

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WUHF LICENSEE, LLC, licensee of full-power digital television station WUHF(TV), Channel 28 in Rochester, New York, 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 the ATSC 3.0 format, the primary ATSC 1.0 programming of WUHF(TV) will be transmitted by television station WROC-TV, Channel 21 in Rochester, New York.

Exhibit B is a map upon which the WUHF(TV) and WROC-TV noise-limited service contours are plotted. As shown, the service contour of WUHF(TV) is almost completely enveloped by that of WROC-TV, meaning that an insignificant "loss area" amounting to only 53 people will be created as a result of the transfer of WUHF(TV)'s primary ATSC 1.0 programming to WROC-TV. Conversely, the additional area served by WROC-TV that is presently not served by WUHF(TV) contains 47,121 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.

It is also important to note that WROC-TV places a city-grade service contour over the entirety of the WUHF(TV) city of license, Rochester, New York, as shown in Exhibit C. This would be expected since WROC-TV is located in the same Designated Market Area (DMA) as

WUHF(TV) and both are licensed to the same community (Rochester). 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 "K" and "F" and a smaller "T" in the middle.

KEVIN T. FISHER

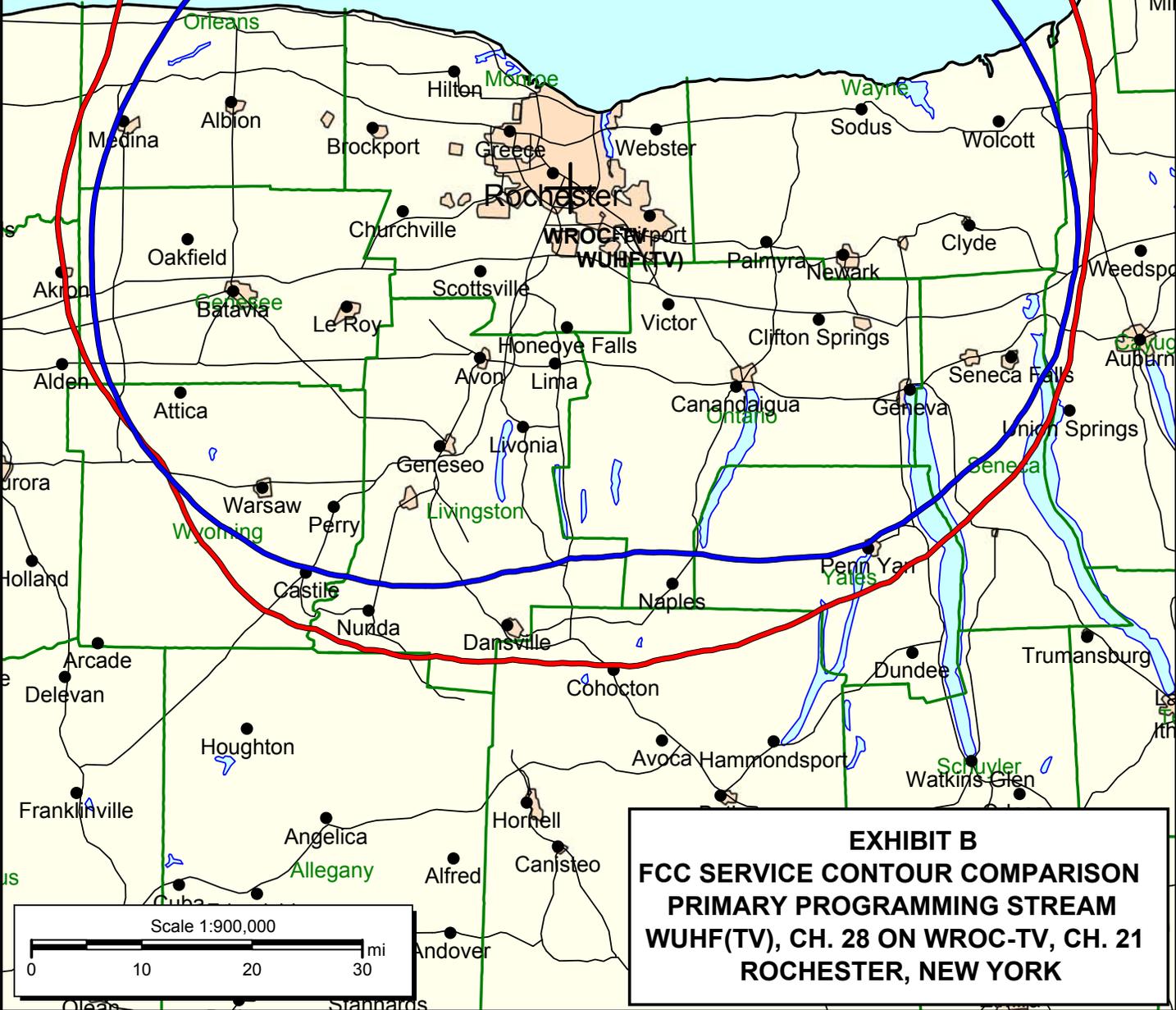
February 14, 2023

CONTOUR POPULATION : 2020 U.S. CENSUS DATA
 WUHF(TV) : 1,157,890 (516,984 HH)
 WROC-TV (Host) : 1,204,958 (540,503 HH)
 Common Area Population : 1,157,837 (>99.9% of WUHF Contour Population)
 WUHF(TV) Programming Loss Area Population: 53 (<0.1%)
 WUHF(TV) Programming Gain Area Population: 47,121

SMITH AND FISHER, LLC

**WROC-TV CH. 21
 N/L FCC CONTOUR**

**WUHF(TV) CH. 28
 N/L FCC CONTOUR**



**EXHIBIT B
 FCC SERVICE CONTOUR COMPARISON
 PRIMARY PROGRAMMING STREAM
 WUHF(TV), CH. 28 ON WROC-TV, CH. 21
 ROCHESTER, NEW YORK**

