

## SUPPLEMENTAL ENGINEERING STATEMENT

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In response to the Commission’s deficiency letter dated July 11, 2008, the applicant is submitting this supplemental statement.

The original Engineering Statement described that W12BZ qualifies for displacement under Section 73.3572(a)(4)(iv)(A)(3) of the Commission’s rules in that the station is less than 260 km. from WNYT-DT, ch. 12, Albany, NY and further that the station receives interference from WBNG, ch. 12, Binghamton, NY. This is exacerbated by new additional interference from WNYT-DT.

In addition, W12BZ also receives unique interference that will be described. The frequency spectrum for W12BZ is 204 – 210 MHz. The visual carrier for channel 12 is at 205.25 MHz. Purely by coincidence, there is a full-power Class B local FM station, WUMX, Rome, NY operating on 102.5 MHz with maximum facilities. The second harmonic of the FM station is at 205 MHz or only 0.25 MHz lower than the visual carrier of W12BZ.

While WUMX has been determined to be in full compliance with the Commission’s rules regarding out-of-band emissions, the station causes fundamental overload in many local television receivers. This type of interference is caused by the FM signal being strong enough that the fundamental frequency (102.5 MHz) causes second harmonic generation (205 MHz) within the front-end (tuner) of the television receiver. The effect of the interference unintentionally caused by the sheer strength of WUMX is similar to that of a co-channel station operating without an offset. It is seen as a herringbone type of interference and appears in varying degrees at different locations

depending on the ability of the television itself to resist this type of overload as well the type and orientation of the antenna being utilized.

While this type of interference is not common, it is also not uncommon when attempting to watch a weaker signal, especially in light of the fact that the FM station operates with considerably more power than the LPTV station. In this case, WUMX operates with the equivalent of nearly 17 times the ERP than that of W12BZ (3 kW), whereas a full-power television station operating with 316 kW, would not likely have any interference caused to it. This type of interference may be minimized by the use of an FM band-stop filter at the input of an affected TV set, but identifying all affected viewers and supplying appropriate filters is virtually impossible.

In summary, the application for W12BZ to modify its operation to channel 6, fully protects all existing station and authorizations and will provide the station with the benefits of less local interference and more reliable service in this unique situation.