

Exhibits 4, 5, 6 & 7 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATIONS AND INTERFERENCE CONSIDERATIONS**

prepared for  
**LP Nyack Limited Partnership**  
WRNN-LP(CA) Nyack, New York  
Facility ID 38945  
Ch. 20+ 2.5 kW

**Nature of Displacement Application**

*LP Nyack Limited Partnership* (“*LNLP*”) is the licensee of WRNN-LP Channel 57, Nyack, New York. *LNLP* has been granted a Class A Construction Permit in connection with a move to Channel 35 (file number BLTTA-20010601AFV). *LNLP* has determined that its authorized Channel 35 facility is displaced as it is 100.3 km from the allotted DTV Ch. 35 for WVIT-DT (New Britain, Connecticut). Pursuant to Sections 73.3572(a)(4)(iii) and (iv) of the Commission’s Rules, a geographic separation of less than 265 km toward a co-channel DTV facility qualifies as a displacement consideration. *LNLP* is therefore submitting the instant displacement application to change WRNN-LP to an alternative channel. Concurrent with the change in channel, *LNLP* is seeking a modest power increase from 0.8 kW to 2.5 kW.

**Allocations Considerations**

*LNLP* is proposing to modify its authorized facility on Channel 35 to use Channel 20 (plus offset). The existing directional antenna will be replaced by an identical directional antenna system tuned to operate on Channel 20 instead of Channel 35. (The antenna will be mounted on an existing 38 meter antenna support structure which does not require an FCC Antenna Structure Registration.) The search for an alternative “in-core” channel for WRNN-LP found, as expected, that the TV and DTV spectrum usage in the area just outside of New York City is extremely congested. No alternative “in-core” channels were found which meet the allocation requirements of §§73.6011, 73.6012 & 63.6013. Thus channels were studied to identify any channel which might comply with the interference protection criteria as applied with the terrain-dependent Longley-Rice point-to-point propagation model, per the

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Commission's Office of Engineering and Technology Bulletin No. 69, Longley-Rice Methodology for Evaluating TV Coverage and Interference, July 2, 1997 ("OET-69"), and as provided for within §§73.6011, 73.6012 & 73.6013 et seq. With the application of OET-69, the instantly proposed Channel 20 is a suitable replacement frequency for WRNN-LP(CA).

**Interference Analysis, Alternative Application of OET-69, and Associated Requests for Waiver of §73.6011 (§74.705)**

Introduction

A detailed analysis of the interference that may result from the use of a 2.5 kW directional antenna for WRNN-LP has been performed. As discussed in detail below, the instantly proposed facility falls short of meeting contour overlap protection criteria or minimum distance separation requirements toward certain NTSC and DTW facilities. *The instantly proposed facility complies with contour overlap protection criteria and minimum distance separation requirements toward LPTV and Class A Facilities except the authorized co-located Channel 20 CP facility for WNXV-LP.* (The permittee of WNXV-LP has surrendered its Channel 20 CP to the Commission and filed for alternative facilities which have no effect on the instant proposal.) As discussed in the following, application of OET-69's interference analysis methods show that in spite of the inability to meet contour overlap protection criteria or minimum distance separation requirements toward certain facilities, no significant interference is predicted to occur.

Interference Issues

The instant proposal does not meet the contour overlap protection criteria or minimum distance separation requirements with respect to the following facilities:

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Call	Ch.	City, State
WNXY-LP	20+	New York, NY
WTXX(TV)	20Z	Waterbury, CT
WRNN-DT	21	Kingston, NY
WLIW(TV)	21-	Garden City, NY
Land Mobile	20	Waterbury, CT (§74.709(b)(2))

WNXY-LP Authorization for Identical Facilities on Ch. 20 is Surrendered

WNXY-LP has submitted a letter, dated February 19, 2002, surrendering the CP for Ch. 20 for WNXY-LP (Facility ID 29233, BPTTL-20010713ACF) and requesting that the authorization be rescinded. A copy of that letter is available upon request.

WRNN-DT is moving From Ch. 21 to Ch. 48

WRNN-DT is the subject of a rulemaking to allot Channel 48 as an alternative paired DTV assignment for WRNN-TV in place of DTV Channel 21. A *Report & Order* in MM Docket 00-121, released January 25, 2002 has granted that move. Hence, WRNN-DT is not a factor under the instant proposal.

Land Mobile's Use of Channel 20 at Waterbury, CT

Section 74.709(b)(2) establishes a 145 km separation requirement between LPTV facilities and a series of Land Mobile "set-aside" reference points including Channel 20 at Waterbury, Connecticut (North Latitude: 41° 31' 02", West Longitude: 073° 01' 00").<sup>1</sup> The Land Mobile reference point is 76.1 km distant from WRNN-LP's proposed site. The Sixth Report and Order in MM Docket 87-268 (*Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket 87-268, (FCC 97-115, released April 12, 1997)*) specifies that proposed land mobile set-aside channels may be considered for use by displaced LPTV facilities.

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<sup>1</sup> This Land Mobile Reference point for Channel 20 at Waterbury, CT is within a few seconds of the authorized Ch. 20 full service TV Station WTXX(TV), Waterbury, Connecticut (North Latitude: 41° 31' 04", West Longitude: 073° 01' 07"). WTXX presumably therefore precludes the use of Channel 20 Land Mobile operations.

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Further, WNXY-LP (Facility ID 29233, New York, NY) was granted, but has now surrendered, a CP for WNXY-LP for facilities identical to what is proposed herein. *LNLP* therefore respectfully requests a waiver of §74.709(b)(2) with regard to the 145 km separation toward the Channel 20 Land Mobile set-aside for Waterbury, CT.

**Application of OET-69 Demonstrates No Interference Toward WTXX & WLIW**

The remaining facilities (TV stations WTXX(TV) and WLIW(TV)) were considered in OET-69 studies of the potential interference which might result from the instant application. As shown in **Table I**, the instant proposal is not predicted to cause significant interference to either of these facilities. Any increase in interference to these facilities is zero, when rounded to the nearest whole percent (per Commission policy). Thus this proposal is believed to be in compliance with Commission policy regarding Class A interference protection criteria full service NTSC facilities. Nevertheless, if a waiver of §§73.6011 is necessary, such waiver is respectfully requested on behalf of *LNLP* for the reasons stated above.

Table I also demonstrates that the proposal complies with the Commission's requirements (§73.6013) regarding protection to DTV facilities. The implementation of OET-69 for this study followed the guidelines of OET-69 as specified herein. A cell size of 1 km was employed. Various results of this computer program (as run on a "Sun" processor) compared to the Commission's implementation of OET-69 show excellent correlation.

Exhibits 4,5,6 & 7 - Table I  
**OET-69 INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**LP Nyack Limited Partnership**  
 WRNN-LP(CA) Nyack, New York  
 Facility ID 38945  
 Ch. 20+ 2.5 kW

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Service Population</u> (2)	<i>---- Unique Interference ---- from proposal</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WTXX(TV) (Lic)	Waterbury, CT 20 NTSC	76.0	5,311,911	4,118,219	24,703	0.465
WLIW(TV) (Lic)	Garden City, NY 21- NTSC	49.2	12,938,070	11,309,664	9,361	0.073
WCVB-DT (CP)	Boston, MA 20 DTV	248.0	6,997,692	5,554,795	0	0
WCVB-DT (Ref)	Boston, MA 20 DTV	248.0	6,612,000	6,657,760	0	0
WSBE-DT (CP)	Providence, RI 21 DTV	223.1	3,213,170	2,486,526	0	0
WSBE-DT (Ref)	Providence, RI 21 DTV	206.3	2,569,000	2,387,519	0	0

Notes:

- (1) For DTV Stations: Greater of NTSC or DTV Service Population, from FCC Table  
For NTSC Stations: Population within noise limited contour
- (2) Interference-free service population per OET-69 before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal  
A number in parentheses indicates a *decrease* in interference.
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "Additional Application Processing Guidelines for Digital Television"