

ENGINEERING STATEMENT

This displacement application is submitted for WWBP-LP, Channel 31, Freedom, PA, Facility ID 268, FCC File Number BLTTL-20040909ABD, licensed to Abacus Television ("Applicant"). Applicant proposes to move WWBP-LP from analog channel 31 to digital channel 27.

Nature of Displacement

WWBP-LP cause 5.77% interference to WYTV and receive 49.41% interference from WYTV.

Waiver of the 30-Mile Rule and Proposed Facility

For reasons listed below, Applicant respectfully requests a waiver of 47 C.F.R. § 74.787 to allow WWBP-LP to move more than 30 miles and without contour overlapping with the existing licensed facility for reasons stated below:

Applicant proposes to move WWBP-LP from its analog channel 31 to digital channel 27 to tower farm that is 32.5 miles distant from its existing licensed facility. The F(50,90) 51 dBu contour of proposed facility does not overlap with the F(50,50) 74 dBu contour of the existing licensed facility.

The proposed tower is owned and occupied by WYTV, the station to which WWBP-LP causes and receives interference from its licensed analog facility on channel 31. To break interference, WYTV has agreed to allow WWBP-LP to move to their tower, which is the nearest tower to which WWBP-LP can move and not interfere with other facilities.

As illustrated in Attachment A, the proposed facility is the only facility WWBP-LP can operate without interfering to the four regional stations on channel 27. There are no other channels between 2 and 36 available in the area. WWBP-LP is unable overlap contours with its existing licensed facility because it would be required to raise power to 15kW and go slightly higher on the tower and it would then interfere with other stations in the region.

The proposed facility for WWBP-LP on channel 27 was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 0.50 km
Profile point spacing: 0.20 km

It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

Canadian Coordination Not Required

The proposed 25.05 dBu contour does not cross the Canadian border, which is 137.3km distant from the proposed tower. Therefore, Canadian coordination and concurrence is not required.

Digital TV and Class A Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., "*de minimis*") based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Low Power TV and TV Translator Station Protection

The proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (i.e., "*de minimis*") based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Environment Effect

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.

