

**ENGINEERING STATEMENT IN SUPPORT OF
WBXZ-LP CH 23 DISPLACEMENT APPLICATION 0000052532 CORRECTIVE AMENDMENT
BUFFALO, NEW YORK**

Steven D. Ritchie (“SDR”) has a displacement application pending for WBXZ-LP proposing operation on CH 23 at Buffalo, New York as specified in FCC File Number 0000052532. WBXZ-LP is licensed on CH 17 and that facility is displaced by CIII-DT CH 17 Toronto, Ontario. This amendment serves to correct an error in antenna system orientation and to request Canadian Coordination. The proposed facility creates no impermissible interference to any domestic facility and is believed to reduce interference to Canadian facilities.

It is pointed out that the proposed LPTV facility specified herein will reduce signal levels into Canada when compared to the facilities specified below:

1. WPXJ-TV CH 23 is located 39 km from the nearest point on the Canadian Border and operates with a maximum ERP of 455 kilowatts.
2. The 2008 Digital Television Post Transition Allotment Plan shows CH 23 at Buffalo with 22 kW Omni and RC 493 M AMSL

This application is mutually exclusive with the licensed operation for WPXJ-TV CH 23, Batavia, NY as authorized in BLCDT-20090612AHY. WPXJ-TV is scheduled to commence operation in Phase 4, August 2, 2019, on CH 24 under FCC file number 0000064525. Although WPXJ-TV should be operating on CH 24 before the Canadian coordination process is completed, and the facilities will no longer be mutually exclusive, it is recognized that the staff may make the WBXZ-LP CH 23 CP contingent on WPXJ-TV operation on CH 24.

The proposed facility specifies the licensed transmitter site, antenna pattern, RC AMSL and ERP. The proposed antenna system will continue to be an Alive Telecom 8 slot, horizontally polarized antenna without beam tilt. Utilizing formula 10 OF OET Bulletin No. 65, Edition 97-01, a value F of 0.5 has been used to calculate the power density 2 meters above ground. The antenna RC is 167 M AGL. The maximum power density is 4.6 uw/cm squared calculated for an ERP of 15,000 watts H. polarization. This value is 1.3% of the Public Exposure MPE per section 1.1310. Based on this analysis, it is believed that the proposed facility follows OET-65 Guidelines. The applicant will reduce power or cease transmission as required to meet FCC OET-65 Guidelines. SDR will reduce power or cease operation as required to meet OET-65 worker exposure guidelines.

The proposed antenna support and associated infrastructure is existing.

Report

Study created: 2019.07.06 14:22:21
 Study build station data: LMS TV 2019-06-24
 Proposal: WBXZ-LP D23 LD APP BUFFALO, NY
 File number: BLANK0000052532
 Facility ID: 14317
 Station data: User record
 Record ID: 271
 Country: U.S.

Search options:

Non-U.S. records included

Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WWHC-LP	N20	TX	LIC	OLEAN, NY	BLANK0000022154	99.5 km
No	WAWW-LP	N20-	TX	LIC	ROCHESTER, NY	BLTTL20121029AAV	108.7
No	WECY-LD	D22	LD	LIC	Elmira, NY	BLANK0000024397	168.7
Yes	WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	108.8

No	WBLZ-LD	D22	LD	CP	SYRACUSE, NY	BLANK0000052577	221.3
No	WDVM-TV	D23	DT	CP	HAGERSTOWN, MD	BLANK0000034764	365.7
No	WBSF	D23	DT	CP	BAY CITY, MI	BLANK0000068742	395.3
No	WUDT-LD	D23	LD	LIC	Detroit, MI	BLANK0000007868	354.4
No	WBPN-LD	D23	LD	CP	BINGHAMTON, NY	BMPDTL20130212ABG	254.7
Yes	WETM-TV	D23	DT	CP	ELMIRA, NY	BLANK0000029984	185.5
No	WNPI-DT	D23	DT	LIC	NORWOOD, NY	BLEDT20050715ABZ	369.3
No	W23ER-D	D23z	LD	LIC	POUGHKEEPSIE, NY	BLANK0000068283	421.4
No	WHSU-CD	D23	DC	CP	SYRACUSE, NY	BLANK0000034940	221.3
No	KONV-LD	D23	LD	CP	CANTON, OH	BLANK0000051662	278.2
No	WWHO	D23	DT	CP	CHILLICOTHE, OH	BLANK0000034759	475.7
No	WNWO-TV	D23	DT	CP	TOLEDO, OH	BLANK0000033631	392.2
No	WPXI	D23	LD	LIC	PITTSBURGH, PA	BLCDT20100429ADA	342.5
No	WPXI	D23	DT	CP	PITTSBURGH, PA	BLANK0000034876	284.5
No	W23DR-D	D23	LD	LIC	ROMNEY, WV	BLDTT20090609AAZ	397.1
No	WPXJ-TV	D24	DT	CP	BATAVIA, NY	BLANK0000064525	35.8
No	WONO-CD	D24	DC	CP	SYRACUSE, ETC., NY	BLANK0000034941	221.3
No	WONO-CD	D24	DC	APP	SYRACUSE, ETC., NY	BLANK0000071755	221.3
No	WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000034754	259.6
No	W45EC-D	D24	LD	APP	ERIE, PA	BLANK0000071908	129.5
No	W30BW	N30+	TX	LIC	OLEAN, NY	BLTT20020307ABR	99.5
No	CICO-DT-53D22		DT	LIC	BELLEVILLE, ON	BLANKCANADA164	208.4
No	CICO-DT-28D22		DT	LIC	KITCHENER, ON	BLANKCANADA183	134.2
Yes	CKWS-DT-1	D23	DT	LIC	BRIGHTON, ON	BLANKCANADA165	156.2
Yes	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	134.1
No	CIVP-DT	D23	DT	LIC	CHAPEAU, QC	BLANKCANADA258	367.4

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D23

Mask: Full Service

Latitude: 42 52 48.50 N (NAD83)

Longitude: 78 52 35.10 W

Height AMSL: 351.4 m

HAAT: 0.0 m
Peak ERP: 15.0 kW
Antenna: ANT-ACS8BR (ID 17791) 90.0 deg
Elev Pattn: Generic
49.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	5.40 kW	167.0 m	44.2 km
45.0	14.4	152.8	48.3
90.0	15.0	160.6	49.0
135.0	14.4	150.7	48.1
180.0	5.40	169.8	44.4
225.0	0.063	177.4	22.1
270.0	0.013	173.2	14.8
315.0	0.054	173.3	21.1

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 166 m

****Proposal 24.66 dBu contour crosses Canadian border, coordination required**

Distance to Canadian border: 3.2 km

Distance to Mexican border: 2472.0 km

Conditions at FCC monitoring station: Canandaigua NY

Bearing: 87.8 degrees Distance: 131.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 271.1 degrees Distance: 2204.6 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 BLANKCANADA165 LIC scenario 1,**

0.70% interference caused CKWS-DT-1 D23 DT LIC BRIGHTON, ON

**IX check failure to BLANKCANADA209 LIC scenario 1,
 0.54% interference caused CIII-DT D23 DT LIC PARIS, ON
 ---- Below is IX received by proposal BLANK0000052532 ----
 Proposal receives 2.50% interference from scenario 1

TVIX

tvstudy v2.2.5 (4uoc83)
 Database: 127.0.0.1, Study: BLANK0000052532, Model: Longley-Rice
 Start: 2019.07.06 14:22:21
 Study created: 2019.07.06 14:22:21
 Study build station data: LMS TV 2019-06-24
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No	WONO-CD	D24	DC	APP	SYRACUSE, ETC., NY	BLANK0000071755	221.3
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No	W45EC-D	D24	LD	APP	ERIE, PA	BLANK0000071908	129.5
No	W30BW	N30+	TX	LIC	OLEAN, NY	BLTT20020307ABR	99.5
No	CICO-DT-53D22		DT	LIC	BELLEVILLE, ON	BLANKCANADA164	208.4
No	CICO-DT-28D22		DT	LIC	KITCHENER, ON	BLANKCANADA183	134.2
Yes	CKWS-DT-1	D23	DT	LIC	BRIGHTON, ON	BLANKCANADA165	156.2
Yes	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	134.1
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Elev Pattn: Generic

49.7 dBu contour:

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135.0	14.4	150.7	48.1
180.0	5.40	169.8	44.4
225.0	0.063	177.4	22.1
270.0	0.013	173.2	14.8
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Database HAAT: 0 m Computed HAAT: 166 m

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Distance to Canadian border: 3.2 km

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 Conditions at FCC monitoring station: Canandaigua NY
 Bearing: 87.8 degrees Distance: 131.2 km
 Proposal is not within the West Virginia quiet zone area
 Conditions at Table Mountain receiving zone:
 Bearing: 271.1 degrees Distance: 2204.6 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%

 Interference to BLANK0000029838 CP scenario 1

Call	Chan	Svc	Status	City, State	File Number	Distance
Desired: WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	
Undesireds: WBXZ-LP	D23	LD	APP	BUFFALO, NY	BLANK0000052532	108.8 km
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
Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
14394.0	1,184,613	14064.3	1,172,580	13921.1	1,167,605	0.00 0.00
109.5	0	109.5	0	81.8	0	0.00 0.00 (in Canada)
Undesired		Total IX		Unique IX, before	Unique IX, after	
WBXZ-LP D23 LD APP		1.7	100		0.2	0
WCWN D22 DT CP		58.1	2,241	18.2	18.2	597
WOLF-TV D22 DT CP		33.2	1,154	7.1	7.1	124
WETM-TV D23 DT CP		14.3	205	9.4	9.4	205
CICO-DT-53 D22 DT LIC		84.7	3,132	50.4	50.4	1,149
CICO-DT-53 D22 DT LIC		27.7	0	27.7	27.7	0 (in Canada)
CICO-DT-28 D22 DT LIC		14.7	1,198	9.6	9.1	517

 Interference to BLANK0000029984 CP scenario 1

Call	Chan	Svc	Status	City, State	File Number	Distance
Desired: WETM-TV	D23	DT	CP	ELMIRA, NY	BLANK0000029984	
Undesireds: WBXZ-LP	D23	LD	APP	BUFFALO, NY	BLANK0000052532	185.5 km
WXXI-TV	D22	DT	CP	ROCHESTER, NY	BLANK0000029838	128.4
WOLF-TV	D22	DT	CP	HAZLETON, PA	BLANK0000027934	132.1
WDVM-TV	D23	DT	CP	HAGERSTOWN, MD	BLANK0000034764	286.7
WNJS	D23	DT	CP	CAMDEN, NJ	BLANK0000034585	314.4
WNPI-DT	D23	DT	LIC	NORWOOD, NY	BLEDT20050715ABZ	311.2

	WFTY-DT	D23	DT	LIC	SMITHTOWN, NY	BLCDT20120427ABO	353.0		
	WHSU-CD	D23	DC	CP	SYRACUSE, NY	BLANK0000034940	120.5		
	WPXI	D23	DT	CP	PITTSBURGH, PA	BLANK0000034876	319.1		
	WPXJ-TV	D24	DT	CP	BATAVIA, NY	BLANK0000064525	150.3		
	WONO-CD	D24	DC	CP	SYRACUSE, ETC., NY	BLANK0000034941	120.5		
	W24DB-D	D24z	DC	LIC	CLARKS SUMMIT, PA	BLANK0000004543	120.5		
	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	318.9		
	Service area			Terrain-limited	IX-free, before	IX-free, after		Percent	New IX
24734.0	880,722	23176.4		802,564	22979.3	799,852	22978.4	799,852	0.00 0.00
Undesired				Total IX	Unique IX, before	Unique IX, after			
WBXZ-LP D23 LD APP		6.2		88		1.0	0		
WXXI-TV D22 DT CP		16.5		211	6.2	6.2	62		
WOLF-TV D22 DT CP		28.4		516	20.6	20.6	514		
WDVM-TV D23 DT CP		57.5		288	30.4	30.4	224		
WNJS D23 DT CP		18.1		62	2.8	2.8	29		
WNPI-DT D23 DT LIC		3.7		13	0.5	0.5	0		
WFTY-DT D23 DT LIC		2.5		2	1.0	1.0	0		
WHSU-CD D23 DC CP		68.7		1,497	56.3	55.1	1,302		
WPXI D23 DT CP		40.1		59	20.3	20.0	28		
WPXJ-TV D24 DT CP		14.6		276	13.1	11.1	221		
W24DB-D D24z DC LIC		0.3		1	0.0	0.0	0		
CIII-DT D23 DT LIC		2.5		69	1.0	0.7	17		

Interference to BLANKCANADA165 LIC scenario 1

**IX: 0.70% interference caused

	Call	Chan	Svc	Status	City, State	File Number	Distance		
Desired:	CKWS-DT-1	D23	DT	LIC	BRIGHTON, ON	BLANKCANADA165			
Undesireds:	WBXZ-LP	D23	LD	APP	BUFFALO, NY	BLANK0000052532	156.2 km		
	WETM-TV	D23	DT	CP	ELMIRA, NY	BLANK0000029984	228.1		
	WNPI-DT	D23	DT	LIC	NORWOOD, NY	BLEDT20050715ABZ	238.9		
	WHSU-CD	D23	DC	CP	SYRACUSE, NY	BLANK0000034940	170.8		
	CICO-DT-53D22	D22	DT	LIC	BELLEVILLE, ON	BLANKCANADA164	55.4		
	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	230.3		
	Service area			Terrain-limited	IX-free, before	IX-free, after		Percent	New IX
4436.1	176,820	4298.7		172,308	4227.5	164,385	4208.1	164,385	0.46 0.70
Undesired				Total IX	Unique IX, before	Unique IX, after			
WBXZ-LP D23 LD APP		55.9		4,869		19.4	1,165		
WETM-TV D23 DT CP		28.4		2,593	11.6	9.5	0		
WNPI-DT D23 DT LIC		21.4		1,228	3.3	2.5	0		

WHSU-CD D23 DC CP	11.6	454	0.5	0	0.5	0
CICO-DT-53 D22 DT LIC	28.1	2,409	14.6	1,446	10.6	1,446
CIII-DT D23 DT LIC	34.7	3,575	10.8	2,210	3.5	432

Interference to BLANKCANADA209 LIC scenario 1

**IX: 0.54% interference caused

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	
Undesireds:	WBXZ-LP	D23	LD	APP	BUFFALO, NY	BLANK0000052532	134.1 km
	WBSF	D23	DT	CP	BAY CITY, MI	BLANK0000068742	265.4
	WETM-TV	D23	DT	CP	ELMIRA, NY	BLANK0000029984	318.9
	WNWO-TV	D23	DT	CP	TOLEDO, OH	BLANK0000033631	297.3
	WPXI	D23	DT	CP	PITTSBURGH, PA	BLANK0000034876	313.1
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	19183.1	3,481,062	19125.6	3,434,048	19063.2	3,426,064	19057.6 3,407,598 0.03 0.54
Undesired			Total IX		Unique IX, before	Unique IX, after	
WBXZ-LP D23 LD APP		8.3	24,371		5.6	18,466	
WBSF D23 DT CP		45.0	1,652	42.7	1,147	42.7	1,147
WETM-TV D23 DT CP		2.9	6,332	2.9	6,332	0.2	427
WNWO-TV D23 DT CP		1.5	505	0.0	0	0.0	0
WPXI D23 DT CP		15.8	0	14.6	0	14.6	0

Interference to proposal scenario 1

2.50% interference received

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WBXZ-LP	D23	LD	APP	BUFFALO, NY	BLANK0000052532	
Undesireds:	WPXI	D23	DT	CP	PITTSBURGH, PA	BLANK0000034876	284.5 km
	WPXJ-TV	D24	DT	CP	BATAVIA, NY	BLANK0000064525	35.8
	CKWS-DT-1	D23	DT	LIC	BRIGHTON, ON	BLANKCANADA165	156.2
	CIII-DT	D23	DT	LIC	PARIS, ON	BLANKCANADA209	134.1
	Service area		Terrain-limited		IX-free	Percent IX	
	4426.8	1,089,668	4223.4	1,080,302	3738.4	1,053,331	11.48 2.50
	286.4	30,331	286.4	30,331	85.3	10,970	70.20 63.83 (in Canada)
Undesired			Total IX		Unique IX	Prctn Unique IX	
WPXI D23 DT CP		0.5	0	0.0	0	0.00	0.00
WPXJ-TV D24 DT CP		295.5	18,196	205.5	14,296	4.87	1.32
WPXJ-TV D24 DT CP		201.0	19,361	201.0	19,361	70.20	63.83 (in Canada)
CKWS-DT-1 D23 DT LIC		0.2	5	0.0	0	0.00	0.00
CIII-DT D23 DT LIC		279.5	12,675	189.0	8,770	4.48	0.81

The foregoing was prepared on behalf of Steven D. Ritchie by Clarence M. Beverage of Communications Technologies, Inc., Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey
July 7, 2019