

Engineering Statement and Interference Analysis

This technical statement supports this application to modify WTSD-CA, an analog Class A television station on channel 14 at Wilmington, DE, Facility ID 53579. FCC File No. BLTTA-20041206AAM, licensed to the Applicant herein.

Displacement Relief

WTSA-CA is displaced because the station's licensed 52 dBu contour overlaps with the 130 km radius of the Land Mobile reference point of channel 14 at New York, NY (40-45-06, 73-59-39). See Attachment A. According to the 2000 US Census, 46,455 persons reside in the portion of the licensed station's 52 dBu contour that overlaps with the channel 14 New York Land Mobile 130 km radius.

Channel 16 is Usable in Philadelphia, PA

The Applicant proposes to move WTSD-CA to digital channel 16 in Philadelphia, PA. The proposed transmitter site is only 0.2 miles from the currently authorized transmitter site of the station. As illustrated in Attachment B, the 52 dBu contour of the proposed channel 16 facility in Philadelphia is entirely within the exclusion area included in Section 74.709(b)(2) of the Rules and Regulations of the Federal Communications Commission. The exclusion area includes the area within a radius of 95 km around the adjacent channel 17 at Philadelphia (40-02-03, 75-14-24).

The proposed facility on channel 16 was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The Applicant requests that the Commission processes this instant application using the following Longley-Rice analysis settings:

- Cell Size for Service Analysis is 1.0 km/side
- Distance Increments for Longley-Rice Analysis is 1.00 km

This application does not cause any predicted interference to any of the other proposals. It is believed that the proposed facility complies with the requirements of Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, 74.794(b) and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Class A, Low Power TV and TV Translator Station Protection

The proposed facility causes less than 0.5% interference to surrounding low power and Class A authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.