

Exhibit 34 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Educational Broadcasting Corporation
WLIW-DT Garden City, New York
Facility ID 38336
Ch. 22 92 kW 111 m

Educational Broadcasting Corporation is the permittee of digital television station WLIW-DT, Channel 22, Garden City, New York. The WLIW-DT Construction Permit (“CP”, file number BMPEDT-20020405AAD) authorizes an effective radiated power (ERP) of 82 kW and an antenna height above average terrain (HAAT) of 122 meters. Under the instant proposal, the ERP will be increased to 92 kW, the antenna HAAT will decrease to 111 meters, and a slightly different directional antenna pattern will be employed.

The DTV reference ERP and HAAT of 88.3 kW and 122 meters, respectively, for WLIW-DT have been established under **Appendix B** of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268, FCC 98-315, released December 18, 1998, per §73.622(f)(1) of the Commission’s rules. The proposed WLIW-DT facility will operate with 92 kW ERP and 111 meters HAAT; the proposed ERP and HAAT combination thus exceeds the reference ERP and HAAT. The proposed site is the same as the reference WLIW-DT transmitter site. Accordingly, as required by §73.622(f)(5) of the Commission’s rules, a study in accordance with §73.623(c) was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed WLIW-DT facility.

A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 (“OET-69”).¹ The interference study examined the net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference WLIW-DT). The interference analysis is based on the use of a nominal 1 km cell size,

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission’s implementation of OET-69 show excellent correlation.

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which provides a finer resolution than the Commission's standard 2 km cell size. **Commission processing using a 1 km cell size is requested.** All stations considered in this study are listed in **Exhibit 34 - Table 1.** The results of the interference study, also summarized in **Exhibit 34 - Table 1,** indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits to all pertinent NTSC and DTV stations and allotments.

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal does not involve prohibited contour overlap to any authorized Class A station. W22BN (Lic, Ch. 22, Danbury, CT) and WLBX-LP (Lic, Ch. 22, Cranford, NJ) are both on the Commission's list² of Low Power Television stations eligible for Class A status and would receive contour overlap that would be prohibited under §73.623(c)(5)(i) from the proposed WLIW-DT facility. Protection requirements to all other pertinent Class A or Class A eligible stations are met.

However, the W22BN and WLBX-LP Channel 22 facilities both appear to have been displaced due to the assignment of DTV Channel 22 to WLIW-DT. Although W22BN is listed as a station eligible for Class A status, according to the Commission's database no *Application for Class A Television Broadcast Station Construction Permit or License* on FCC Form 302-CA was filed for W22BN, and no such application was filed for WLBX-LP on Channel 22. For eligible LPTV stations operating on a "core" channel, the deadline for filing such an application (which would trigger continued interference protection) was July 12, 2001.³ Accordingly, interference protection to the Channel 22 operations of W22BN and WLBX-LP is not believed to be necessary. WLBX-LP does hold a Class A Construction Permit on Channel 46 (BLTTA-20010712ADH), which is not impacted by the instant proposal.

²See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

³See *Order*, MM Docket 00-10, DA 01-1730, released August 6, 2001.

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The nearest FCC monitoring station is 339.6 km distant at Laurel, MD. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

Thus, this proposal is believed to be in compliance with the current Commission Rules and policy with respect to allocation matters.

Exhibit 34 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Educational Broadcasting Foundation
 WLIW-DT Garden City, New York
 Facility ID 38336
 Ch. 22 92 kW 111 m

DTV Facilities

DTV Facilities							Percentage Reduction of Baseline Population (“10 percent” test)	
Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated “Before” Service Population (2)	Calculated “After” Service Population (3)	--- Net “New” Interference --- (“2 percent” test)		
						Population (4)	Percentage (5)	(“10 percent” test) (6)
WRNN-DT (Ref)	Kingston, NY 21	153.8	----- evaluation not required, WRNN-DT was ordered to DTV Channel 48 (MM Docket 00-121) -----					
WSBE-DT (Ref)	Providence, RI 21	200.6	----- no interference caused by proposal -----					
WSBE-DT (CP)	Providence, RI 21	217.1	----- no interference caused by proposal -----					
WNJS-DT (Ref)	Camden, NJ 22	167.0	6,092,000	5,941,217	5,934,320	6,897	0.11	2.59
WNJS-DT (CP)	Camden, NJ 22	167.0	6,092,000	6,204,139	6,192,234	11,905	0.20	0.00
WLWC-DT (Ref)	New Bedford, MA 22	238.3	3,499,000	3,532,491	3,532,491	0	0.00	0.00
WLWC-DT (App)	New Bedford, MA 22	238.3	3,499,000	4,107,683	4,107,650	33	0.00	0.00
WFTY-DT (Ref)	Smithtown, NY 23	43.5	3,074,000	2,940,794	2,885,542	55,252	1.80	6.13
WFTY-DT (CP)	Smithtown, NY 23	43.6	3,074,000	3,423,306	3,384,361	38,945	1.27	0.00

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NTSC Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated “Before” Service Population</u> (2)	<u>Calculated “After” Service Population</u> (3)	<u>--- Net “New” Interference --- (“2 percent” test)</u> <u>Population</u> (4)		<u>Percentage</u> (5)	<u>---Total Interference--- from DTV only (“10 percent” test)</u> <u>Population</u> (7)		<u>Percentage</u> (8)
WUVN(TV) (Lic)	Hartford, CT 18	122.4		----- no interference caused by proposal -----							
WTXX(TV) (Lic)	Waterbury, CT 20	88.8	5,311,911	1,193,639	1,193,639	0	0.00		225,155	4.24	
WLIW(TV) (Lic)	Garden City, NY 21	0.0		----- no interference caused by proposal -----							
WLIW(TV) (CP)	Garden City, NY 21	0.0		----- no interference caused by proposal -----							
WWLP(TV) (Lic)	Springfield, MA 22	157.0	2,802,381	1,970,517	1,966,752	3,765	0.13		91,610	3.27	
WWLP(TV) (CP)	Springfield, MA 22	157.0	2,921,678	2,007,685	2,002,185	5,500	0.19		102,945	3.52	
WYOU(TV) (Lic)	Scranton, PA 22	208.4	2,341,648	1,502,339	1,502,055	284	0.01		63,486	2.71	
WYOU(TV) (CP)	Scranton, PA 22	208.4	2,669,229	1,692,174	1,691,775	399	0.01		81,551	3.06	
WMPT(TV) (Lic)	Annapolis, MD 22	334.5		----- no interference caused by proposal -----							
WMPT(TV) (CP)	Annapolis, MD 22	334.5		----- no interference caused by proposal -----							
WNJS(TV) (Lic)	Camden, NJ 23	167.0		----- no interference caused by proposal -----							

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NTSC Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated “Before” Service Population</u> (2)	<u>Calculated “After” Service Population</u> (3)	<u>--- Net “New” Interference --- (“2 percent” test)</u> <u>Population</u> (4)		<u>---Total Interference--- from DTV only (“10 percent” test)</u> <u>Population</u> (7)	
						<u>Percentage</u> (5)		<u>Percentage</u> (8)	
WEDH(TV) (Lic)	Hartford, CT 24	122.1				----- no interference caused by proposal -----			
WNYE-TV (Lic)	New York, NY 25	45.3	17,037,469	16,598,913	16,598,913	0	0.00	65,894	0.39
WHPX(TV) (Lic)	New London, CT 26	126.4				----- no interference caused by proposal -----			
WVIT(TV) (Lic)	New Britain, CT 30	113.8				----- no interference caused by proposal -----			

- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour
 - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
 - (3) Service population after reduction from terrain and interference losses, considering proposal
 - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.
 - (5) Proposal’s impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
 - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
 - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
 - (8) Proposal’s impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

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*”