

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of CHANNEL 41, INC., dba TRI-STATE CHRISTIAN TV, INC., licensee of digital Low Power Television Station WNIB-LD, Channel 42 in Rochester, New York, in support of this amendment to its pending displacement Application for Construction Permit for operation on Channel 30 (LMS-0000054849). This application is mutually exclusive with that of WAWW-LD, which also filed a Channel 30 displacement application in Rochester. As a result, the FCC placed both applications in MX Group 84. The purpose of this amendment is to now specify operation on Channel 11 for WNIB-LD in order to extricate the application from the MX Group. No change in site location or antenna height is proposed herein.

It is proposed to mount a 2-bay slotted-cylinder horizontally-polarized directional antenna at the 35-meter level of the existing 61-meter communications tower on which the present WNIB-LD antenna is located. The proposed effective radiated power for the facility is 3.0 kW in the horizontal plane. Exhibit B is a map upon which the predicted 48 dBu service contour is plotted. Azimuth and elevation pattern data for the proposed antenna are provided in Exhibit C.

Included, as Exhibit D, is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed a cell size of 0.5 kilometers and an increment spacing of 0.1 kilometers. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed WNIB-LD facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities, except to WVTT-CD, Channel 11 in Olean, New York (LMS-0000033365). However,

that station has agreed to accept interference from the facility proposed herein. Therefore, the interference situation can be ignored.

A detailed power density calculation is attached hereto as Exhibit E.

Since no change in the overall height or location of the existing WNIB-LD tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, the FCC assigned Antenna Structure Registration Number 1061133 to this tower.

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.

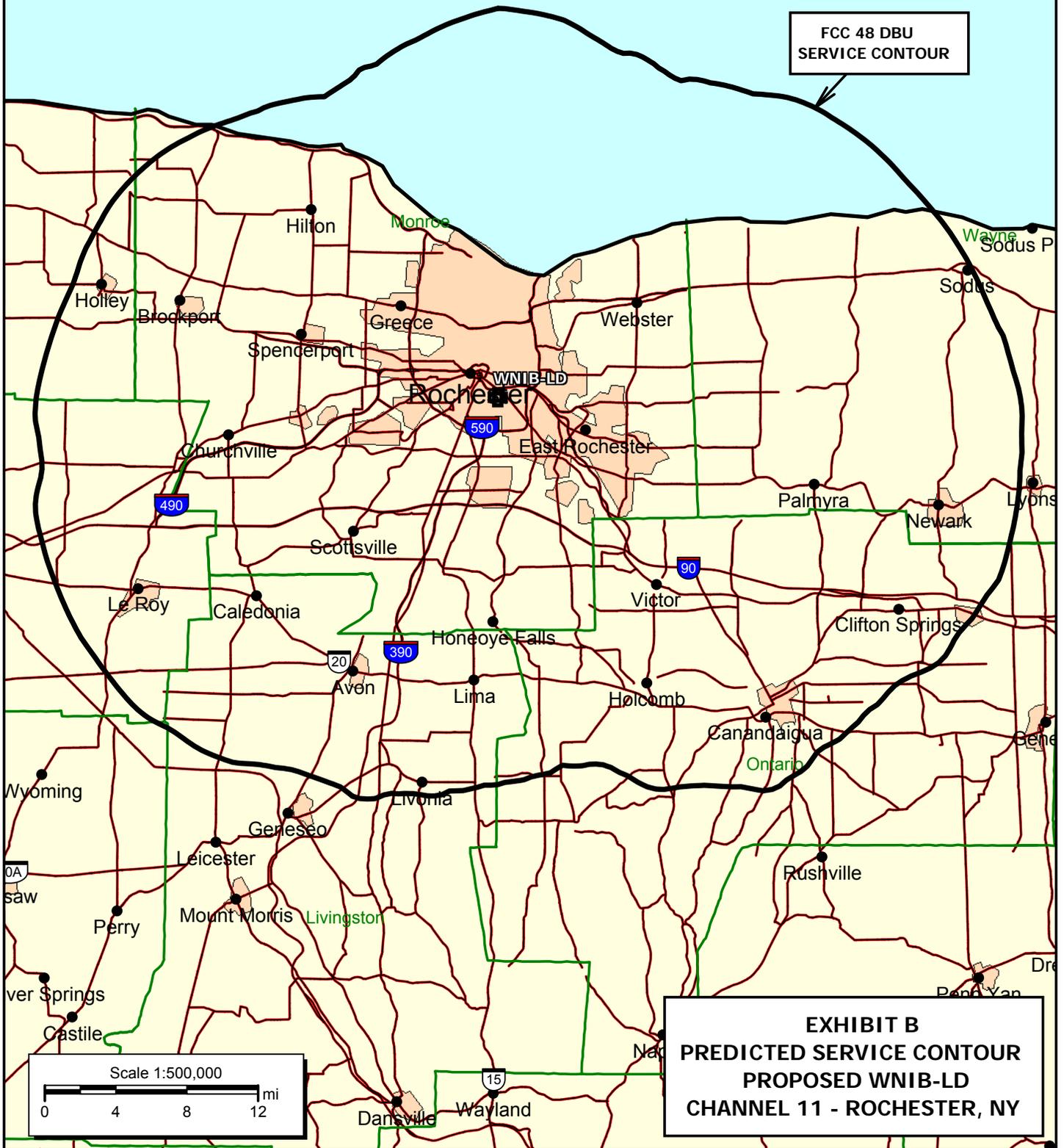
KEVIN T. FISHER

January 10, 2019

CONTOUR POPULATION  
2015 U.S. CENSUS DATA  
930,267 (403,999 HH)

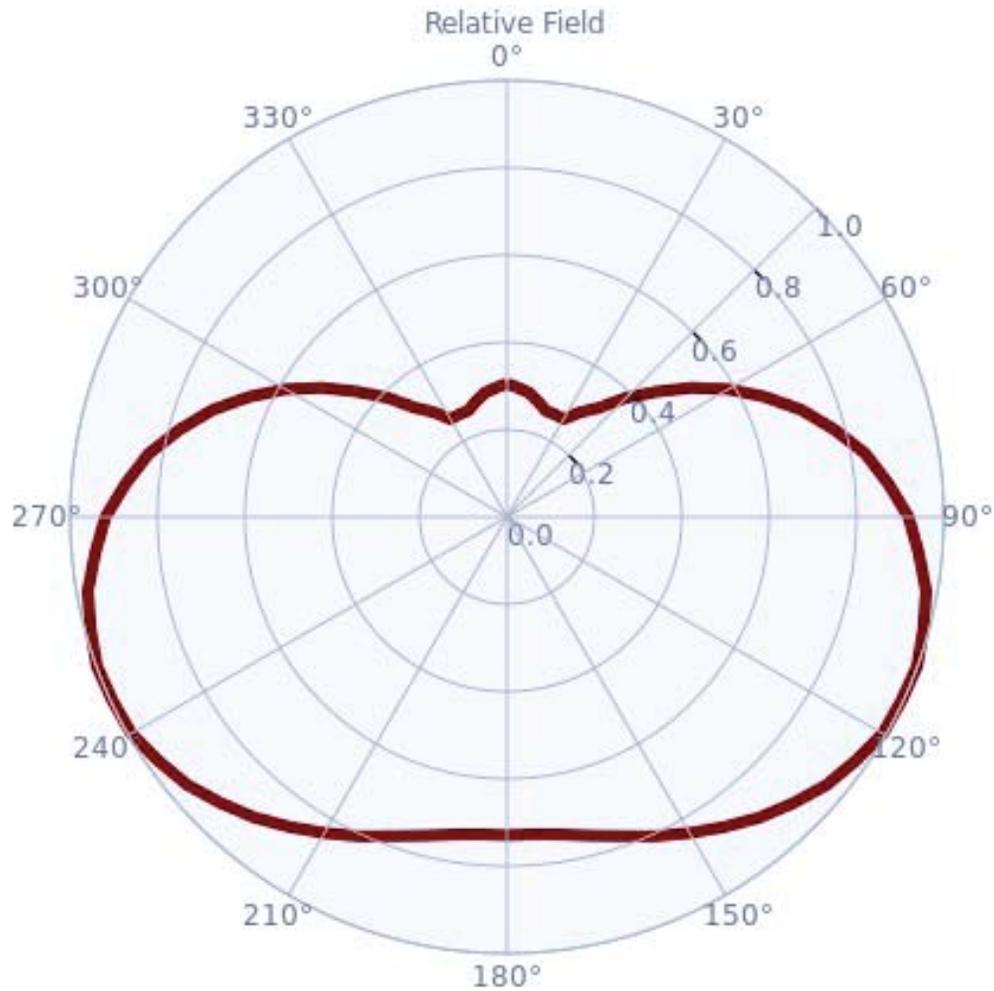


FCC 48 DBU  
SERVICE CONTOUR



**EXHIBIT B**  
**PREDICTED SERVICE CONTOUR**  
**PROPOSED WNIB-LD**  
**CHANNEL 11 - ROCHESTER, NY**

# Horizontal Azimuth Pattern





ANTENNA SPECIFICATIONS



ALIVETELE.COM  
SPEC GENERATOR

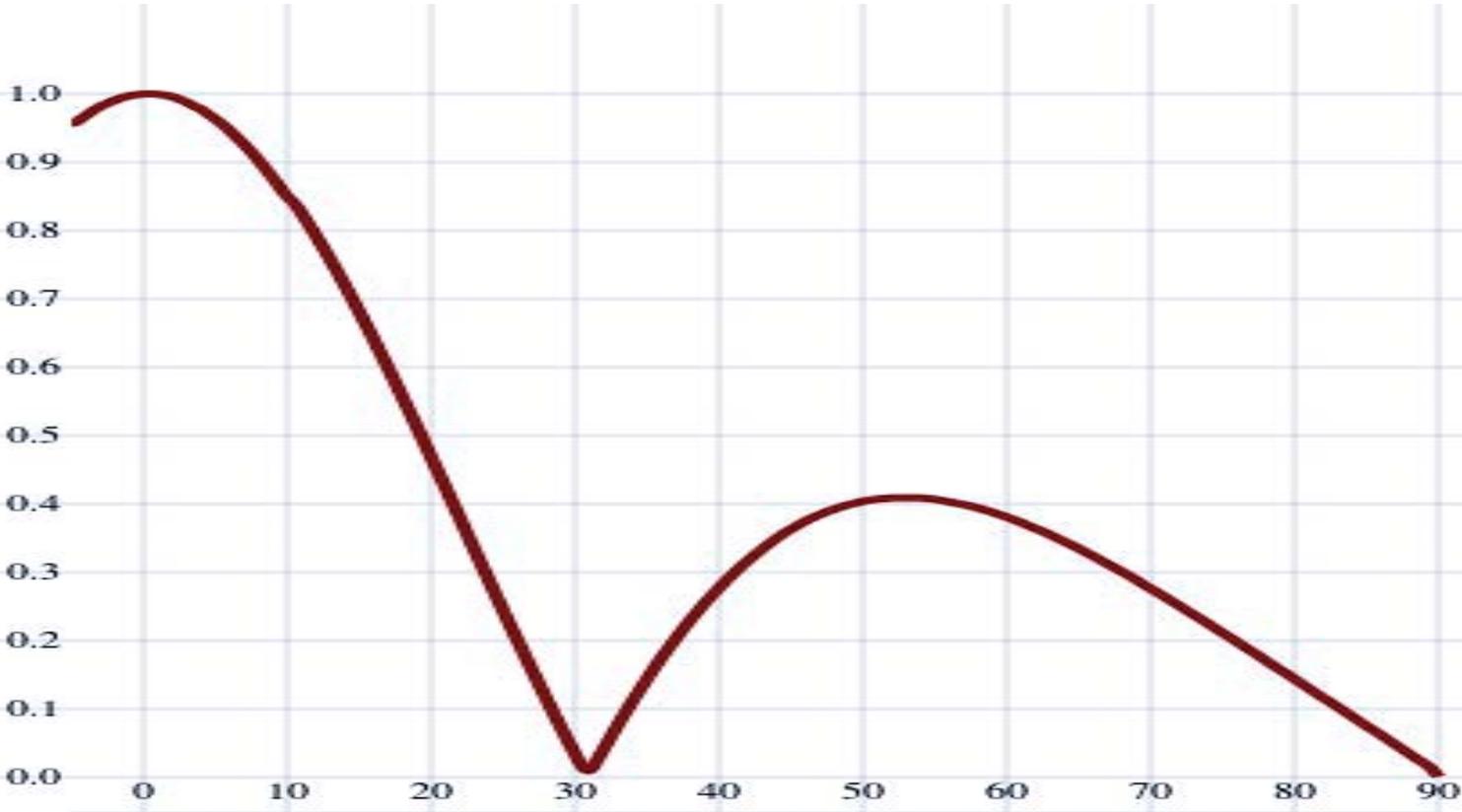
model no.: ATC-BCH22PC-11

call sign: WNIB

city of license: Rochester

state: NY

Elevation pattern -5 to 90



TVSTUDY INTERFERENCE ANALYSIS RESULTS  
PROPOSED WNIB-LD  
CHANNEL 11 – ROCHESTER, NEW YORK

Study created: 2019.01.10 16:53:03

Study build station data: LMS TV 2018-12-17

Proposal: WNIB-LD D11 LD APP ROCHESTER, NY

File number: BLANK0000054849

Facility ID: 67785

Station data: User record

Record ID: 395

Country: U.S.

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	WHEC-TV	D10	DT	LIC	ROCHESTER, NY	BMLCDT20111228ABJ	0.1 km
No	WWLP	D11	DT	LIC	SPRINGFIELD, MA	BLCDT20090612AJV	416.0
No	WJZ-TV	D11	DT	CP	BALTIMORE, MD	BLANK0000032917	429.6
No	WBAL-TV	D11	DT	LIC	BALTIMORE, MD	BLCDT20111102ACP	429.6
No	WPIX	D11	DT	CP	NEW YORK, NY	BMPCDT20080620ALB	399.6
No	WPIX	D11	DT	LIC	NEW YORK, NY	BLCDT20090911ABN	398.6
Yes	WVTT-CD	D11	DC	CP	OLEAN, NY	BLANK0000033365	92.1
No	WPNY-LP	D11+	LD	CP	UTICA, ETC., NY	BLANK0000054839	195.4
No	WPNY-LP	N11+	TX	LIC	UTICA, ETC., NY	BLTVL20060428ABO	195.4
No	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDT20090626AAT	356.1
Yes	WBRE-TV	D11	DT	LIC	WILKES-BARRE, PA	BLCDT20051123AJX	258.8
No	WYOU	D12	DT	CP	SCRANTON, PA	BLANK0000028347	258.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D11

Mask: Full Service

Latitude: 43 8 7.00 N (NAD83)

Longitude: 77 35 6.00 W  
Height AMSL: 255.0 m  
HAAT: 0.0 m  
Peak ERP: 3.00 kW  
Antenna: Alive ATC-BCH22PC-11 0.0 deg  
Elev Pattn: Generic  
Elec Tilt: 0.50

48.0 dBu contour:

Azimuth (degree)	ERP (kW)	HAAT (m.)	Distance (km.)
0.0	0.279	146.7	34.8
45.0	0.447	143.0	37.8
90.0	2.53	116.2	47.0
135.0	2.58	99.9	44.7
180.0	1.59	67.9	35.4
225.0	2.58	90.2	43.0
270.0	2.53	85.4	42.0
315.0	0.447	117.7	35.1

Database HAAT does not agree with computed HAAT  
Database HAAT: 0 m Computed HAAT: 108 m

\*\*Proposal 21.00 dBu contour crosses Canadian border, coordination required  
Distance to Canadian border: 84.2 km

Distance to Mexican border: 2577.2 km

Conditions at FCC monitoring station: Canandaigua NY  
Bearing: 133.5 degrees Distance: 35.8 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 271.2 degrees Distance: 2308.9 km

Study cell size: 0.50 km  
Profile point spacing: 0.10 km

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

\*\*IX check failure to BLANK0000033365 CP scenario 1, 1.72% interference caused

POWER DENSITY CALCULATION

PROPOSED WNIB-LD  
CHANNEL 11 – ROCHESTER, NEW YORK

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Rochester facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 3.0 kW, an antenna radiation center 35 meters above ground, and the specific elevation pattern for the proposed Alive ATC-BCH22PC-11 antenna, maximum power density two meters above ground of 0.010 mW/cm<sup>2</sup> is calculated to occur 47 meters east-southeast and west-southwest of the base of the tower. Since this is only 5.2 percent of the 0.20 mW/cm<sup>2</sup> reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 11 (198-204 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.