



MINOR MOD FOR WESU (FM)
Exhibit 19 for Section VII / 15.e
09/01/2007

This exhibit is to demonstrate that this application meets the requirements of 47 CFR Section 73.525.

This application involves two TV Channel 6 stations: WEDY-DT (digital TV) in New Haven, CT, and WLNE-TV in Providence, RI. See the contour map at the end of this document for a visual reference.

WEDY-DT Channel 6

WESU already has contour overlap¹ (48dBu F(50,10) interfering contour) with WEDY-DT (47dBu F(50,50) contour), due to WEDY-DT making changes to their own signal **after** WESU established their existing signal.

This application proposes a change in WESU's antenna from omni-directional to directional, which includes a null towards WEDY-DT that will reduce the amount of prohibited overlap. As defined by 73.525 (b)(i):

(b) Existing NCE-FM stations. (1) A NCE-FM station license authorized to operate on channels 201-220 as of December 31, 1984, or a permittee, granted a construction permit for a NCE-FM station as of December 31, 1984, are not subject to this section unless they propose either:

(i) To make changes in operating facilities or location which will increase predicted interference as calculated under paragraph (e) of this section to TV Channel 6 reception in any direction

For calculating interference, specifically referencing 73.525 (e)(iii), which allows for:

An adjustment of 6 dB for television receiving antenna directivity will be added to each NCE-FM interference contour at all points outside the Grade A field strength contour (Sec. 73.683) of the TV Channel 6 station and within an arc defined by the range of angles, of which the FM transmitter site is the vertex, from 110° relative to the azimuth from the FM transmitter site to the TV Channel 6 transmitter site, counterclockwise to 250° relative to that azimuth.

The proposed WESU interfering contour is entirely outside the Grade A field strength (68 dBu) contour of WEDY-DT. As such, for any new WESU facility, WESU's interfering

¹ The WESU 48dBu F(50,10) interfering contour overlaps the WEDY-DT 47dBu F(50,50) protected contour. This creates a technical condition that increases the chances a TV viewer will receive interference from WESU within the overlap area. Since WEDY-DT is a new digital TV channel (WEDY's migration from analog channel 65) it went on the air well after WESU; FCC rules do not require new DTV channels to protect NCE-FM signals.



54 dBu contour may not overlap WEDY-DT's 47 dBu protected contour any more than WESU's existing 48 dBu protected contour overlaps WEDY-DT's 47 dBu protected contour.

Currently the overlap covers 495.96 sq.km. and 158494 population², the proposed facility's overlap covers 259.05 sq.km. and 68548 population; a significant reduction.

WLNE-TV Channel 6

WESU also has contour overlap (48dBu F(50,10) interfering contour) with WLNE-TV (47dBu F(50,50) protected contour). Like WEDY-DT, the proposed WESU facility's interfering contours are outside the Grade A 68 dBu field strength contour, and like WEDY-DT, the proposed WESU facility will reduce the 54dBu interfering contour overlap over WLNE-TV's 47dBu protected contour.

Currently the overlap covers, 86.54 sq.km and 5684 population, the proposed facility's overlap covers 40.32 sq.km. and 2846 population.

Furthermore, 73.525 (c) states:

(c) New NCE-FM stations³. Except as provided for by paragraph (d) of this section⁴, applicants for NCE-FM stations proposing to operate on Channels 201-220 must submit a showing indicating that the predicted interference area resulting from the proposed facility contains no more than 3,000 persons.

The proposed facility's contour overlap is below the 3000 persons cutoff.

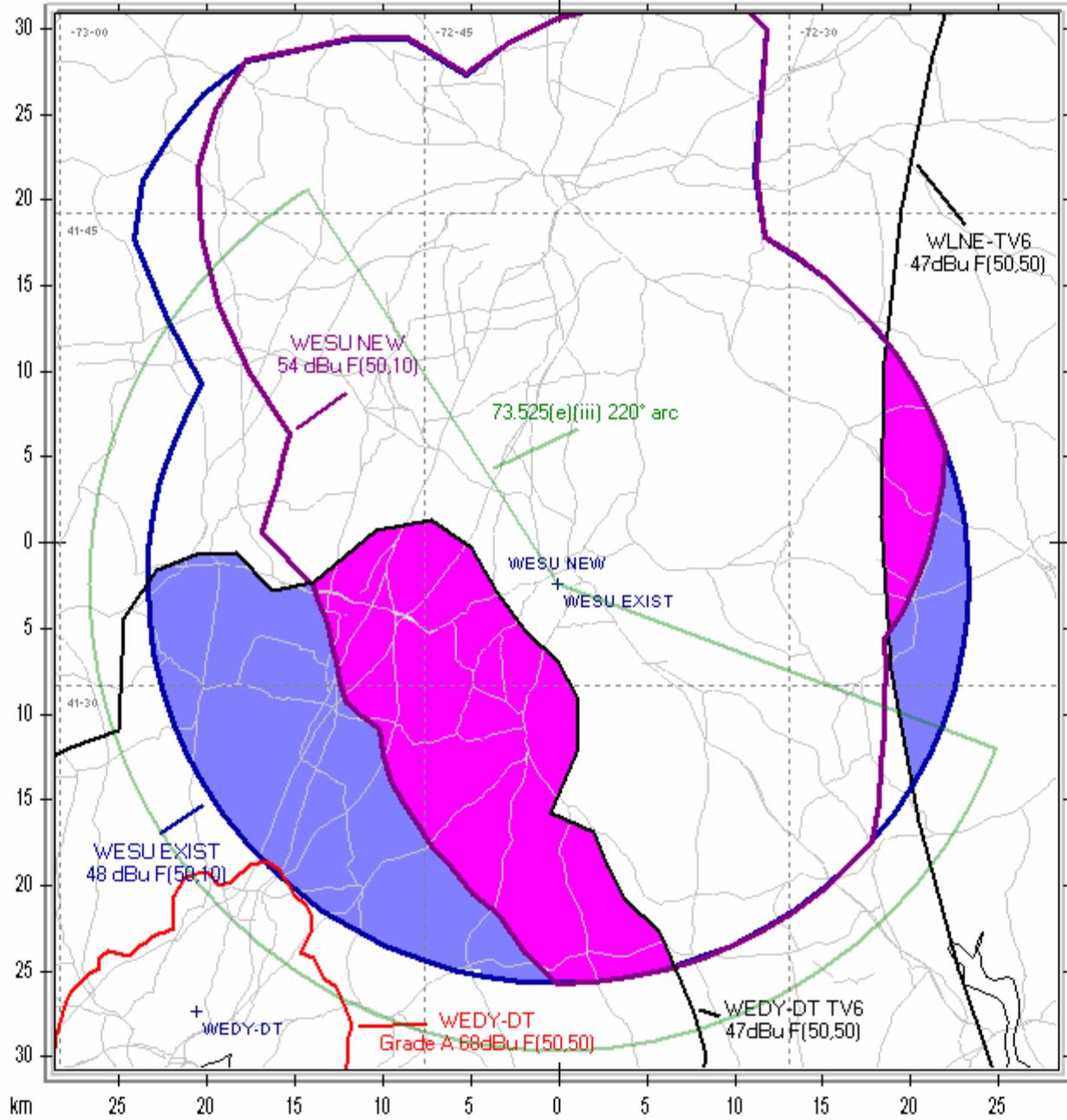
As such, this proposed WESU facility meets the criteria of 73.525 (b)(i) for both WEDY-DT and WLNE-TV. There are no other TV Channel 6 stations relevant to this application.

² All population numbers are from the 2000 US Census.

³ 73.525 (b) refers Existing NCE-FM stations to this section for interference protection rules.

⁴ Paragraph (d) refers to NCE-FM stations co-located with the TV Channel 6 in question, which does not apply here.

WESU Interaction with WEDY-DT and WLNE-TV



TV Channel 16 Protection

Blue-shaded area = Existing overlap between WESU and WEDY-DT & WLNE-TV (existing overlap also includes purple-shaded area)

Purple-shaded area = Reduced overlap between proposed WESU facility and WEDY-DT & WLNE-TV

State Borders Highways Lat/Lon Grid

Map Scale: 1:389860 1 cm = 3.90 km V|H Size: 61.67 x 57.07 km

Blue = WESU Existing 48dBu / Purple = WESU New 54dBu