



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN
APPLICATION FOR MODIFICATION OF
POST-TRANSITION DTV CONSTRUCTION PERMIT
BPCDT-20080317AGW
WGGB-DT - SPRINGFIELD, MASSACHUSETTS
DTV - CH. 40 - 460 kW - 324 m HAAT**

Prepared for: Gormally Broadcasting Licenses, LLC

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by Gormally Broadcasting Licenses, LLC, licensee of WGGB-TV, channel 40, Springfield, Massachusetts, licensee of WGGB-DT, channel 55, and permittee of post-transition WGGB-DT, channel 40, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits in support of an application for modification of post-transition construction permit, BPCDT-20080317AGW, on its current analog channel 40. The applicant proposes herein to substitute its existing licensed channel 40 transmitting antenna, and utilize its existing transmitter to effectuate its post-transition digital operation on channel 40. Additionally, the applicant proposes a change in Effective Radiated Power (ERP). No other changes are herein proposed. The instant proposal represents a gain in population compared to the current DTV authorization and serves 100% of the analog population. See exhibits 3 and 4.

PROPOSED DIRECTIONAL ANTENNA

The applicant intends to re-purpose WGGB-TV's currently authorized antenna, an Andrew model ATW25H3-DTC/P-40 Elliptically Polarized directional antenna, current FCC antenna ID number 17192. The antenna manufacturer's horizontal plane radiation field pattern tabulation is in Form 301, Section III-D, Tech Box item 10e. Also see exhibit 1.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data, # 1018460. Exhibit 2 contains the predicted DTV Noise Limited (41 dBu) contour and the predicted principal community (48 dBu) contour, which entirely encompasses the principal community of license, Springfield, Massachusetts.

ALLOCATION CONSIDERATIONS

An allocation study was performed, using the Commission's application processing software TV_Process, to ensure that the proposed DTV transmission facility complies with the Commission's *post-transition* interference criteria in Section 73.616. The study was evaluated to determine if the proposed post-transition DTV facility for WGGB-DT on channel 40 is predicted to cause any level of new prohibited interference to any post-

transition DTV stations, any current expansion construction permits, or applications for expansion CPs, or any Appendix B DTV allotments. Results indicate that the instant proposal to utilize WGGB-TV's existing directional antenna is predicted to cause no unacceptable level of new interference to the populations served by any existing DTV station, DTV expansion application or construction permit or any DTV allotment contained in Appendix B.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, the interference contour overlap analysis which is provided by TV_Process was considered, based on the proposed WGGB-DT facility, to establish compliance with the protection requirements contained therein. The study results indicate that no prohibited contour overlap exists with any Class A LPTV stations.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WGGB-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT & OCCUPATIONAL SAFETY

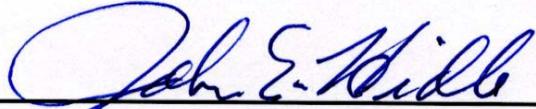
The WGGB-DT facility is located atop Mount Tom, Holyoke, Massachusetts, inside a fenced "antenna farm" compound with restricted public access. Each and every station located at the site is aware of safety precautions necessary when work is being conducted on towers at or near the site. WGGB-DT is a party, with the other stations located at the

site, to a joint use RFR safety agreement and is committed to the safety of personnel working on or near the WGGB-DT transmitting antenna. WGGB-DT will reduce power or suspend operation as necessary to ensure the safety and protection of workers at the site.

SUMMARY

It is submitted that the instant application for modification of construction permit for WGGB-DT seeking to utilize the existing antenna transmission facilities of WGGB-TV for post-transition digital operation, as described herein complies with the Rules, Regulations and Policies of the Federal Communications Commission. This statement, FCC Form 301, Section III-D, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: November 20, 2008

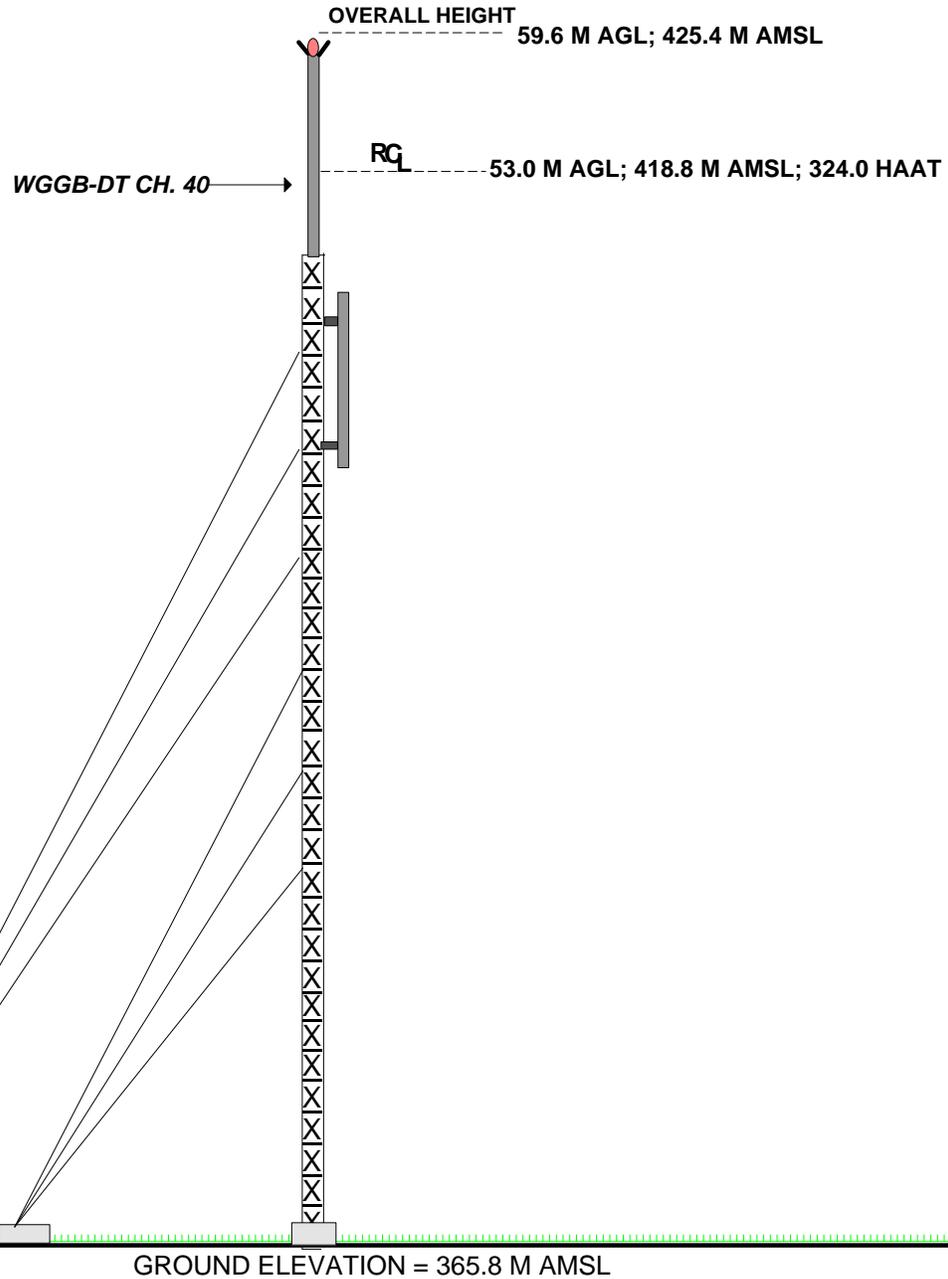


John E. Hidle, P.E.



42° 14' 30" NL
072° 38' 57" WL

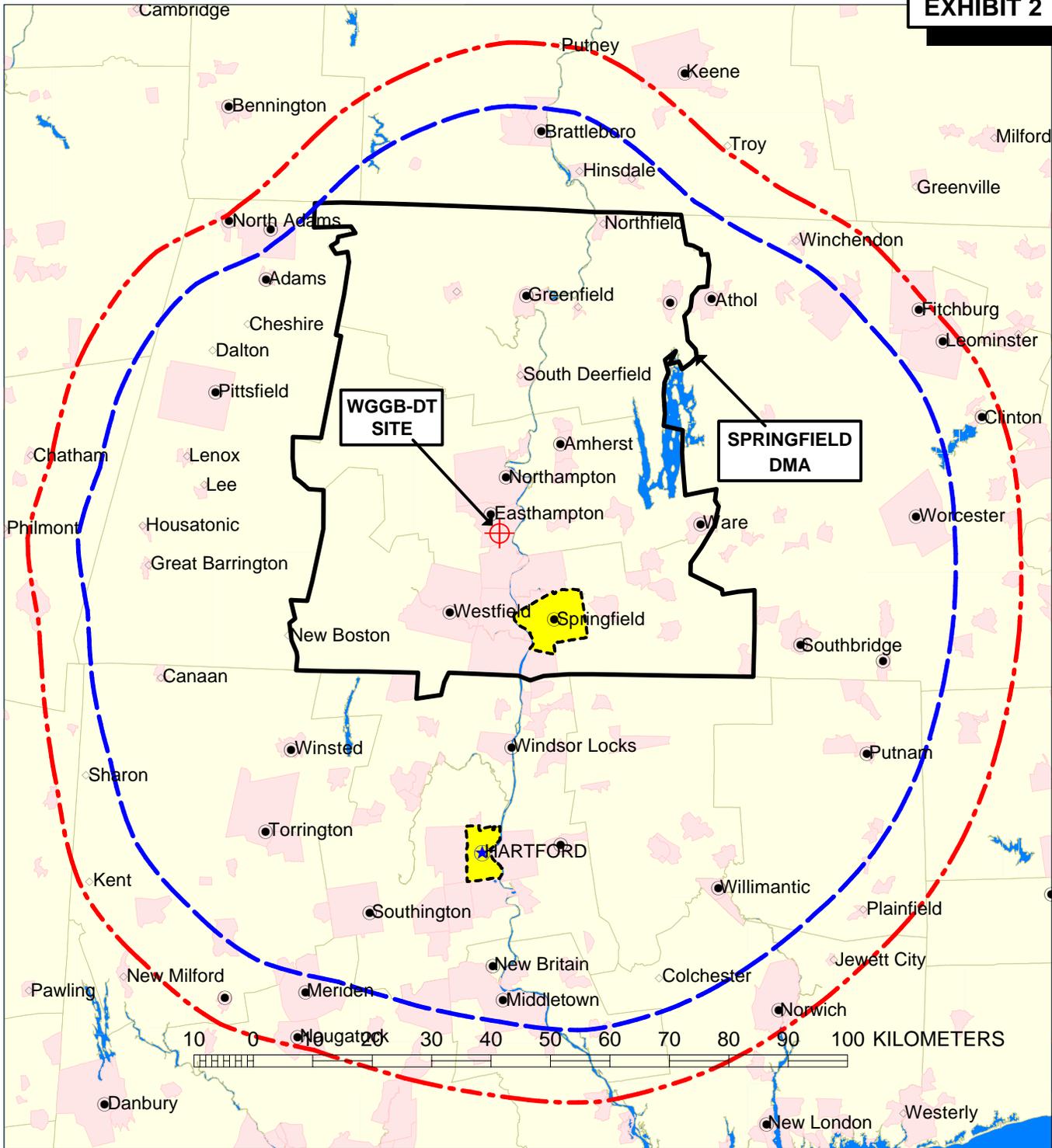
EXHIBIT 1



VERTICAL PLAN ANTENNA SKETCH
WGGB-DT, SPRINGFIELD, MASSACHUSETTS
CH. 40, 460 kW - 324.0 m HAAT
NOVEMBER, 2008

CARL T. JONES
CORPORATION

NOTE: NOT DRAWN TO SCALE



PREDICTED COVERAGE CONTOURS

WGGB-DT, SPRINGFIELD, MASSACHUSETTS

CH. 40, 460 kW - 324.0 m HAAT

Predicted Noise Limited Contour

F(50,90) - 48 dBu

Population (2000 census)

2,610,160 - 17,086 sq km

Existing Authorized ANALOG

Antenna FCC ID # 17192

Predicted Noise Limited Contour

F(50,90) - 41 dBu

Population (2000 census)

3,304,102 - 22,274 sq km

Andrew Model Number

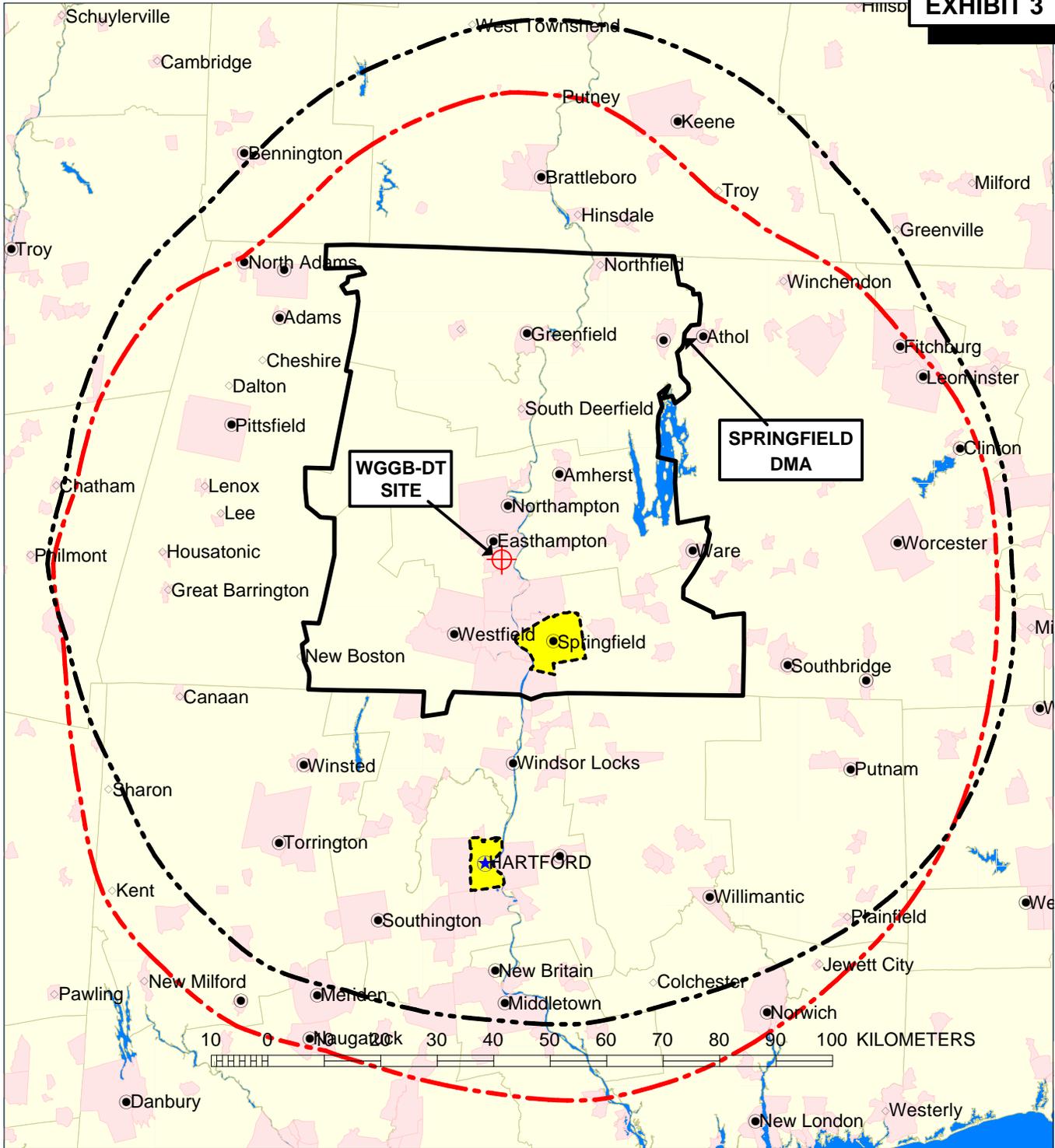
ATW25H3-DTC/P-40

DMA Population (2000 census)

680,563 - 4,918 sq km

NOVEMBER 2008

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PREDICTED COVERAGE CONTOURS

WGGB-DT, SPRINGFIELD, MASSACHUSETTS

CH. 40, 460 kW - 324.0 m HAAT

Predicted CP NL Contour - 380 kW

F(50,90) - 41 dBu

Population (2000 census)

3,059,806 - 22,831 sq km

Existing Authorized ANALOG

Antenna FCC ID # 17192

Predicted DTV Noise Limited Contour

F(50,90) - 41 dBu

Population (2000 census)

3,304,102 - 22,274 sq km

Andrew Model Number

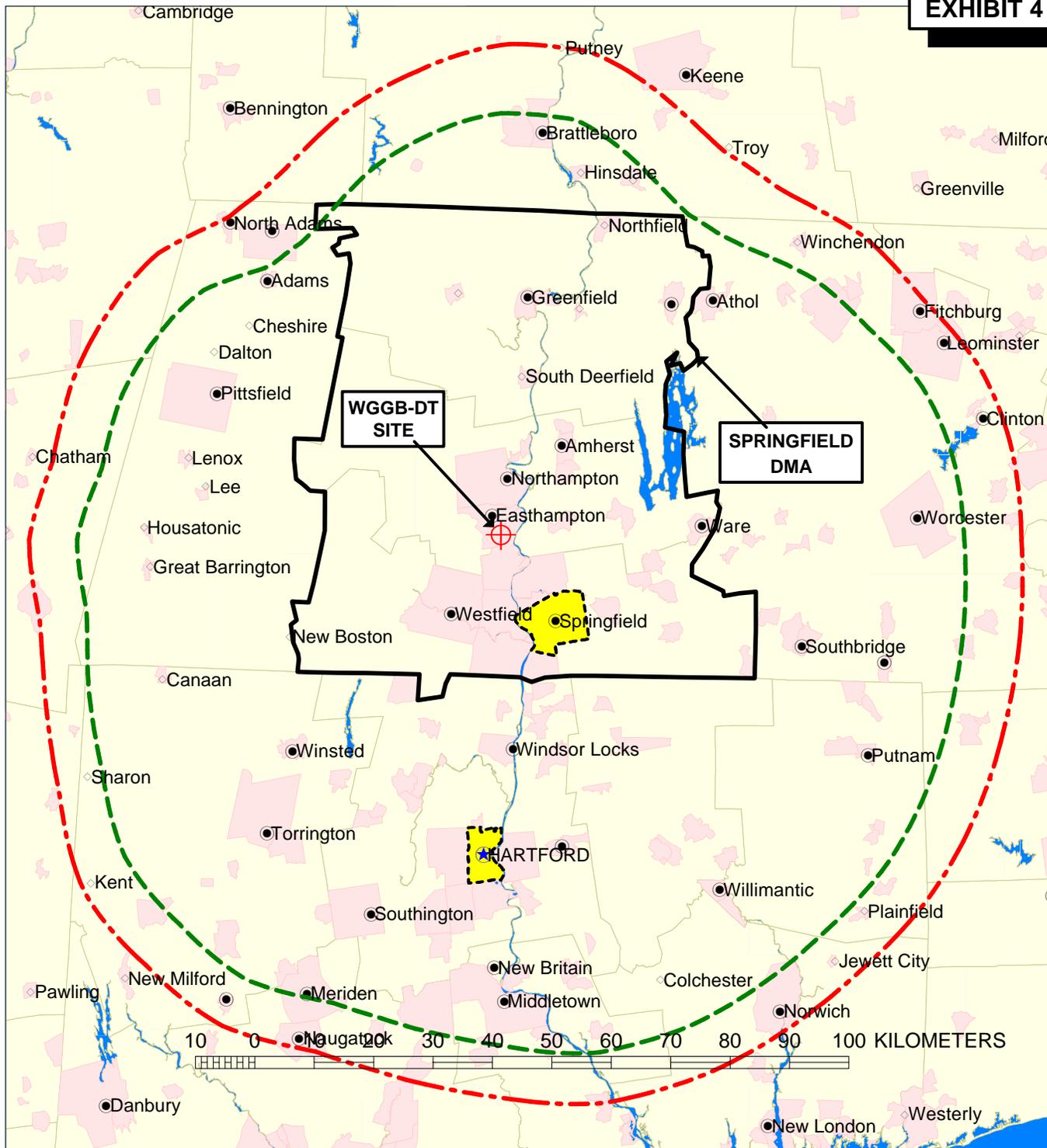
ATW25H3-DTC/P-40

DMA Population (2000 census)

680,563 - 4,918 sq km

NOVEMBER 2008

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PREDICTED COVERAGE CONTOURS

WGGB-DT, SPRINGFIELD, MASSACHUSETTS

CH. 40, 460 kW - 324.0 m HAAT

Predicted Licensed ANALOG F(50,50)

Grade "B" Contour - 64 dBu

Population (2000 census)

2,757,651 - 17,573 sq km

Existing Authorized ANALOG

Antenna FCC ID # 17192

Predicted DTV Noise Limited Contour

F(50,90) - 41 dBu

Population (2000 census)

3,304,102 - 22,274 sq km

Andrew Model Number

ATW25H3-DTC/P-40

DMA Population (2000 census)

680,563 - 4,918 sq km

NOVEMBER 2008

