ENGINEERING STATEMENT

IN SUPPORT OF

APPLICATION FOR MINOR MODIFICATION TO A CONSTRUCTION PERMIT

W07BJ-D

ITHACA, NY

Background

Lilly Broadcasting, L.L.C. (Lilly), is seeking, in its instant application, to modify the W07BJ-D construction permit to specify a new transmit location.

Proposed Parameters

Lilly is proposing the following parameters for the W07BJ-D digital operation on Ch. 34:

Coordinates: 42° 26' 30.2" N (NAD83)

76° 34′ 39.0" W

ERP: 15.0 kW RCAMSL: 472.7m RCAGL: 45.7m

Antenna: Dielectric DLP-8M

Mask: Full-Service

Interference

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5) with the default parameters. The results of the study (copy attached hereto) show that potential interference is not predicted to exceed 0.49% to any full-service DTV or Class A stations or 1.99% to any low power stations as required by the Commission's Rules, except for interference to WENY-TV which is a station that is co-owned by Lilly. WENY-TV has agreed to accept the predicted incoming interference as stated in the Consent to Accept Interference document attached to the application. When the study is re-run without the WENY-TV CP on Ch. 35, the study results show that are no interference issues (copy of study results with and without WENY, attached hereto).

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report.

The location of the proposed post-incentive auction facility is assumed to currently be "in compliance" with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst case ground level RFR contributed to the site by this proposal in public areas is calculated to be 0.012585 mW/cm², which is less than the MPE for public exposure (0.395333 mW/cm²) at Ch. 34 (590-596 MHz). Per Section 1.1307(b) of the FCC Rules, the proposed operation would be categorically excluded from taking corrective action in areas with levels above the MPE limit where the contribution to the RFR from the proposed facility is less than 5%.

Lilly agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

Benjamin Pidek, P.E. March 27, 2022

Attached:

TVStudy Interference Check Report with WENY-TV TVStudy Interference Check Report without WENY-TV

TVStudy TV Interference Check Report for Proposed W07BJ-D Facility on Ch. 34 with WENY-TV in Study

Study created: 2022.03.27 13:33:11

Study build station data: LMS TV 2022-03-27

Proposal: W07BJ D34z LD CP ITHACA, NY

File number: W07BJ-WCIDSite-wWENY

Facility ID: 71512

Station data: User record

Record ID: 139 Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Search options:

Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WTKJ-LP	N19	TX	LIC	WATERTOWN, NY	BLTTL20080804ADM	180.8 km
No	WWHC-LD	N20	TX	LIC	OLEAN, NY	BLANK0000022154	157.6
No	WAWW-LD	N20-	TX	LIC	Rochester, NY	BLTTL20121029AAV	112.7
No	W26BF-D	N26-	TX	LIC	ELMIRA, NY	BLTTL19960111AB	38.7
Yes	WSKG-TV	D33	LD	CP	BINGHAMTON, NY	BLANK0000054938	6.8
No	WGRZ	D33	DT	CP	BUFFALO, NY	BLANK0000035664	165.4
No	WGRZ	D33	DT	LIC	BUFFALO, NY	BLANK0000137137	165.4
No	WVVC-LD	D33	LD	LIC	UTICA, NY	BLDTL20110829AAZ	130.8
No	WQPX-TV	D33	DT	LIC	SCRANTON, PA	BLANK0000080158	132.2
No	WTIC-TV	D34	DT	LIC	HARTFORD, CT	BLANK0000159941	319.7
No	WRC-TV	D34	DT	LIC	WASHINGTON, DC	BLANK0000153860	391.5
No	WPPX-TV	D34	DT	LIC	WILMINGTON, DE	BLANK0000181597	289.0
No	WFXT	D34	DT	LIC	BOSTON, MA	BLANK0000080060	440.3
No	WSJZ-LD	D34	LD	APP	Salisbury, MD	BLANK0000143852	422.9
Yes	WKBW-TV	D34	DT	LIC	BUFFALO, NY	BLANK0000134785	168.7
No	WPXN-TV	D34	DT	LIC	NEW YORK, NY	BLANK0000086780	287.0
No	WHTV-LD	N34+	TX	LIC	New York, NY	BLTTL20070223AHK	197.6
No	WYCI	D34	DD	APP	SARANAC LAKE, NY	BLANK0000127536	333.0
No	WYCI	D34	DT	LIC	SARANAC LAKE, NY	BLANK0000078627	289.3
Yes	WFXV	D34	DT	LIC	UTICA, NY	BLANK0000112314	138.5
No	W34FP-D	D34	LD	LIC	EASTLAKE, OH	BLANK0000080537	378.0
No	W34FL-D	D34	LD	LIC	Harrisburg/Lancaster, PA	BLANK0000184712	281.9
No	WPXI	D34	LD	LIC	PITTSBURGH, PA	BLANK0000106623	349.8
Yes	WSWB	D34	DT	LIC	SCRANTON, PA	BLANK0000079375	132.0
No	WNPB-TV	D34	DT	LIC	MORGANTOWN, WV	BLANK0000106559	405.4
Yes	WENY-TV	D35	DT	LIC	ELMIRA, NY	BLANK0000104138	52 . 9
No	WRGB	D35	DT	LIC	SCHENECTADY, NY	BLANK0000185806	211.3
No	WWLF-LD	D35z	LD	LIC	SYRACUSE, NY	BLANK0000120990	76.3
No	WWLF-LD	N35z	TX	LIC	SYRACUSE, NY	BLTTA20050922ACH	76.3
No	WNYF-CD	D35	DC	LIC	WATERTOWN, NY	BLDTL20090924ABW	181.6
No	W15EG-D	N41-	TX	LIC	CORNING, NY	BLTTL20080729AFT	52.9
No	CFGS-DT	D34	DT	LIC	GATINEAU, QC	BLANKCANADA266	345.2
No	CFTO-DT-5	4D35	DT	LIC	PETERBOROUGH, ON	BLANKCANADA214	273.0

No non-directional AM stations found within 0.8 \mbox{km}

No directional AM stations found within 3.2 km $\,$

Record parameters as studied:

```
Channel: D34z
      Mask: Full Service
  Latitude: 42 26 30.20 N (NAD83)
 Longitude: 76 34 39.00 W
Height AMSL: 472.7 m
      HAAT: 0.0 m
  Peak ERP: 15.0 kW
   Antenna: DIE DLP8-M 0.0 deg
Elev Pattrn: Generic
 Elec Tilt: 1.50
50.7 dBu contour:
Azimuth
           FRP
                      HAAT Distance
 0.0 deg
          13.0 kW 232.1 m 51.3 km
45.0
           13.5
                     198.9
                               49.5
90.0
          13.3
                     205.4
                               49.9
135.0
          4.55
                     139.2
                               40.3
180.0
          0.953
                     84.4
                               27.3
225.0
          0.576
                     -17.6
                               14.9
270.0
          5.56
                     47.1
                               29.8
315.0
           14.0
                     118.9
                               44.6
Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 126 m
**Proposal 25.68 dBu contour crosses Canadian border, coordination required
Distance to Canadian border: 133.4 km
Distance to Mexican border: 2603.5 km
Conditions at FCC monitoring station: Canandaigua NY
Bearing: 313.2 degrees Distance: 76.9 km
Proposal is not within the West Virginia quiet zone area
Conditions at Table Mountain receiving zone:
Bearing: 273.6 degrees Distance: 2394.3 km
Study cell size: 1.00 km
Profile point spacing: 1.00 km
Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%
**IX check failure to BLANK0000104138 LIC scenario 1, 9.69% interference caused
---- Below is IX received by proposal W07BJ-WCIDSite-wWENY ----
Proposal receives 3.73% interference from scenario 1
```

TVStudy TV Interference Check Report for Proposed W07BJ-D Facility on Ch. 34 with WENY-TV Removed From Study

Study created: 2022.03.27 13:38:41

Study build station data: LMS TV 2022-03-27

Proposal: W07BJ D34z LD CP ITHACA, NY File number: W07BJ-WCIDSite-woutWENY

Facility ID: 71512 Station data: User record

Record ID: 140 Country: U.S.

Build options:

Protect pre-transition records not on baseline channel

Search options:

Non-U.S. records included

Individual records excluded:

0000104138 WENY-TV D35 DT LIC ELMIRA, NY BLANK0000104138

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WTKJ-LP	N19	TX	LIC	WATERTOWN, NY	BLTTL20080804ADM	180.8 km
No	WWHC-LD	N20	TX	LIC	OLEAN, NY	BLANK0000022154	157.6
No	WAWW-LD	N20-	TX	LIC	Rochester, NY	BLTTL20121029AAV	112.7
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No	CFGS-DT	D34	DT	LIC	GATINEAU, QC	BLANKCANADA266	345.2
No	CFTO-DT-54D35		DT	LIC	PETERBOROUGH, ON	BLANKCANADA214	273.0

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

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Elev Pattrn: Generic
  Elec Tilt: 1.50
50.7 dBu contour:
Azimuth
            FRP
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           13.0 kW 232.1 m 51.3 km
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           13.5
                     198.9
                               49.5
 90.0
           13.3
                     205.4
                               49.9
135.0
           4.55
                     139.2
                               40.3
180.0
          0.953
                     84.4
                               27.3
225.0
          0.576
                     -17.6
                               14.9
270.0
           5.56
                     47.1
                               29.8
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Profile point spacing: 1.00 km
Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%
---- Below is IX received by proposal W07BJ-WCIDSite-woutWEN ----
Proposal receives 3.73% interference from scenario 1
No IX check failures found.
```