

**Engineering Statement
Modification of Outstanding Construction Permit
Translator W33CR-D Chambersburg, PA
December 16, 2020**

The purpose of this application is to modify the Construction Permit (File # 0000053818) of W33CR-D Channel 34 Chambersburg, PA. The current construction permit was requested and granted during the Special Displacement Window opened by the FCC for LPTV/translator stations that were displaced by the incentive auction and repacking process. W33CR-D is currently operating under Special Temporary Authority (STA), FCC File Number 0000120230, on channel 34 at reduced power (5 kW instead of the 15 kW authorized by the Construction Permit). Subsequent to moving to channel 34, it was determined that interference was being caused to full-service station WRC-TV channel 34 Washington, DC. The lower power STA was requested to temporarily minimize the interference to WRC-TV while seeking a solution to the problem.

After conducting a study, it has been determined that moving W33CR-D to channel 20 is the best solution. This move can be accomplished by using a directional antenna to provide interference protection to other television stations while allowing for coverage to the desired area. An analysis using TVStudy (copy of study results provided) with the default settings indicates this proposal does not cause any interference to other television stations above the de minimis limit.

TVStudy does however identify several distance check violations to land mobile stations in the adjacent channel 19 spectrum. In view of the land mobile issues, it is proposed to employ a cascaded post-transmitter filter to eliminate any potential interference to land mobile stations. A separate detailed study of interference to land mobile stations (copy of report provided) concludes that with the utilization of the proposed cascaded post-transmitter filter no interference will be caused to land mobile stations.

Should the FCC feel it necessary, the licensee of W33CR-D is willing to accept a condition requirement on the construction permit that all licensees of the potentially affected Land Mobile stations identified in the report be notified in advance of commencing operation on channel 20. It is further willing to accept as another condition requirement that a copy of the transmitter proof of performance report that includes the post-transmitter OOB filter be provided showing that no harmful interference will be caused into the Land Mobile stations identified in this study.

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