



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF A REQUEST FOR
SPECIAL TEMPORARY AUTHORIZATION
TO COMMENCE DIGITAL TV BROADCASTING
USING AUTHORIZED POST-TRANSITION DTV FACILITIES
BMPCDT-20081124ACP
WGGB-DT - SPRINGFIELD, MASSACHUSETTS
DTV - CH. 40 - 460 kW - 324 m HAAT**

Prepared for: Gormally Broadcasting Licenses, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by Gormally Broadcasting Licenses, LLC, licensee of WGGB-TV, channel 40, Springfield, Massachusetts, licensee of WGGB-DT, channel 55, and permittee of post-transition WGGB-DT, channel 40, to prepare this statement and the attached exhibits in support of a request for a Special Temporary Authorization. WGGB-DT's permittee is prepared to commence digital broadcasting on its post-transition channel and hereby seeks authority to do so.

STATUS OF TRANSITION

Since WGGB-DT's pre-transition DTV channel is out-of-core, WGGB-DT elected to return to its authorized analog channel for post-transition DTV operation. WGGB-DT's current post-transition construction permit specifies the currently authorized analog

antenna and transmitter system. In order to facilitate its transition WGGB-TV obtained authorization to cease analog broadcasting prior to the transition deadline. Plans were formulated, arrangements were made, equipment was purchased, contracts were signed, temporary technical personnel were hired, test equipment was rented and the station is prepared to commence operation with its full digital facilities on channel 40.

WGGB-DT's permittee herein requests Special Temporary Authority to proceed with its long planned digital transition, and to commence digital television broadcasting on channel 40 with its facilities as authorized in its construction permit, BMPCDT-20081124ACP.

ALLOCATION CONSIDERATIONS

An allocation study was performed, using the Commission's application processing software TV_Process, and including analog stations in the data base to ensure that the proposed "pre-transition" operation of WGGB-DT's authorized post-transition DTV facility would comply with the Commission's *pre-transition* interference criteria in Section 73.623(c)(2). The study was evaluated to determine if the proposed post-transition DTV facility for WGGB-DT on channel 40 is predicted to cause any level of new prohibited interference to any post-transition DTV stations, current expansion construction permits, applications for expansion CPs, any Appendix B DTV allotments and any pre-transition analog TV stations. Results indicate that the instant proposal to utilize WGGB-TV's authorized post-transition DTV facility is predicted to cause no unacceptable level of new interference to the populations served by any existing DTV station, DTV expansion application or construction permit or any DTV allotment contained in Appendix B.

The study did, however, predict a change in existing interference to one existing analog TV station, WYDN(TV), channel 48, Worcester, Massachusetts. A careful examination of the results of the study show that WGGB-TV's analog operation on channel 40 is predicted to potentially cause interference to WYDN(TV), channel 48, Worcester, Massachusetts. The study also shows that when WGGB-DT's post-transition digital operation on channel 40 is substituted for the former analog operation, the resulting predicted interference to WYDN(TV) is substantially less. The study shows that WGGB-TV's analog operation on channel 40 is predicted to cause interference to 204,821 more persons located within WYDN(TV)'s channel 48 predicted coverage area than WGGB-DT's digital operation on channel 40. Accordingly, based on the study results, WGGB-DT's digital operation on channel 40 fully meets the first condition for early post-transition operation contained in the Public Notice, FCC 09-6, dated February 5, 2009, as this operation will cause no new interference, but rather will reduce the existing level of interference.

COVERAGE CONSIDERATIONS

Condition 2 in the Public Notice requires that for a station to make an early transition to its post-transition channel it must maintain at least its current digital service. For WGGB-DT to make the transition it must reduce the service area of its pre-transition facility on channel 55 in order to re-purpose some of the transmission equipment. The channel 55 facility must cease on the date of the transition, therefore WGGB-DT had planned to begin digital operation on channel 40 simultaneous with ending digital operation on channel 55.

The permittee therefore requests a waiver of condition 2 in the Public Notice to permit a temporary reduction in digital service in order to commence full digital service on channel 40. Attached is exhibit 1 showing the predicted coverage areas of WGGB-TV licensed analog service on channel 40, WGGB-DT's authorized post-transition digital service on channel 40 and WGGB-DT's pre-transition digital service on channel 55. The post-transition digital service area covers more than 100% of the licensed analog service area. The slightly smaller digital coverage area on channel 40 when compared to the coverage area on channel 55 is a result of the re-purposing of the existing licensed analog transmitting antenna, and was authorized when the current construction permit was granted on January 30, 2009.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WGGB-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of actual interference shown to be created by this proposal, in accordance with applicable Rules.

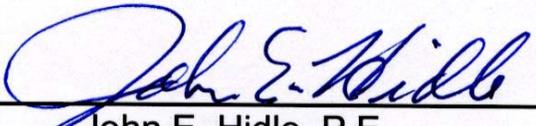
RADIO FREQUENCY IMPACT & OCCUPATIONAL SAFETY

The WGGB-DT facility is located atop Mount Tom, Holyoke, Massachusetts, inside a fenced "antenna farm" compound with restricted public access. Every station located at the site is aware of safety precautions necessary when work is being conducted at or near the site. WGGB-DT is a party to a joint use RFR safety agreement and is committed to the safety of personnel working at the site. WGGB-DT will reduce power or suspend operation as necessary to ensure the safety and protection of workers at the site.

SUMMARY

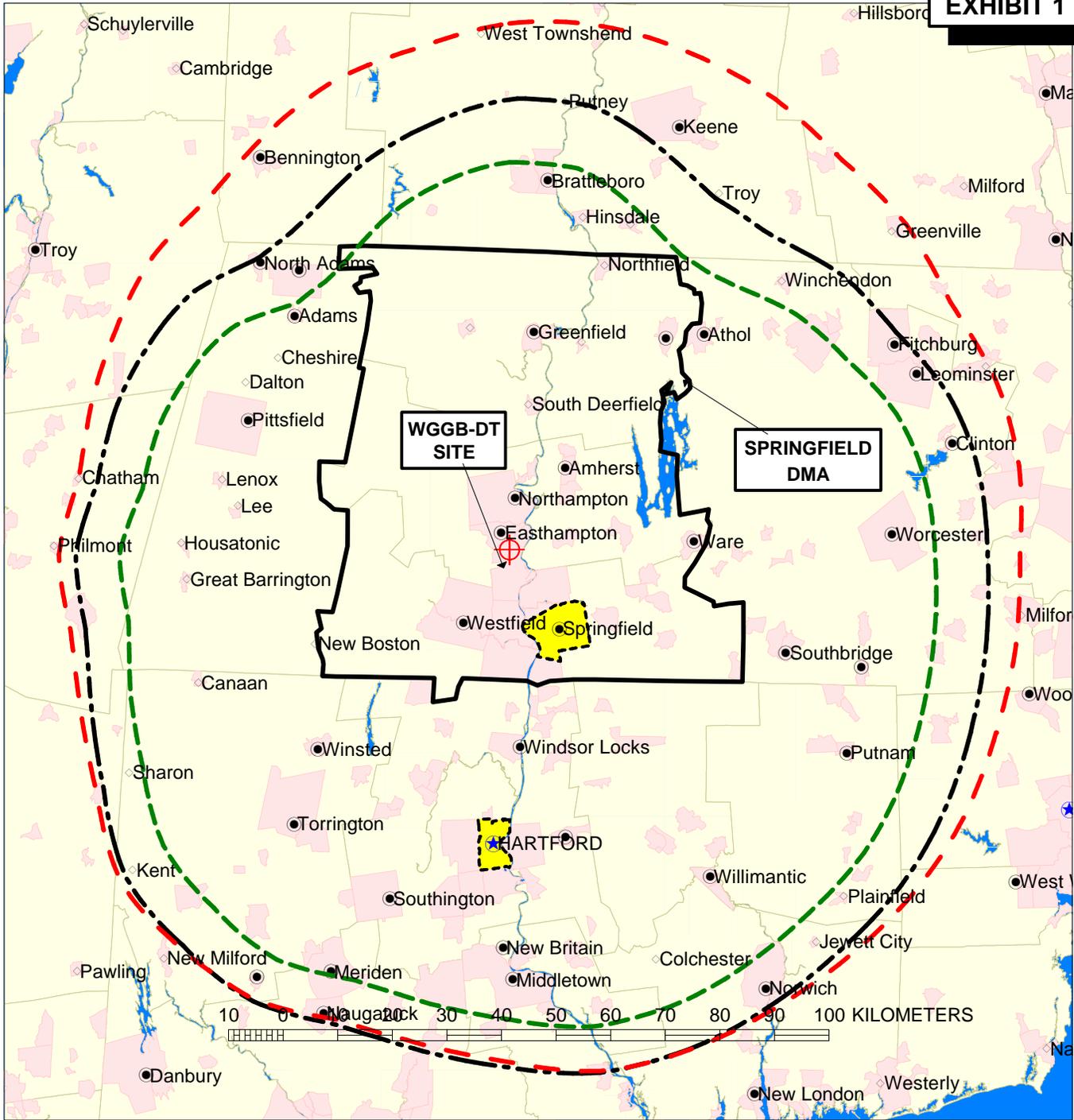
It is submitted that the instant request by WGGB-DT's licensee and permittee for Special Temporary Authorization to commence digital broadcasting utilizing its authorized post-transition digital broadcast facility as planned would be in compliance with the Rules, Regulations and Policies of the Federal Communications Commission had the delay not occurred. The licensee believes that the public interest will be absolutely served by permitting WGGB-DT to proceed with its plans to commence digital broadcasting using its authorized post-transition facilities on channel 40 as originally planned. Any other action, or delay, would be extremely disruptive to WGGB-DT's viewers, would cause potentially irreparable harm to WGGB-DT's ability to continue its operations and service to its viewers. The licensee therefore seeks any waiver(s) as necessary to obtain the requested STA and commence digital operation on channel 40 as planned. This statement and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: February 19, 2009



John E. Hidle, P.E.





PREDICTED COVERAGE CONTOURS

WGGB-DT, SPRINGFIELD, MASSACHUSETTS

CH. 40, 460 kW - 324.0 m HAAT

Predicted Licensed ANALOG F(50,50)

Ch. 40 - Grade "B" Contour - 64 dBu

Population (2000 census)

2,757,651 - 17,573 sq km

DMA Population (2000 census)

680,563 - 4,918 sq km

Predicted DTV Noise Limited Contour

Authorized Ch. 40 - F(50,90) - 41 dBu

Population (2000 census)

3,304,102 - 22,274 sq km

Predicted DTV Noise Limited Contour

Licensed Ch. 55 - F(50,90) - 41 dBu

Population (2000 census)

3,538,221 - 25,879 sq km

FEBRUARY 2009

