

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of RALEIGH (WRDC-TV) LICENSEE, INC., licensee of full-power digital television station WRDC(TV), Channel 14 in Durham, North Carolina, 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 WRDC(TV) will be transmitted by station WLFL(TV), Channel 18 in Raleigh, North Carolina.

Exhibit B is a map upon which the WRDC(TV) and WLFL(TV) noise-limited service contours are plotted. As shown, the majority of the WRDC(TV) service contour is contained within that of WLFL(TV). Indeed, the WRDC(TV) population that will continue to be served as a result of the transfer of its primary ATSC 1.0 programming to WLFL(TV) will be approximately 95% (94.6%) of the total service population of WRDC(TV). It is also important to note that a significant amount of the "loss" population generated by this proposal occurs in Greensboro, North Carolina, which is in an adjacent market (the Greensboro-Winston Salem-High Point DMA). As a result, expedited processing of this proposal is respectfully requested under the 95% standard set forth in Section 73.801(f)(6)(ii) of the FCC Rules.

WLFL(TV) places a city-grade service contour over the entirety of the WRDC(TV) city of license, Durham, North Carolina, as shown in Exhibit C. This is not unexpected, since

WFLA(TV) and WRDC(TV) are both licensed within the same Designated Market Area (DMA) and operate from the same transmitter site. Thus, the instant application meets the requirements of Section 73.3801(c) of the Commission's Rules.

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 initial "K" and a long horizontal stroke at the end.

KEVIN T. FISHER

September 27, 2020

CONTOUR POPULATION : 2018 U.S. CENSUS ESTIMATE
WRDC(TV) : 4,336,560 (1,865,162 HH)
WLFL(TV) (Host) : 4,102,843 (1,760,863 HH)
WRDC(TV) Programming Loss Area Population: 233,717 (5.4%)
WRDC(TV) Programming Gain Area Population: 0

Smith and Fisher, LLC

WRDC(TV) CH. 14
N/L FCC CONTOUR

WLFL(TV) CH. 18
N/L FCC CONTOUR

WLFL(TV)
WRDC(TV)

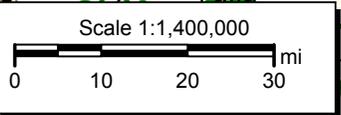
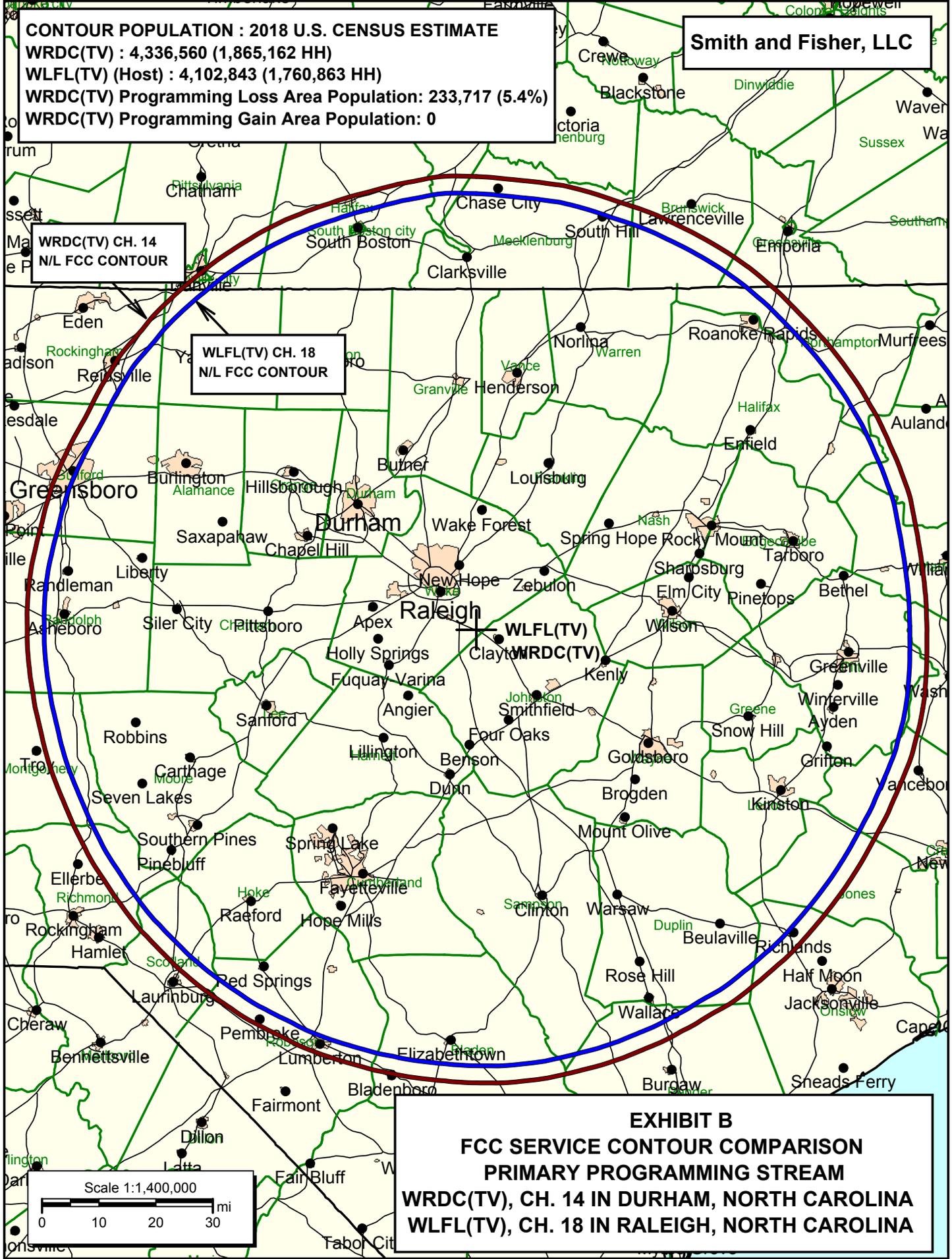
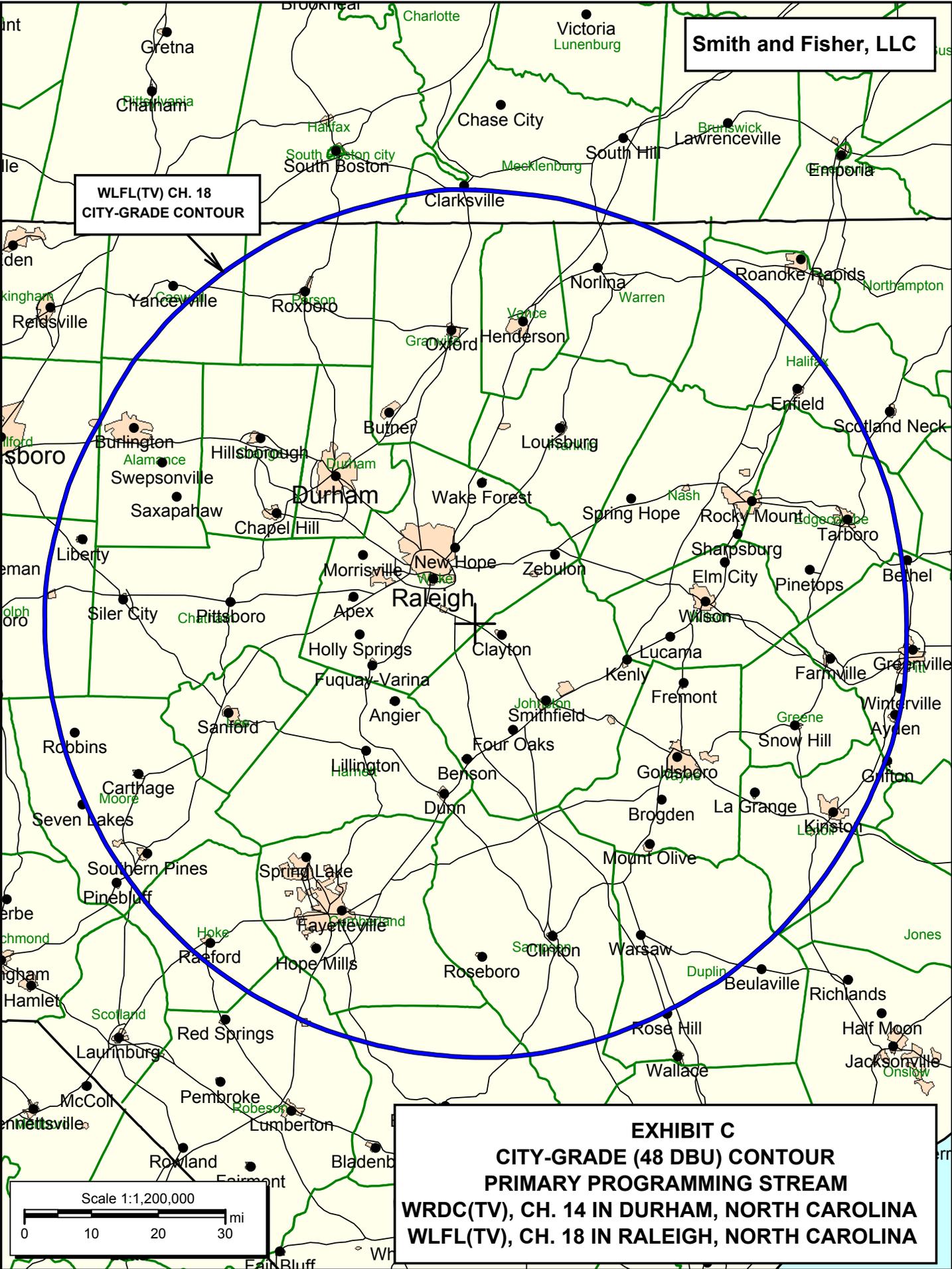


EXHIBIT B
FCC SERVICE CONTOUR COMPARISON
PRIMARY PROGRAMMING STREAM
WRDC(TV), CH. 14 IN DURHAM, NORTH CAROLINA
WLFL(TV), CH. 18 IN RALEIGH, NORTH CAROLINA



Smith and Fisher, LLC

**WLFL(TV) CH. 18
CITY-GRADE CONTOUR**



**EXHIBIT C
CITY-GRADE (48 DBU) CONTOUR
PRIMARY PROGRAMMING STREAM
WRDC(TV), CH. 14 IN DURHAM, NORTH CAROLINA
WLFL(TV), CH. 18 IN RALEIGH, NORTH CAROLINA**