



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF A REQUEST FOR
SPECIAL TEMPORARY AUTHORIZATION
WPVI-TV - PHILADELPHIA, PENNSYLVANIA
CH. 6 - 62.9 kW - 330 meters HAAT**

Prepared for: ABC, Inc.

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a Licensed Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by ABC, Inc., Licensee of WPVI-TV, channel 6, Philadelphia, Pennsylvania, to prepare this statement and the associated exhibits, in support of a request for Special Temporary Authorization (STA) to increase WPVI-TV's authorized Effective Radiated Power (ERP) from 34.0 kW to 62.9 kW. WPVI-TV has a currently pending application for construction permit, BPCDT-20120604AEC, to authorize such an increase in ERP. WPVI-TV seeks temporary authorization to implement its proposed ERP increase on an interim basis pending Commission action on its application for construction permit.

PURPOSE OF APPLICATION

As explained in its pending application, and reiterated herein, WPVI-TV seeks the proposed increase in ERP in order to assist in its efforts to overcome serious reception

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problems that its viewers have suffered, and continue even to this day to suffer, since June 12, 2009, the DTV transition date. A very substantial body of serious reception problems suffered by digital television stations broadcasting on the VHF channels is well-documented, both before and especially after June 12, 2009. The most serious of the documented reception problems appears to be suffered by the digital television stations that are broadcasting on any one of the low-VHF channels.

Shortly after the DTV transition on June 12, 2009, both WPVI-TV and another digital television station broadcasting on channel 6, WRGB in Schenectady, New York, filed applications for new DTV construction permits seeking increases in ERP, in a mutual attempt to ameliorate the very serious reception deficiencies that their viewers were suffering, and to try to improve the likelihood of potential viewers being able to receive usable signals from the stations. WPVI-TV's application, BPCDT-20090617ADQ, and WRGB's application, BPCDT-20090622ABV, were both granted on March 16, 2011, each construction permit authorizing equal ERPs of 30.2 kW. Subsequently, WPVI-TV obtained authorization to relocate to a different tower 249 meters away, with a lower HAAT, and corresponding slight increase in ERP to 34.0 kW.

WRGB's license application, BLCDDT-20110428ABT, was granted on August 15, 2011. WPVI-TV's license application, BLCDDT-20111019ACJ, was granted on February 17, 2012. WPVI-TV's authorized ERP increase was implemented in October 2011, but there remain many reception problems, many of which appear to result from lack of sufficient signal level at many viewers' locations. The applicant believes that most of these remaining reception problems could be solved by the proposed 2.67 dB increase in ERP.

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Therefore, for the stated reasons, WPVI-TV herein proposes to increase its authorized ERP from 34.0 kW to 62.9 kW, and herein requests temporary authorization to do so prior to Commission action on its pending application for construction permit.

REQUEST FOR WAIVERS

To any extent necessary, WPVI-TV also requests waivers of Sections 73.622(f)(7)(ii) and 73.622(f)(5) of the Commission's rules. The Media Bureau previously has approved WPVI-TV's applications for construction permits to operate facilities at power levels in excess of the Zone I limits, which applications specified facilities that would define WPVI-TV as the largest station in the Philadelphia DMA. See FCC File Nos. BPCDT-20090617ADQ, BPCDT-20110525ACX, and BMPCDT-20110831ABM. As explained herein, WPVI-TV anticipates that the enhanced facilities that are proposed herein will enable it to resolve most, if not all, of its remaining reception problems. Accordingly, it is in the public interest to further waive Sections 73.622(f)(7)(ii) and 73.622(f)(5) to the extent necessary for the grant of this application.

AUTHORIZED FACILITY

WPVI-TV's current authorization permits a facility with an ERP of 34.0 kW at a Height Above Average Terrain (HAAT) of 330 meters. WPVI-TV's authorized antenna is a Dielectric Model CBR-O3FMB-6/18H-1 channel 6 omni-directional circularly polarized antenna on the tower bearing registration number 1035474, with its radiation center line located 320.7 meters above ground level, and 330 meters above average terrain. The authorized antenna employs an electrical beam-tilt of 1 degree below the horizontal plane.

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The manufacturer's elevation plane radiation pattern is shown in exhibits 1 and 2, and is tabulated in exhibit 3.

ALLOCATION CONSIDERATIONS

An allocation study was performed, using the Commission's application processing and interference analysis software, the results of which are shown in Appendix B. The potentially affected stations listed are: a construction permit, BNPCDT-20110330AAY, authorizing a full-service digital facility on channel 5 allotted to Seaford, Delaware; a displacement application, BDISTVA-20080528AGR, for Class A LPTV station WWDG-CA, channel 6, Rome, New York; and WRGB, channel 6, Schenectady, New York.

The Seaford, Delaware, construction permit is the result of a Notice of Proposed Rule Making, RM-11586, which proposed to amend the DTV Table of Allotments to add channel 5 to Seaford, Delaware, and its Report and Order, DA 10-698, that was adopted on April 23, 2010, which amended the Table to add channel 5 effective June 7, 2010. The study predicts that the facility proposed herein will cause 1.8627% new interference to BNPCDT-20110330AAY. That level of predicted interference is, however, acceptable since paragraph 18 in the Report and Order states: "IT IS FURTHER ORDERED, That any licensee of the channel 5 allotment at Seaford will be subject to the condition that it must accept interference of up to 2% of the population within the allotment's DTV service area from WPVI(TV), Philadelphia, Pennsylvania."

Relative to WRGB's licensed facility, the study predicts 2.4831% new interference from WPVI-TV's instant proposal. However, according to the terms of an interference

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acceptance agreement executed between the parties, the predicted new interference to WRGB from WPVI-TV is acceptable, and the predicted new interference to be received by the proposed WPVI-TV facility, as described in the instant application, from WRGB's licensed facility is also acceptable. The fully executed Interference Acceptance Agreement between WPVI-TV and WRGB, which sets forth all of the terms and conditions of the agreement between the parties, is included herein.

Class A Television Allocation Considerations

The allocation study, shown in Appendix B, revealed no spacing violations, contour overlap with, nor predicted interference to WWDG-CA's displacement application, nor to any other authorized Class A LPTV station, as required in Section 73.616(f) of the FCC's Rules. The instant proposal is, therefore, considered to be in compliance with Section 73.616(f).

AM Radio Station Considerations

The study shows that WPVI-TV's authorized broadcast tower site is located 0.58 kilometers from directional daytime AM radio station WNWR, 1540 kHz, 50 kW, DA-D, licensed to Philadelphia, Pennsylvania. WPVI-TV has previously demonstrated that the facilities authorized by BPCDT-20110525ACX will have effectively no impact on the directional antenna radiation pattern of AM radio station WNWR. See Letter of Barbara A. Kreisman, Chief, Video Division, to Susan L. Fox & Howard F. Jaeckel (Oct. 4, 2011), (MB 2011) ("October 2010 Letter"); Letter of Barbara A. Kreisman, Chief, Video Division, to Howard Jaeckel & John W. Zucker (Aug. 31, 2010), 25 FCC Rcd 12562 (MB 2010); see also FCC File No. BPCDT-20110525ACX, Engineering Statement at 4; Opposition to

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Petition for Rescission and Informal Objection at Exhibit C (Technical Statement). The instant proposal seeks only to increase WPVI-TV's ERP, and does not propose any physical modification of its transmission system at all. It is, therefore, inconceivable that implementation of the instant proposal could result in any measurable effect on WNWR. See October 2010 Letter at 2.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 4 contains the predicted DTV Noise Limited (28 dBu) contour and the predicted principal community (35 dBu) contour. The predicted 35 dBu contour entirely encompasses the principal community, Philadelphia, Pennsylvania.

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast technical facilities are co-located with, or located within 10 km of the proposed WPVI-TV transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference which might result from this proposal in accordance with applicable Rules.

RADIO FREQUENCY IMPACT

Effective October 15, 1997 the FCC adopted modified guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986) and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines establish maximum permissible exposure (MPE) levels for both occupational or "controlled" environments, as well as for "uncontrolled" environments that apply in cases that could affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65, titled "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (DA 04-319, February 6, 2004), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guideline limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 provides the technical data required to evaluate compliance with the FCC's policies and guidelines.

The FCC's Maximum Permitted Exposure (MPE) level established for "uncontrolled" environments is 0.2 milliwatts per centimeter squared (mW/cm^2) when applied to broadcast facilities operating between 30 MHz and 300 MHz. For broadcast facilities operating between 300 MHz and 1500 MHz, primarily UHF TV stations, the MPE is derived from the formula, (frequency (MHz)/1500). The MPE level that is established for occupational, or "controlled" environments is 1.0 milliwatts per centimeter squared (mW/cm^2) for operations

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between 30 MHz and 300 MHz. For broadcast stations operating between 300 MHz and 1500 MHz, the MPE is derived from the formula, (frequency (MHz)/300).

The predicted emissions of WPVI-TV operating on channel 6 must be considered, in addition to predicted emissions from any other proposed or existing stations at the site. For WPVI-TV, which will operate on television channel 6 (82-88 MHz), the MPE is 0.200 milliwatts per centimeter squared (mW/cm^2) in an "uncontrolled" environment and 1.000 mW/cm^2 in a "controlled" environment. The proposed WPVI-TV facility will operate with a maximum ERP of 62.9 kW using a circularly polarized omni-directional transmitting antenna with a centerline height of 320.7 meters above ground level (AGL). Considering the proposed antenna's vertical plane relative field factor of 0.15 the WPVI-TV facility is predicted to produce a power density at two meters above ground level of 0.00093 mW/cm^2 , which is 0.47% of the FCC guideline value for an "uncontrolled" environment, and 0.094% of the FCC's guideline value for "controlled" environments. (See Appendix A)

There are three other full-service DTV stations, and eight FM radio stations that are authorized to be located at the site, or within the relevant proximity of 315 meters. The total percentage of the ANSI value at the proposed site, including the cumulative radiation based on actual field factors, from all post-transition broadcast stations within the relevant proximity is 14.26% of the limit for "uncontrolled" environments, and 2.85% of the limit for "controlled" environments.

OCCUPATIONAL SAFETY

The applicant is committed to the protection of station personnel and/or tower

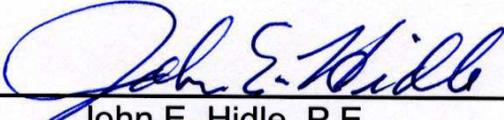
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contractors working on the tower support structure, or in the vicinity of the proposed WPVI-TV antenna, by reducing power and/or ceasing operation during times of maintenance of the transmission systems, when necessary, to ensure the proper protection of persons who might be required to perform their assigned tasks in this “controlled” environment.

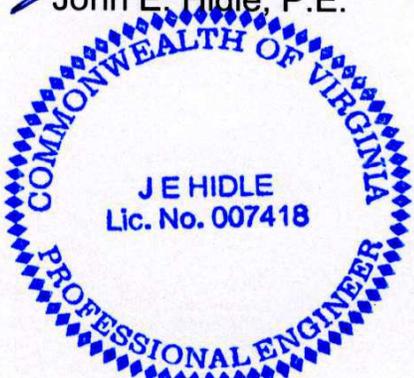
SUMMARY

WPVI-TV contends that its instant request for Special Temporary Authorization (STA) seeking to increase its authorized ERP from 34.0 kW to 62.9 kW, on a temporary interim basis as described herein, pending Commission action on its application for construction permit, is in the public interest, and, except in the instance(s) where waiver(s) exist, and/or are requested, complies with the Rules, Regulations, and Policies of the Federal Communications Commission. This statement and the attached exhibits were prepared by me, or under my direct supervision, and are believed to be true and correct to the best of my knowledge and belief.

DATED: June 19, 2012



John E. Hidle, P.E.

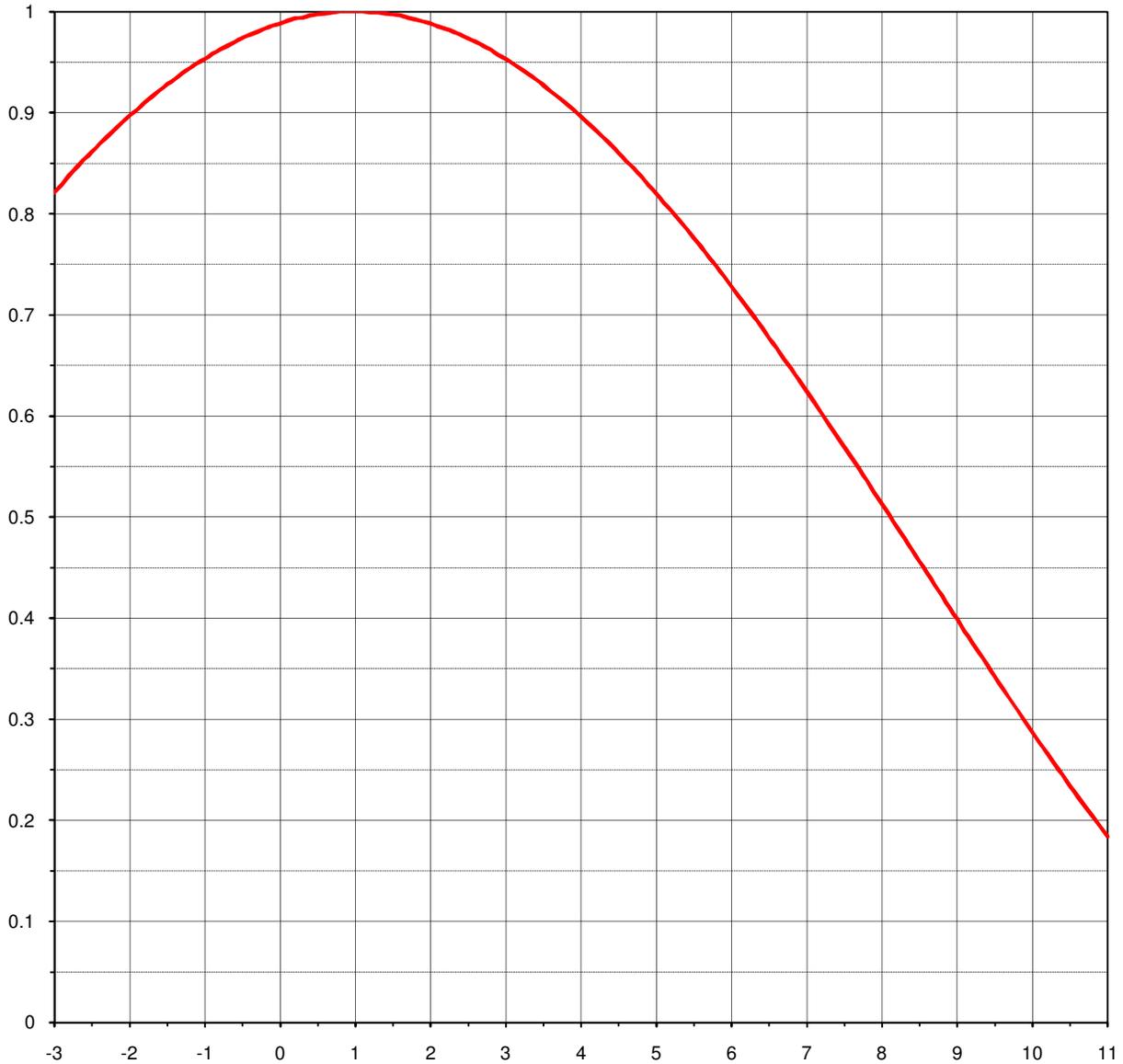




Proposal Number **C-04057** **Exhibit 1**
Date **16-Mar-10**
Call Letters **WPVI-TV** Channel **6**
Location **Philadelphia, PA**
Customer
Antenna Type **CBR-O3FMB-6/18H-1**

ELEVATION PATTERN

RMS Gain at Main Lobe	5.50 (7.40 dB)	Beam Tilt	1.00 deg
RMS Gain at Horizontal	5.40 (7.32 dB)	Frequency	85.00 MHz
Calculated / Measured	Calculated	Drawing #	06C055100



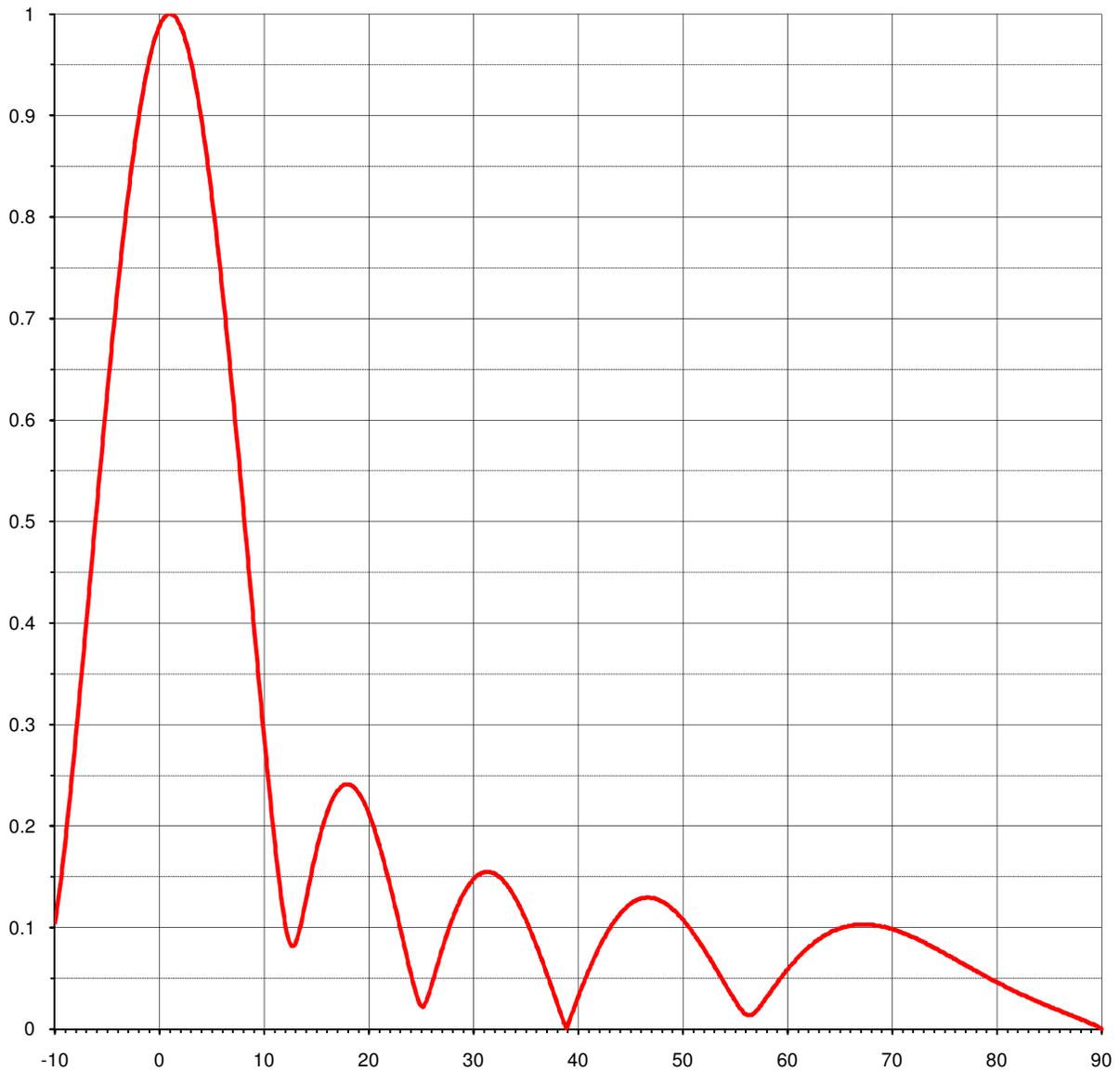
Degrees Below Horizontal



Proposal Number **C-04057** **Exhibit 2**
Date **16-Mar-10**
Call Letters **WPVI-TV** Channel **6**
Location **Philadelphia, PA**
Customer
Antenna Type **CBR-O3FMB-6/18H-1**

ELEVATION PATTERN

RMS Gain at Main Lobe	5.50 (7.40 dB)	Beam Tilt	1.00 deg
RMS Gain at Horizontal	5.40 (7.32 dB)	Frequency	85.00 MHz
Calculated / Measured	Calculated	Drawing #	06C055100-90





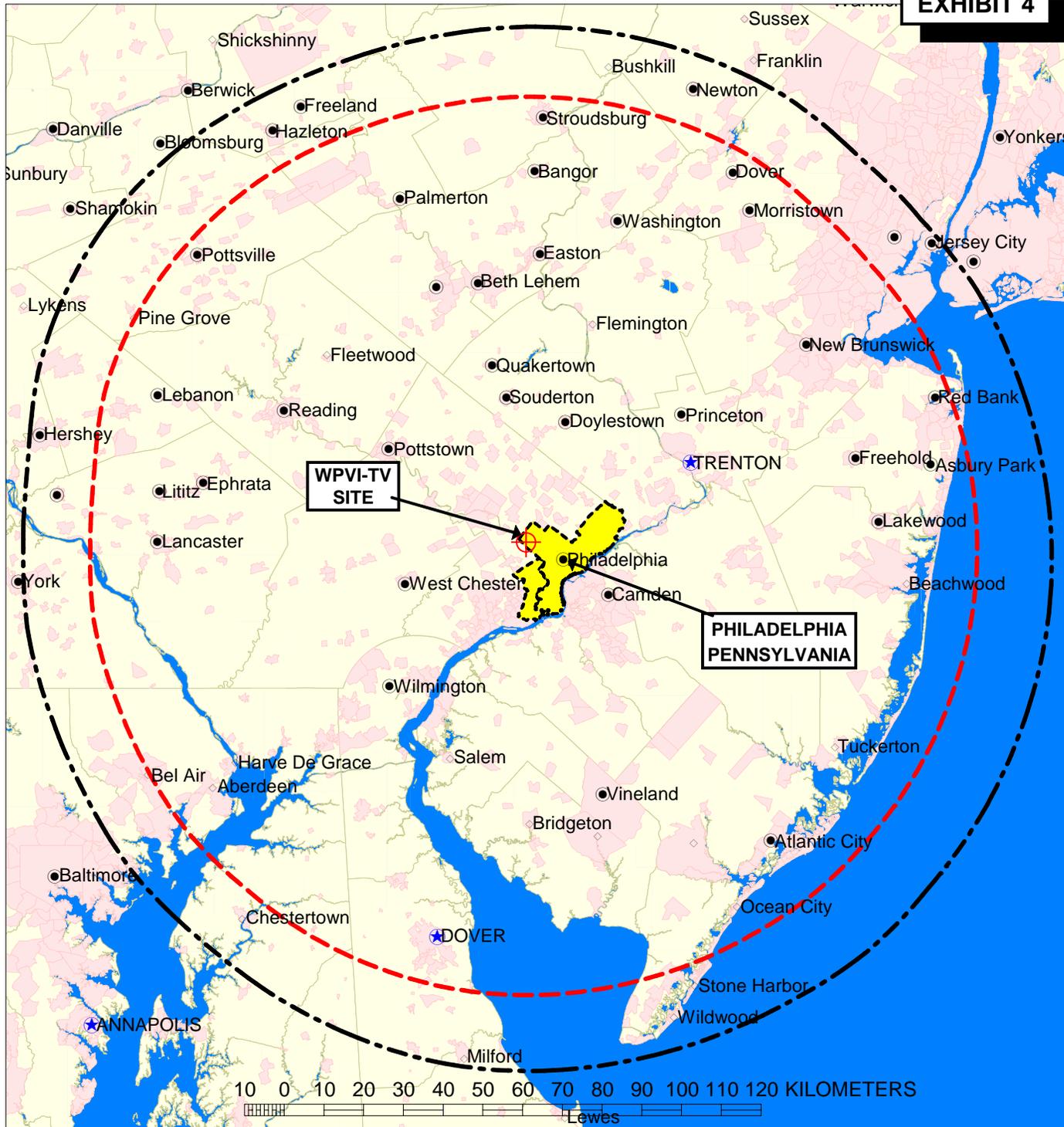
Proposal Number **C-04057** **Exhibit 3**
 Date **16-Mar-10**
 Call Letters **WPVI-TV** Channel **6**
 Location **Philadelphia, PA**
 Customer
 Antenna Type **CBR-O3FMB-6/18H-1**

TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing #: **06C055100-90**

Angle	Field										
-10.0	0.105	2.4	0.977	10.6	0.234	30.5	0.152	51.0	0.096	71.5	0.093
-9.5	0.141	2.6	0.970	10.8	0.214	31.0	0.154	51.5	0.088	72.0	0.091
-9.0	0.185	2.8	0.962	11.0	0.194	31.5	0.155	52.0	0.081	72.5	0.088
-8.5	0.235	3.0	0.953	11.5	0.148	32.0	0.154	52.5	0.072	73.0	0.086
-8.0	0.288	3.2	0.943	12.0	0.110	32.5	0.150	53.0	0.064	73.5	0.083
-7.5	0.343	3.4	0.933	12.5	0.086	33.0	0.145	53.5	0.055	74.0	0.080
-7.0	0.400	3.6	0.921	13.0	0.083	33.5	0.139	54.0	0.046	74.5	0.077
-6.5	0.457	3.8	0.909	13.5	0.099	34.0	0.130	54.5	0.038	75.0	0.075
-6.0	0.514	4.0	0.896	14.0	0.123	34.5	0.121	55.0	0.029	75.5	0.072
-5.5	0.570	4.2	0.882	14.5	0.148	35.0	0.110	55.5	0.021	76.0	0.069
-5.0	0.625	4.4	0.868	15.0	0.172	35.5	0.098	56.0	0.015	76.5	0.066
-4.5	0.679	4.6	0.852	15.5	0.193	36.0	0.085	56.5	0.014	77.0	0.063
-4.0	0.729	4.8	0.837	16.0	0.210	36.5	0.071	57.0	0.017	77.5	0.060
-3.5	0.777	5.0	0.820	16.5	0.224	37.0	0.057	57.5	0.023	78.0	0.057
-3.0	0.821	5.2	0.803	17.0	0.234	37.5	0.043	58.0	0.030	78.5	0.054
-2.8	0.838	5.4	0.785	17.5	0.239	38.0	0.028	58.5	0.037	79.0	0.052
-2.6	0.854	5.6	0.767	18.0	0.241	38.5	0.013	59.0	0.044	79.5	0.049
-2.4	0.869	5.8	0.748	18.5	0.240	39.0	0.001	59.5	0.051	80.0	0.046
-2.2	0.883	6.0	0.728	19.0	0.234	39.5	0.016	60.0	0.058	80.5	0.044
-2.0	0.897	6.2	0.708	19.5	0.226	40.0	0.030	60.5	0.064	81.0	0.041
-1.8	0.910	6.4	0.688	20.0	0.215	40.5	0.043	61.0	0.070	81.5	0.038
-1.6	0.922	6.6	0.667	20.5	0.201	41.0	0.056	61.5	0.075	82.0	0.036
-1.4	0.933	6.8	0.646	21.0	0.184	41.5	0.067	62.0	0.080	82.5	0.034
-1.2	0.944	7.0	0.624	21.5	0.166	42.0	0.079	62.5	0.084	83.0	0.031
-1.0	0.953	7.2	0.602	22.0	0.146	42.5	0.089	63.0	0.088	83.5	0.029
-0.8	0.962	7.4	0.580	22.5	0.125	43.0	0.098	63.5	0.092	84.0	0.027
-0.6	0.970	7.6	0.558	23.0	0.103	43.5	0.106	64.0	0.094	84.5	0.024
-0.4	0.977	7.8	0.536	23.5	0.081	44.0	0.112	64.5	0.097	85.0	0.022
-0.2	0.983	8.0	0.513	24.0	0.059	44.5	0.118	65.0	0.099	85.5	0.020
0.0	0.988	8.2	0.490	24.5	0.039	45.0	0.123	65.5	0.101	86.0	0.018
0.2	0.993	8.4	0.467	25.0	0.024	45.5	0.126	66.0	0.102	86.5	0.016
0.4	0.996	8.6	0.445	25.5	0.026	46.0	0.128	66.5	0.103	87.0	0.014
0.6	0.998	8.8	0.422	26.0	0.041	46.5	0.129	67.0	0.103	87.5	0.012
0.8	1.000	9.0	0.399	26.5	0.058	47.0	0.129	67.5	0.103	88.0	0.010
1.0	1.000	9.2	0.376	27.0	0.076	47.5	0.128	68.0	0.103	88.5	0.008
1.2	0.999	9.4	0.354	27.5	0.092	48.0	0.126	68.5	0.102	89.0	0.005
1.4	0.998	9.6	0.331	28.0	0.107	48.5	0.123	69.0	0.101	89.5	0.003
1.6	0.996	9.8	0.320	28.5	0.120	49.0	0.119	69.5	0.100	90.0	0.000
1.8	0.992	10.0	0.298	29.0	0.131	49.5	0.115	70.0	0.099		
2.0	0.988	10.2	0.276	29.5	0.140	50.0	0.109	70.5	0.097		
2.2	0.983	10.4	0.255	30.0	0.147	50.5	0.103	71.0	0.095		

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PREDICTED COVERAGE CONTOURS
WPVI-TV, PHILADELPHIA, PENNSYLVANIA
DTV - CH. 6 - 62.9 kW - 330.0 m HAAT

Predicted Principal Community Contour
 F(50,90) - 35 dBu
 Area = 38,520 sq km
 2010 Population = 12,237,922

Predicted Noise Limited Contour
 F(50,90) - 28 dBu
 Area = 51,870 sq km
 2010 Population = 15,842,344



MAY 2012

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY**
WPVI-TV, PHILADELPHIA, PENNSYLVANIA
CHANNEL 6, 62.9 kW ERP, 330.0 m HAAT
JUNE, 2012

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT ** mAGL</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WPVI-TV	DT	6	85	H & V	318.7	62.900	0.150	0.00093	0.200	0.47%
WHYY-TV	DT	12	207	H	290	30.000	0.130	0.00020	0.200	0.10%
WPHL-TV	DT	17	491	H	320	645.000	0.140	0.00412	0.327	1.26%
KYW-TV	DT	26	545	H	364	790.000	0.100	0.00199	0.363	0.55%
WXPB	FM	203	88.5	H & V	271	5.000	0.350	0.00056	0.200	0.28%
WHYY-FM	FM	215	90.9	H & V	277	13.500	0.400	0.00188	0.200	0.94%
WUSL	FM	255	98.9	H & V	189	27.000	0.280	0.00396	0.200	1.98%
WPHI-FM	FM	262	100.3	H & V	251	17.000	0.500	0.00451	0.200	2.25%
WBEB	FM	266	101.1	H & V	285	12.000	0.400	0.00158	0.200	0.79%
WIOQ	FM	271	102.1	H & V	191	27.000	0.400	0.00791	0.200	3.96%
WRFF	FM	283	104.5	H & V	306	11.000	0.500	0.00196	0.200	0.98%
WDAS-FM	FM	287	105.3	H & V	265	16.500	0.300	0.00141	0.200	0.71%

TOTAL PERCENTAGE OF ANSI VALUE= 14.26%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights*

so that the predicted power densities consider the 2 meter human height allowance.

This evaluation includes facilities collocated at the site, and facilities located within 315 meters.



**WPVI-TV - APPENDIX B
 LONGLEY-RICE INTERFERENCE ANALYSIS
 MAY 2012**

Percent allowed new interference: 0.500
 Percent allowed new interference to non Class A LPTV: 2.000
 Census data selected 2000
 Data Base Selected
 ./data/tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 05-25-2012 Time: 16:29:46

Record Selected for Analysis

WPVI-TV BLCDT -NEWWPVI629 PHILADELPHIA PA US
 Channel 06 ERP 62.9 kW HAAT 330. m RCAMSL 394.7 m
 Latitude 040-02-33 Longitude 0075-14-33
 Status APP Zone 1 Border Site number: 01
 Last update 00000000 Cutoff date 20120217 Docket
 Comments
 Applicant ABC, INC.

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits
 Channel 6 ERP = 62.90 HAAT = 330.

Site number	1			
Azimuth (Deg)	ERP (kW)	HAAT (m)	28.0 dBu F(50,90) (km)	
0.0	62.900	321.2	128.0	
45.0	62.900	295.4	125.8	
90.0	62.900	347.5	129.9	
135.0	62.900	372.8	132.0	
180.0	62.900	356.9	130.6	
225.0	62.900	308.5	126.9	
270.0	62.900	278.8	124.3	
315.0	62.900	354.2	130.4	

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap
 to Class A stations from site # 01

Class A Evaluation Complete

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SPACING VIOLATION FOUND BETWEEN STATION

WPVI-TV 06 PHILADELPHIA PA BLCDT NEWWPVI629 Site # 01

and station

SHORT TO: WPVI-TV 06 PHILADELPHIA PA DTVPLN DTVP0041
 040-02-39 0075-14-26
 Req. separation 244.6 Actual separation 0.2 Short 244.4 km

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations
 Proposed facility OK toward West Virginia quiet zone
 Proposed facility OK toward Table Mountain
 Proposed facility is beyond the Canadian coordination distance
 Proposed facility is beyond the Mexican coordination distance
 Proposed station is 0.58km from AM station
 PHILADELPHIA PA WNWR Status: L Antenna: DAD
 Proposed station is 0.58km from AM station
 PHILADELPHIA PA WNWR Status: M Antenna: DAD
 Proposed station is 0.58km from AM station
 PHILADELPHIA PA WNWR Status: P Antenna: DA2

 Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
06	WPVI-TV	PHILADELPHIA PA	BLCDT NEWWPVI629

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	NEW	SEAFORD DE	141.2	CP	BNPCDT	20110330AAY
06	WWDG-CA	ROME NY	352.1	APP	BSTA	20081117AAE
06	WWDG-CA	ROME NY	352.1	APP	BDISTVA	20080528AGR
06	WRGB	SCHENECTADY NY	304.9	LIC	BMLCDT	20110816AAF

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	NEW	SEAFORD DE	BNPCDT	-20110330AAY

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WDTV	WESTON WV	368.5	LIC	BLCDT	-20090612AJX
06	WPVI-TV	PHILADELPHIA PA	141.2	APP	BLCDT	-NEWWPVI629
06	WPVI-TV	PHILADELPHIA PA	141.5	PLN	DTVPLN	-DTVP0041

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Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 5A DE SEAFORD BNPCDT 20110330AAY CP
 HAAT 144.0 m, ATV ERP 10.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	5892899	26465.4
not affected by terrain losses	5823256	26365.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	36004	84.0
lost to ATV IX only	36004	84.0
lost to all IX	36004	84.0

Potential Interfering Stations Included in above Scenario 1
 5A WV WESTON BLCDT 20090612AJX LIC
 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 5A DE SEAFORD BNPCDT 20110330AAY CP
 HAAT 144.0 m, ATV ERP 10.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	5892899	26465.4
not affected by terrain losses	5823256	26365.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	143803	515.9
lost to ATV IX only	143803	515.9
lost to all IX	143803	515.9

Potential Interfering Stations Included in above Scenario 1
 5A WV WESTON BLCDT 20090612AJX LIC
 6A PA PHILADELPHIA BLCDT NEWWPVI629 APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BLCDT NEWWPVI629
 ERP 62.90 kW HAAT 330.0 m RCAMSL 394.7 m
 Antenna 9999999999999999

Due to interference to the following station and scenario: 1
 5D DE SEAFORD BNPCDT 20110330AAY
 ERP 10.00 kW HAAT 144.0 m RCAMSL 153.1 m
 Antenna 9999999999999999

Percent new interference from proposal: 1.8627 to BNPCDT 20110330AAY

Worst case new IX 1.8627% Scenario 1

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WPVI-TV - Appendix B

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WWDG-CA	ROME NY	BSTA	-20081117AAE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WRGB	SCHENECTADY NY	135.9	LIC	BMLCDT	-20110816AAF
06	WMBO-LP	WESTVALE NY	58.0	CP	BPTVL	-20090824ALS
06	WPVI-TV	PHILADELPHIA PA	352.1	APP	BLCDT	-NEWWPVI629
06	WPVI-TV	PHILADELPHIA PA	351.9	PLN	DTVPLN	-DTVP0041

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WWDG-CA	ROME NY	BDISTVA	-20080528AGR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WNNY-LP	AUBURN NY	94.1	CP MOD	BMPTVL	-20120206ADR
06	WRGB	SCHENECTADY NY	135.9	LIC	BMLCDT	-20110816AAF
06	WMBO-LP	WESTVALE NY	58.0	CP	BPTVL	-20090824ALS
06	WPVI-TV	PHILADELPHIA PA	352.1	APP	BLCDT	-NEWWPVI629
06	WPVI-TV	PHILADELPHIA PA	351.9	PLN	DTVPLN	-DTVP0041

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WRGB	SCHENECTADY NY	BMLCDT	-20110816AAF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WPVI-TV	PHILADELPHIA PA	304.9	APP	BLCDT	-NEWWPVI629
06	WPVI-TV	PHILADELPHIA PA	304.7	PLN	DTVPLN	-DTVP0041

Total scenarios = 1

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Result key: 2
 Scenario 1 Affected station 4
 Before Analysis

Results for: 6A NY SCHENECTADY BMLCDT 20110816AAF LIC
 HAAT 392.0 m, ATV ERP 30.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2789321	49064.8
not affected by terrain losses	2312759	43198.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	18198	392.7
lost to ATV IX only	18198	392.7
lost to all IX	18198	392.7

Potential Interfering Stations Included in above Scenario 1
 6A PA PHILADELPHIA DTVPLN DTVP0041 PLN

After Analysis

Results for: 6A NY SCHENECTADY BMLCDT 20110816AAF LIC
 HAAT 392.0 m, ATV ERP 30.2 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2789321	49064.8
not affected by terrain losses	2312759	43198.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	75175	1326.4
lost to ATV IX only	75175	1326.4
lost to all IX	75175	1326.4

Potential Interfering Stations Included in above Scenario 1
 6A PA PHILADELPHIA BLCDDT NEWWPVI629 APP

The following station failed the de minimis interference criteria.

6D PA PHILADELPHIA BLCDDT NEWWPVI629
 ERP 62.90 kW HAAT 330.0 m RCAMSL 394.7 m
 Antenna 9999999999999999

Due to interference to the following station and scenario: 1

6D NY SCHENECTADY BMLCDT 20110816AAF
 ERP 30.20 kW HAAT 392.0 m RCAMSL 649.0 m
 Antenna 9999999999999999

Percent new interference from proposal: 2.4831 to BMLCDT 20110816AAF

Worst case new IX 2.4831% Scenario 1

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WPVI-TV - Appendix B

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WPVI-TV	PHILADELPHIA PA	BLCDT	-NEWWPVI629

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	NEW	SEAFORD DE	141.2	CP	BNPCDT	-20110330AAY
06	WRGB	SCHENECTADY NY	304.9	LIC	BMLCDT	-20110816AAF

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 5
Before Analysis

Results for: 6A PA PHILADELPHIA BLCDT NEWWPVI629 APP
HAAT 330.0 m, ATV ERP 62.9 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	15017882	51837.5
not affected by terrain losses	14705511	50442.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	986314	1221.9
lost to ATV IX only	986314	1221.9
lost to all IX	986314	1221.9

Potential Interfering Stations Included in above Scenario 1

5A DE SEAFORD	BNPCDT	20110330AAY	CP
6A NY SCHENECTADY	BMLCDT	20110816AAF	LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

DIGITAL FACILITIES AGREEMENT

This Digital Facilities Agreement ("Agreement") is entered into as of April 16, 2012 (the "Effective Date") by ABC, Inc. ("ABC") and WRGB Licensee, LLC ("WRGB Licensee").

1. **WPVI Digital Operations.** ABC, the licensee of full-power commercial digital television station WPVI-TV, Philadelphia, Pennsylvania (FCC Facility ID No. 8616) ("WPVI"), is authorized by the Federal Communications Commission ("FCC") to operate on channel 6 at an effective radiated power ("ERP") of 34.0 kilowatts ("kW") with its existing antenna at 330 meters height above average terrain ("HAAT") (FCC File No. BLCDDT-20111019ACJ). Upon receipt of the necessary FCC consent, ABC proposes to increase the currently authorized ERP by 2.67 dB to 62.9 kW ERP (the "WPVI Proposed Facilities").
2. **WRGB Digital Operation.** WRGB Licensee, the licensee of full-power commercial digital television station WRGB(TV), Schenectady, New York (FCC Facility ID No. 73942) ("WRGB"), is authorized by the FCC to operate on channel 6 at 30.2 kW ERP with its existing antenna at 392 meters HAAT (FCC File No. BMLCDDT-20110816AAF, the "WRGB Licensed Facilities"). WRGB Licensee has filed a petition for rulemaking with the FCC seeking to substitute UHF channel 19 in lieu of VHF channel 6 for WRGB ("WRGB Channel Substitution"). In the event that WRGB Licensee does not receive FCC approval for the WRGB Channel Substitution and WRGB must continue operating on channel 6, WRGB proposes to increase its currently authorized ERP by 1.73 dB to 45.0 kW ("WRGB 45.0 kW Facilities").
3. **WPVI-WRGB Interference and Agreements.**
 - (a) WRGB Licensee seeks ABC's agreement to support WRGB Licensee's WRGB Channel Substitution. ABC hereby agrees to support the WRGB Channel Substitution by filing a statement in support of the Channel Substitution in the form attached hereto.
 - (b) Using Appendix B facilities as the baseline for calculation, the parties have determined that the WPVI Proposed Facilities will result in additional interference of 0.7785% and 0.8967% to the total population served by the WRGB Licensed Facilities and the WRGB 45.0 kW Facilities, respectively. ABC seeks WRGB Licensee's agreement that, once it acquires WRGB, WRGB Licensee will accept the additional interference resulting from the WPVI Proposed Facilities to the WRGB Licensed Facilities and the WRGB 45.0 kW Facilities, as specified in this Paragraph 3(b). WRGB Licensee hereby acknowledges and agrees that it shall accept the additional interference resulting from the WPVI Proposed Facilities as specified in this Paragraph 3(b).
 - (c) Using Appendix B facilities as the baseline for calculation, the WRGB 45.0 kW Facilities are predicted to result in additional interference of 3.5632% to the total population served by the WPVI Proposed Facilities. WRGB Licensee seeks ABC's agreement that, in the event the FCC denies the WRGB Channel Substitution and WRGB Licensee files an application seeking FCC approval for

the WRGB 45.0 kW Facilities, ABC will accept the additional interference resulting from the WRGB 45.0 kW Facilities to the WPVI Proposed Facilities as specified in this Paragraph 3(c). ABC hereby acknowledges and agrees that in the event the FCC denies the WRGB Channel Substitution and WRGB Licensee files an application seeking FCC approval for the WRGB 45.0 kW Facilities, it shall accept the additional interference resulting from the WRGB 45.0 kW Facilities as specified in this Paragraph 3(c).

4. FCC Applications.

- (a) To effectuate the terms and provisions of this Agreement, ABC will prepare and file an application seeking FCC authority for operation of the WPVI Proposed Facilities ("WPVI Application") and will include in such application a copy of this Agreement. Upon receipt of the requisite FCC consent and filing of the required license application to cover the construction permit for the WPVI Proposed Facilities, ABC will initiate operation of the WPVI Proposed Facilities on a permanent basis as specified herein.
- (b) To effectuate the terms and provisions of this Agreement, in the event that the FCC denies the WRGB Channel Substitution, and only in this event, WRGB Licensee will prepare and file an application seeking FCC authority for operation of the WRGB 45.0 kW Facilities and will include in such application a copy of this Agreement. Upon receipt of the requisite FCC consent and filing of the required license application to cover the construction permit for the WRGB 45.0 kW Facilities, WRGB Licensee will initiate operation of the WRGB 45.0 kW Facilities on a permanent basis as specified herein.
- (c) ABC and WRGB Licensee shall use commercially reasonable efforts to obtain FCC consent to the applications described in this Paragraph 4 as promptly as possible after the filing thereof.
- (d) Each party represents and warrants that, to its knowledge, other than predicted interference that may be caused by any of the WPVI Proposed Facilities to the Seaford, Delaware Channel 5 allocation,¹ none of the facilities proposed herein will create additional predicted interference greater than 0.5% to the total population served by any television station other than as described in Paragraph 3 of this Agreement.

¹ See Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Seaford, Delaware), Report and Order, 25 FCC Rcd 4466, ¶¶ 13, 18 (rel. April 28, 2010) (ordering that any licensee of the channel 5 allotment at Seaford will be subject to the condition that it must accept interference of up to 2% of the population within the allotment's DTV service area from WPVI).

5. **Operation of Digital Facilities.**

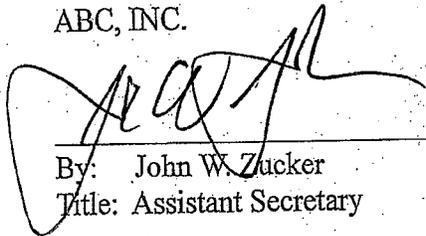
- (a) ABC may commence operations of the WPVI Proposed Facilities immediately upon or at any time after the FCC grants its initial consent to the WPVI Application.
- (b) In the event that the WRGB Channel Substitution is denied, WRGB Licensee may commence operations of the WRGB 45.0 kW Facilities immediately upon or at any time after the FCC grants its initial consent to the WRGB 45.0 kW Application.

6. **Miscellaneous.** Except for the agreements set forth in Paragraphs 3 and 4, no consideration is being paid or promised by any of the parties in connection with this Agreement. No amendment or waiver of compliance with any provision hereof shall be effective unless in a writing signed by the party against whom enforcement is sought. This Agreement shall be governed by the laws of the State of New York without giving effect to the choice of law provisions thereof. Notwithstanding any provision to the contrary, it is understood that the acceptance of interference levels agreed to herein shall continue to run with the station, not the licensee, and shall be binding on future successors or assigns (without the need for consent) in the event of an assignment of a station's license or a change in control of a licensee. This Agreement constitutes the entire agreement and understanding of the parties hereto and supersedes all prior agreements and understandings with respect to the subject matter hereof. Nothing in this Agreement expressed or implied is intended or shall be construed to give any rights to any person or entity other than the parties hereto and their respective successors and permitted assigns. This Agreement may be executed in one or more counterparts, each of which will be deemed an original, but all of which together will constitute one and the same instrument.

[signature page follows]

IN WITNESS WHEREOF, the parties have executed this Agreement to be effective as of the date first above written.

ABC, INC.



By: John W. Zucker
Title: Assistant Secretary

WRGB LICENSEE, LLC

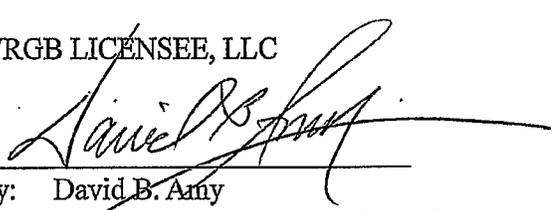
By: David B. Amy
Title: Secretary of Sinclair Television Group, Inc.

IN WITNESS WHEREOF, the parties have executed this Agreement to be effective as of the date first above written.

ABC, INC.

By: John W. Zucker
Title: Assistant Secretary

WRGB LICENSEE, LLC



By: David B. Amy
Title: Secretary of Sinclair Television Group, Inc.