



***Kessler and Gehman Associates, Inc.***

Telecommunications Consulting Engineers

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR. OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS CONSULTING ENGINEERS IN CONNECTION WITH A MINOR AMENDMENT TO A PENDING MINOR CHANGE IN LICENSED FACILITY APPLICATION (BPEDT-20080327AAM) REQUESTING AUTHORIZATION TO OPERATE THE WABW-DT DIGITAL TELEVISION BROADCAST FACILITY, LICENSED TO THE GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION, ON DIGITAL CHANNEL 6 AS ADOPTED IN THE FINAL DTV TABLE OF ALLOTMENTS.**

The firm Kessler and Gehman Associates, Inc. has been retained by Georgia Public Telecommunications Commission (GPTC), Atlanta, GA to prepare the engineering portion of a minor amendment application to demonstrate that the proposed facility, as filed (BPEDT-20080327AAM), will benefit the public.

**Discussion**

GPTC filed a First Round Election application (FCC 382) on February 9, 2005 requesting Channel 5 for its final post-transition digital channel. GPTC elected Channel 5 because it wanted to operate on a VHF channel so that it could save hundreds of thousands of dollars on operational costs; however, the only option at the time was to collocate on the WCTV-TV Channel 6 tower so that it would not cause excessive interference. On February 25, 2005, WCTV filed its First Round Election application requesting to release Channel 6 and lock-in Channel 46 for its final post-transition channel. GPTC realized, with WCTV releasing Channel 6, it would no longer have to collocate on the WCTV tower in Metcalf, GA and it could move to the WABW-TV tower in Pelham, GA and save a tremendous amount of money since it would be able to completely eliminate hefty expenses for leasing space on the WCTV tower and for strengthening it. Since WABW-DT was assigned a low-band VHF Channel 5 as its tentative channel designation, it had the opportunity to file again in the Third Round Channel Elections. Accordingly, on May 24, 2006 GPTC requested to release Channel 5 and lock-in Channel 6 for its post-transition digital channel because it also wanted to move a NCE-FM facility to



the WABW tower and duplex with the WABW-DT Channel 6 facility. Unfortunately, the Channel Election applications did not offer an opportunity to submit engineering requesting to move sites from Metcalf to Pelham but it was not a concern because GPTC realized that the filing freeze would be lifted at some point and that it could file at that time to change sites. Since most applicants abandoned the lower VHF band, GPTC was aware that a site change would most likely not result in unacceptable interference. GPTC did not file a Petition for Reconsideration because the filing freeze was still in effect.

Approximately one and a half years after GPTC filed its Third Round Channel Election application requesting Channel 6, the Third Periodic Review Report and Order was released stating that the freeze will be lifted on August 17, 2008 and final post-transition applications must be filed first. GPTC is in the final stages of a multi-million dollar digital television buildout and is set to operate on the WABW tower in Pelham, GA. The application pending for the WABW-DT Channel 6 post-transition facility utilized the 5-mile expansion waiver since it was the best option available to move from the Metcalf site to the Pelham site. It was never GPTC's intent to operate the WABW-DT Channel 6 post-transition facility at low power and it plans to file a maximization application on August 17, 2008 when the filing freeze for expanding coverage areas is lifted. GPTC plans to file a maximization application requesting nondirectional operation with an ERP of 10.5 kW which will provide superior coverage compared to the licensed analog service. Again, since low-band VHF has essentially been abandoned, GPTC believes that the maximization application will be similar to "checklist" since the interference to other stations will most likely be zero percent (0.0%). If the maximization application is granted prior to February 17, 2009, the proposed low-power WABW-DT directional facility will not be turned on and will most likely remain in place as a future auxiliary and the maximized nondirectional DTV Channel 6 facility will be turned on. Since there is no doubt that cessation of the filing freeze will open the flood gates for maximization applications across the country, GPTC must be prepared in case the maximization application is not granted by February 17, 2009. Therefore, GPTC requests authorization to operate the WABW-DT Channel 6 facility with the parameters proposed in the pending application with the intent that the parameters will be used either temporarily (maximization application granted after February 17, 2009) or not at all (maximization granted prior to February 17, 2009).



**Less Than 5% Reduction in DTV Service**

The authorized WACS-DT Channel 8, WMUM-DT Channel 7 and WXGA-DT Channel 8 facilities are licensed to GPTC and their F(50,90) 36.0 dBuV/m noise limited contours significantly overlap the assigned WABW-DT Channel 6 DTV TOA F(50,90) 28.0 dBuV/m noise limited contour and the proposed WABW-DT Channel 6 F(50,90) 28.0 dBuV/m noise limited contour. Exhibit 1 depicts the aforementioned contour overlap as well as contour overlap from the licensed WFSU-DT Channel 32 Tallahassee, FL non-commercial educational digital television broadcast facility licensed to Florida State University. Referring to Exhibit 1, it can be seen that the assigned WABW-DT Channel 6 TOA facility F(50,90) 28.0 dBuV/m contour is predicted to serve 475,385 persons in GA and 369,467 persons in FL for a total service population of 844,852 persons. It would appear that the service population would be significantly decreased if the proposed WABW-DT facility was built instead of the assigned facility. However, as shown in Exhibit 2, the contour overlap between the proposed WABW-DT Channel 6 facility, the surrounding GPTC post-transition facilities (Stations WACS-DT and WXGA-DT), and the WFSU-DT public television facility would compensate for the reduction and would result in less than 5% of the population in the service area of the TOA facilities losing public television service.

Referring to Exhibit 2, it can be seen that between the facilities proposed here and the service areas of Stations WACS-DT and WXGA-DT, 465,846 out of the 475,385 or 98% of the Georgia residents will continue to receive the programming of GPTC. Further, as shown in Exhibit 3, Station WFSU-DT will serve 325,736 of the 358,901 Florida residents (90.8%) predicted to be served by Station WABW-DT's TOA facilities and not served by the facilities proposed here. And, as shown in Exhibit 4, collectively, the stations licensed to GPTC and Station WFSU-DT will provide public television programming to a population of 804,579 out of the 844,852 predicted to be served by the Station WABW-DT TOA facilities, or 95.2%.

Therefore, there would only be a 4.8% total service population reduction with the proposed WABW-DT Channel 6 facility in operation. Of course, if you only look at the service population in GA, the total loss would only be 2.0%.



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## **Conclusion**

GPTC plans to file a maximization application on the first day (August 17, 2008). The maximized facility will serve a greater population than that currently served by the licensed WABW-TV Channel 14 analog facility. It is anticipated that the proposed WABW-DT Channel 6 facility will either operate temporarily, if the maximization application is still pending after February 17, 2009, or not at all, if the maximization application is granted prior to February 17, 2009. Since GPTC cannot depend on the maximization application, it could operate the proposed WABW-DT Channel 6 facility indefinitely without reducing the GA service population by more than 2.0% and without reducing the total service population (GA & FL) by more than 4.8%. Therefore, GPTC respectfully requests that the FCC grant the pending application for the WABW-DT Channel 6 post-transition DTV facility.

## **Certification**

This technical statement was prepared by William T. Godfrey, Telecommunications Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.



KESSLER AND GEHMAN ASSOCIATES, INC.

A handwritten signature in blue ink that reads 'William T. Godfrey, Jr.' is written over a horizontal line.

WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

5 May, 2008