

ENGINEERING DISCUSSION FOR MODIFICATION TO SPECIAL TEMPORARY AUTHORITY

Background

Renard Communications Corp. (“RCC”) is the licensee of WMBQ-CA, channel 46, Manhattan, NY and received Special Temporary Authority (“STA”) BSTA-20071016AJA to operate from 4 Times Square. RCC is now filing for a replacement or modification of its STA due to the fact that it has been determined that the site at 4 Times Square is unsuitable for operation of WMBQ-CA. A new building, being built by the Bank of America just east of 4 Times Square, will eclipse and block the main lobe of WMBQ-CA. The authorization for the antenna for WMBQ is at 267.6 m (878 ft.) above ground. The new Bank of America building will be 1200 feet above ground and will disrupt the WMBQ-CA signal. This information was not conveyed to RCC until after the STA application for 4 Times Square was filed. Now, RCC has located an ideal site without any obstructions, either present or planned at Trump World Tower at 1st Ave. & 48th Streets in Manhattan.

Proposed Site

The proposed site is approximately 1.3 km. (0.8 miles) ENE of the WMBQ-CA’s licensed site at 3 Park Ave. Due to the increased height, it is proposed to reduce the licensed ERP from 50 kW to 21.5 kW. It is proposed to use the same antenna (Antenna Concepts ACB-8CR) and rotate it four (4) degrees True. The proposed operation would provide for a “best fit” in relation to the licensed 74 dBu contour and a comparison of the licensed and proposed contours is included as an exhibit (Figure 1). The building is 268.8 m. (882 feet) in height and has several other licensed communications users. The

antenna for WMBQ-CA is proposed to be attached to a wall and side railing, and the top of the pole supporting the proposed antenna will not extend above 268.5 m. (881 feet) so there will be no increase to the height of the existing structure. A copy of the FAA study 1999-AEA-1712-OE is attached at the end of this discussion. Additionally, the coordinates for the building are based on NAD83 datum and as the proposed antenna will be slightly east of the center of the building, it has been determined that the NAD27 coordinates are N 40-45-08, W 75-58-03.

Impact to Other Stations

It is necessary to determine the impact to a number of other stations, but they are the same ones as in the application for the original construction permit. There are three local stations of interest: WABC-DT, channel 45, New York, NY, WNJU, channel 47+, Linden, NJ and WPXN-TV, channel 31-, New York, NY. Unfortunately, all three of these stations were affected by the destruction of the World Trade Center (“WTC”). Each of the stations now has multiple authorized locations. Each station maintains an underlying license at the WTC. In addition, WABC-DT has a licensed auxiliary at the Empire State Building (“ESB”) and an auxiliary CP at 4 Times Square. WNJU has an auxiliary facility at the ESB and a CP for changed facilities at the WTC. WPXN has an auxiliary license at the ESB and STA for a site in West Orange (“WO”), NJ. All of the interference studies were performed using Probe 3 from V-Soft Communications. As is shown in the summary table, all of these facilities will be protected by the instant request for STA for WMBQ-CA. It is also noted that with these three local stations, no masking was used and the lack of interference was calculated with WMBQ-CA as a single contributor.

Five co-channel stations operating on channel 46 were studied. They are: WUVN-DT, Hartford, CT, and WFMZ-DT, Allentown, PA, WWDP, Norwell, MA, WBFF-DT, Baltimore, MD and WRNN-LP, Nyack, NY. The summary table below shows that there would be no prohibitive interference to the pertinent stations.

Summary Table of Attached Studies

Adjacent-Channel Stations

<u>Station</u>	<u>Channel</u>	<u>City/State</u>	<u>Site</u>	<u>File No.</u>	<u>Proposed Interference</u>
WABC-DT	45	New York, NY	WTC	BLCDT-20010710ABU	0.0%
WABC-DT	45	New York, NY	ESB	BXLCDT-20051012ACE	0.0%
WABC-DT	45	New York, NY	4TS	BXPCDT-20060213ABD	0.0%
WNJU	47+	Linden, NJ	WTC	BLCT-19800423KE	0.0%
WNJU	47+	Linden, NJ	ESB	BXLCT-20070605ABK	0.0%
WNJU	47+	Linden, NJ	WTC	BPCT-20030721AGT	0.0%
WPXN-TV	31-	New York, NY	WTC	BLCT-19860703KH	0.0%
WPXN-TV	31-	New York, NY	ESB	BXLCT-20031121AOV	0.0%
WPXN-TV	31-	New York, NY	WO	BPFS-20020425ABW	0.315%

Co-Channel Stations

<u>Station</u>	<u>Channel</u>	<u>City/State</u>	<u>File No.</u>	<u>Proposed Unique Interference</u>
WUVN-DT	46	Hartford, CT	BLCDT-20060706AED	0.0%
WFMZ-DT	46	Allentown, PA	BLCDT-20060621AAU	0.009%
WWDP	46+	Norwell, MA	BLCT-19970116KE	0.0%*
WBFF-DT	46	Baltimore, MD	BPCDT-19980803KR	0.0%*
WRNN-LP	46-	Nyack, NY	BPTTA-20060823ACV	0.0%*

*WMBQ-CA proposed interference as a single contributor

Detailed information regarding the interference studies is included as Figures 2 through 10 for adjacent-channel stations and Figures 11 through 15 for co-channel stations. Finally, it is noted that the “pre-fill” section of the STA Form incorrectly lists the licensed community as Cranford, NJ, which was the original licensed community. Correctly stated, Manhattan, NY is both the present and proposed community of license.

Environmental Statement

The applicant certifies that it has determined that the proposed operation is excluded from environmental processing under 47 C.F.R. Section 1.1306 as the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency exposure limits for controlled and uncontrolled environments. The applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

Summary

The technical facilities requested comply with the Commission’s freeze order DA 04-2446, and would allow WMBQ-CA to return to the air as quickly as possible. RCC respectfully requests expedited consideration so that the station may return to the air prior to 1/17/08, the expiration of its authorization to remain silent.

Form 7460-1 for ASN: 1999-AEA-1712-OE

Overview**Study (ASN):** 1999-AEA-1712-OE**Prior Study:****Status:** Determined**Letters:****Received Date:** 06/17/1999**Entered Date:** 06/18/1999**Completion Date:** 06/25/1999**Expiration Date:** 02/04/2001**Sponsor Information****Sponsor:** 845 UNITED NATIONS LIMITED PARTNERS**Attention Of:** MICHA KOEPEL**Address:** 725 FIFTH AVENUE**Address2:****City:** NEW YORK**State:** NY**Postal Code:** 10022**Country:****Phone:** 212-832-2000**Fax:****Sponsor's Representative Information****Representative:****Attention Of:****Address:****Address2:****City:****State:****Postal Code:****Country:****Phone:****Fax:****Construction Info****Notice Of:****Duration:** (Months: 0 Days: 0)**Work Schedule:****Date Built:** 10/04/2001**Structure Summary****Structure Type:** Other w/o Antenna**Other Description:****NACO Number:** 36-002306**FCC Number:****Structure Details****Latitude (NAD 83):** 40° 45' 08.05" N**Longitude (NAD 83):** 73° 58' 02.05" W**Datum:** NAD 83**Accuracy:****Marking/Lighting:** Other**Other Description:** Red**Name:****City:** MANHATTAN**State:** NY**Nearest Airport:** LGA**Distance to Structure:****On Airport:** No**Direction to Structure:****Description of Location:****Description of Proposal:** BUILDING**Height and Elevation**

	Proposed	DNE	DET
Site Elevation:	31		
Structure Height:	851	0	851
Total Height (ASML):	882	0	882

Frequencies

Low Freq	High Freq	Unit	ERP	Unit