

ENGINEERING STATEMENT
MARYLAND PUBLIC BROADCASTING COMMISSION
MODIFICATION OF CONSTRUCTION PERMIT FILE NUMBER 0000025178
WMPT, ANNAPOLIS, MD
GRANTED: CH 31, 415 KW (H) / 207.5 kW (V) -DIRECTIONAL, 287 m HAAT
PROPOSED: CH 21, 1000 KW (H) / 500 kW (V) -DIRECTIONAL, 284 m HAAT

This statement supports an application by Maryland Public Broadcasting Commission, licensee of WMPT, to modify construction permit file number 0000025178 to construct its post-auction television repack facility.

This proposed modification is part of an Unable to Construct Channel Resolution Agreement (“Agreement”) and attached to this application. As a part of that Agreement, this application proposes that WMPT be reallocated channel 21 from 31 and proposes to operate with an Effective Radiated Power of 1000 kW.

An interference analysis was performed pursuant to the parameters used by the Commission for application interference processing.

TVSTUDY PROCESSING REQUEST

Applicant requests that the TVStudy processing be conducted with the following setting:

1. A Profile Point Spacing of 0.1 km

Using the Profile Point Spacing of 0.1 km, the results of the analysis showed that the proposed operation for WMPT is not predicted to cause interference in excess of that allowed by the rules to other television stations except for interference into WMPB assigned to operate on channel 22. Maryland Public Broadcasting Commission is also the licensee of WMPB and hereby accepts the interference caused by WMPT operating on the reassigned channel of 21 into WMPB on channel 22.

TVStudy returned an alert that the proposal is within the coordination distance of the FCC monitoring station at Laurel, MD, and calculated a predicted field strength of 42.0 mV/m from WMPT. Applicant has made notification to FCC staff regarding this alert.

TVStudy also reported the following land mobile alert:

Proposal is short-spaced to land mobile station: Philadelphia PA ch. 20, 162.6 km
No land mobile station failures found

Applicant states the following observations:

1. This was not reported as an error by TVStudy as it was not preceded by a double asterisk (**).
2. TVStudy did not report any Land Mobile failures

3. §73.623(e) of the rules specifically states, “The Commission will not accept petitions to amend the DTV Table of Allotments, applications for new DTV stations, or applications to change the channel or location of authorized DTV stations that would use channels 14-20...” (emphasis added). Applicant is proposing to operate on channel 21.
4. Two television stations are currently authorized to operate on channel 21 that are close to the same distance from the reference point defined in §73.623(e) for Philadelphia, PA.
 - WHP-TV, Harrisburg, PA, Ch 21, 750 kW, distance from reference point: 152.1 km
 - WBOC-TV, Salisbury, MD, Ch 21, 740 kW, Distance from reference point: 166 km

WMPT proposal:

WMPT, Annapolis, MD, Ch 21, 1000 kW, Distance from reference point: 162.6 km

Considering the above, there are no anticipated interference issues into current land mobile facilities at Harrisburg, PA, from the WMPT proposal. Nevertheless, the applicant will install an 8-pole mask filter in the output of its transmission system to provide further reduction of any out-of-band emissions.

The analysis was performed using the methodology stated in OET-69 using the same software (TVStudy v2.2.3) utilized by the Commission and, therefore, should yield similar results.