

REQUEST FOR WAIVER AND MODIFICATION OF ASSIGNED TRANSITION
PHASE FOR WTVU-CD, SYRACUSE, NY
Renard Communications Corp.
July, 2019

Renard Communications Corp. (“Renard”), licensee of WTVU-CD, Syracuse, NY (Fac. ID 617) presently operates on UHF television channel 22 and has been assigned post-auction channel 25 in the Commission’s repacking of certain television stations. The station has been assigned to transition in Phase 4. However, two additional Class A stations (WHSU-CD, Fac. ID 629 and WONO-CD Fac. ID 14312) of which Renard is also the licensee are scheduled for transition in Phase 8 on the same tower as WTVU-CD.

Renard respectfully requests a modification of the assigned transition phase for WTVU-CD be changed to Phase 8 to best coordinate the transitions with WHSU-CD and WONO-CD.

The following is a list of efficiencies pertinent to the request:

- 1) The proposed change would reduce the number of times Renard’s tower crew would need to rig the common tower of the three aforementioned stations as well as minimize the disruption of service for other users of the tower which include AM, FM, FM translators and LPTV stations. Thus, the three stations’ transitions would be able to be completed in just a single rigging session.
- 2) The tower crew retained by Renard (Northeast Site and Tower, Inc.) is constrained by other jobs needed to be completed which were delayed beyond normal expected circumstances due to extremely rainy spring weather. (See attached letter.)

- 3) The modification of the transition phase would not delay the transition for any other stations in its present linked station set or create any new linked station set, nor would the delay cause prohibitive interference to any station transitioning in presently or in any future phase. The proposed request would, however, cause a temporary slight increase in interference received by WTVU-CD upon the completion of television stations transitioning in Phase 4. The major contributor to the increase would be caused by the new facilities of WXXI-TV, channel 22, Rochester, NY (0000029838) and would be approximately 2.19% of new unique interference to WTVU-CD as shown in the attached TVStudy report. The proposed request would not cause any prohibitive interference to any television stations transitioning in Phase 4 or in a later phase.
- 4) The Syracuse, NY television market has two assigned transition phases (4 and 8). The proposed request would not increase the number of rescans in the market, and would enhance the enjoyment of television viewers by ensuring that they would be properly prepared for the transition and required rescan for WTVU-CD, WHSU-CD and WONO-CD in Phase 8.
- 5) Finally, a waiver for the transition of WTVU-CD to a later transition phase would permit the use of a common antenna for the three stations which provides for reduced wind loading and physical space efficiency on the tower.

Northeast Site and Tower Inc.

Date: July 16, 2019


To: Renard Communications Corp.
Craig Fox
401 West Kirkpatrick Street
Syracuse, New York 13204

Site name: 415' tower - W. Kirkpatrick St., Syracuse, NY

Dear Mr. Fox:

In response to our recent phone conversation for rigging the W. Kirkpatrick St. tower for installation of a new antenna for WTVU and Renard's other stations, Northeast Site and Tower Inc. supports a change to a later phase. With the inclement weather in late Spring and delays in equipment delivery of several of NEST's customers for the current repack, the immediate workload is significantly greater than originally anticipated. In addition, it would be time saving to only have to rig the tower once for the channel changes for the multiple stations at your site.

Thank you,



Michael Cortese
President
Northeast Site and Tower Inc.
4487 Abbey Road
Syracuse, New York 13215

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Syracuse, New York 13215
315-427-7422

WTVU_190718-13C.txt

tvstudy v2.2.5 (4uoc83)

Database: 127.0.0.1, Study: BLDTA20130603AEQ #211, Model: Longley-Rice

Start: 2019.07.18 00:51:57

Study last edited: 2019.07.18 00:51:52

Proposal: WTVU-CD D22 DC LIC SYRACUSE, NY
 Facility ID: 0
 Station data: User record
 Record ID: 195
 Country: U.S.

Proposal "before": (none)

Study has been edited. Stations studied for impact of proposal:

Call	Chan	Svc	Status	City, State	File Number	Distance
WDSS-LD	D21		LD CP	SYRACUSE, NY	BLANK0000072128	13.5 km
WXXI-TV	D22		DT CP	ROCHESTER, NY	BLANK0000029838	115.4
WCWN	D22		DT CP	SCHENECTADY, NY	BLANK0000033782	182.2
W22DO-D	D22		LD LIC	UTICA, NY	BLDTT20111024AES	80.8
CICO-DT-53D22			DT LIC	BELLEVILLE, ON	BLANKCANADA164	162.6

Record parameters as studied:

Channel: D22
 Mask: Full Service
 Latitude: 43 3 30.00 N (NAD83)
 Longitude: 76 9 59.00 W
 Height AMSL: 222.8 m
 HAAT: 0.0 m
 Peak ERP: 15.0 kw
 Antenna: DIE-TLP16-H/CP (ID 107222) 0.0 deg
 Elev Pattn: Generic
 Elec Tilt: 1.05

49.6 dBU contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kw	100.4 m	44.4 km
45.0	9.13	100.2	42.0
90.0	12.7	91.0	42.4
135.0	3.90	-16.2	24.7
180.0	4.06	9.2	24.8
225.0	3.90	-24.9	24.7
270.0	13.0	60.3	37.9
315.0	9.60	102.7	42.5

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 53 m

**Proposal 24.56 dBU contour crosses Canadian border, coordination required

Distance to Canadian border: 81.5 km

Distance to Mexican border: 2672.4 km

Conditions at FCC monitoring station: Canandaigua NY

Bearing: 260.2 degrees Distance: 90.9 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 272.3 degrees Distance: 2424.3 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%

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Interference to BLANK0000072128 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WDSS-LD	D21	LD	CP	SYRACUSE, NY	BLANK0000072128	
Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		13.5 km
	WCNY-TV	D20	DT	CP	SYRACUSE, NY	BLANK0000028027	1.1
	W20CP-D	D20	LD	CP	MANSFIELD, PA	BLANK0000063289	148.1
	WROC-TV	D21	DT	CP	ROCHESTER, NY	BLANK0000055351	122.0
	W22DO-D	D22	LD	LIC	UTICA, NY	BLDTT20111024AES	78.4
IX	Service area			Terrain-limited	IX-free, before	IX-free, after	Percent New
6797.9	700,192			5746.7	610,087	4583.7	553,703
0.16						4580.7	552,797
							0.07

Undesired	Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	28.1	2,984	3.0
WCNY-TV D20 DT CP	858.5	43,230	381.5
WROC-TV D21 DT CP	771.5	38,168	263.4
W22DO-D D22 LD LIC	41.2	698	4.0

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Interference to BLANK0000029838 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	

WTVU_190718-13C.txt

Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		115.4 km
	WROC-TV	D21	DT	CP	ROCHESTER, NY	BLANK0000055351	0.0
	WCWN	D22	DT	CP	SCHENECTADY, NY	BLANK0000033782	296.5
	WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	258.9
	WETM-TV	D23	DT	CP	ELMIRA, NY	BLANK0000029984	128.4
	CICO-DT-53	D22	DT	LIC	BELLEVILLE, ON	BLANKCANADA164	134.3
	CICO-DT-28	D22	DT	LIC	KITCHENER, ON	BLANKCANADA183	232.2
	CHCH-DT-1	D22	DT	LIC	OTTAWA, ON	BLANKCANADA201	281.9

IX	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New
14413.1	1,184,622	14040.6	1,169,558	13890.4	1,165,902
0.25				13770.1	1,162,977
91.4	0	91.4	0	67.0	0
0.00	(in Canada)				

Undesired	Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	170.5	5,074	120.3
WROC-TV D21 DT CP	3.0	0	2.0
WCWN D22 DT CP	59.4	2,153	8.1
WOLF-TV D22 DT CP	30.2	492	1.0
WETM-TV D23 DT CP	13.1	128	8.1
CICO-DT-53 D22 DT LIC	93.9	1,777	52.6
CICO-DT-53 D22 DT LIC	24.4	0	24.4
CICO-DT-28 D22 DT LIC	19.1	395	8.0
CHCH-DT-1 D22 DT LIC	1.0	44	0.0

(in Canada)

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Interference to BLANK0000033782 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCWN	D22	DT	CP	SCHENECTADY, NY	BLANK0000033782	

Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		182.2 km
	WEDW	D21	DD	CP	STAMFORD, CT	BLANK0000036047	178.7
	WUTH-CD	D22	DC	CP	HARTFORD, CT	BLANK0000034459	162.4
	WBPX-TV	D22	DT	CP	BOSTON, MA	BLANK0000063303	208.0
	WVMA-CD	D22	DC	CP	WINCHENDON, MA	BLANK0000033356	141.4
	WDVB-CD	D22	DC	CP	EDISON, NJ	BLANK0000034859	208.6
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	296.5
	WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	222.2

IX	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New
36640.3	1,909,518	30744.4	1,624,424	29382.9	1,601,635
0.00				29326.9	1,601,632

Undesired	Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	80.0	107	56.0
WEDW D21 DD CP	8.0	109	1.0

WTVU_190718-13C.txt

WUTH-CD	D22	DC	CP	687.9	12,838	343.6	5,295	343.6	5,295
WBPX-TV	D22	DT	CP	312.5	5,051	33.2	704	33.2	704
WVMA-CD	D22	DC	CP	547.3	8,385	199.4	2,230	199.4	2,230
WDVB-CD	D22	DC	CP	55.9	2,143	7.0	285	7.0	285
WXXI-TV	D22	DT	CP	114.7	1,462	46.3	625	38.3	577
WOLF-TV	D22	DT	CP	362.2	7,984	208.6	2,920	206.6	2,920

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Interference to BLANK0000033782 CP scenario 2

Desired:	Call WCWN	Chan D22	Svc DT	Status CP	City, State SCHENECTADY, NY	File Number BLANK0000033782	Distance
Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		182.2 km
	WEDW	D21	DD	CP	STAMFORD, CT	BLANK0000036047	178.7
	WUTH-CD	D22	DC	CP	HARTFORD, CT	BLANK0000034459	162.4
	WBPX-TV	D22	DT	LIC	BOSTON, MA	BLANK0000075858	208.0
	WVMA-CD	D22	DC	CP	WINCHENDON, MA	BLANK0000033356	141.4
	WDVB-CD	D22	DC	CP	EDISON, NJ	BLANK0000034859	208.6
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	296.5
	WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	222.2

IX	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New
36640.3	1,909,518	30744.4	1,624,424	29382.9	1,601,635
0.00				29326.9	1,601,632

Undesired	Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	80.0	107	56.0
WEDW D21 DD CP	8.0	109	1.0
WUTH-CD D22 DC CP	687.9	12,838	343.6
WBPX-TV D22 DT LIC	312.5	5,051	33.2
WVMA-CD D22 DC CP	547.3	8,385	199.4
WDVB-CD D22 DC CP	55.9	2,143	7.0
WXXI-TV D22 DT CP	114.7	1,462	46.3
WOLF-TV D22 DT CP	362.2	7,984	208.6

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Interference to BLDTT20111024AES LIC scenario 1

Desired:	Call W22DO-D	Chan D22	Svc LD	Status LIC	City, State UTICA, NY	File Number BLDTT20111024AES	Distance
Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		80.8 km
	W21CP-D	D21	LD	LIC	GLOVERSVILLE, NY	BLDTT20090601AQC	66.8
	WBPX-TV	D22	DT	CP	BOSTON, MA	BLANK0000063303	312.3
	WECY-LD	D22	LD	LIC	Elmira, NY	BLANK0000024397	191.1
	WCBS-TV	D22	LD	APP	NEW YORK, NY	BLANK0000074938	311.8
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	195.2

	WCWN	D22	DT	CP	WTVU_190718-13C.txt			
	WTVU-CD	D22	DC	LIC	SCHENECTADY, NY	BLANK0000033782		111.2
	WOLF-TV	D22	DT	CP	SYRACUSE, NY	BLDTA20130603AEQ		80.8
					HAZLETON, PA	BLANK0000027934		225.3

	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New
IX	5372.3	314,889	4378.2	282,993	3466.5
0.00				254,879	3466.5
				254,879	0.00

Undesired		Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	470.3	20,691	0.0	0
W21CP-D D21 LD LIC	3.0	5	1.0	0
WECY-LD D22 LD LIC	2.0	0	0.0	0
WXXI-TV D22 DT CP	64.1	749	9.0	325
WCWN D22 DT CP	547.3	8,135	390.4	6,446
WTVU-CD D22 DC LIC	470.3	20,691	327.4	19,259
WOLF-TV D22 DT CP	45.0	464	10.0	257

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Interference to BLANKCANADA164 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	CICO-DT-53	D22	DT	LIC	BELLEVILLE, ON	BLANKCANADA164	
Undesireds:	WTVU-CD	D22	DC	LIC	SYRACUSE, NY		162.6 km
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	134.3
	WCWN	D22	DT	CP	SCHENECTADY, NY	BLANK0000033782	318.8
	CICO-DT-92	D21	DT	LIC	CLOYNE, ON	BLANKCANADA168	63.1
	CHCH-DT-1	D22	DT	LIC	OTTAWA, ON	BLANKCANADA201	164.0
	CKWS-DT-1	D23	DT	LIC	BRIGHTON, ON	BLANKCANADA165	55.4

	Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New
IX	10646.7	339,795	10611.6	338,261	10037.2
0.00				335,681	10035.2
				335,681	0.02

Undesired		Total IX	Unique IX, before	Unique IX, after
WTVU-CD D22 DC LIC	6.0	0	2.0	0
WXXI-TV D22 DT CP	545.2	2,580	526.1	2,031
WCWN D22 DT CP	2.0	0	0.0	0
CICO-DT-92 D21 DT LIC	9.1	0	8.1	0
CHCH-DT-1 D22 DT LIC	31.1	0	19.1	0
CKWS-DT-1 D23 DT LIC	9.1	549	0.0	0

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Interference to proposal scenario 1
5.76% interference received

Call	Chan	Svc	Status	City, State	File Number	Distance
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Desired:	WTVU-CD	D22	DC	LIC	WTVU_190718-13C.txt SYRACUSE, NY		
Undesireds:	WDSS-LD	D21	LD	CP	SYRACUSE, NY	BLANK0000072128	13.5 km
	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	115.4
	WCWN	D22	DT	CP	SCHENECTADY, NY	BLANK0000033782	182.2
	W22DO-D	D22	LD	LIC	UTICA, NY	BLDTT20111024AES	80.8
	WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	209.9
	CICO-DT-53	D22	DT	LIC	BELLEVILLE, ON	BLANKCANADA164	162.6

	Service area		Terrain-limited		IX-free		Percent IX
	4166.8	585,548	3974.9	575,882	3451.6	542,707	13.17 5.76
Undesired				Total IX		Unique IX	Prcnt Unique IX
WDSS-LD D21 LD CP		32.1		786	14.1	288	0.35 0.05
WXXI-TV D22 DT CP		358.0		20,793	234.7	12,604	5.90 2.19
WCWN D22 DT CP		119.3		6,427	22.0	1,134	0.55 0.20
W22DO-D D22 LD LIC		189.3		16,652	113.1	10,256	2.85 1.78
WOLF-TV D22 DT CP		4.0		78	0.0	0	0.00 0.00
CICO-DT-53 D22 DT LIC		8.0		471	3.0	169	0.08 0.03