WAIVER REQUEST

LOW POWER TELEVISION STATION WHTX-LD
SPRINGFIELD, MASSACHUSETTS
CHANNEL 24 15 KW (DA)

1. A waiver of the contingent application rule, Section 73.3517 of the FCC Rules, is hereby respectfully requested.

2. Operation is proposed on channel 24 which is a pre-auction channel in the repacked television band (channel 2-36) that is currently precluded from use by WVTA on channel 24 at Windsor, Vermont (FCC File No. BLEDT-20070307AAW).[1] However, as a result of the incentive auction and repacking process WVTA will go off-air on channel 24 and will channel share with WVER on channel 9 at Rutland, Vermont.

3. The waiver will allow the applicant to propose a channel that will become available following the Incentive Auction repack. This will allow WHTX-LD to continue to serve its current viewers without interruption and it will allow for more efficient use of the limited available frequency spectrum in the market.

4. The applicant agrees with the FCC condition that it not begin transmitting on the requested channel prior to the discontinuation of operation by the subject station currently licensed on the conflicting channel.

[1] The proposed WHTX-LD operation on channel 24 is predicted to cause 3.13% new interference to WVTA's pre-auction channel 24 operation per the attached *TVStudy* analysis summary.

Study created: 2018.05.11 15:35:55

Study build station data: LMS TV 2018-05-11

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    Proposal: WHTX-LD D24 LD APP SPRINGFIELD, MA
 File number: WHTX-LD D24
 Facility ID: 26337
Station data: User record
   Record ID: 1899
     Country: U.S.
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Build options:
Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WLIG-LP	N17+	TX	LIC	PLAINVIEW, ETC., NY	BLTTL20050802AAY	157.0 km
Yes	WDMR-LD	D23	LD	APP	SPRINGFIELD, MA	BLANK0000053791	0.2
No	WPXG-TV	D23	DT	CP	CONCORD, NH	BLANK0000027021	166.7
No	WLED-TV	D23	DT	CP	LITTLETON, NH	BLANK0000034358	264.1
No	WXNY-LD	D23	LD	APP	NEW YORK, NY	BLANK0000053900	180.9
No	W42AE	D23z	LD	APP	POUGHKEEPSIE, NY	BLANK0000052611	114.2
No	WFTY-DT	D23	DT	LIC	SMITHTOWN, NY	BLCDT20120427ABO	134.3
No	WNGN-LD	D23	LD	LIC	TROY, NY	BLANK0000035004	123.9
No	W20CS-D	D23	LD	APP	RUTLAND, VT	BLANK0000053964	166.8
No	WDPB	D24	DT	CP	SEAFORD, DE	BLANK0000026250	453.7
No	WDPB	D24	DT	APP	SEAFORD, DE	BLANK0000034446	453.7
No	WFXZ-CD	D24	DC	LIC	BOSTON, MA	BLANK0000001384	124.4
Yes	WLNE-TV	D24	DT	CP	NEW BEDFORD, MA	BLANK0000034491	119.6
No	WWDD-LD	D24	LD	APP	HAVRE DE GRACE, MD	BLANK0000041691	376.6
No	WPME	D24	DT	CP	LEWISTON, ME	BLANK0000026108	275.6
Yes	WTEN	D24	DT	CP	ALBANY, NY	BLANK0000034757	123.0
No	WPXJ-TV	D24	DT	CP	BATAVIA, NY	BLANK0000034885	444.5
No	WNYE-TV	D24	DT	APP	NEW YORK, NY	BLANK0000035705	182.2
No	WNYE-TV	D24	DT	LIC	NEW YORK, NY	BLEDT20071228ABM	182.2
No	W25FA-D	N24	TX	LIC	PORT JERVIS, NY	BLTTL20121024AAA	182.2
No	WRGB	D24	LD	LIC	SCHENECTADY, NY	BLCDT20110523AEL	110.0
No	WSTM-TV	D24	DT	LIC	SYRACUSE, NY	BLCDT20090622AEM	295.6
No	WONO-CD	D24	DC	CP	SYRACUSE, ETC., NY	BLANK0000034941	303.4
No	WVNC-LD	D24	LD	APP	WATERTOWN, NY	BLANK0000053357	327.7
No	W24DB-D	D24z	DC	LIC	CLARKS SUMMIT, PA	BLANK0000004543	260.9
No	WPHA-CD	D24	DC	LIC	PHILADELPHIA, PA	BLDTA20130920ADK	310.7
No	WPHA-CD	D24	DC	CP	PHILADELPHIA, PA	BLANK0000036105	310.7
No	W24CS-D	D24	LD	LIC	READING, PA	BLANK0000001522	329.1
Yes	WVTA	D24	DT	LIC	WINDSOR, VT	BLEDT20070307AAW	151.9
No	WWOR-TV	D25	DT	LIC	SECAUCUS, NJ	BLANK0000048531	187.4
No	W25DY-D	D25	LD	LIC	MONTICELLO, NY	BLDTT20100506AEI	170.7
No	W26CE	D25	LD	CP	NEW YORK, NY	BDISDTL20100120ABI	136.7
No	WASA-LD	D25	LD	LIC	PORT JERVIS, NY	BLDTL20091222AQB	182.2
Yes	WMHT	D25	DT	CP	SCHENECTADY, NY	BLANK0000028390	123.0
Yes	WMHT	D25	DT	APP	SCHENECTADY, NY	BLANK0000035673	123.0
No	WNGX-LD	D25	LD	CP	SCHENECTADY, NY	BDISDTL20111026AAB	108.8
Yes	WJAR	D25	DT	CP	PROVIDENCE, RI	BLANK0000034380	119.6
No	WCRN-LD	D25+	LD	LIC	PROVIDENCE, RI	BLANK0000013903	73.2
No	WNNE	D25	DT	LIC	MONTPELIER, VT	BLCDT20050801BFZ	151.9
No	W28AJ	N28z	TX	LIC	ALLINGTOWN, CT	BLTTL20010608AAO	90.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

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    Channel: D24
       Mask: Full Service
   Latitude:  42  5  1.30 N (NAD83)
  Longitude:  72 42 14.30 W
Height AMSL: 202.0 m
       HAAT: 0.0 m
   Peak ERP: 15.0 kW
    Antenna: AND-ALP8L1-HSM (ID 16981) 0.0 deg
Elev Pattrn: Generic
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49.8 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	120.1 m	46.1 km
45.0	10.0	147.4	45.9
90.0	4.60	156.7	42.6

135.0 0.749 162.8 33.6
180.0 1.56 145.4 36.3
225.0 0.749 109.0 29.9
270.0 4.60 30.9 25.3
315.0 10.0 111.2 43.3

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 123 m

Distance to Canadian border: 325.3 km

Distance to Mexican border: 2842.9 km

Conditions at FCC monitoring station: Canandaigua NY
Bearing: 285.4 degrees Distance: 385.0 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 276.5 degrees Distance: 2715.2 km

Study cell size: 1.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

**IX check failure to BLEDT20070307AAW LIC scenario 1, 3.12% interference caused
**IX check failure to BLEDT20070307AAW LIC scenario 2, 3.13% interference caused