



Engineering Statement of John F.X. Browne

Re: WRAY-DT

Wilson, N.C.

Background

WRAY, Inc. licensee of WRAY-TV, Wilson, N.C. was issued a construction permit for its companion WRAY-DT on August 30, 2001. This construction permit authorized a maximized facility having parameters including an omni-directional antenna and 1000 kW ERP (FCC File No BPCDT-19991101AFB). Subsequently, on March 27, 2003 WRAY filed an application to modify this permit to specify use of a directional antenna, increased HAAT and slightly lower ERP (FCC File No BMPCDT – 20030327ADD). On Feb 10, 2004 WRAY received a letter from the Commission which stated that the proposed modification would cause impermissible interference to WLXI-DT, an adjacent station at Greensboro, N.C.

Interference Issues

The Commission's de minimis interference rules in effect at the time permitted stations to cause up to 2%^{1/} interference to other DTV stations. Clearly, the original application met this requirement as the Commission granted the WRAY application. Subsequently, nearly 7 months after the grant of the WRAY permit, WLXI-DT filed an application (BMPCDT-20020201AAN) for modified DTV facilities. This application would meet the de minimis interference requirements to WRAY and the application was granted on April 8, 2002. However, significant interference was predicted to be received by WLXI-DT and, in

^{1/} All interference assessments are expressed in terms of the 1990 census in effect at the time.

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accepting this grant, WLXI-DT also agreed to accept 4.6% interference from WRAY-DT (based on our recent calculations). Thus, the then authorized facilities of WRAY-DT would cause 4.6% interference to the then proposed (now authorized) facilities for WLXI-DT.

WRAY filed an application on March 27, 2003 seeking to use a directional antenna, to change to the HAAT and lower the ERP (FCC File No 20030327ADD). The Commission calculated that this proposal would cause 3.4% interference to WLXI-DT a value we also obtained using software which mimics that used by the Commission. However, this is a reduction in the interference from 4.6% to 3.4% based on the interference received by WLXI-DT from the previously authorized WRAY-DT construction permit.

Conclusion

It appears that the proposal to modify the facilities of WRAY-DT would reduce pre-existing interference to WLXI DT by 1.2% and, thus, the application comports with all Commission interference requirements.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.
November 2, 2004