

TECHNICAL SUMMARY

TELEVISION STATION WEDW/WZME (DTS)
STAMFORD/BRIDGEPORT, CONNECTICUT
DTS1: CHANNEL 21, 200 KW (H), 60 KW (V), 219 M HAAT
DTS2: CHANNEL 21, 175 KW (H), 70 KW (V), 439 M HAAT

1. The instant application for modification of a distributed transmission system (DTS) construction permit* was prepared for WEDW, Stamford, CT, which also is the channel share host of WZME, Bridgeport, CT. By means of this application it is proposed to make modifications to the construction permit DTS facilities of WEDW/WZME.

2. With respect to DTS1, the non-directional transmitting antenna is to be replaced, with a directional antenna specified. There will be no change in the antenna location or height, but the maximum effective radiated power (ERP) of DTS1 will be increased to 200 kW using elliptical polarization.

3. With respect to DTS2, the transmitting antenna will be replaced and relocated to the top of the spire of the Empire State Building. The maximum ERP of DTS2 will be increased to 175 kW using elliptical polarization. The antenna height above average terrain (HAAT) of DTS2 will be increased to 439 m. Due to the improved mounting situation for DTS2, the DTS3 transmitter is no longer needed and was removed from the DTS system design.

4. The instant proposal is compliant with the interference protection requirements of the FCC Rules. The results the FCC's *TVStudy* analysis are attached hereto as an exhibit. It is noted that use of a higher resolution cell size of 1 km with a higher resolution terrain profile increment of 0.1 km is requested for the *TVStudy* analysis. As detailed in the *TVStudy* analysis, the baseline records to be used for the WEDW facility when considering interference caused to the WNEP-TV and WNYT-TV facilities must be manually associated in the *TVStudy* analysis process. Using the proper baseline record with respect to each station, the predicted interference to the WNEP-TV and WNYT-TV records is compliant with the 0.5% de minimis requirement. Lastly, as stated in the *TVStudy* analysis results exhibit, the applicant consents to the predicted

* FCC File No. 0000122655.

interference received from the WNYT-TV pending application (FCC File No. 0000156619).

5. The instant proposal is compliant with the city coverage requirements of Stamford, in the case of WEDW, and of Bridgeport, in the case of WZME. This is demonstrated in the Predicted Coverage Contours exhibit.

6. The proposed DTS system is compliant with the requirements of Section 73.626 of the FCC Rules relating to distributed transmission systems, as amended effective on April 22, 2021. It is noted that there is no change to the previously authorized reference point for the WEDW/WZME DTS system. Furthermore, it has been previously established that the reference distance for the WEDW/WZME DTS system is 116.5 km based on the ‘largest station in the market’ criterion of the FCC Rules.[†]

7. The DTS Compliance Map exhibit for the WEDW/WZME DTS system demonstrates contour compliance with the contour limits established in Section 73.626 of the FCC Rules, as amended. Specifically, the proposal meets the F(50,50) contour extension limit distance of 168.0 km and the proposal meets the F(50,10) contour extension limit distance of 280.2 km. These contour extension limit distances are based on the calculation for the ‘largest station in the market’ reference as shown in the DTS Compliance Map exhibit.

8. The combined coverage of the proposed DTS system meets the coverage requirement of the applicant’s authorized service area, which is the WEDW originally licensed facility on Channel 49 under FCC File No. 0000074518.

[†] See Technical Statement in FCC File No. 0000122655. Specifically, the largest station in the market was determined to be WJLP, Middletown Township, NY, Channel 3 (FCC File No. 0000163350).