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**REQUEST FOR SPECIAL
TEMPORARY AUTHORITY FOR
WFUN-LD A TV TRANSLATOR
TO CHANNEL SHARE WITH
CLASS A FACILITY WPMF-CD
HAVING FCC FACILITY ID
30129**

Prepared For:

Caribevision Holdings, Inc.
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1.0 BACKGROUND

This engineering statement was prepared on behalf of Caribevision Holdings, Inc., (“CHI”) licensee of digital LPTV station WFUN-LD located at Miami, FL. Appendix A is a 120-day advance notification letter served to CHI on May 10, 2018 which informs T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area (“PEA”) # 9 by September 21, 2018 (which was then extended to November 1, 2018) and WFUN-LD is likely to cause harmful interference to T-Mobile’s operations. The required termination of WFUN-LD from using channel 48 will likely occur before the Commission is able to resolve the WFUN-DT channel 20 displacement application¹ which has been found to be mutually exclusive with two other applications² filed during the same filing window. Channel 20 is currently occupied by pre-transition station WLRN-DT³ and shall be vacated on April 12, 2019.

The grant of the instant Channel Sharing STA will allow WFUN-LD to operate on a temporary channel after the required November 1, 2018 T-Mobile termination date and will allow WFUN-LD to continue providing service to viewers with minimal disruption while transitioning and thus will best serve the public interest.

2.0 CHANNEL SHARING AGREEMENT

WFUN-LD has entered into a channel sharing agreement with WPMF-CD, FCC Facility ID 30129 to operate pursuant to the technical parameters found in FCC File No.: BLDTA-20130930BTN until the pre-transition WPMF-CD facility is scheduled to transition to channel 17 on April 4th 2019.

¹ FCC File No.: 0000052533

² FCC File No.: 0000052578 and 0000053956

³ FCC File No.: BLEDT-20090611ABR

3.0 ALLOCATION ANALYSIS AND COVERAGE CONTOUR

AN allocation study is not provided since WPMF-CD is a licensed facility. Appendix B demonstrates that the licensed WPMF-CD 51dBu F(50,90) contour is completely subsumed by the WFUN-LD licensed contour and shall substantially cover Miami, FL.

4.0 RF EXPOSURE ANALYSIS

The proposed Channel Sharing Agreement will utilize the existing licensed technical facilities for WPMF-CD. Accordingly, grant of the authorization will have no significant environmental effect.

5.0 CERTIFICATION

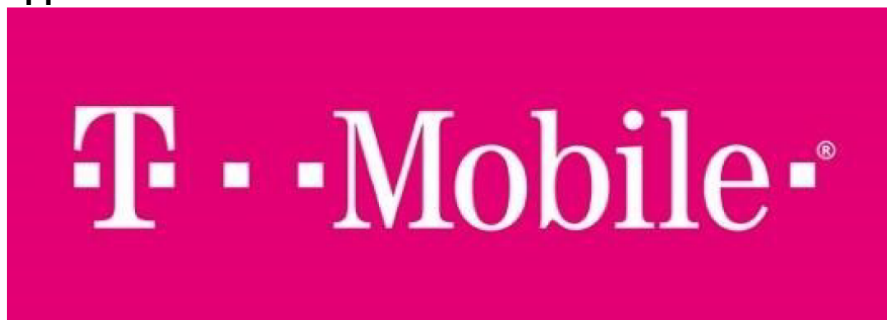
I, Ryan Wilhour, am an engineering associate of Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and have been working in the field of radio and television broadcast consulting since 1996. I am a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering. The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge.

Ryan Wilhour



Consulting Engineer
October 16, 2018

Appendix A – T-Mobile Certified Letter



VIA CERTIFIED MAIL & EMAIL

May 10, 2018
CARIBEVISION HOLDINGS, INC.
13001 NW 107th Ave
Hialeah Gardens, FL 33018-1104

RE: Notification of Intent to Begin 600MHz Operations

Dear WFUN-LD Contact/ Facility ID: 60542

T-Mobile USA, Inc. (T-Mobile) is notifying you that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area (PEA) #9 by 9/21/2018 and your station is likely to cause harmful interference to T-Mobiles operations.

To determine if your station(s) is likely to cause interference, an interference analysis has been performed, as specified by the Federal Communications Commissions (FCC) Inter-service Interference procedures¹, using publicly available information in the FCCs Licensing and Management System (LMS) for your facility. This analysis predicts field strength at T-Mobiles base station and user equipment locations in the PEA #9 market from your facility. The FCC has set the thresholds at which the predicted field strength from low power TV and translator stations creates a sufficient interference risk to wireless facilities. T-Mobile has determined that your facility exceeds those thresholds and is an interference risk to its wireless operations.

T-Mobile will commence its operations in the PEA #9 market on 9/21/2018. This letter provides the 120 days advance notification required by FCC regulations, 47 CFR §73.3700(g)(4). The FCC regulations also require you to cease operations or eliminate the potential for harmful interference to T-Mobiles wireless facilities in the PEA #9 market.

The FCC will work with you to attempt find a new television channel outside of the new 600 MHz mobile band that will not interfere with T-Mobiles network. You should review the FCCs Tools Available to LPTV/Translator Station Public Notice (enclosed) released on June 14, 2017 and contact Hossein Hashemzadeh, Melvin Collins, or Barbara Kreisman at the FCC for more information about the options available in your area.²

Please email SpectrumClearing@T-Mobile.com once you have determined when you will eliminate the interference. If you would like additional information regarding our findings or if it might be possible to coordinate our operations, please submit a request to Dan Wilson, Sr. Manager, Spectrum Engineering, at SpectrumClearing@T-Mobile.com.

Sincerely,
/s/ Mark Bishop
Sr Manager, Engineering Development, T-Mobile USA, Inc.

¹See 30 FCC Rcd 12049, 12071, para. 49 (2015)

²See www.fcc.gov/document/latf-mb-set-forth-tools-available-lptvtranslator-stations

Appendix B – 51 dBu F(950,90) Coverage Contour

