

ENGINEERING TECHNICAL STATEMENT
COMPLIANCE WITH §73.3801 OF FCC RULES
SIMULCASTING DURING ATSC 3.0 TRANSITION

The WSYR-TV full-power digital television broadcast facility (File Number BLCDT-20030812ABK) is licensed to operate on Channel 17 with an ERP of 105 kW using a directional antenna mounted on a tower with Antenna Structure Registration Number (ASRN) 1004101 located in Pompey, NY. WSYR-TV facility also has a pending maximization application (File Number 0000127611) requesting to increase the ERP from 105 kW to 285 kW. The WSTM-DT full-power television facility (File Number 0000090187) is licensed to operate on Channel 19 with an ERP of 150 kW using a nondirectional antenna mounted on a tower with ASRN 1233154 located in Lafayette, NY. The stations plan to partner in a simulcasting arrangement for purposes of airing one of WSTM's ATSC 1.0 programming streams where WSYR is the ATSC 1.0 "Host" station and WSTM-DT is the ATSC 1.0 "Tenant" station. Additionally, WSTM shall be an ATSC 3.0 Host station and WSYR shall be an ATSC 3.0 Tenant station where WSTM will air WSYR in in ATSC 3.0 format. Both stations are assigned to the same DMA (Syracuse, NY).

Pursuant to section 73.3801(f)(6)(i) of FCC Rules, the following information is required for this type of application.

- Station serving as the host: WSYR ([0000127611](#))
- Technical facilities of the host station:
 - Frequency: 491 MHz (Channel 17)
 - ERP: 285 kW ([Pending Application](#))
 - Antenna: Directional
 - Antenna Center Height: 224.0 m AGL
 - Antenna Model: ALP16M2-HSOC-17
 - Antenna Polarization: Horizontal
 - Antenna Beam Tilt: 0.50°

- Coordinates: 42° 56' 42.0" N, 076° 01' 27.0" W
- ASRN: 1004101
- DMA: Syracuse, NY (both stations)

Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the following information is also required for this type of application.

- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal: **1,453,601 persons (See Exhibit 2)** based on U.S. Census 2010 data.
- Predicted population within the noise limited service contour served by the station's original ATSC 1.0 signal that will lose the station's ATSC 1.0 service as a result of the simulcasting arrangement, including identifying areas of service loss by providing a contour overlap map: **74,301 Persons (See Exhibits 3-4)**
 - **Note:** *The predicted population loss above is based on the pending WSYR-TV maximization application (0000127611). The predicted population loss based on the WSYR-TV licensed facility's (BLCDT-20030812ABK) noise limited service contour is 128,756.*
- Will the ATSC 1.0 simulcast signal aired on the host station serve at least 95% of station's original ATSC 1.0 population? **Yes, it will serve 95% (See Exhibits 1-4).**
 - **Note:** *The above predicted percentage served is based on the pending maximization application (0000127611). The ATSC 1.0 simulcast signal aired via the host station based on the existing licensed facility will serve 91% of station's original ATSC 1.0 population.*


Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Referring to Exhibit 3, it can be seen that the WSTM-DT ATSC 1.0 "Tenant" station will continue to completely encompass its community of license (Syracuse, NY) with the WSYR-TV F(50,90) 48.0 dBu "Host" station's principal community

contour. Also pursuant to §73.3801(c) and §73.3801(d) of FCC Rules, the WSTM-DT “Tenant” station and the WSYR-DT “Host” station are both assigned to the same DMA (Syracuse, NY).

Accordingly, as demonstrated above and in enclosed Exhibits 1-4, the proposed WSTM-TV “ATSC 1.0 Tenant” facility operating with an ATSC 1.0 signal and sharing the frequency with the WSYR-DT “ATSC 1.0 Host” facility (Coverage requirements for the ATSC 1.0 simulcast signal) and the proposed WSYR-TV “ATSC 3.0 Tenant” facility operating with an ATSC 3.0 signal and sharing the frequency with the WSTM-DT “ATSC 3.0 Host” facility (Coverage requirements for ATSC 3.0 signals) fully satisfies the FCC rules specified in §73.3801 and the application should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

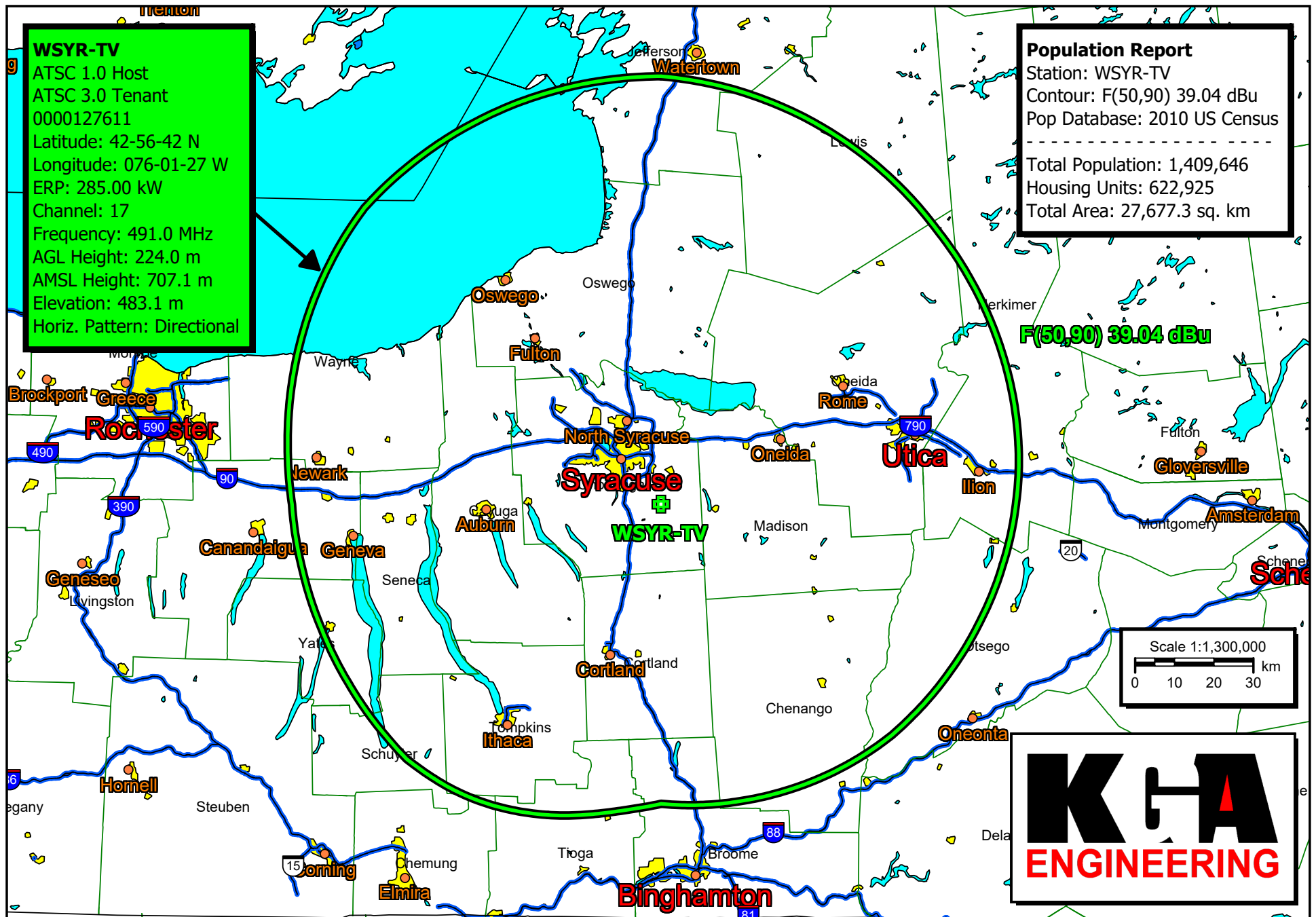
CERTIFICATION

This technical statement was prepared by William T. Godfrey, Jr., Engineering Associate with the firm Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida, and has been working with the firm in the field of radio and television broadcast consulting since 1998. Mr. Godfrey was a graduate from the University of North Florida and a Distinguished Military Graduate from the University of Florida. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.


WILLIAM T. GODFREY, JR., CBT
Kessler and Gehman Associates, Inc.

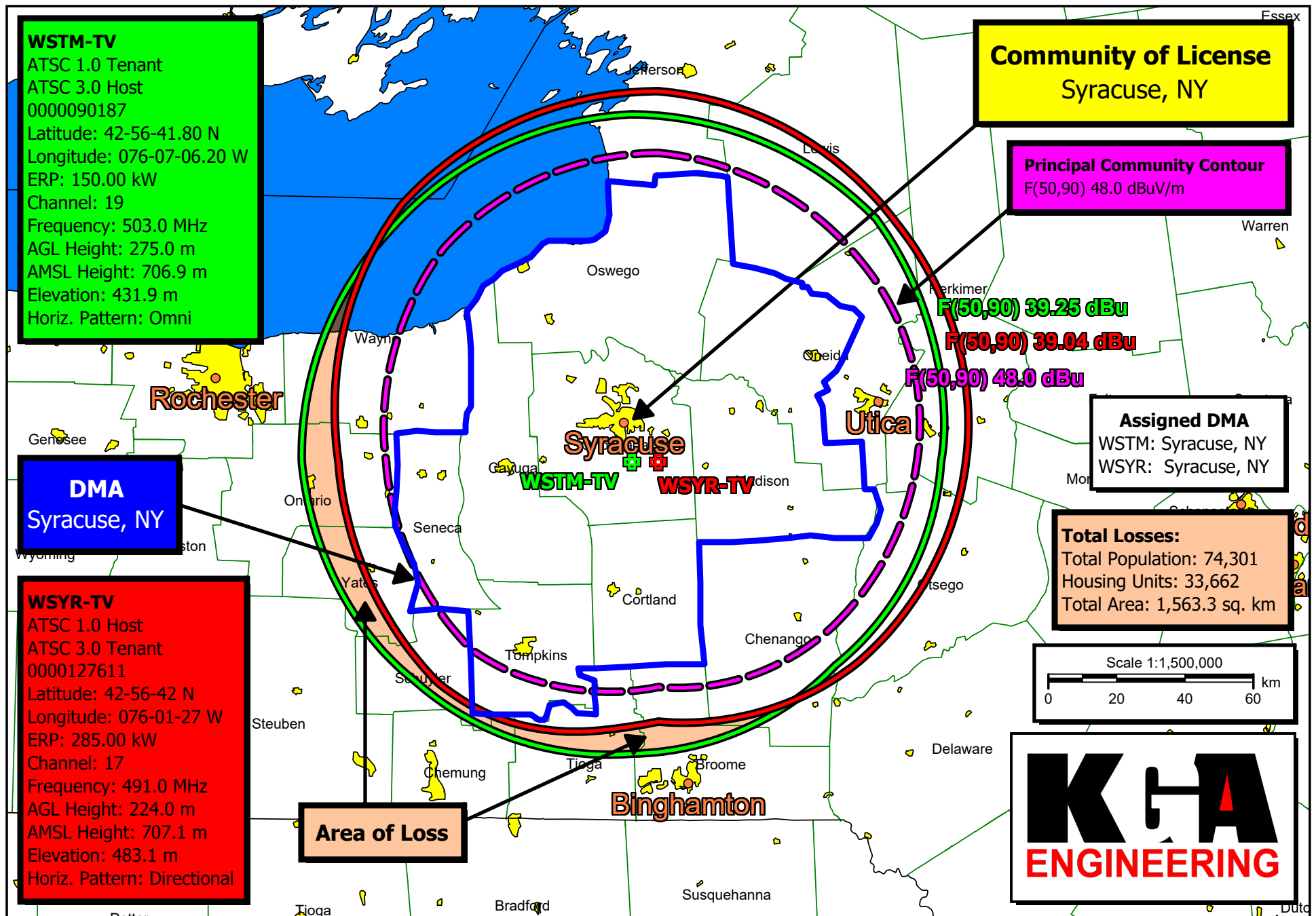
Consulting Engineers

February 17, 2021



Population Within WSYR-TV Protected Noise Limited Service Contour

EXHIBIT 1



WSTM Original ATSC 1.0 Population Loss as Tenant Station (5% Loss)

Overlap Population Report
WSTM-D19 LIC (19) / WSYR-D17 (17)

Overlap Area Type: Intersection
Areas Included:

WSTM-D19 (19): FCC F(50-90) 39.25 dBu (8 Radial HAAT) (FCC HAAT)
WSYR-D17 (17): FCC F(50-90) 39.04 dBu (8 Radial HAAT) (FCC HAAT)

Population Database: 2010 US Census (PL)

Total Population: 74,301

Housing Units: 33,662

Overlap Area: 1563.2 sq. km (Area determined using 0.1 km cells)

Total Breakdown

White:	70,685	[95.1%]
Black:	807	[1.1%]
Hispanic:	1,380	[1.9%]
Native American:	174	[0.2%]
Asian:	323	[0.4%]
Pacific Islander:	11	[0.0%]
Mixed Race:	878	[1.2%]
Other:	43	[0.1%]
Total:	74,301	