

WFBD DTS Conversion Application 0000182313 Amendment

This amendment is filed to provide additional public interest justification for the proposed WFBD reference point change to satisfy the FCC's 2008 DTS Order's requirement that "[u]pon the appropriate public interest showing, a station may request a change to its reference point, just as stations have done historically. . . ."¹

Granting WFBD's DTS Conversion will serve a critically important public interest objective by providing over 227,000 homes in the western part of the station's DMA with free over-the-air reception of an additional television station signal that adds six (6) new and unique programming channels to the existing television viewing choices in the market.²

RLM acquired WFBD in September 2020, just after the prior licensee completed the buildout of the station's post-TV auction repack facilities. WFBD is assigned to the Mobile-Pensacola Nielsen Designated Market Area ("DMA"), which includes a total of 16 full power television stations.³ From FCC records, the station began broadcasting in 2005 and since that time has not provided coverage to the western portion of the DMA, consisting primarily of the Mobile, AL metropolitan area. WFBD is only one of two stations out of the 16 full power television stations in the DMA that does not provide coverage throughout the DMA.⁴ For nearly two decades, viewers in the western portion of the DMA have historically been deprived from receiving the free over-the-air signal of a television station assigned to the market, and concomitantly, its new and unique programming options that are not otherwise replicated by the other DMA full power stations. At its own cost, using a design that includes a reference point change, RLM seeks to correct that disparity with its proposed DTS application.

RLM's DTS proposal does not involve "cherry picking" to favor some populations within WFBD's service area over others. Instead and importantly, RLM's proposal continues to cover all of the viewers in its existing service area,⁵ and then adds over 500,000 additional viewers unable to currently receive WFBD's signal.⁶ Furthermore, the likelihood of viewers receiving WFBD's newly available over-the-air signal is dramatically assisted by the proposed placement of the DTS-2 transmitter on a tower in the Mobile antenna farm, making WFBD-TV's signal more accessible to over-the-air viewers in the Mobile metro area who typically would direct their antennas east/southeast, toward the antenna farm, rather than east-northeast, where WFBD-TV's presently authorized transmitter is located.⁷ The expected benefits of RLM's proposal are clearly not just notional; a new signal and new programming choices will be an immediate reality for viewers.

For the above reasons, the reference point change and proposed DTS facility properly aligns with the Commission's programming diversity and allotment objectives and is squarely in the public interest.

¹ See Digital Television Distributed Transmission System Technologies, Report and Order, 23 FCC Rcd 16731, 16748-49, para. 29 (2008) ("DTS R&O")

² See Exhibit B for number of homes. On its multicast channels, WFBD carries SonLife, Twist, True Real, Defy, Newsy and Digi-TV, none of which are being offered on any of the stations in the DMA.

³ Source: <http://www.biakelsey.com/research-data/broadcast-center/station-search/>

⁴ See Exhibit A.

⁵ See Smith & Fisher Engineering Statement, p.2.

⁶ See Exhibit B.

⁷ Id.

SMITH AND FISHER, LLC

LICENSED WFBD-DT SERVICE CONTOUR

PROPOSED WFBD-DT DTS-2 SERVICE CONTOUR

COVERAGE COMPARISON OF FULL-POWER DIGITAL TELEVISION STATIONS IN MOBILE-PENSACOLA DMA

Legend:

- WFBD-D (29)
- WALA-TV (9)
- WPMI-TV (15)
- WMPV-TV (18)
- WKRG-TV (20)
- WDPM-DT (23)
- WEIQ-D (30)
- WFGX-D (14)
- WEAR-TV (17)
- WPAN-D (21)
- WSRE-D (24)
- WAWD-D (25)
- WHBR-D (34)
- WJTC-D (35)
- WMPV-TV (18)
- WFNA-D (27)
- WFBD-DTS2 (29)

Scale 1:1,500,000

0 20 40 60 km

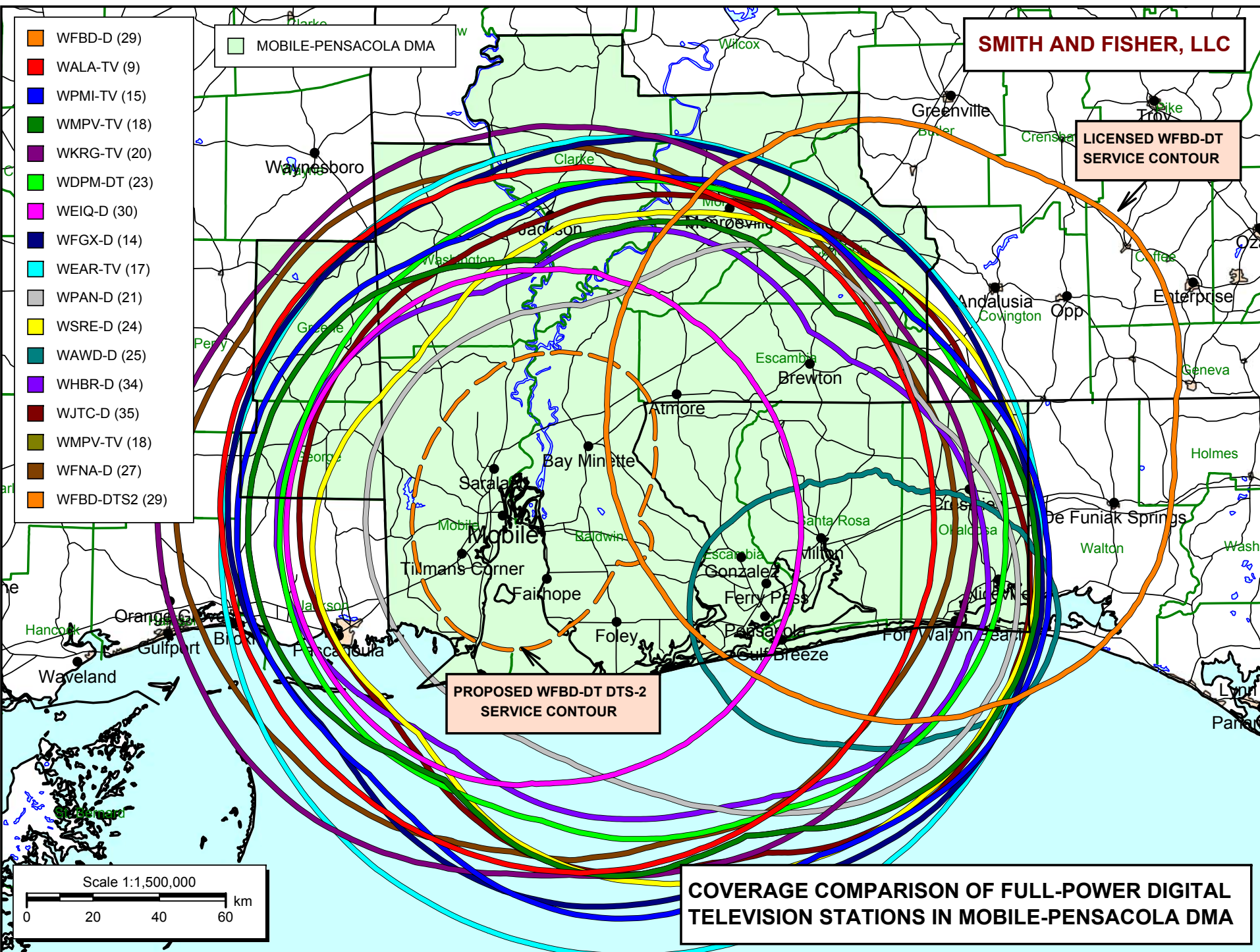


EXHIBIT B

Population Report for All Contours

Population Database: 2020 US Census (PL)

	Population	Housing Units	Area (sq. km)
WFBD-D (29) [Destin, FL]			
FCC F(50-90) 40.23 dBu (918,398	428,001	24797.9
WALA-TV (9) [Mobile, AL]			
FCC F(50-90) 36.00 dBu (1,426,774	649,101	35737.3
WPMI-TV (15) [Mobile, AL]			
FCC F(50-90) 38.83 dBu (1,612,994	748,118	40679.0
WMPV-TV (18) [Mobile, AL]			
FCC F(50-90) 39.15 dBu (1,563,966	718,517	35107.2
WKRG-TV (20) [Mobile, AL]			
FCC F(50-90) 39.36 dBu (1,660,663	754,672	43564.8
WDPM-DT (23) [Mobile, AL]			
FCC F(50-90) 39.66 dBu (1,500,514	685,915	33793.4
WEIQ-D (30) [Mobile, AL]			
FCC F(50-90) 40.32 dBu (1,133,856	523,062	18990.6
WFGX-D (14) [Fort Walton Beach, FL]			
FCC F(50-90) 38.72 dBu (1,633,647	754,104	43961.2
WEAR-TV (17) [Pensacola, FL]			
FCC F(50-90) 39.04 dBu (1,663,140	765,520	47868.6
WPAN-D (21) [Fort Walton Beach, FL]			
FCC F(50-90) 39.46 dBu (1,394,951	642,694	25065.0
WSRE-D (24) [Pensacola, FL]			
FCC F(50-90) 39.76 dBu (1,492,528	689,715	33731.4
WAWD-D (25) [Fort Walton Beach, FL]			
FCC F(50-90) 39.85 dBu (660,985	308,690	7204.4
WHBR-D (34) [Pensacola, FL]			
FCC F(50-90) 40.68 dBu (1,429,186	654,130	28162.8
WJTC-D (35) [Pensacola, FL]			
FCC F(50-90) 40.77 dBu (1,515,119	699,110	35059.1
WMPV-TV (18) [Mobile, AL]			
FCC F(50-90) 39.15 dBu (1,563,966	718,517	35107.2
WFNA-D (27) [Gulf Shores, AL]			
FCC F(50-90) 40.05 dBu (1,511,481	686,878	38569.0
WFBD-DTS2 (29) [Destin, FL]			
FCC F(50-90) 40.23 dBu (516,983	227,477	5073.0