

ENGINEERING STATEMENT  
Metro TV, Inc.  
August, 2009

Metro TV, Inc. ("Metro") is the licensee of WMBO-LP, Westvale, NY and is licensed for 0.3 kW ERP. This application proposes an increase to the maximum of 3 kW ERP. Figures 1 and 2 are included to show 19 dBu and 2 dBu respectively as proposed contour protection to CJOH, Deseronto, ON and the Canadian border in general. As can be seen, the proposed interfering contours for WMBO-LP are contained inside its licensed contours in all directions toward the Canadian border. Therefore no Canadian concurrence is required.

The proposal also protects WRGB, Schenectady, NY. WRGB is licensed for 4.64 kW ERP; the maximum permissible power for its licensed height. WRGB also has an STA for 11.5 kW and a pending application for 30.2 kW. Both of these exceed the standard limit as set by the Commission's rules. The instant application for WMBO-LP protects the maximized licensed service area of WRGB and also the STA and pending application to the decibel level by which those applications exceed the maximum. In other words, WRGB's 11.5 kW STA is 3.94 dB above the maximum and its 30.2 kW application is 8.13 dB above the maximum. Under a normal situation, a VHF low-band station would be protected to its 28 dBu noise-limited contour. In the special case of the WRGB STA and its pending application, the instant application for WMBO-LP easily protects the enhanced 31.94 dBu and 36.13 dBu noise-limited contours respectively. This is to say that the increases proposed by WRGB as stated in its respective applications were done so in order to "rectify apparent coverage deficiencies in the core market" supposedly to improve the reliability of reception within its protected in-market

service area, but not to extend it out-of-market. As this is a grey area of the rules, Metro requests any waiver that may be necessary for demonstrating proper protection to WRGB.