

ENGINEERING STATEMENT  
Renard Communications Corp.  
October, 2003

Renard Communications Corp. ("RCC") operates low-power station W38CL, Bronx, New York, and as displaced, is the permittee for W03BK, Brooklyn, NY. RCC also holds an experimental authorization to operate digitally on channel 3 at a new site from that authorized in the CP. It is now proposed to modify the NTSC permit (BMPTVL-20000928ABO) to propose operation for W03BK at the same site as the digital authorization which is nearly co-located site to several first-adjacent channel New York City stations in order not to cause interference to them.

The proposed site is that of RCC's commonly owned station, WLBX-LP, which also has a CP at the site of an office building at 3 Park Ave., New York, NY. The building has a height of 552 feet (168.2 m.) and has many antennas mounted on the parapet around the perimeter of the roof. The proposed antenna for W03BK would be similarly mounted and would extend 15 feet (4.6 m.) above the roof. As it is less than 20 feet, no FAA clearance is required. The antenna would also be mounted far enough away from any area of general access by the public and will not exceed RF exposure standards. However, the antenna will be properly marked and if any work needs to be done in the near vicinity of the antenna, RCC will lower the power or cease operation as necessary for the duration of the work.

In order to demonstrate that no interference would be caused to any existing stations, RCC has attached Longley-Rice studies showing no interference to co-channel stations KYW-TV, Philadelphia, PA and WFSB, Hartford, CT. Also included are first-adjacent channel studies for WCBS-TV, channel 2, New York, NY, and WNBC, channel

4, New York, NY. When RCC had first applied for channel 3, it endeavored to find a site close to the common site of channels 2 and 4 at the World Trade Center so as to minimize any potential interference as a first-adjacent channel. Now, with the destruction of that site, both stations operate at the Empire State Building. The site now proposed for channel 3 is approximately two city blocks east of the common site of channels 2 and 4 which is much closer to than the 3 km distance as currently authorized. A reduction in power is also proposed from the authorized ERP of 3 kW to .75 kW which will further minimize any potential interference. The proposed antenna is that which is already authorized for the digital operation. It is a Scala HDCA-5CP-3 antenna with an orientation of 130 degrees True.

The propagation program used is Probe II (version 2.103) from V-Soft Communications. It is a Longley-Rice model that utilizes all of the methods of OET 69 and any modifications further adopted by the Commission. It is noted that the studies were performed using a finer resolution with a cell size of 1 km., rather 2 km.

Exhibits E-1 and E-2 show that there would be no unique interference caused to co-channel stations KYW-TV, Philadelphia or WFSB, Hartford, CT. Interference to these stations from other existing full-power stations completely masks any potential interference from the proposed low-power digital operation on channel 3. Exhibits E-3, E-4 and E-5 show that there would be no interference to first adjacent channel stations WCBS-TV, channel 2, and WNBC, channel 4, both New York, NY. With regard to WNBC, Exhibit E-4 shows the lack of interference to WNBC's licensed facility at the former World Trade Center while Exhibit E-5 shows the lack of interference to WNBC's

current STA operation at the Empire State Building which is co-located with WCBS-TV's licensed operation.

In summary, the proposal will allow for W03BK to have its NTSC signal to be at the same site as that for the digital authorization and at a site that is much more nearly co-located with first adjacent full-power stations.

Respectfully submitted,

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President  
Renard Communications Corp.

October 29, 2003