

STAMP & RETURN

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October 24, 2014

VIA MESSENGER

Accepted/Files

OCT 24 2014

Federal Communications Commission  
Office of the Secretary

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Attn: Kevin Harding  
Media Bureau

**Re: FCC File No. BDSTA-20141016ACR**

Dear Ms. Dortch:

American Broadcasting Companies, Inc. (“ABC”), licensee of full-power commercial digital television station WABC-TV, New York, New York (“WABC”), by its attorneys, is filing this letter to amend the above-referenced application (“Application”), filed on October 16, 2014, for special temporary authorization. The Application seeks authority for the installation of a temporary test panel type antenna (“Test Facility”) on the One World Trade Center (“1WTC”) complex in Lower Manhattan (“1WTC”) in order to test the propagation and reception characteristics of VHF TV channels to be compared with the characteristics of the existing VHF transmission facilities located at the Empire State Building. The Test Facility will be installed on behalf of WABC, WPIX(DT), and WNET (collectively, the “NYC VHF Stations”) by the Metropolitan Television Alliance, LLC (“MTVA”), and the tests will be conducted by WABC and the other NYC VHF Stations in cooperation with the MTVA.

The Application seeks authority to install the Test Facility at tower level 5 of 1WTC, at 500.2 meters height of radiation center above ground level. Subsequent to the filing of the Application, ABC was notified by the Durst Organization<sup>1</sup> that it would be necessary instead to install the Test Facility at tower level 6 of 1WTC, which is 13.7 meters higher in elevation. Accordingly, the instant letter seeks to amend the Application to seek authority to install the Test Facility at 513.9 meters height of radiation center above ground level. The proposed operation at

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<sup>1</sup> The Durst Organization oversees construction, leasing, and management of 1WTC. See <http://www.durst.org/properties/one-world-trade-center>,

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the higher elevation is not predicted to cause impermissible interference to any facility required to be protected under FCC rules, except as described in the Application.<sup>2</sup>

In addition, the Application requested authority to operate the Test Facility on channel 12 for a period of not more than four weeks. Enclosed herewith please find a letter from ION Media LPTV, Inc., the current licensee of WPXU-LD consenting to the use of channel 12 for the Test Facility for a period not to exceed four weeks.<sup>3</sup>

The Application further explained that WABC, the other NYC VHF Stations, and MTVA initially intend to collect measurements from the Test Facility with the antenna for the Test Facility oriented at 29 degrees True, but that it may be beneficial to reposition the test antenna from (a) 29 degrees True to (b) 60 and/or 0 degrees True in order to support the collection of data in Queens and the Bronx, respectively. To the extent the parties do, in fact, orient the antenna for the Test Facility to 0 degrees True, it will be for a duration not to exceed two weeks, in accordance with the statement of WHYY, Inc., as filed with the Application.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Respectfully submitted,



Tom W. Davidson, Esq.

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<sup>2</sup> As explained in the Application, if the Test Facility is oriented at 0 degrees True, it is predicted to cause interference to WHYY-TV. The increase in elevation from 500.2 meters height of radiation center above ground level to 513.2 meters height of radiation center above ground level will result in a de minimis increase in predicted inference to WHYY-TV beyond that described in the Application. ABC has discussed this matter with WHYY-TV, and WHYY-TV does not object to the potential negligible increase in interference that may occur as a result of the minimal increase in height if the Test Facility antenna is oriented at 0 degrees True.

<sup>3</sup> The letter from ION initially attached to the Application provided consent for operation of the Test Facility for a duration not to exceed two weeks.

**STATEMENT OF WPXU-LD**

ION Media LPTV, Inc. ("ION"), licensee of VHF digital low power television station WPXU-LD, Amityville, New York, is providing this statement to be submitted with the application ("Application") for special temporary authority filed by American Broadcasting Companies, Inc. ("ABC"), licensee of WABC-TV, New York, New York ("WABC"), to enable the Metropolitan Television Alliance ("MTVA") to install a temporary test panel type antenna on the One World Trade Center complex in Lower Manhattan ("1WTC") in order to evaluate whether VHF signal reception might be improved by relocating the facilities of WABC-TV, channel 7; WPIX(DT), channel 11 and WNET, channel 13 (collectively, the "NYC VHF Stations"), to One World Trade Center. ION has agreed, and hereby consents, to permit MTVA and the NYC VHF Stations to use channel 12 for the tests as described in the Application. ION understands that the tests will be conducted during the overnight hours for a duration of no more than four weeks.



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Bill Beam  
Chief Engineer WPXN-TV/WPXU-LD  
ION Media LPTV, Inc.

October 16, 2014