

STATEMENT OF JOHN E. HIDLE, P.E. IN SUPPORT OF AN APPLICATION FOR POST-TRANSITION CONSTRUCTION PERMIT WPVI-TV - PHILADELPHIA, PENNSYLVANIA CH. 6 - 37.6 kW - 330 meters HAAT

Prepared for: ABC, INC.

I am a Consulting Engineer, and 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 Licensed 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 ABC, INC., Licensee of WPVI-TV, channel 6, Philadelphia, Pennsylvania, to prepare this statement, FCC Form 301, Section III-D, and the associated exhibits, in support of an application for a post-transition construction permit. It is proposed herein to relocate WPVI-TV's post-transition broadcast transmission facility on channel 6 from its current position on its former analog tower, with registration number 1023152, to a nearby tower, with registration number 1035474, that was formerly utilized by WPVI-TV's pre-transition channel 64 digital facility.

WPVI-TV elected, for initial post-transition operation, to utilize its former analog channel 6 broadcast facility, including its former analog antenna. WPVI-TV now proposes to remove its pre-transition channel 64 antenna, and install a new channel 6 circular polarized omni-directional antenna on the former channel 64 tower.

AUTHORIZED FACILITY

WPVI-TV has a pending license application, BLCDT-20110503ACH, to cover its construction permit, BPCDT-20090617ADQ. WPVI-TV's current authorization allows a facility with an Effective Radiated Power (ERP) of 30.2 kW at a Height Above Average Terrain (HAAT) of 332 meters. The applicant herein seeks an increase in ERP up to 37.6 kW, partly to compensate for the 9.3 meter reduction in the antenna's centerline height Above Mean Sea Level (AMSL).

NEW OMNI-DIRECTIONAL ANTENNA

WPVI-TV proposes to install a new Dielectric Model CAR-O3FMB-6/18H-1 channel 6 omni-directional circularly polarized antenna, on the tower bearing registration number 1035474, with its radiation center line located 320.7 meters above ground level, and 330 meters above average terrain. The proposed antenna will employ an electrical beam-tilt of 1 degree below the horizontal plane. The manufacturer's elevation plane radiation pattern is shown in exhibits 1 and 2, and is tabulated in exhibit 3.

DTV ALLOCATION CONSIDERATIONS

WPVI-TV's current authorization allows a facility with an Effective Radiated Power (ERP) of 30.2 kW at a Height Above Average Terrain (HAAT) of 332 meters. WPVI-TV's current authorization, BPCDT-20090617ADQ, was granted concurrently with WRGB's current authorization, BPCDT-20090622ABV, on March 16, 2011, each being authorized an ERP of 30.2 kW, based on an acceptable interference agreement between the stations. According to a study performed using the Commission's recently revised application

processing and interference analysis software, the results of which are in <u>Appendix B</u>, WPVI-TV's currently authorized facility is predicted to cause 1.8074% new interference to WRGB's facility.

The study also revealed a predicted effect on a Notice of Proposed Rule Making, RM-11,586, which proposed to amend the DTV Table of Allotments to add channel 5 to Seaford, Delaware, and its Report and Order, DA 10-698, that was adopted on April 23, 2010, which amended the Table to add channel 5 to Seaford, Delaware. The study predicts that WPVI-TV's current authorization will cause 1.0781% new interference to BPRM-20091008ACC. That level of predicted interference is, however, acceptable since paragraph 18 in the Report and Order states: "IT IS FURTHER ORDERED, That any licensee of the channel 5 allotment at Seaford will be subject to the condition that it must accept interference of up to 2% of the population within the allotment's DTV service area from WPVI(TV), Philadelphia, Pennsylvania."

DTV ALLOCATION CONSIDERATIONS AT THE NEW SITE

The instant proposal specifies a tower that is located 249 meters from WPVI-TV's current authorized site, which will result in a change in geographic coordinates, in HAAT and ERP. A new study, the results of which are in <u>Appendix C</u>, was performed to determine what predicted effects, if any, the proposal might be expected to cause to other authorized facilities. Currently WPVI-TV and WRGB have both implemented their construction permits and have submitted license applications. Also, a construction permit has been granted for the Seaford, Delaware allotment, BNPCDT-20110330AAY.

The newer study shows that WPVI-TV's proposal is predicted to cause 1.2610% new interference to the NEW authorized facility on channel 5 in Seaford, Delaware; therefore, the proposal is in compliance with the 2% permitted new interference. Relative to WRGB's authorized facility the study predicts 1.7983% new interference from the instant proposal, which is less than the predicted 1.8074% new interference from WPVI-TV's current authorization. Therefore, WPVI-TV's proposed new facility will comply with the interference agreement between WRGB and WPVI-TV.

Class A Television Allocation Considerations

Using the application processing software, the study revealed no spacing violations, contour overlap with, nor predicted interference to, any authorized Class A LPTV station, as required in Section 73.616(f) of the FCC's Rules. The instant proposal is, therefore, considered to be in compliance with Section 73.616(f).

AM Radio Station Considerations

The study shows that the existing tower that is proposed to support WPVI-TV's new channel 6 antenna is located 0.58 kilometers from directional daytime AM radio station WNWR, 1540 kHz, 50 kW, DA-D, licensed to Philadelphia, Pennsylvania. WPVI-TV seeks to remove the obsolete channel 64 antenna and install a new channel 6 antenna. The tower extends to 389 meters Above Ground Level (AGL), and it supports numerous other authorized broadcast and non-broadcast facilities. The proposed work on the tower will be performed more than 1000 feet AGL. The applicant is confident that the proposed antenna exchange is extremely unlikely to result in any measurable effect on WNWR.

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. Exhibit 4 contains the predicted DTV Noise Limited (28 dBu) contour and the predicted principal community (35 dBu) contour. The predicted 35 dBu contour entirely encompasses the principal community, Philadelphia, Pennsylvania.

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast technical facilities are co-located with, or located within 10 km of the proposed WPVI-TV transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference which might result from this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted modified guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National

Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish maximum permissible exposure (MPE) levels for both occupational or "controlled" environments, as well as for "uncontrolled" environments such that apply in cases that could affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level established for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm²) when applied to broadcast facilities operating between 30 MHz and 300 MHz, and for broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, the MPE is derived from the formula, (frequency (MHz)/1500). The MPE level that is established for occupational, or "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm²) for operations between 30 MHz and 300 MHz, and for broadcast stations operating between 300 MHz and 1500 MHz the MPE is derived from the formula, (frequency (MHz)/300).

The predicted emissions of WPVI-TV operating on channel 6 must be considered, in addition to predicted emissions from any other proposed or existing stations at the site. For WPVI-TV, which will operate on television channel 6 (82-88 MHz), the MPE is 0.200

milliwatts per centimeter squared (mW/cm²) in an "uncontrolled" environment and 1.000

mW/cm² in a "controlled" environment. The proposed WPVI-TV facility will operate with a

maximum ERP of 37.6 kW using a circularly polarized omni-directional transmitting antenna

with a centerline height of 320.7 meters above ground level (AGL). Considering the

proposed antenna's vertical plane relative field factor of 0.15 the WPVI-TV facility is

predicted to produce a power density at two meters above ground level of 0.00056

mW/cm², which is 0.28% of the FCC guideline value for an "uncontrolled" environment, and

0.056% of the FCC's guideline value for "controlled" environments. (See Appendix A)

There are three other full-service DTV stations, and eight FM radio stations that are

authorized to be located at the site, or within the relevant proximity of 315 meters. There

is one AM radio station located 0.58 km from the site. The total percentage of the ANSI

value at the proposed site, including the cumulative radiation based on actual field factors,

from all post-transition broadcast stations within the relevant proximity is 14.07% of the limit

for "uncontrolled" environments, and 2.81% of the limit for "controlled" environments.

OCCUPATIONAL SAFETY

The applicant is committed to the protection of station personnel and/or tower

contractors working on the tower support structure, or in the vicinity of the proposed WPVI-

TV antenna, by reducing power and/or ceasing operation during times of maintenance of

the transmission systems, when necessary, to ensure the proper protection of persons who

might be required to perform their assigned tasks in this "controlled" environment.

SUMMARY

It is submitted that the instant application for post-transition relocation construction permit for WPVI-TV seeking to relocate its post-transition facility to a nearby tower, reduce its HAAT to 330 meters, and increase its ERP to 37.6 kW, 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: May 25, 2011





Proposal Number C-04057 Exhibit 1

Date **16-Mar-10**

WPVI-TV Channel Philadelphia, PA

6

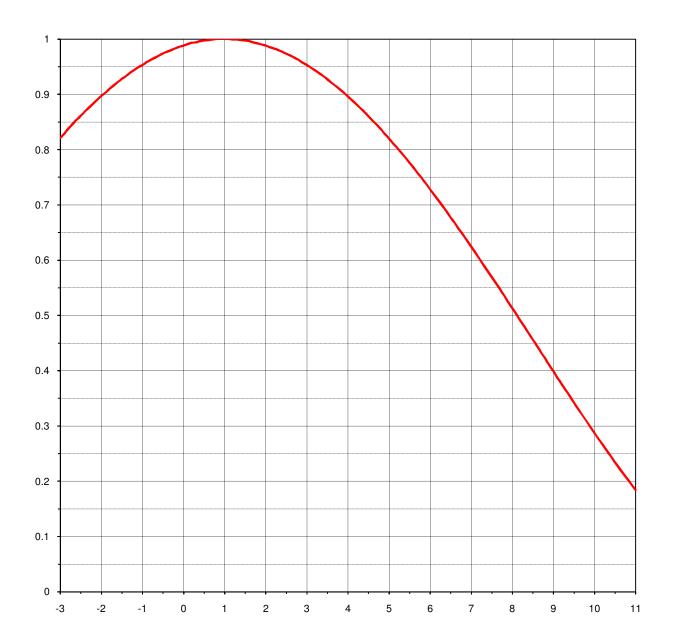
Location Customer

Call Letters

Antenna Type CBR-O3FMB-6/18H-1

ELEVATION PATTERN

RMS Gain at Main Lobe 5.50 (7.40 dB) Beam Tilt 1.00 deg
RMS Gain at Horizontal 5.40 (7.32 dB) Frequency 85.00 MHz
Calculated / Measured Calculated Drawing # 06C055100



Degrees Below Horizontal

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Proposal Number C-04057 Exhibit 2

Date **16-Mar-10**

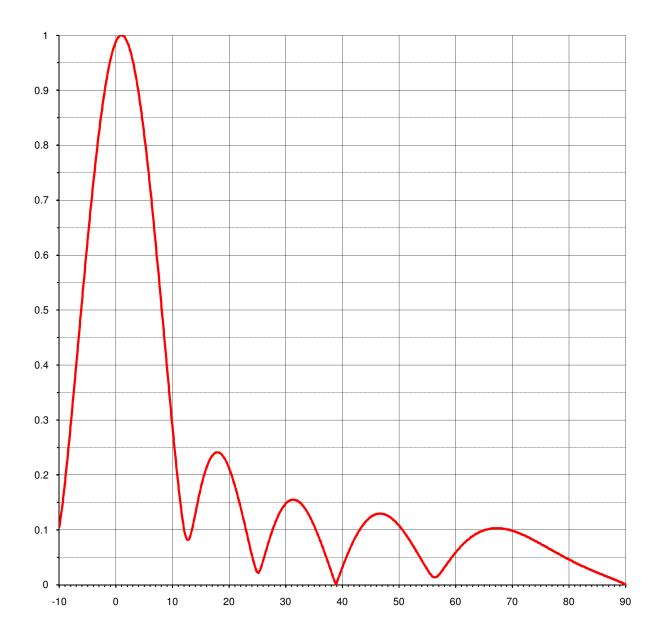
Call Letters WPVI-TV Channel 6
Location Philadelphia, PA

Customer

Antenna Type CBR-O3FMB-6/18H-1

ELEVATION PATTERN

RMS Gain at Main Lobe 5.50 (7.40 dB) Beam Tilt 1.00 deg
RMS Gain at Horizontal 5.40 (7.32 dB) Frequency 85.00 MHz
Calculated / Measured Calculated Drawing # 06C055100-90



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2.2

0.983

10.4

0.255

Proposal Number C-04057 Exhibit 3

Date **16-Mar-10**

Call Letters WPVI-TV Channel 6

Location Philadelphia, PA

Customer

Antenna Type CBR-O3FMB-6/18H-1

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: 06C055100-90

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.105	2.4	0.977	10.6	0.234	30.5	0.152	51.0	0.096	71.5	0.093
-9.5	0.141	2.6	0.970	10.8	0.214	31.0	0.154	51.5	0.088	72.0	0.091
-9.0	0.185	2.8	0.962	11.0	0.194	31.5	0.155	52.0	0.081	72.5	0.088
-8.5	0.235	3.0	0.953	11.5	0.148	32.0	0.154	52.5	0.072	73.0	0.086
-8.0	0.288	3.2	0.943	12.0	0.110	32.5	0.150	53.0	0.064	73.5	0.083
-7.5	0.343	3.4	0.933	12.5	0.086	33.0	0.145	53.5	0.055	74.0	0.080
-7.0	0.400	3.6	0.921	13.0	0.083	33.5	0.139	54.0	0.046	74.5	0.077
-6.5	0.457	3.8	0.909	13.5	0.099	34.0	0.130	54.5	0.038	75.0	0.075
-6.0	0.514	4.0	0.896	14.0	0.123	34.5	0.121	55.0	0.029	75.5	0.072
-5.5	0.570	4.2	0.882	14.5	0.148	35.0	0.110	55.5	0.021	76.0	0.069
-5.0	0.625	4.4	0.868	15.0	0.172	35.5	0.098	56.0	0.015	76.5	0.066
-4.5	0.679	4.6	0.852	15.5	0.193	36.0	0.085	56.5	0.014	77.0	0.063
-4.0	0.729	4.8	0.837	16.0	0.210	36.5	0.071	57.0	0.017	77.5	0.060
-3.5	0.777	5.0	0.820	16.5	0.224	37.0	0.057	57.5	0.023	78.0	0.057
-3.0	0.821	5.2	0.803	17.0	0.234	37.5	0.043	58.0	0.030	78.5	0.054
-2.8	0.838	5.4	0.785	17.5	0.239	38.0	0.028	58.5	0.037	79.0	0.052
-2.6	0.854	5.6	0.767	18.0	0.241	38.5	0.013	59.0	0.044	79.5	0.049
-2.4	0.869	5.8	0.748	18.5	0.240	39.0	0.001	59.5	0.051	80.0	0.046
-2.2	0.883	6.0	0.728	19.0	0.234	39.5	0.016	60.0	0.058	80.5	0.044
-2.0	0.897	6.2	0.708	19.5	0.226	40.0	0.030	60.5	0.064	81.0	0.041
-1.8	0.910	6.4	0.688	20.0	0.215	40.5	0.043	61.0	0.070	81.5	0.038
-1.6	0.922	6.6	0.667	20.5	0.201	41.0	0.056	61.5	0.075	82.0	0.036
-1.4	0.933	6.8	0.646	21.0	0.184	41.5	0.067	62.0	0.080	82.5	0.034
-1.2	0.944	7.0	0.624	21.5	0.166	42.0	0.079	62.5	0.084	83.0	0.031
-1.0	0.953	7.2	0.602	22.0	0.146	42.5	0.089	63.0	0.088	83.5	0.029
-0.8	0.962	7.4	0.580	22.5	0.125	43.0	0.098	63.5	0.092	84.0	0.027
-0.6	0.970	7.6	0.558	23.0	0.103	43.5	0.106	64.0	0.094	84.5	0.024
-0.4	0.977	7.8	0.536	23.5	0.081	44.0	0.112	64.5	0.097	85.0	0.022
-0.2	0.983	8.0	0.513	24.0	0.059	44.5	0.118	65.0	0.099	85.5	0.020
0.0	0.988	8.2	0.490	24.5	0.039	45.0	0.123	65.5	0.101	86.0	0.018
0.2	0.993	8.4	0.467	25.0	0.024	45.5	0.126	66.0	0.102	86.5	0.016
0.4	0.996	8.6	0.445	25.5	0.026	46.0	0.128	66.5	0.103	87.0	0.014
0.6	0.998	8.8	0.422	26.0	0.041	46.5	0.129	67.0	0.103	87.5	0.012
0.8	1.000	9.0	0.399	26.5	0.058	47.0	0.129	67.5	0.103	88.0	0.010
1.0	1.000	9.2	0.376	27.0	0.076	47.5	0.128	68.0	0.103	88.5	0.008
1.2	0.999	9.4	0.354	27.5	0.092	48.0	0.126	68.5	0.102	89.0	0.005
1.4	0.998	9.6	0.331	28.0	0.107	48.5	0.123	69.0	0.101	89.5	0.003
1.6	0.996	9.8	0.320	28.5	0.120	49.0	0.119	69.5	0.100	90.0	0.000
1.8	0.992	10.0	0.298	29.0	0.131	49.5	0.115	70.0	0.099	ļ	
2.0	0.988	10.2	0.276	29.5	0.140	50.0	0.109	70.5	0.097]	
	0.000	1 40 4	0.055		0 4 4 7		0 400	1 74 0			

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0.147

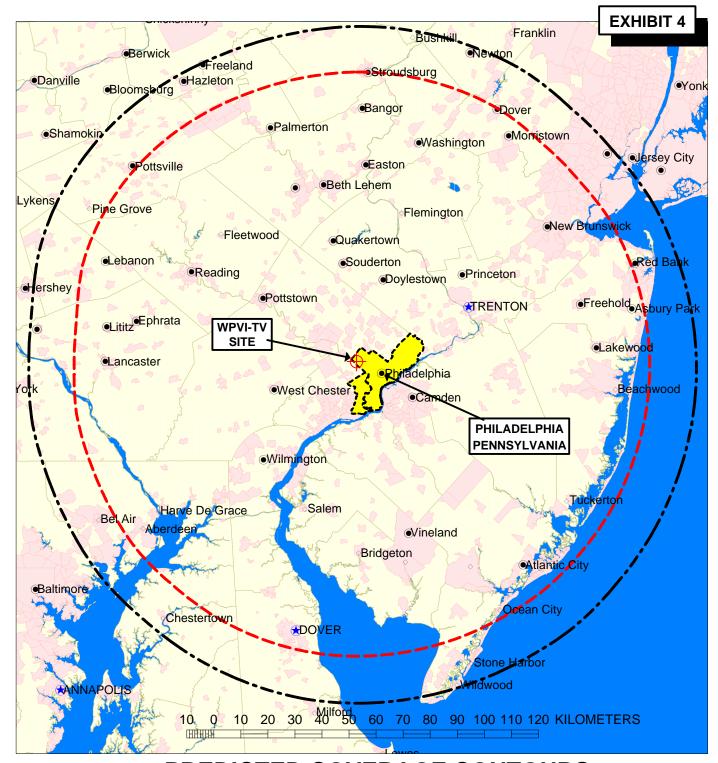
50.5

0.103

71.0

0.095

30.0



PREDICTED COVERAGE CONTOURS

WPVI-TV, PHILADELPHIA, PENNSYLVANIA DTV - CH. 6 - 37.6 kW - 330.0 m HAAT

Predicted Principal Community Contour F(50,90) - 35 dBu Area = 35,025 sq km

Population = 10,727,836



Predicted Noise Limited Contour F(50,90) - 28 dBu Area = 47,020 sq km Population = 13,343,749

SUMMARY OF RADIOFREQUENCY RADIATION STUDY

WPVI-TV, PHILADELPHIA, PENNSYLVANIA CHANNEL 6, 37.6 kW ERP, 330.0 m HAAT MAY, 2011

							VERT.		FCC	
				,	ANTENNA		RELATIVE	PREDICTED	UNCONTROLLED	PERCENT OF
					HEIGHT **	ERP	FIELD	POWER DENSITY	LIMIT	UNCONTROLLED
<u>CALL</u>	<u>SERVICE</u>	CHANNEL	<u>FREQUENCY</u>	POLARIZATION	mAGL	<u>(kW)</u>	FACTOR	(mW/cm ²)	(mW/cm ²)	<u>LIMIT</u>
WPVI-TV	DT	6	85	H & V	318.7	37.600	0.150	0.00056	0.200	0.28%
WHYY-TV	DT	12	207	Н	290	30.000	0.130	0.00020	0.200	0.10%
WPHL-TV	DT	17	491	Н	320	645.000	0.140	0.00412	0.327	1.26%
KYW-TV	DT	26	545	Н	364	790.000	0.100	0.00199	0.363	0.55%
WXPN	FM	203	88.5	H & V	271	5.000	0.350	0.00056	0.200	0.28%
WHYY-FM	FM	215	90.9	H & V	277	13.500	0.400	0.00188	0.200	0.94%
WUSL	FM	255	98.9	H & V	189	27.000	0.280	0.00396	0.200	1.98%
WPHI-FM	FM	262	100.3	H & V	251	17.000	0.500	0.00451	0.200	2.25%
WBEB	FM	266	101.1	H & V	285	12.000	0.400	0.00158	0.200	0.79%
WIOQ	FM	271	102.1	H & V	191	27.000	0.400	0.00791	0.200	3.96%
WRFF	FM	283	104.5	H & V	306	11.000	0.500	0.00196	0.200	0.98%
WDAS-FM	FM	287	105.3	H & V	265	16.500	0.300	0.00141	0.200	0.71%

TOTAL PERCENTAGE OF ANSI VALUE= 14.07%

^{**} The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.



WPVI-TV - Appendix B Page 1

Percent allowed new interference: 0.500

Percent allowed new interference to non Class A LPTV: 2.000

Census data selected 2000

Data Base Selected

./data/tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-18-2011 Time: 14:20:51

Record Selected for Analysis

WPVI-TV BPCDT -20090617ADQ PHILADELPHIA PA US

Channel 06 ERP 30.2 kW HAAT 332. m RCAMSL 404.0 m

Latitude 040-02-39 Longitude 0075-14-26

Status APP Zone 1 Border Site number: 01 Last update 00000000 Cutoff date 20090617 Docket

Comments

Applicant ABC, INC.

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits Channel 6 ERP = 30.20 HAAT = 332.

Site number	1		
Azimuth	ERP	HAAT	28.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	30.200	331.0	120.2
45.0	30.200	304.2	118.7
90.0	30.200	355.9	121.2
135.0	30.200	380.4	122.6
180.0	30.200	365.2	121.6
225.0	30.200	317.2	119.5
270.0	30.200	287.4	117.5
315.0	30.200	360.3	121.3

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap to Class A stations from site # 01

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WPVI-TV 06 PHILADELPHIA PA BPCDT 20090617ADQ Site # 01

and station

SHORT TO: WPVI-TV 06 PHILADELPHIA PA DTVPLN DTVP0041

040-02-39 0075-14-26

Req. separation 244.6 Actual separation 0.0 Short 244.6 km

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Page 2

Proposed station is 0.34km from AM station

PHILADELPHIA PA WNWR Status: L Antenna: DAD

Proposed station is 0.34km from AM station

PHILADELPHIA PA WNWR Status: M Antenna: DAD

Proposed station is 0.34km from AM station

PHILADELPHIA PA WNWR Status: P Antenna: DA2

Start of Interference Analysis

Proposed Station

Channel Call City/State ARN

06 WPVI-TV PHILADELPHIA PA BPCDT 20090617ADQ

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No	
05	NEW	SEAFORD DE	157.8	APP	BPRM	20091008ACC
06	WWDG-CA	ROME NY	351.9	APP	BDISTVA	20080528AGR
06	WWDG-CA	ROME NY	351.9	APP	BSTA	20081117AAE
06	WRGB	SCHENECTADY NY	304.7	LIC	BPCDT	20090622ABV
06	WRGB	SCHENECTADY NY	304.7	CP	BPCDT	20080307AAK

Analysis of Interference to Affected Station 1

Analysis of current record

Channel Call City/State Application Ref. No.
05 NEW SEAFORD DE BPRM -20091008ACC

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Applica	tion Ref. No.
05	WDTV	WESTON WV	415.1	LIC	BLCDT	-20090612AJX
06	WPVI-TV	PHILADELPHIA PA	157.8	APP	BPCDT	-20090617ADQ
06	WPVI-TV	PHILADELPHIA PA	157.8	PLN	DTVPLN	-DTVP0041

Total scenarios = 1
Result key: 1

Scenario 1 Affected station 1

Before Analysis

Results for: 5A DE SEAFORD BPRM 20091008ACC APP

HAAT 305.0 m, ATV ERP 10.0 kW

·	POPULATION	AREA (sq km)
within Noise Limited Contour	1852013	36018.5
not affected by terrain losses	1851742	36002.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	442	32.1
lost to ATV IX only	442	32.1
lost to all IX	442	32.1

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 5A DE SEAFORD BPRM 20091008ACC APP

HAAT 305.0 m, ATV ERP 10.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1852013	36018.5
not affected by terrain losses	1851742	36002.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	20400	297.2
lost to ATV IX only	20400	297.2
lost to all IX	20400	297.2

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Potential Interfering Stations Included in above Scenario 1

6A PA PHILADELPHIA BPCDT 20090617ADQ APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BPCDT 20090617ADQ ERP 30.20 kW HAAT 332.0 m RCAMSL 404.0 m

Due to interference to the following station and scenario: 1

5D DE SEAFORD BPRM 20091008ACC ERP 10.00 kW HAAT 305.0 m RCAMSL 309.0 m

Percent new interference from proposal: 1.0781 to BPRM 20091008ACC

Worst case new IX 1.0781% Scenario 1

Proposed station is MX

6A PA PHILADELPHIA BPCDT 20090617ADQ APP 5A DE SEAFORD BPRM 20091008ACC APP

Proposal MX with BPRM 20091008ACC scenario 1 of station 1

Analysis of Interference to Affected Station 2

Analysis of current record

Channel Call City/State Application Ref. No.

06 WWDG-CA ROME NY BDISTVA -20080528AGR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
06	WNNY-LP	AUBURN NY	94.0	CP	BDISTVL	-20080222AEE
06	WRGB	SCHENECTADY NY	135.9	LIC	BPCDT	-20090622ABV
06	WRGB	SCHENECTADY NY	135.9	CP	BPCDT	-20080307AAK
06	WMBO-LP	WESTVALE NY	58.0	CP	BPTVL	-20090824ALS
06	WPVI-TV	PHILADELPHIA PA	351.9	APP	BPCDT	-20090617ADQ
06	WPVI-TV	PHILADELPHIA PA	351.9	PLN	DTVPLN	-DTVP0041

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 3

Analysis of current record

Channel Call City/State Application Ref. No. 06 WWDG-CA ROME NY BSTA -20081117AAE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Applica	tion Ref. No.
06	WRGB	SCHENECTADY NY	135.9	LIC	BPCDT	-20090622ABV
06	WRGB	SCHENECTADY NY	135.9	CP	BPCDT	-20080307AAK
06	WMBO-LP	WESTVALE NY	58.0	CP	BPTVL	-20090824ALS
06	WPVI-TV	PHILADELPHIA PA	351.9	APP	BPCDT	-20090617ADQ
06	WPVI-TV	PHILADELPHIA PA	351.9	PLN	DTVPLN	-DTVP0041

Proposed station is beyond the site to nearest cell evaluation distance

WPVI-TV - Appendix B Page 4

Analysis of Interference to Affected Station
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Analysis of current record

Channel Call City/State Application Ref. No. 06 WRGB SCHENECTADY NY BPCDT -20090622ABV

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No.
06 WPVI-TV PHILADELPHIA PA 304.7 APP BPCDT -20090617ADQ
06 WPVI-TV PHILADELPHIA PA 304.7 PLN DTVPLN -DTVP0041

Total scenarios = 1 Result key: 2

Scenario 1 Affected station 4

Before Analysis

Results for: 6A NY SCHENECTADY BPCDT 20090622ABV LIC

HAAT 392.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km) within Noise Limited Contour 2789321 49064.8 not affected by terrain losses 2312759 43198.2 lost to NTSC IX 0 0.0 lost to additional IX by ATV 18198 392.7 lost to ATV IX only 18198 392.7 lost to all IX 18198 392.7

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 6A NY SCHENECTADY BPCDT 20090622ABV LIC HAAT 392.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km)
within Noise Limited Contour 2789321 49064.8
not affected by terrain losses 2312759 43198.2
lost to NTSC IX 0 0.0
lost to additional IX by ATV 59669 1001.8
lost to ATV IX only 59669 1001.8
lost to all IX 59669 1001.8

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

The following station failed the de minimis interference criteria.
6D PA PHILADELPHIA BPCDT 20090617ADO

6D PA PHILADELPHIA BPCDT 20090617ADQ ERP 30.20 kW HAAT 332.0 m RCAMSL 404.0 m

Due to interference to the following station and scenario: 1 6D NY SCHENECTADY BPCDT 20090622ABV

ERP 30.20 kW HAAT 392.0 m RCAMSL 649.0 m

Percent new interference from proposal: 1.8074 to BPCDT 20090622ABV

Worst case new IX 1.8074% Scenario 1

WPVI-TV - Appendix B Page 5

Analysis of Interference to Affected Station 5

Analysis of current record

City/State Channel Call Application Ref. No. BPCDT -20080307AAK WRGB 06 SCHENECTADY NY

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No.
06 WPVI-TV PHILADELPHIA PA 304.7 APP BPCDT -20090617ADQ
06 WPVI-TV PHILADELPHIA PA 304.7 PLN DTVPLN -DTVP0041

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 5

Before Analysis

BPCDT 20080307AAK CP Results for: 6A NY SCHENECTADY

HAAT 396.0 m, ATV ERP 4.6 kW

POPULATION AREA (sq km)
within Noise Limited Contour 1741545 35048.3
not affected by terrain losses 1610598 31653.7
lost to NTSC IX 0 0.0 lost to NTSC IX 0
lost to additional IX by ATV 8385
lost to ATV IX only 8385 228.4 228.4 228.4 lost to all IX 8385

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

BPCDT 20080307AAK CP Results for: 6A NY SCHENECTADY

HAAT 396.0 m, ATV ERP 4.6 kW

POPULATION AREA (sq km) within Noise Limited Contour 1741545 35048.3 not affected by terrain losses 1610598 31653.7 lost to NTSC IX 0 0.0 lost to additional IX by ATV 29852 561.1 lost to ATV IX only 29852 561.1 lost to all IX 29852 561.1

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

The following station failed the de minimis interference criteria. 6D PA PHILADELPHIA BPCDT 20090617ADQ

ERP 30.20 kW HAAT 332.0 m RCAMSL 404.0 m

Due to interference to the following station and scenario: 1

6D NY SCHENECTADY BPCDT 20080307AAK ERP 4.64 kW HAAT 396.0 m RCAMSL 653.1 m

Percent new interference from proposal: 1.3398 to BPCDT 20080307AAK

Worst case new IX 1.3398% Scenario

WPVI-TV - Appendix B Page 6

Analysis of Interference to Affected Station 6

Analysis of current record

Channel Call City/State Application Ref. No. 06 WPVI-TV PHILADELPHIA PA BPCDT -20090617ADQ

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No.

05 NEW SEAFORD DE 157.8 APP BPRM -20091008ACC

06 WRGB SCHENECTADY NY 304.7 LIC BPCDT -20090622ABV

06 WRGB SCHENECTADY NY 304.7 CP BPCDT -20080307AAK

Total scenarios = 6 Result key: 4

Scenario 1 Affected station

Before Analysis

Results for: 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

HAAT 332.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km) within Noise Limited Contour 13105147 45533.4 not affected by terrain losses 12846296 44170.5 lost to NTSC IX 0 0.0 lost to additional IX by ATV 396160 794.4 lost to ATV IX only 396160 794.4 lost to all IX 396160 794.4

Potential Interfering Stations Included in above Scenario 6A NY SCHENECTADY BPCDT 20090622ABV LIC

Result key: 5
Scenario 2 Affected station

Before Analysis

BPCDT 20090617ADQ APP Results for: 6A PA PHILADELPHIA

HAAT 332.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km)
within Noise Limited Contour 13105147 45533.4
not affected by terrain losses 12846296 44170.5
lost to NTSC IX 0 0.0
lost to additional IX by ATV 90073 165.3
lost to ATV IX only 90073 165.3 90073 165.3 lost to ATV IX only 90073 lost to all IX 165.3

Potential Interfering Stations Included in above Scenario 2 6A NY SCHENECTADY BPCDT 20080307AAK CP

Result key: 6
Scenario 3 Affected station 6

Before Analysis

Results for: 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

HAAT 332.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km)
within Noise Limited Contour 13105147 45533.4
not affected by terrain losses 12846296 44170.5
lost to NTSC IX 0 0.0
lost to additional IX by ATV 396792 806.5
lost to ATV IX only 396792 806.5 lost to ATV IX only 396792 lost to all IX 396792

Potential Interfering Stations Included in above Scenario 3 5A DE SEAFORD BPRM 20091008ACC APP

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6A NY SCHENECTADY BPCDT 20090622ABV LIC

Result key: 7
Scenario 4 Affected station

Before Analysis

BPCDT 20090617ADQ APP Results for: 6A PA PHILADELPHIA

HAAT 332.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km) within Noise Limited Contour 13105147 45533.4 45533.4 44170.5 not affected by terrain losses 12846296 lost to NTSC IX U lost to additional IX by ATV 90705 0.0 177.4 lost to ATV IX only 90705 177.4 lost to all IX 90705 177.4

Potential Interfering Stations Included in above Scenario

BPRM 20091008ACC APP 5A DE SEAFORD 6A NY SCHENECTADY BPCDT 20080307AAK CP

Result key: 8
Scenario 5 Affected station

Before Analysis

Results for: 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

HAAT 332.0 m, ATV ERP 30.2 kW

within Noise Limited Contour 13105147 45533.4 not affected by terrain losses 12846296 44170.5 not affected by terrain 10 lost to NTSC IX 0 lost to additional IX by ATV 396160 396160 0.0 794.4 lost to ATV IX only 794.4 lost to all IX 396160

Potential Interfering Stations Included in above Scenario 5 6A NY SCHENECTADY BPCDT 20090622ABV LIC

Result key:

Scenario 6 Affected station

Before Analysis

Results for: 6A PA PHILADELPHIA BPCDT 20090617ADQ APP

HAAT 332.0 m, ATV ERP 30.2 kW

POPULATION AREA (sq km) within Noise Limited Contour 13105147 45533.4 not affected by terrain losses 12846296 44170.5 lost to NTSC IX 0 0.0 lost to NTSC IX
lost to additional IX by ATV
90073 165.3 lost to ATV IX only 90073 165.3 165.3 lost to all IX 90073

Potential Interfering Stations Included in above Scenario

6A NY SCHENECTADY BPCDT 20080307AAK CP

FINISHED FINISHED FINISHED FINISHED FINISHED

WPVI-TV - Appendix C Page 1

Percent allowed new interference: 0.500

Percent allowed new interference to non Class A LPTV: 2.000

Census data selected 2000

Data Base Selected

./data/tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 05-10-2011 Time: 12:23:45

Record Selected for Analysis

WPVI-TV BPCDT -NEWWPVIDT6 PHILADELPHIA PA US

Channel 06 ERP 37.6 kW HAAT 330. m RCAMSL 394.7 m

Latitude 040-02-33 Longitude 0075-14-33

Status APP Zone 1 Border Site number: 01 Last update 00000000 Cutoff date 20080306 Docket

Comments

Applicant ABC, INC.

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits Channel 6 ERP = 37.60 HAAT = 330.

Site number	1		
Azimuth	ERP	HAAT 2	8.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	37.600	321.2	122.1
45.0	37.600	295.4	120.3
90.0	37.600	347.5	123.4
135.0	37.600	372.8	124.8
180.0	37.600	356.9	123.8
225.0	37.600	308.5	121.3
270.0	37.600	278.8	119.0
315.0	37.600	354.2	123.7

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap to Class A stations from site # 01

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WPVI-TV 06 PHILADELPHIA PA BPCDT NEWWPVIDT6 Site # 01

and station

SHORT TO: WPVI-TV 06 PHILADELPHIA PA DTVPLN DTVP0041

040-02-39 0075-14-26

Req. separation 244.6 Actual separation 0.2 Short 244.4 km $\,$

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance Proposed facility is beyond the Mexican coordination distance

Page 2

Proposed station is 0.58km from AM station

PHILADELPHIA PA WNWR Status: L Antenna: DAD

Proposed station is 0.58km from AM station

PHILADELPHIA PA WNWR Status: M Antenna: DAD

Proposed station is 0.58km from AM station

PHILADELPHIA PA WNWR Status: P Antenna: DA2

Start of Interference Analysis

Proposed Station

Channel Call City/State ARN

06 WPVI-TV PHILADELPHIA PA BPCDT NEWWPVIDT6

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Applicati	on Ref. No.
05	NEW	SEAFORD DE	157.5	APP	BPRM	20091008ACC
05	NEW	SEAFORD DE	141.2	CP	BNPCDT	20110330AAY
06	WWDG-CA	ROME NY	352.1	APP	BDISTVA	20080528AGR
06	WRGB	SCHENECTADY NY	304.9	LIC	BPCDT	20090622ABV

Analysis of Interference to Affected Station 1

Analysis of current record

Channel Call City/State Application Ref. No.
05 NEW SEAFORD DE BPRM -20091008ACC

Stations Potentially Affecting This Station

Chan	Call	City/State		Dist(km)	Status	Applicati	on Ref. No.
05	WDTV	WESTON WV		415.1	LIC	BLCDT	-20090612AJX
06	WPVI-TV	PHILADELPHIA	PA	157.5	APP	BPCDT	-NEWWPVIDT6
06	WPVI-TV	PHILADELPHIA	PA	157.8	PLN	DTVPLN	-DTVP0041

Total scenarios = 1
Result key: 1

Scenario 1 Affected station 1

Before Analysis

Results for: 5A DE SEAFORD BPRM 20091008ACC APP

HAAT 305.0 m, ATV ERP 10.0 kW

,	POPULATION	AREA (sq km)
within Noise Limited Contour	1852013	36018.5
not affected by terrain losses	1851742	36002.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	442	32.1
lost to ATV IX only	442	32.1
lost to all IX	442	32.1

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 5A DE SEAFORD BPRM 20091008ACC APP

HAAT 305.0 m, ATV ERP 10.0 kW

· · · · · · · · · · · · · · · · ·		
	POPULATION	AREA (sq km)
within Noise Limited Contour	1852013	36018.5
not affected by terrain losses	1851742	36002.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	27408	337.4
lost to ATV IX only	27408	337.4
lost to all IX	27408	337.4

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Potential Interfering Stations Included in above Scenario 1

6A PA PHILADELPHIA BPCDT NEWWPVIDT6 APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BPCDT NEWWPVIDT6 ERP 37.60 kW HAAT 330.0 m RCAMSL 394.7 m

Due to interference to the following station and scenario: 1

5D DE SEAFORD BPRM 20091008ACC ERP 10.00 kW HAAT 305.0 m RCAMSL 309.0 m

Percent new interference from proposal: 1.4566 to BPRM 20091008ACC

Worst case new IX 1.4566% Scenario 1

Proposed station is MX

6A PA PHILADELPHIA BPCDT NEWWPVIDT6 APP 5A DE SEAFORD BPRM 20091008ACC APP

Proposal MX with BPRM 20091008ACC scenario 1 of station 1

Analysis of Interference to Affected Station 2

Analysis of current record

Channel Call City/State Application Ref. No.

05 NEW SEAFORD DE BNPCDT -20110330AAY

Stations Potentially Affecting This Station

Chan City/State Dist(km) Status Application Ref. No. Call 05 WDTV WESTON WV 368.5 LIC BLCDT -20090612AJX WPVI-TV PHILADELPHIA PA 141.2 APP BPCDT -NEWWPVIDT6 06 WPVI-TV PHILADELPHIA PA 141.5 PLN DTVPLN -DTVP0041

Total scenarios = 1

Result key: 2

Scenario 1 Affected station 2

Before Analysis

Results for: 5A DE SEAFORD BNPCDT 20110330AAY CP

HAAT 144.0 m, ATV ERP 10.0 kW

POPULATION AREA (sq km) 26465.4 within Noise Limited Contour 5892899 not affected by terrain losses 5823256 26365.4 lost to NTSC IX 0.0 0 lost to additional IX by ATV 36004 84.0 lost to ATV IX only 36004 84.0 lost to all IX 36004 84.0

Potential Interfering Stations Included in above Scenario

5A WV WESTON BLCDT 20090612AJX LIC 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 5A DE SEAFORD BNPCDT 20110330AAY CP

HAAT 144.0 m, ATV ERP 10.0 kW

POPULATION AREA (sq km)

within Noise Limited Contour 5892899 26465.4

Carl T. Jones Corporation

Page 4

not affected by terrain losses 5823256 26365.4 lost to NTSC IX

lost to additional IX by ATV

108980 0.0 388.0 388.0 lost to all IX 108980 388.0

Potential Interfering Stations Included in above Scenario

5A WV WESTON BLCDT 20090612AJX LIC 6A PA PHILADELPHIA BPCDT NEWWPVIDT6 APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BPCDT NEWWPVIDT6 ERP 37.60 kW HAAT 330.0 m RCAMSL 394.7 m

9999999999999

Due to interference to the following station and scenario: 1

5D DE SEAFORD BNPCDT 20110330AAY ERP 10.00 kW HAAT 144.0 m RCAMSL 153.1 m

Percent new interference from proposal: 1.2610 to BNPCDT 20110330AAY

Worst case new IX 1.2610% Scenario 1 < 2% See R&O DA 10-698

Analysis of Interference to Affected Station

Analysis of current record

Channel Call City/State Application Ref. No.

WWDG-CA ROME NY 06 BDISTVA -20080528AGR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km) S	Status	Applicati	on Ref. No.
06	WNNY-LP	AUBURN NY	94.0	CP	BDISTVL	-20080222AEE
06	WRGB	SCHENECTADY NY	135.9	LIC	BPCDT	-20090622ABV
06	WMBO-LP	WESTVALE NY	58.0	CP	BPTVL	-20090824ALS
06	WPVI-TV	PHILADELPHIA PA	352.1	APP	BPCDT	-NEWWPVIDT6
06	WPVT-TV	PHTTADET.PHTA PA	351.9	PT.N	DTVPT.N	-DTVP0041

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station

Analysis of current record

Channel Call City/State 06 WRGB SCHENECTADY NY City/State Application Ref. No. BPCDT -20090622ABV

Stations Potentially Affecting This Station

City/State Dist(km) Status Application Ref. No. Chan Call WPVI-TV PHILADELPHIA PA 304.9 APP BPCDT -NEWWPVIDT6 304.7 PLN DTVPLN -DTVP0041 06 WPVI-TV PHILADELPHIA PA

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 4

Before Analysis

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Results for: 6A NY SCHENECTADY BPCDT 20090622ABV LIC

HAAT 392.0 m, ATV ERP 30.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2789321	49064.8
not affected by terrain losses	2312759	43198.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	18198	392.7
lost to ATV IX only	18198	392.7
lost to all IX	18198	392.7

Potential Interfering Stations Included in above Scenario 6A PA PHILADELPHIA DTVPLN DTVP0041

After Analysis

BPCDT 20090622ABV LIC Results for: 6A NY SCHENECTADY

HAAT 392.0 m, ATV ERP 30.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2789321	49064.8
not affected by terrain losses	2312759	43198.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	59462	1069.9
lost to ATV IX only	59462	1069.9
lost to all IX	59462	1069.9

Potential Interfering Stations Included in above Scenario 1 6A PA PHILADELPHIA BPCDT NEWWPVIDT6 APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BPCDT NEWWPVIDT6 ERP 37.60 kW HAAT 330.0 m RCAMSL 394.7 m

Due to interference to the following station and scenario: 1 6D NY SCHENECTADY BPCDT 20090622ABV

ERP 30.20 kW HAAT 392.0 m RCAMSL 649.0 m

Percent new interference from proposal: 1.7983 to BPCDT 20090622ABV

Worst case new IX 1.7983% Scenario 1 < 1.8074% See Appendix B

Analysis of Interference to Affected Station 5

Analysis of current record

Channel Call City/State Application Ref. No. WPVI-TV PHILADELPHIA PA BPCDT -NEWWPVIDT6

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km) S	Status	Applicat	ion Ref. No.
05	NEW	SEAFORD DE	157.5	APP	BPRM	-20091008ACC
05	NEW	SEAFORD DE	141.2	CP	BNPCDT	-20110330AAY
06	WRGB	SCHENECTADY NY	304.9	LIC	BPCDT	-20090622ABV

Total scenarios = 2

Result key: 4
Scenario 1 Affected station 5

Before Analysis

Page 6

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Results for: 6A PA PHILADELPHIA	BPCDT	NEWWPVIDT6	APP
HAAT 330.0 m, ATV ERP 37.6 k	cW		
	POPULATION	AREA (sq km)	
within Noise Limited Contour	13337171	47011.3	
not affected by terrain losses	13076398	45636.2	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	387729	895.2	
lost to ATV IX only	387729	895.2	
lost to all IX	387729	895.2	
Potential Interfering Stations Ir	ncluded in abo	ove Scenario	1

5A DE SEAFORD BNPCDT 20110330AAY CP 6A NY SCHENECTADY BPCDT 20090622ABV LIC

Result key: 5
Scenario 2 Affected station 5

Before Analysis

Results for: 6A PA PHILADELPHIA	BPCDT	NEWWPVIDT6	APP
HAAT 330.0 m, ATV ERP 37.6 k	ĸ₩		
	POPULATION	AREA (sq km)	
within Noise Limited Contour	13337171	47011.3	
not affected by terrain losses	13076398	45636.2	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	384886	826.7	
lost to ATV IX only	384886	826.7	
lost to all TV	384886	826 7	

Potential Interfering Stations Included in above Scenario 2 5A DE SEAFORD BPRM 20091008ACC APP BPCDT 20090622ABV LIC 6A NY SCHENECTADY

FINISHED FINISHED FINISHED FINISHED FINISHED