EXHIBIT D-1

ALLOCATION AND INTERFERENCE STUDY

PROPOSED WNYW-DT
CHANNEL 44- NEW YORK, NEW YORK
[AMENDMENT TO BMPCDT-19990402KI]

The Commission allotted Channel 44 to WNYW-DT with a nominal ERP of 224.8 kw at 515 meters above average terrain, and WNYW-DT is presently licensed for 246 kw at 366 meters above average terrain at a different site. The instant application specifies an ERP of 1000 kw (directional) at 366 meters at the licensed site, which is allowable under the FCC's *de minimis* standards with respect to various NTSC and DTV facilities.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by WNYW-DT to other pertinent stations are tabulated in Exhibit D-2.

As indicated, the proposed WNYW-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station's receiving more than ten percent total DTV interference to viewers living within its present service area.

A special case, not shown in Exhibit D-2, involves WNJT-DT, Channel 43, Trenton, New Jersey. Our calculations show that the instant proposal would cause interference to WNJT-DT which would exceed 2.0 percent of the total population served, and that the instant proposal would cause the total interference to exceed 10 percent of the total. This result applies both to the WNJT-DT allotment and the WNJT-DT CP.

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However, as licensed, WNYW-DT causes even more interference to WNJT-DT than is proposed herein, as follows:

	WNJT-DT Interference from WNYW-DT (1990 Population)	
	Allotment	CP
WNYW-DT (License)	508.930	449,900
WNYW-DT (Proposed)	498,775	431,882

As indicated, under the instant proposal, the interference to WNJT-DT would be less than is now allowed, and the percentage figures are thus irrelevant.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

It should be noted that this interference study employs a signal resolution (cell size) of 1 kilometer, instead of 2 kilometers, and a profile spacing increment of 0.1 kilometer instead of 1 kilometer. In doing so, we rely on the Commission's August 10, 1998, Public Notice "Additional Applications Processing Guidelines for DTV."

EXHIBIT D-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED WNYW-DT
CHANNEL 44 - NEW YORK, NEW YORK
[AMENDMENT TO BMPCDT-19990402KI]

NTSC FACILITIES

				Interference Losses (Population)								
Call	City of License	Ch.	Grade B Population F(50,50)	NTSC Only	NTSC & DTV Without WNYW-DT	Unmasked DTV	%[1]	NTSC & DTV With WNYW-DT	Unmasked DTV	%[1]	WNYW-DT Contribution	%[2]
WSAH	Bridgeport, CT	43	3,185,704	5,353	146,859	141,506	4.4	195,648	190,295	6.0	48,789	1.5
WGBX-TV	Boston, MA	44	6,246,951	171,781	553,856	382,075	6.1	554,529	382,748	6.1	673	< 0.1
WGBX-TV (CP)	Boston, MA	44	6,305,309	164,705	488,205	323,500	5.2	489,078	324,373	5.2	873	< 0.1
WVIA-TV	Scranton, PA	44	1,754,726	820	31,601	30,781	1.8	45,702	44,882	2.6	14,101	0.8
WNJT	Trenton, NJ	52	9,363,311	1,073,434	1,227,529	154,095	1.6	1,227,529	154,095	1.6	0	0

DTV FACILITIES

				Interference Losses (Population)								
Call	City of License	Ch.	NTSC/DTV[3] Grade B Pop. Longley-Rice	NTSC Only	NTSC & DTV Without WNYW-DT	Unmasked DTV	%[1]	NTSC & DTV With WNYW-DT	Unmasked DTV	%[1]	WNYW-DT Contribution	%[2]
WWPB-DT (Allot.)	Hagerstown, MD	44	1,066,638	133,923	146,922	12,999	1.2	146,922	12,999	1.2	0	0
WWPB-DT (CP)	Hagerstown, MD	44	987,074	122,857	130,198	7,341	0.7	130,198	7,341	0.7	0	0
WWAC-DT*	Atlantic City, NJ	44	5,413,821	33,420	67,727	34,307	0.6	162,302	128,882	2.3	94,575	1.7
WABC-DT (Allot.)	New York, NY	45	19,449,451	32,583	173,982	141,399	0.7	184,513	151,930	0.8	10,531	< 0.1
WABC-DT (CP)	New York, NY	45	19,275,578	25,079	200,311	175,232	0.9	212,351	187,272	1.0	12,040	< 0.1

[1] Cannot exceed 10%, under FCC *de minimis* interference standards.
[2] Cannot exceed 2%, under FCC *de minimis* interference standards.
[3] Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.
* Proposed rulemaking.