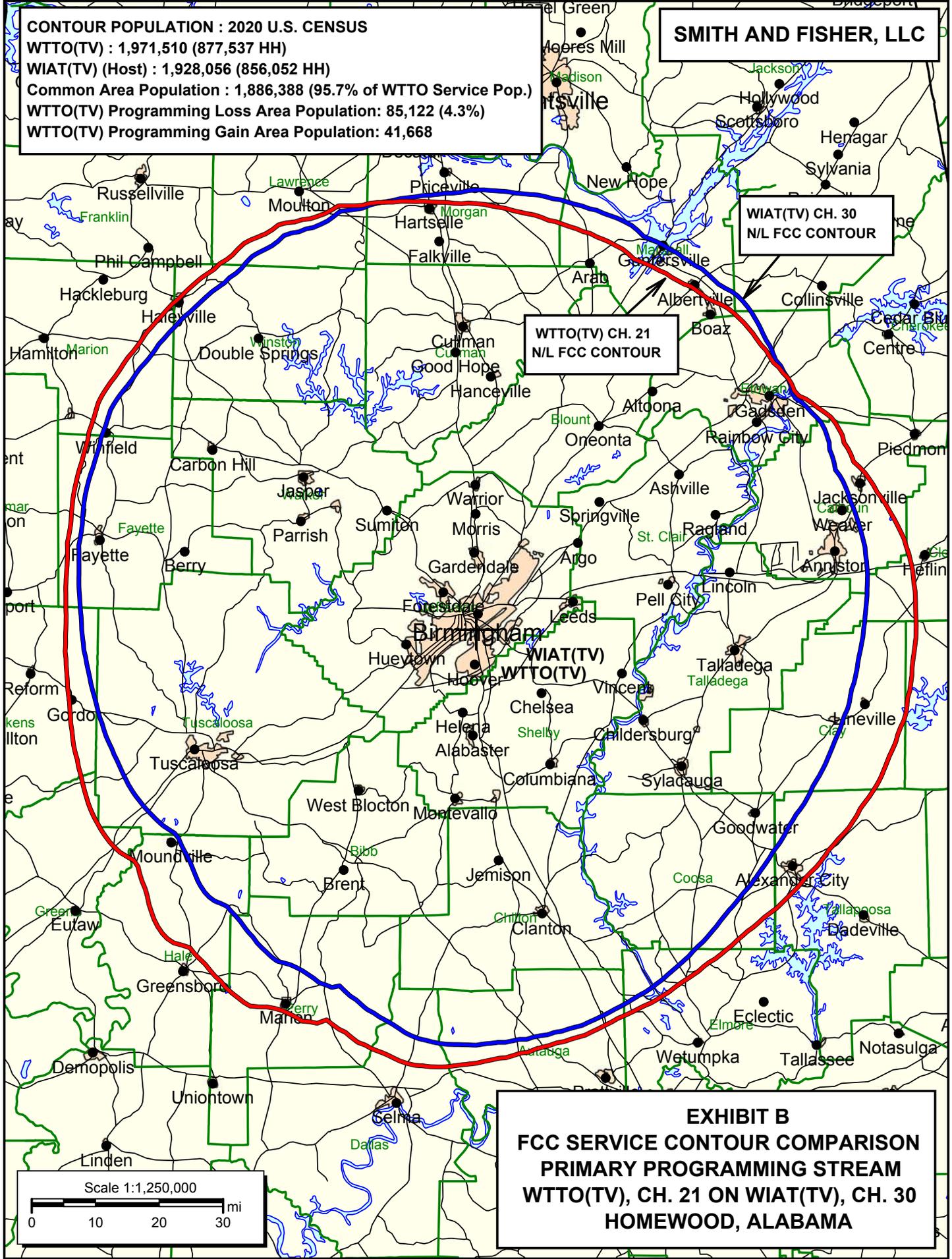
A handwritten signature in blue ink, appearing to read "K. T. Fisher". The signature is stylized with a large "K" and "F" and a smaller "T".

KEVIN T. FISHER

December 20, 2023

**CONTOUR POPULATION : 2020 U.S. CENSUS**  
WTTO(TV) : 1,971,510 (877,537 HH)  
WIAT(TV) (Host) : 1,928,056 (856,052 HH)  
Common Area Population : 1,886,388 (95.7% of WTTO Service Pop.)  
WTTO(TV) Programming Loss Area Population: 85,122 (4.3%)  
WTTO(TV) Programming Gain Area Population: 41,668

**SMITH AND FISHER, LLC**

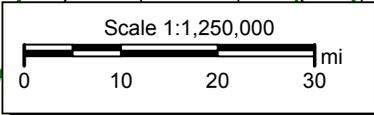


**WIAT(TV) CH. 30  
N/L FCC CONTOUR**

**WTTO(TV) CH. 21  
N/L FCC CONTOUR**

**WIAT(TV)  
WTTO(TV)**

**EXHIBIT B  
FCC SERVICE CONTOUR COMPARISON  
PRIMARY PROGRAMMING STREAM  
WTTO(TV), CH. 21 ON WIAT(TV), CH. 30  
HOMEWOOD, ALABAMA**



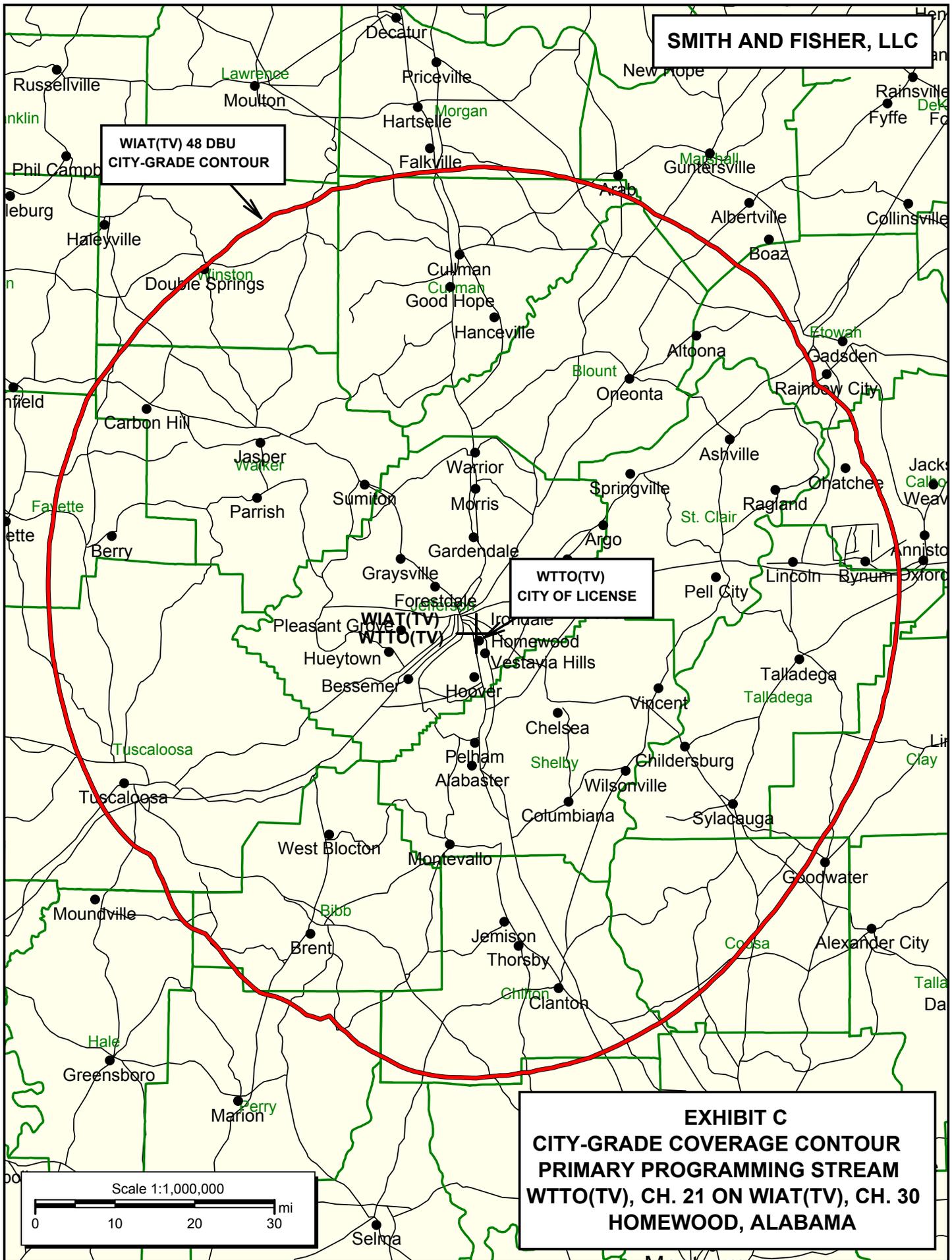
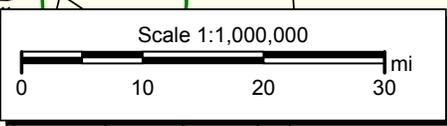
**SMITH AND FISHER, LLC**

**WIAT(TV) 48 DBU  
CITY-GRADE CONTOUR**

**WTTO(TV)  
CITY OF LICENSE**

**WIAT(TV)  
WTTO(TV)**

**EXHIBIT C  
CITY-GRADE COVERAGE CONTOUR  
PRIMARY PROGRAMMING STREAM  
WTTO(TV), CH. 21 ON WIAT(TV), CH. 30  
HOMEWOOD, ALABAMA**



**CONTOUR POPULATION : 2020 U.S. CENSUS**  
**WTTO(TV) : 1,971,510 (877,537 HH)**  
**WABM(TV) (Host) : 1,852,103 (825,601 HH)**  
**Common Area Population : 1,835,090 (93.1% of WTTO Service Pop.)**  
**WTTO(TV) Programming Loss Area Population: 136,420 (6.9%)**  
**WTTO(TV) Programming Gain Area Population: 17,013**

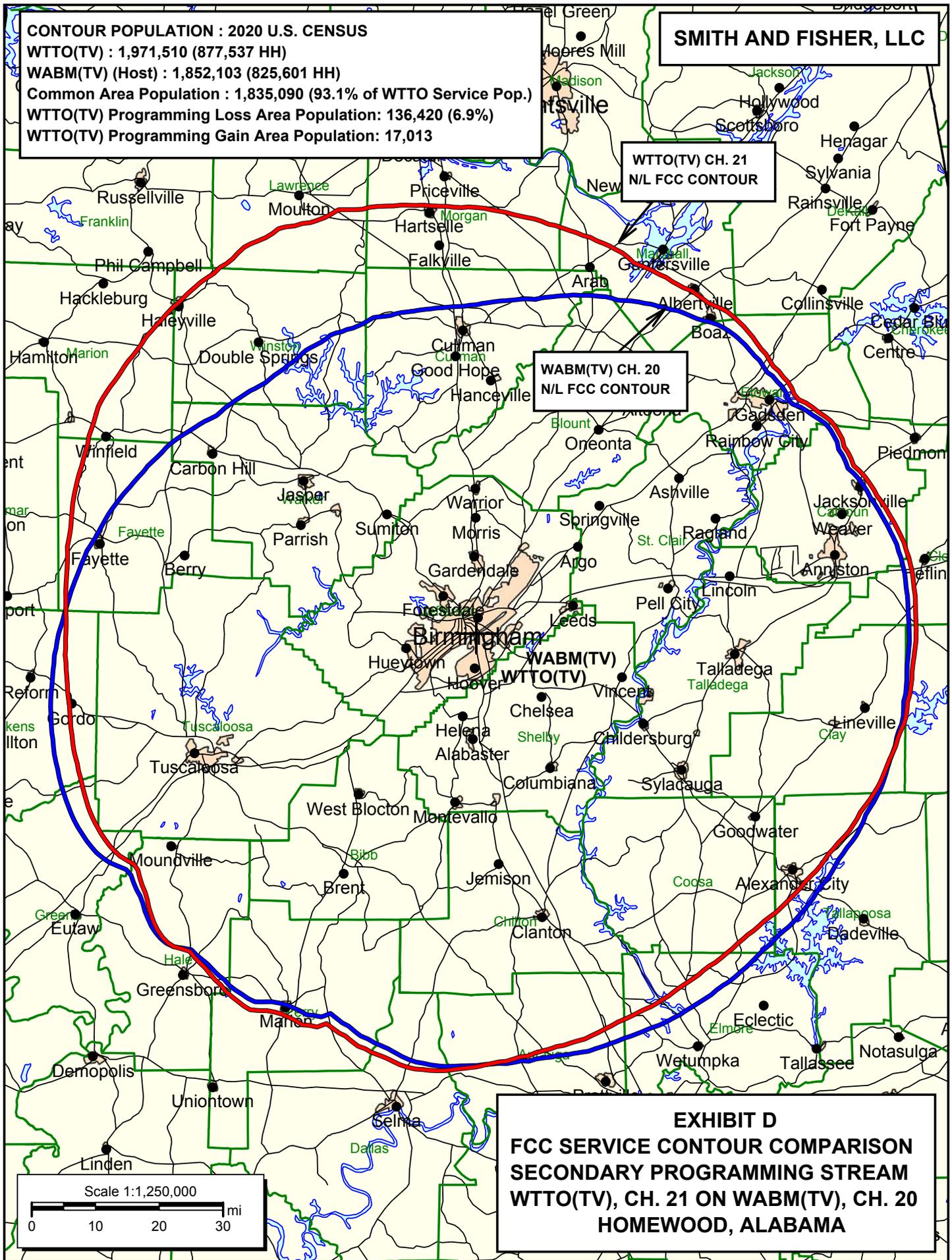
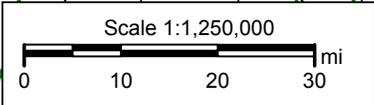
**SMITH AND FISHER, LLC**

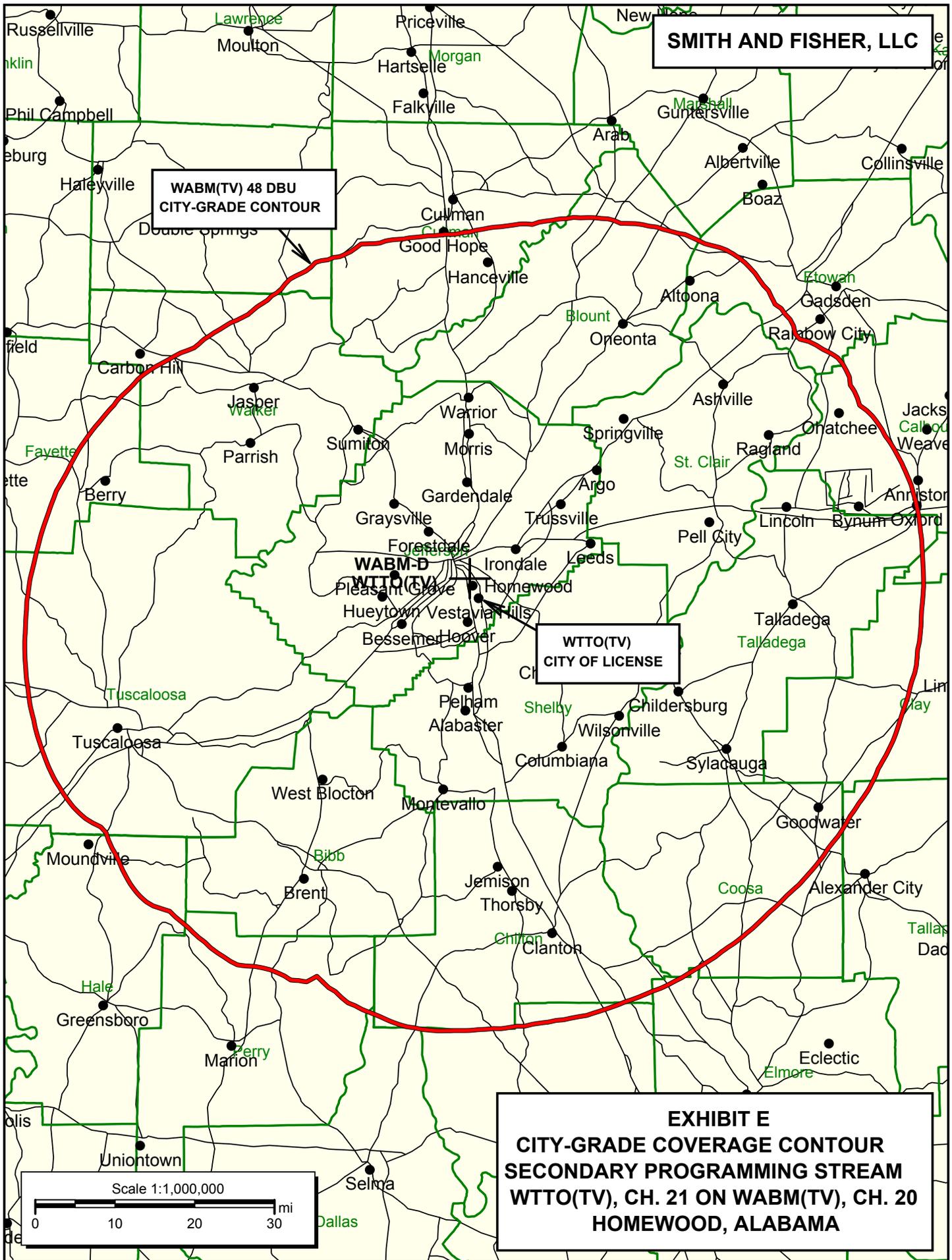
**WTTO(TV) CH. 21  
 N/L FCC CONTOUR**

**WABM(TV) CH. 20  
 N/L FCC CONTOUR**

**WABM(TV)  
 WTTO(TV)**

**EXHIBIT D  
 FCC SERVICE CONTOUR COMPARISON  
 SECONDARY PROGRAMMING STREAM  
 WTTO(TV), CH. 21 ON WABM(TV), CH. 20  
 HOMEWOOD, ALABAMA**



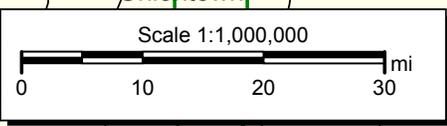


**SMITH AND FISHER, LLC**

**WABM(TV) 48 DBU  
CITY-GRADE CONTOUR**

**WTTO(TV)  
CITY OF LICENSE**

**EXHIBIT E  
CITY-GRADE COVERAGE CONTOUR  
SECONDARY PROGRAMMING STREAM  
WTTO(TV), CH. 21 ON WABM(TV), CH. 20  
HOMEWOOD, ALABAMA**



**CONTOUR POPULATION : 2020 U.S. CENSUS**  
WTTO(TV) : 1,971,510 (877,537 HH)  
WVTM-TV (Host) : 2,111,251 (936,610 HH)  
Common Area Population : 1,971,382 (>99.9% of WTTO Service Pop.)  
WTTO(TV) Programming Loss Area Population: 128 (<0.1%)  
WTTO(TV) Programming Gain Area Population: 139,869

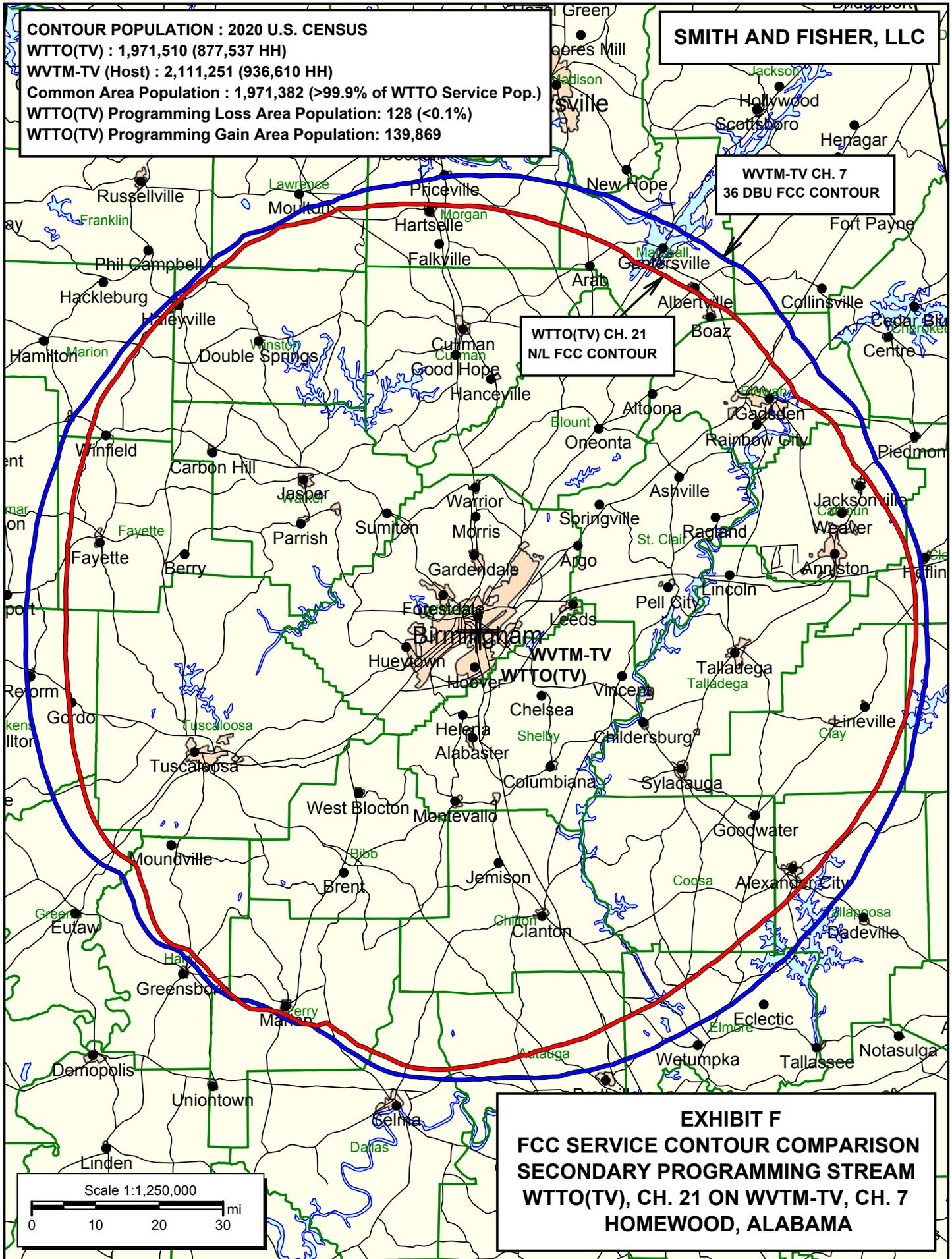
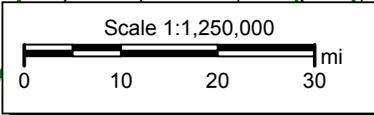
**SMITH AND FISHER, LLC**

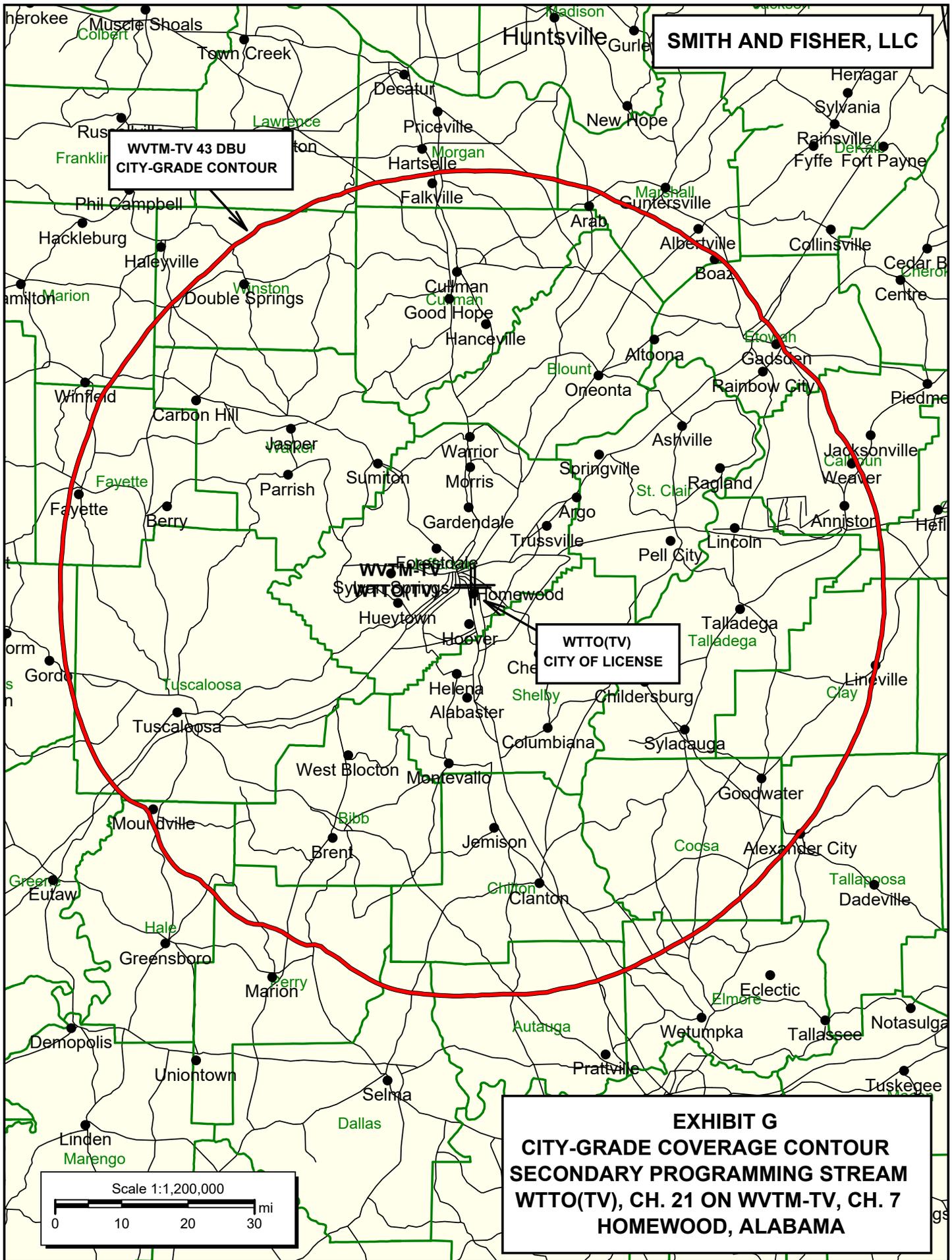
**WVTM-TV CH. 7  
36 DBU FCC CONTOUR**

**WTTO(TV) CH. 21  
N/L FCC CONTOUR**

**WVTM-TV  
WTTO(TV)**

**EXHIBIT F  
FCC SERVICE CONTOUR COMPARISON  
SECONDARY PROGRAMMING STREAM  
WTTO(TV), CH. 21 ON WVTM-TV, CH. 7  
HOMEWOOD, ALABAMA**





**CONTOUR POPULATION : 2020 U.S. CENSUS**  
WTTO(TV) : 1,971,510 (877,537 HH)  
WBRC(TV) (Host) : 1,972,986 (877,388 HH)  
Common Area Population : 1,935,720 (98.2% of WTTO Service Pop.)  
WTTO(TV) Programming Loss Area Population: 35,790 (1.8%)  
WTTO(TV) Programming Gain Area Population: 37,266

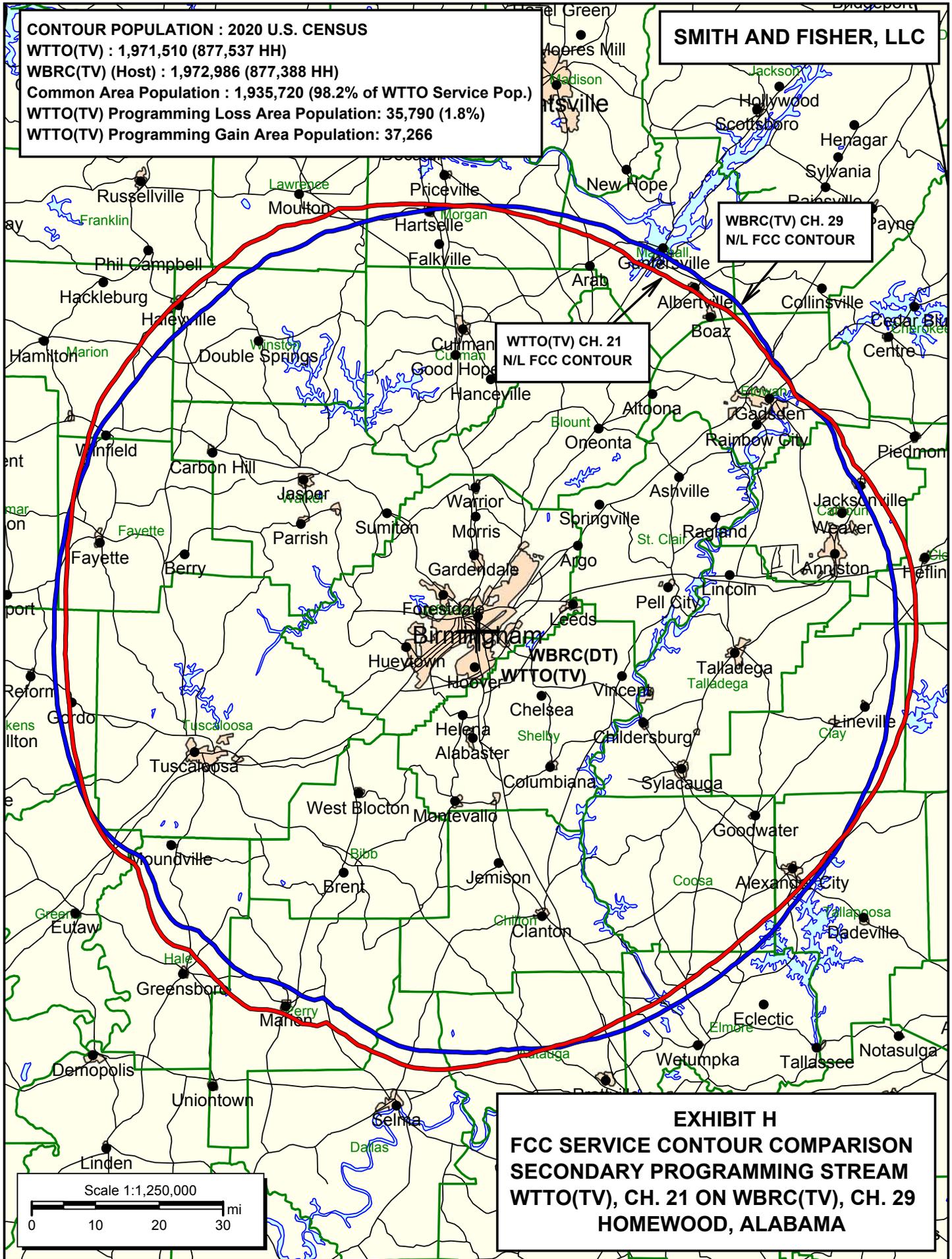
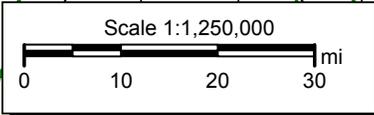
**SMITH AND FISHER, LLC**

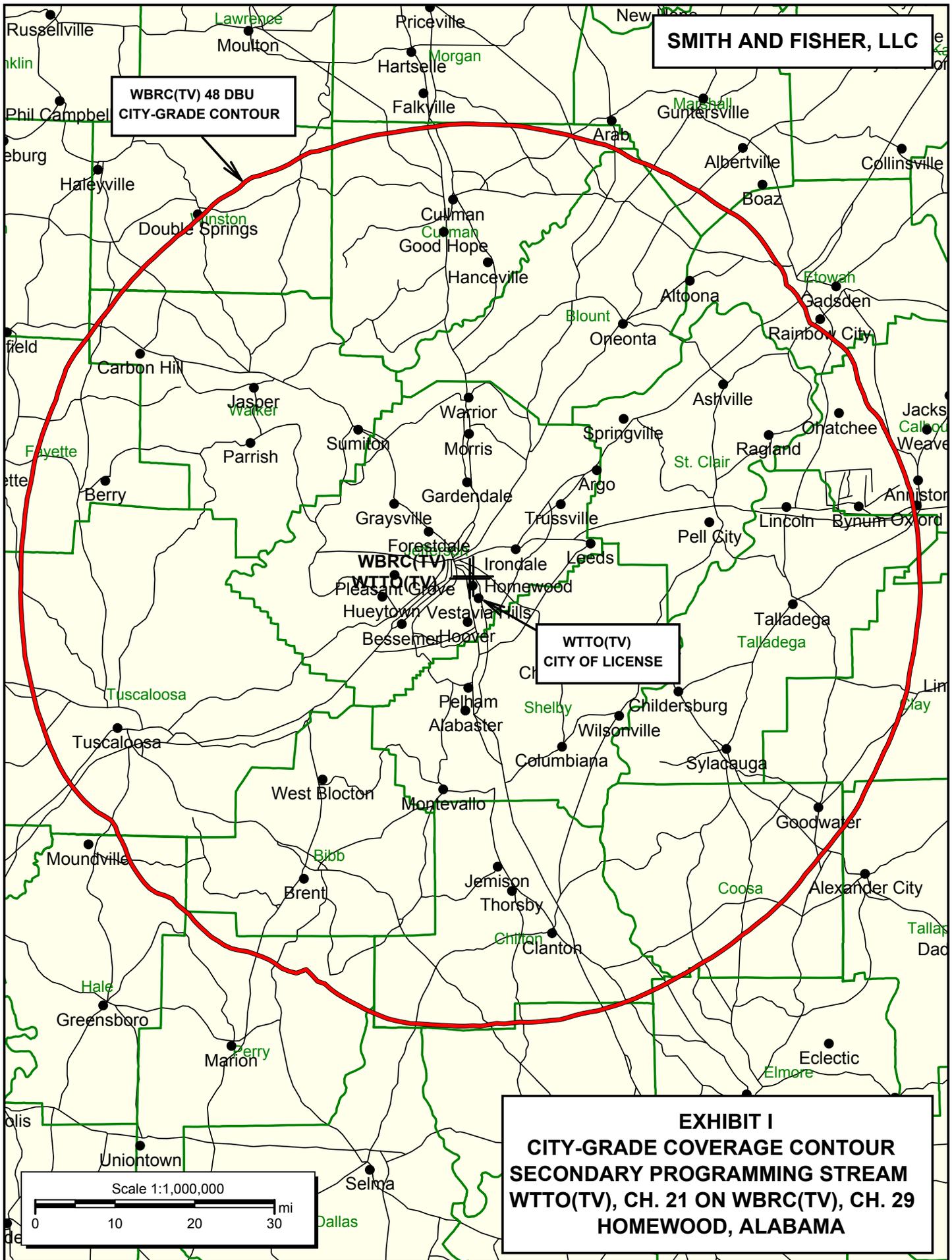
**WBRC(TV) CH. 29  
N/L FCC CONTOUR**

**WTTO(TV) CH. 21  
N/L FCC CONTOUR**

**WBRC(DT)  
WTTO(TV)**

**EXHIBIT H  
FCC SERVICE CONTOUR COMPARISON  
SECONDARY PROGRAMMING STREAM  
WTTO(TV), CH. 21 ON WBRC(TV), CH. 29  
HOMEWOOD, ALABAMA**





**SMITH AND FISHER, LLC**

**WBRC(TV) 48 DBU  
CITY-GRADE CONTOUR**

**WTO(TV)  
CITY OF LICENSE**

**EXHIBIT I  
CITY-GRADE COVERAGE CONTOUR  
SECONDARY PROGRAMMING STREAM  
WTO(TV), CH. 21 ON WBRC(TV), CH. 29  
HOMEWOOD, ALABAMA**

