FLASH CUT APPLICATION
K LICENSEE, INC.
WEBR-CA CLASS A LPTV STATION
CH 17 - 488-494 MHZ - 0.315 KW (5.45 KW TILTED BEAM)
MANHATTAN, NEW YORK
May 2009

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of K Licensee, Inc. ("K Licensee"), licensee of Class A LPTV station WEBR-CA, Channel 17Z, Manhattan, New York. K Licensee herein submits an application to flash-cut WEBR-CA from analog to digital operations on Channel 17. The proposed WEBR-CA digital facilities will use the existing circularly polarized Andrew ALP16L10-CSER-17 antenna, with a 2.5° beam tilt, in use by the analog facility.[1] A composite horizontal plane relative field pattern of the horizontal and vertical components was developed for this instant application. The outgoing DTV interference analysis was conducted using a power of 0.315 kilowatt at the radio horizon. The power in the tilted beam will reach 5.45 kilowatts. The proposed transmitter power output of 0.816 kilowatt is based on the power in the tilted beam. This figure does not consider the added emission filtering to be installed to accommodate the land mobile system.[2]

The antenna system for WEBR-CA flash-cut to digital will be located on an existing building tower located in New York. New York, at the site presently used by the station's analog

---

1) Some of the documentation for the antenna lists the model as ALP16**H**10-CSER-17. The H in the model reflects a high power input version of the antenna. The antenna is the lower power model, ALP16**L**10-CSER-17. This does not affect the data provided.

2) The antenna system gain, transmission line loss and calculated transmitter power is shown on Exhibit C.

operation.[3] The tower has been registered with the FCC and assigned Antenna Structure Registration Number 1007048. As such, the Federal Aviation Administration was not apprised of this proposal.

Channel 17 digital complies with the Commission's interference rules, based on the use of the Longley-Rice, OET-69 Bulletin[4], with the exception of two other LPTV stations as discussed in Exhibit A. It is noted that the terrain was sampled at 0.1 kilometer, and a signal cell size of 1.0 kilometer was used, with 2000 Census population reviews. A stringent emission mask was used in the calculations. It is noted that the WEBR-CA licensed analog facility, as well as the proposed digital facility on Channel 17, does not meet the distance to Channel 16 Land Mobile operations in New York. WEBR-CA was operating prior to the waiver of the Commission's rules to allow the New York Metropolitan Area Public Safety agencies to operate land mobile systems on TV Channel 16 in New York area. The New York Metropolitan Advisory Committee ("NYMAC") advises the operator on the land mobile systems. NYMAC has previously entered into an agreement with K Licensee regarding interference matters between the Land Mobile operations and WEBR-CA. An updated letter from NYMAC is being prepared and will be submitted to the Commission in an amendment, as soon as the signed letter is available. As such, if a waiver is needed to consider this instant flash cut application for WEBR-CA, one is respectfully requested.

---

3) The WEBR-CA antenna system is located on the Empire State Building.

4) The Longley-Rice model was implemented on the Probe 3 computer model from V-Soft Communications. This model has been found to closely replicate the results provided by the Commission's computer model.

The WEBR-CA antenna is co-located with other TV and radio facilities, as such attached as Exhibit B is a radio frequency radiation statement demonstrating compliance with the Commission's RF rules.