

Technical Summary

WPXH-TV Hoover, Alabama Channel 33 300 kW 318.4 (HAAT)

ION Media License Company, LLC (“ION”) licensee of television station WPXH-TV, Facility ID 73312, Hoover, Alabama (the “Station”) hereby amends its pending construction permit application seeking authority to relocate its transmitter from the currently authorized site to a site that will accommodate post-repack operations (FCC LMS File No. 0000034874).

This application is necessary because ION does not have access to its current tower for post-repack operations. Following the Commission’s assignment of post-repack facilities to WPXH-TV, ION was unable to reach accommodation with the tower landlord that would permit the station to continue operating from its current site. This forced ION to identify a new site for the station’s post-repack operations.

Before selecting the proposed tower site, ION performed a comprehensive analysis of available tower sites in the Birmingham market. In the immediate vicinity of the current tower site, ION’s market analysis found no acceptable alternatives that would provide equivalent interference-free coverage as compared to the Station’s pre-auction or authorized post-auction facilities. ION determined that the proposed site would provide the best option due to its structural capability and coverage performance, with minimal or no interference to other full-power broadcast stations.

The new tower is located 55 kilometers to the southwest of the current site. Accordingly, the Station’s proposed noise limited service contour (“NLSC”) will shift to the southwest, resulting in some areas of service gain and loss. Figure 1 shows the loss area and the stations predicted to serve the loss areas using the Commission’s standard prediction methodology. Under this analysis, the total size of the WPXH-TV loss area would be 358,003 persons over an area of 6,653 sq. km. WPXH-TV also would have a gain area of 337,467 persons and 8,983.6 sq. km. Thus, under the Commission’s traditional counter prediction methodology, WPXH-TV would have a net loss of 20,536 persons notwithstanding a gain area of 2,330.6 sq. km. WPXH-TV currently provides an over-the-air signal to 1,487,722 persons in its service area, so the predicted service loss using 50/90 curves would represent approximately 1.4% of WPXH-TV’s service population.

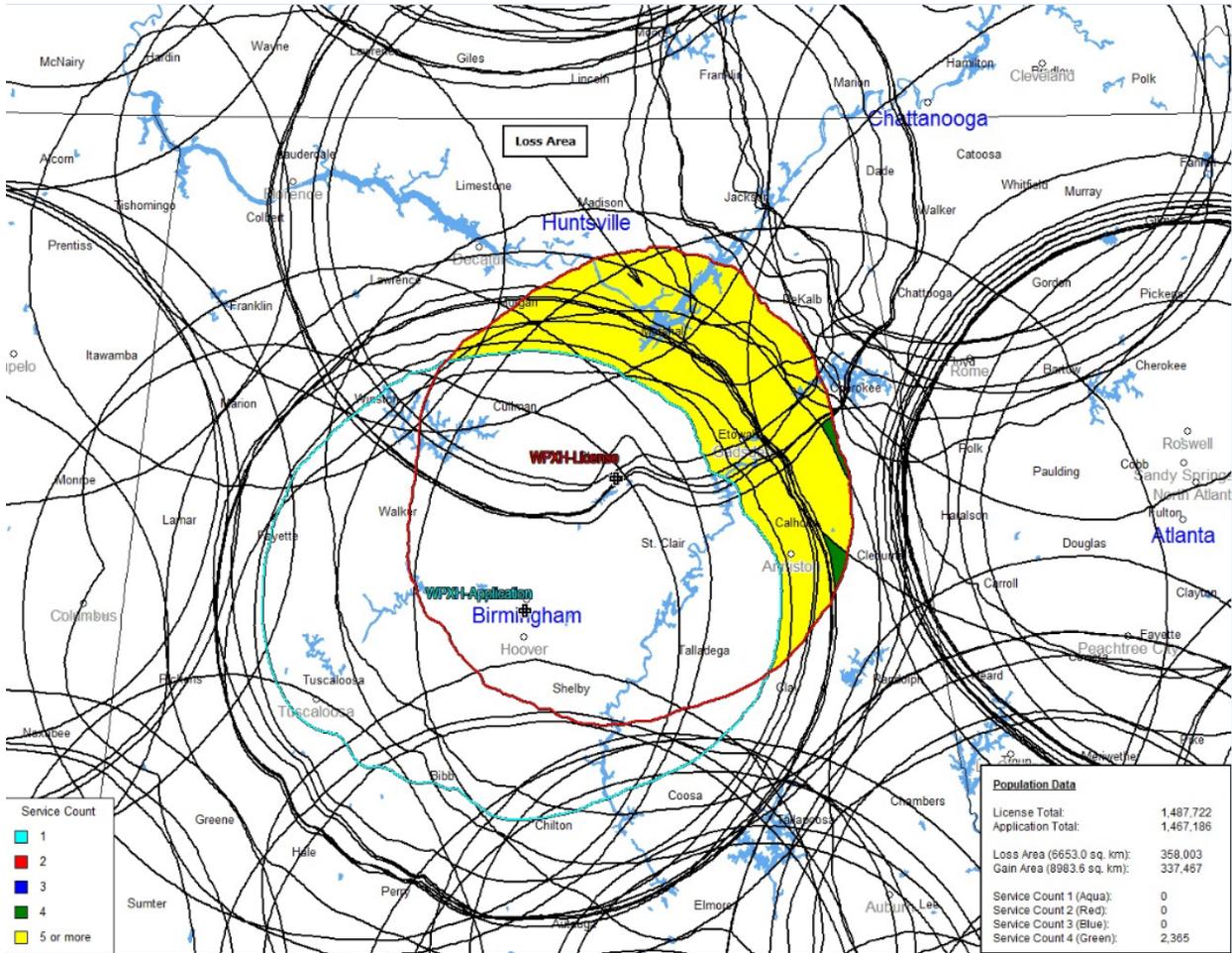
Figure 1 also demonstrates that the Commission's 50/90 curves predict that the majority of the loss area would remain well served by 5 or more over-the-air full-power television stations with a small area (2,365 persons or 0.16% of WPXH-TV's total service population) served by 4 stations. The proposed site relocation would not, of course, create any television coverage "white area."

ION has determined that the instant application will cause additional interference to a low-power television station that participated in the post-auction displacement window that occurred in 2018. The proposed operations would displace a construction permit for digital low power television station WBMA-LD (File No. 0000052973). However, given the exigent circumstances caused by ION's loss of access to its tower for post-auction operations, the displacement of this secondary service is necessary to ensure the continuation of ION's full-power over-the-air operations.

ION's proposed relocation of WPXH-TV is in the public interest and should be granted. First, ION's pre-repack tower site is unavailable for post-repack operations, and the current proposal is ION's best solution to implementing its reassignment to Channel 33. Given the loss of its current tower site, grant of authority to construct at the proposed location is necessary to ensure that ION can timely complete construction of the station's facilities by the September 6, 2019 Phase 5 transition deadline. Second, the requested tower site change is necessary for WPXH-TV to continue serving the vast majority of its viewers in the Birmingham market. Third, as a practical matter, very few viewers are likely to lose access to the programming available on WPXH-TV. ION network programming will remain available on area cable and satellite providers throughout the loss area, and approximately 90% of the viewers in the loss area subscribe to one of such services.

For the foregoing reasons, WPXH-TV requests that the staff promptly grant this Construction Permit Modification, as hereby amended. If the application is not granted, ION's ability to complete its transition to Channel 33 operations before the close of Phase 5 will be jeopardized.

Figure 1



Tabulation of other NLSC Services Considered

<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>State</u>
WAAY-TV	32	Huntsville	AL
WABM-D	36	Birmingham	AL
WACS-TV	8	Dawson	GA
WAFF-D	48	Huntsville	AL
WAGA-TV	27	Atlanta	GA
WAIQ-D	27	Montgomery	AL
WAKA-D	42	Selma	AL
WATC-DT	41	Atlanta	GA
WATL-D	25	Atlanta	GA
WBBJ-TV	43	Jackson	TN
WBIH-D	29	Selma	AL
WBIQ-D	10	Birmingham	AL
WBMM-D	22	Tuskegee	AL
WBRC-D	50	Birmingham	AL
WCBI-TV	27	Columbus	MS
WCIQ-D	7	Mount Cheaha	AL
WCOV-TV	20	Montgomery	AL
WCTE-D	22	Cookeville	TN
WDBB-D	18	Bessemer	AL
WDEF-TV	12	Chattanooga	TN
WDIQ-D	10	Dozier	AL
WDSI-TV	14	Chattanooga	TN
WELF-TV	16	Dalton	GA
WEPH-D	17	Tupelo	MS
WFIQ-D	22	Florence	AL
WFLI-TV	42	Cleveland	TN
WGBC-D	31	Meridian	MS
WGCL-TV	19	Atlanta	GA
WGIQ-D	30	Louisville	AL
WGNM-D	45	Macon	GA
WGTA-D	24	Toccoa	GA
WGTV-D	8	Athens	GA
WGWW-D	9	Anniston	AL
WGXA-D	16	Macon	GA
WHDF-D	14	Florence	AL
WHIQ-D	24	Huntsville	AL
WHNT-TV	19	Huntsville	AL
WHSB-TV	44	Monroe	GA
WHTN-D	38	Murfreesboro	TN
WIAT-D	30	Birmingham	AL
WIIQ-D	19	Demopolis	AL
WIYC-D	48	Troy	AL
WJFB-D	44	Lebanon	TN
WJSP-TV	23	Columbus	GA

WKRN-TV	27	Nashville	TN
WLGA-D	30	Opelika	AL
WLJT-DT	27	Lexington	TN
WLOV-TV	16	West Point	MS
WLTZ-D	35	Columbus	GA
WMAB-TV	10	Mississippi State	MS
WMAE-TV	12	Booneville	MS
WMAZ-TV	13	Macon	GA
WMCF-TV	46	Montgomery	AL
WMDN-D	24	Meridian	MS
WMGT-TV	40	Macon	GA
WNAB-D	23	Nashville	TN
WNCF-D	31	Montgomery	AL
WNGH-TV	33	Chatsworth	GA
WNPT-D	8	Nashville	TN
WNPX-TV	36	Cookeville	TN
WPBA-D	21	Atlanta	GA
WPCH-TV	20	Atlanta	GA
WPGA-TV	32	Perry	GA
WPGD-TV	33	Hendersonville	TN
WPXA-TV	31	Rome	GA
WRBL-D	15	Columbus	GA
WRCB-D	13	Chattanooga	TN
WSB-TV	39	Atlanta	GA
WSES-D	33	Tuscaloosa	AL
WSFA-D	12	Montgomery	AL
WSMV-TV	10	Nashville	TN
WTCI-D	29	Chattanooga	TN
WTJP-TV	26	Gadsden	AL
WTOK-TV	11	Meridian	MS
WTTO-D	28	Homewood	AL
WTVA-D	8	Tupelo	MS
WTVC-D	9	Chattanooga	TN
WTVF-D	25	Nashville	TN
WTVM-D	11	Columbus	GA
WUPA-D	43	Atlanta	GA
WUVG-DT	48	Athens	GA
WUXP-TV	21	Nashville	TN
WVTM-TV	13	Birmingham	AL
WVUA-D	6	Tuscaloosa	AL
WXIA-TV	10	Atlanta	GA
WXTX-D	24	Columbus	GA
WZDX-D	41	Huntsville	AL
WZTV-D	15	Nashville	TN

***Licensed Authorization**