

ENGINEERING DISCUSSION FOR SPECIAL TEMPORARY AUTHORITY

Background

Renard Communications Corp. (“RCC”) is the licensee of WBQM-LP, channel 3, Brooklyn, NY. In addition to its analog license, RCC was originally granted experimental authorization (“EA”) May 12, 2003 to operate as a digital facility with temporary call sign W03BM at the licensed site for WBQM-LP (formerly, W03BK and originally W38CL) in order to minimize any potential co-channel interference to Part 15 consumer-type set-top equipment. The original EA was for a one-year period. RCC then filed a request for an extension of the experimental authorization on or about April 30, 2004.

WBQM-LP is licensed to operate at 3 Park Ave., New York, NY and shared the rooftop site with many licensed communications users. While fully having expected its lease to be renewed, as had been assured by the landlord, Cohen Brothers Realty Corporation (“Cohen”), Cohen decided at the last minute that it no longer wanted to lease its roof space to any users. This apparently came about in that the site manager, AAT Communications Corp., had previously informed the landlord that the terms for managing the roof no longer fit in economically with AAT’s business plan. While the landlord thought it could manage the roof tenants itself, it became apparent, but not until the last days of the common lease period for all tenants, that it did not have the expertise for carrying out its previous plans. That is to say, managing a complex communications facility requires a unique understanding of equipment, licenses, antennas, wind-loading, insurance and other technical factors which Cohen did not possess and was not willing to hire additional personnel in order to oversee such an extensive undertaking.

RCC, unexpectedly having lost its site, was forced to have WBQM-LP cease broadcasting and filed an STA 1/19/07 to remain silent. RCC has looked at many potential sites in and around the vicinity and found that while there were a number of available locations, many had at least one or more deficiencies rendering them less than suitable. The Trump World Tower at 1st Ave. and 48th Streets in New York City, has been determined to be best suited as the proposed site for WBQM-LP. In addition, now that LPTV stations may be authorized for digital service, RCC is filing for Special Temporary Authority rather than experimental authorization in order to continue digital operation at the newly proposed site. In the near future, RCC will also be filing Form 346 for relocation of the analog facilities for WBQM-LP to the new site. However, it is the digital operation, which RCC had been operating at the time of its request to remain silent, that is proposed in order for the station to return to the air prior to the 1/17/08 expiration of its authority to remain silent.

Proposed Site

The proposed site is approximately 1.3 km. (0.8 miles) ENE of the WBQM-LP's licensed site at 3 Park Ave. RCC proposes to use the same ERP, antenna (Scala HDCA-5CP-3) and azimuth as had been authorized with the proposed operating parameters as follows:

Coordinates (NAD27): N 40-45-08, W 73-58-03

ERP: 300 watts average digital power (horizontal and vertical)

Emission Mask: simple

Antenna: Scala HDCA-5CP-3

Azimuth: 130 degrees True

Site Elevation: 9.4 meters AMSL

Radiation Center: 265.1 meters above ground level

Figure 1 depicts the authorized and proposed 43 dBu contours. The building is 268.8 m. (882 feet) in height and has several other licensed communications users. The antenna for WBQM-LP is proposed to be attached to a wall and side railing, and the top of the proposed antenna will not extend above 266.4 m. (874 feet) so there will be no increase to the height of the existing structure. A copy of the FAA study (1999-AEA-1712-OE) is attached at the end of this discussion. Additionally, the coordinates for the building are based on NAD83 datum and as the proposed antenna will be slightly east of the center of the building, it has been determined that the NAD27 coordinates are N 40-45-08, W 75-58-03.

Impact to Other Stations

It is necessary to determine the impact to a number of other stations, but they are the same ones as in the original application for the authorization. There are two local stations of interest: WCBS-TV, channel 2, and WNBC-TV, channel 4, both New York, NY. Unfortunately, both of these stations were affected by the destruction of the World Trade Center (“WTC”). WCBS-TV is presently licensed at the Empire State Building (“ESB”) and WNBC maintains an underlying license at the location of the former WTC. In addition, WNBC-TV has authorization to operate at the ESB. All of the interference studies were performed using Probe 3 from V-Soft Communications. As is shown in the summary table, these facilities will be protected by the instant request for STA for WBQM-LP. It is also noted that with these two local stations, no masking was used and the lack of interference was calculated with WBQM-LP (digital) as a single contributor.

Two co-channel stations operating on channel 3 were also studied. They are: WFSB, Hartford, CT, and KYW-TV, Philadelphia, PA. The summary table below shows that there would be no prohibitive interference to the pertinent stations.

Summary Table of Attached Studies

First Adjacent-Channel Stations

<u>Station</u>	<u>Channel</u>	<u>City/State</u>	<u>Site</u>	<u>File No.</u>	<u>Proposed Interference</u>
WCBS-TV	2	New York, NY	ESB	BLCT-20011123AAQ	0.0%
WNBC-TV	4	New York, NY	WTC	BLCT-19840312KG	0.0%
WNBC-TV	4	New York, NY	ESB	BPCT-20040609ABQ	0.0%

Co-Channel Stations

<u>Station</u>	<u>Channel</u>	<u>City/State</u>	<u>File No.</u>	<u>Proposed Unique Interference</u>
WFSB	3	Hartford, CT	BLCT-20060324ABA	0.0%
KYW-TV	3	Philadelphia, PA	BLCT-1825	0.0%

Detailed information regarding the interference studies is included as Figures 2 through 4 for adjacent-channel stations and Figures 5 and 6 for co-channel stations.

Environmental Statement

The applicant certifies that it has determined that the proposed operation is excluded from environmental processing under 47 C.F.R. Section 1.1306 as the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency exposure limits for controlled and uncontrolled environments.

The applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

Summary

The technical facilities requested comply with the Commission's rules for Low-Power television stations, and would allow WBQM-LP to return to the air as quickly as possible. RCC respectfully requests expedited consideration so that the station may return to the air prior to 1/17/08, the expiration of its authorization to remain silent.

Form 7460-1 for ASN: 1999-AEA-1712-OE

Overview**Study (ASN):** 1999-AEA-1712-OE**Prior Study:****Status:** Determined**Letters:****Received Date:** 06/17/1999**Entered Date:** 06/18/1999**Completion Date:** 06/25/1999**Expiration Date:** 02/04/2001**Sponsor Information****Sponsor:** 845 UNITED NATIONS LIMITED PARTNERS**Attention Of:** MICHA KOEPEL**Address:** 725 FIFTH AVENUE**Address2:****City:** NEW YORK**State:** NY**Postal Code:** 10022**Country:****Phone:** 212-832-2000**Fax:****Sponsor's Representative Information****Representative:****Attention Of:****Address:****Address2:****City:****State:****Postal Code:****Country:****Phone:****Fax:****Construction Info****Notice Of:****Duration:** (Months: 0 Days: 0)**Work Schedule:****Date Built:** 10/04/2001**Structure Summary****Structure Type:** Other w/o Antenna**Other Description:****NACO Number:** 36-002306**FCC Number:****Structure Details****Latitude (NAD 83):** 40° 45' 08.05" N**Longitude (NAD 83):** 73° 58' 02.05" W**Datum:** NAD 83**Accuracy:****Marking/Lighting:** Other**Other Description:** Red**Name:****City:** MANHATTAN**State:** NY**Nearest Airport:** LGA**Distance to Structure:****On Airport:** No**Direction to Structure:****Description of Location:****Description of Proposal:** BUILDING**Height and Elevation**

	Proposed	DNE	DET
Site Elevation:	31		
Structure Height:	851	0	851
Total Height (ASML):	882	0	882

Frequencies

Low Freq	High Freq	Unit	ERP	Unit