

ENGINEERING STATEMENT

This Engineering Statement supports this application to modify the licensed facility of WNYJ-LD, Channel 28, Facility ID 127912, New York, NY, FCC File Number 0000164080, licensed to Venture Technologies Group, LLC (“Applicant”).

Proposed Facility

The proposed facility is less than 30 miles distance from the existing licensed facility. 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). The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility. The proposed facility was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 1.00 km
Profile point spacing: 1.00 km

WNYJ-LD has built permanent facilities at its current licensed site and will continue to operate from that site until it relocates to the facilities specified in this construction permit. The permanent facilities currently licensed to WNYJ-LD will be used by WEPT-CD, which has a construction permit to move to the WNYJ-LD site. By this application, WNYJ-LD proposes to move to WEPT-CD’s current site where it will take over WEPT’s long term tower lease and its equipment. This swap is in the public interest because it will allow WEPT-CD – a protected Class A station – to operate closer to New York City, where WNYJ-LD was more likely to be displaced. WNYJ-LD, after its relocation, will serve a more rural area where it is less likely to be displaced.

Digital TV and Class A Station Protection and Interference Acceptance

The proposed facility of WNYJ-LD on channel 28 is predicted to cause interference to the licensed facility of WEPT-CD, Facility 30429. Both stations are licensed to the Applicant and the Applicant hereby agrees to accept such interference.

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 of WNYJ-LD on channel 28 is predicted to cause interference to the proposed facility of W25FA-D (FCC File No. 0000127436). Both stations are licensed to the Applicant and the Applicant hereby agrees to accept such interference.

Except as referenced above, 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.