

**Statement Concerning Interference**

The applicant seeks authority to shift the operation of its Low Power Television Station WSHM-LP, Channel N67, Springfield, Massachusetts, to an “in-core” channel. Additionally, the applicant seeks authority to concurrently “flash-cut” the operation of WSHM-LP from NTSC Channel 67 to DTV Channel 49, with some associated facility modifications.

The proposed operation was analyzed using the general methodology described in OET Bulletin No. 69 using proprietary software developed by Hammett & Edison, Inc. That analysis software, described more fully in the Petition for Reconsideration in MM Docket 87-268, filed June 13, 1997,\* employs all of the features in the FCC’s software and obtains similar results. The results of the analysis are included on the accompanying pages of this exhibit and indicate that the proposed operation is in compliance with Sections 74.793(e) through (h) of the Commission’s rules, when that analysis is based on 1-by-1-kilometer cells and terrain profiles are extracted at 10 points per kilometer. FCC processing using these finer-resolution parameters is hereby requested, pursuant to the Commission’s August 10, 1998, Public Notice, “Additional Applications Processing Guidelines for DTV.” In addition, the actual antenna elevation-plane pattern has been used, because of the 16-bay antenna gain, the actual electrical beam tilt of 1.75° has been used, instead of the default 0.75°, and depression angles have been correctly calculated, using the antenna’s effective height above mean sea level, because of the large difference in that height versus the antenna’s height above ground. Pursuant to Paragraph 66 of the January 19, 2001, MM Docket 00-39 Report & Order, the use of these more accurate analysis factors is permitted where it would “make a critical difference.”

The proposed operation is either not on any of the channels listed or not within the land mobile protection distance described in Section 74.709 of the Rules.

The proposed operation is not on any of the channels listed as requiring additional measures to protect frequencies used by the Global Positioning System, as described in Section 74.794(b).

The proposed operation is not within the coordination zone of any of the radio astronomy, research, or receiving installation facilities listed in Section 73.1030.

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\* <http://www.h-e.com/pdfs/he87-268.pdf>



# Station WSHM-LP • As DTV Channel 49 • Springfield, Massachusetts

## OET-69 Interference Study for WSHM-LP as D49

OET-69 Interference Analysis, 2000 Census  
tvstudy v3.2.4

This interference study is based on 1.00 x 1.00 kilometer cells and terrain profiles with 10.0 points per kilometer. **FCC processing using these finer-resolution parameters is hereby requested,** pursuant to the Commission's August 10, 1998, Public Notice, "Additional Applications Processing Guidelines for DTV."

Station: D49 L WSHM-LP LIC  
City: SPRINGFIELD, MA  
Facility ID: 67980  
Coordinates: N 42-14-28.0  
W 72-38-56.0  
Height AMSL: 364.1 m  
Maximum ERP: 0.084 kW  
Azimuth pattern: ALP-HSNRaz.pat  
Orientation: 170.0  
Elevation pattern: ALP-16elv.pat  
Electrical tilt: 1.75  
Service level: 51.9 dBu

Warning - some records had missing or bad data:

D48 WRNNTV APP Re-computed DTV baseline population

Protected station	Base Pop	Unique IX	%Chng
D48 WRNN-TV LIC KINGSTON, NY	10,656,865	0	0.00
D48 WRNNTV APP KINGSTON, NY	8,986,825	0	0.00
D49 WEKW-TV LIC KEENE, NH	217,630	1,013	0.47
D49 WEKW-TV alot KEENE, NH	217,630	0	0.00
D49 WLNE-TV LIC NEW BEDFORD, MA	5,328,639	0	0.00
D49 WLNE-TV alot NEW BEDFORD, MA	5,328,639	0	0.00
D49 WNEP-TV CP SCRANTON, PA	1,462,183	0	0.00
D49 WNEP-TV LIC SCRANTON, PA	1,462,183	0	0.00
D49 WNEP-TV alot SCRANTON, PA	1,462,183	0	0.00
D49 WWSI LIC ATLANTIC CITY, NJ	1,159,541	0	0.00
D49 WWSI alot ATLANTIC CITY, NJ	1,159,541	0	0.00
D50 WYPX LIC AMSTERDAM, NY	878,914	0	0.00
D50 WYPX alot AMSTERDAM, NY	878,914	0	0.00
N34-L WESA-LP CP GRANBY, CT	506,128	0	0.00
N35+L W35BK LIC PLAINFIELD, MA	1,460	0	0.00
N45+L WSHM-LP APP SPRINGFIELD, MA	512,512	0	0.00
N45z WEWB-TV LIC SCHENECTADY, NY	1,344,615	0	0.00
N48+ WYDN LIC WORCESTER, MA	5,195,151	430	0.01
N48-L WRNT-LP CP HARTFORD, CT	716,861	0	0.00
N49+ WLED-TV LIC LITTLETON, NH	111,721	0	0.00
N49+A WNDR-LP CP SYRACUSE, NY	306,929	0	0.00
N49+L WNYN-LP CP NEW YORK, NY	3,499,458	0	0.00
N49- WEDW LIC BRIDGEPORT, CT	4,025,333	2,145	0.05
N49-A WVBK-CA LIC MANCHESTER, ETC, VT	6,222	0	0.00

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**HAMMETT & EDISON, INC.**  
CONSULTING ENGINEERS  
SAN FRANCISCO

060329  
Exhibit 11B

# Station WSHM-LP • As DTV Channel 49 • Springfield, Massachusetts

Protected station		Base Pop	Unique IX	%Chng
N49zA	WFNY-CA LIC	GLOVERSVILLE, NY	60,487	0 0.00
N49zL	W49BE LIC	HACKETTSTOWN, NJ	78,280	0 0.00
N50-	WZMY-TV LIC	DERRY, NH	3,570,218	0 0.00
N50-A	WRDM-LP CP	HARTFORD, CT	873,143	0 0.00
N50zA	WRIW-LP CP	PROVIDENCE, RI	686,237	0 0.00
N50zA	WRIW-LP LIC	PROVIDENCE, RI	555,448	0 0.00
N51+	960724LI APP	PITTSFIELD, MA	1,349,043	0 0.00
N51+	WNYA LIC	PITTSFIELD, MA	624,501	0 0.00
N51zA	WDMR-LP CP	SPRINGFIELD, MA	736,645	0 0.00
N53z	WEDN LIC	NORWICH, CT	1,515,694	0 0.00
N57+	WGBY-TV LIC	SPRINGFIELD, MA	2,291,784	0 0.00

Note: The results of the OET-69 algorithm are dependent on the use of computer databases and complex software algorithms, which may vary between computer platforms and installations. Also, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods changes from time to time. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.

