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**ENGINEERING EXHIBIT
AMENDED APPLICATION FOR
TV TRANSLATOR CONSTRUCTION PERMIT
NEW YORK TIMES MANAGEMENT SERVICES
MANSFIELD, PENNSYLVANIA
CH. 26z 0.175 KW**

The instant Engineering Exhibit has been prepared on behalf of New York Times Management Services (hereafter, NYTMS) to supply additional information in support of its pending application for a TV translator construction permit at Mansfield, Pennsylvania. The application file number is BNPTT-20000830BAZ. The application specifies operation on Channel 26, zero frequency offset, and maximum effective radiated power of 0.175 kW with a directional antenna.

The application was identified on the FCC's Public Notice, DA 01-1289, Attachment A, as being mutually exclusive with the proposal by WSKG Public Telecommunications for a construction permit for a new TV translator at Canisteo and Hornell, New York, for operation on Channel 26, also with zero frequency offset. Maximum effective radiated power of 0.4 kW with a directional antenna is proposed. Hereafter, in the interest of brevity, the application location will be referred to as Canisteo, rather than Canisteo and Hornell.

This amendment seeks a waiver of the FCC's Rule which requires use of the FCC's prediction methodology for allocation purposes related to TV translators. In support of the waiver, information is provided herein which demonstrates that terrain barriers effectively isolate the Mansfield translator from the Canisteo

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translator so that the two proposals may be considered to be non-mutually exclusive.

Since the Mansfield translator site does not satisfy the 121 kilometer geographic constraint with respect to two television markets that was imposed for Auction No. 81 submissions, waivers of that constraint are requested, and supports therefor by way of demonstrations of terrain shielding are furnished, also.

Turning first to the 121 kilometer geographic constraint concerns, the short-spacings are with respect to Scranton and Wilkes-Barre, both Pennsylvania. The Mansfield site is 112.3 kilometers from the Scranton reference, and 103.9 kilometers from the Wilkes-Barre reference. However, in both cases, terrain shielding effectively isolates signals from stations in these markets from direct viewing in Mansfield.

Scranton full service television stations operate on channels 16, 22, 38, 44, and 64. Only one station is licensed to serve Wilkes-Barre. That lone station is WBRE-TV, Channel 28. However, the WBRE-TV transmitter site is located in the same vicinity as the transmitter sites for the Scranton stations on channels 16 and 22. The remaining area television station transmitters are clustered in the same general vicinity as the WQPX, Channel 64 transmitter. Hence, terrain profiles drawn from the WQPX and WBRE-TV sites toward the proposed Mansfield

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translator's service area are sufficient to portray conditions from all the Scranton and Wilkes-Barre area stations.

Figure 1 shows the proposed Mansfield translator's 74 dBu service contour, and the three radials from WQPX for which terrain profiles have been drawn. The profiles are shown in Figure 2. Figure 3 shows the radials along which profiles have been drawn from the WBRE-TV transmitter site toward the proposed Mansfield translator's 74 dBu contour, and Figure 4 shows these profiles. It is abundantly clear that the area proposed to be served is well shielded from the Scranton and Wilkes-Barre stations. The purpose of the geographic constraint set forth in the FCC's Public Notice will not be compromised by a grant of the 121 kilometer separation requirement for the instant proposal.

With respect to the question of mutual exclusivity with the co-pending application for construction permit at Canisteo, the allocation study of Figure 5 demonstrates that it is the overlap of the Mansfield translator's 29 dBu, F(50,10) contour with the Canisteo translator's 74 dBu, F(50,50) contour that is the problem. However, the intervening terrain provides adequate shielding and signal attenuation so that no actual interference will result.

Figure 5 shows the radials from the proposed Mansfield translator site toward the proposed Canisteo 74 dBu contour along which terrain profiles have been drawn. The terrain profiles are included in Figure 6. The profiles demonstrate that terrain barriers will shield the Canisteo service area from the undesired Mansfield signals, and no interference will result. The two applications, despite

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theoretical overlap of desired and undesired contours, are not truly mutually exclusive, and the requested waiver of the FCC's Rule in this regard is believed warranted.

The terrain profiles shown herein were drawn from elevation data available in the U.S.G.S. 3 arc-second terrain elevation database. The computer algorithm developed by EDX was employed. Contours were calculated using the algorithm developed by EDX, also. The EDX algorithm replicates the FCC's propagation curves. A 45 dB desired to undesired signal strength ratio was used for the Mansfield-Canisteo allocation study since the two proposals are for the same zero frequency offset.

Consideration has been given to environmental concerns. Since the proposed Mansfield translator site is used by other translators, only the matters relating to human exposure to radio-frequency radiation (rfr) from among the various items of environmental interest mentioned in Section 1.1307 of the FCC Rules, merit attention.

The proposed Mansfield translator will employ a Bogner, model B8UB, antenna manufactured by Radio Frequency Systems, Inc. (RFS). The antenna is of the slot type and so would have a downward radiation equal to no more than 10% of that occurring in the plane of maximum radiation. Using OET Bulletin 65 calculation procedures, the equivalent plane wave power density from the antenna

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at a target two meters above ground level at the tower base would be only 0.01% of the maximum permissible exposure (MPE) of 0.36 mW/cm^2 allowed at 545 MHz (Channel 26) for general population exposure at uncontrolled locations. Based on the foregoing result, no question arises of possible overexposure to the public at uncontrolled locations.

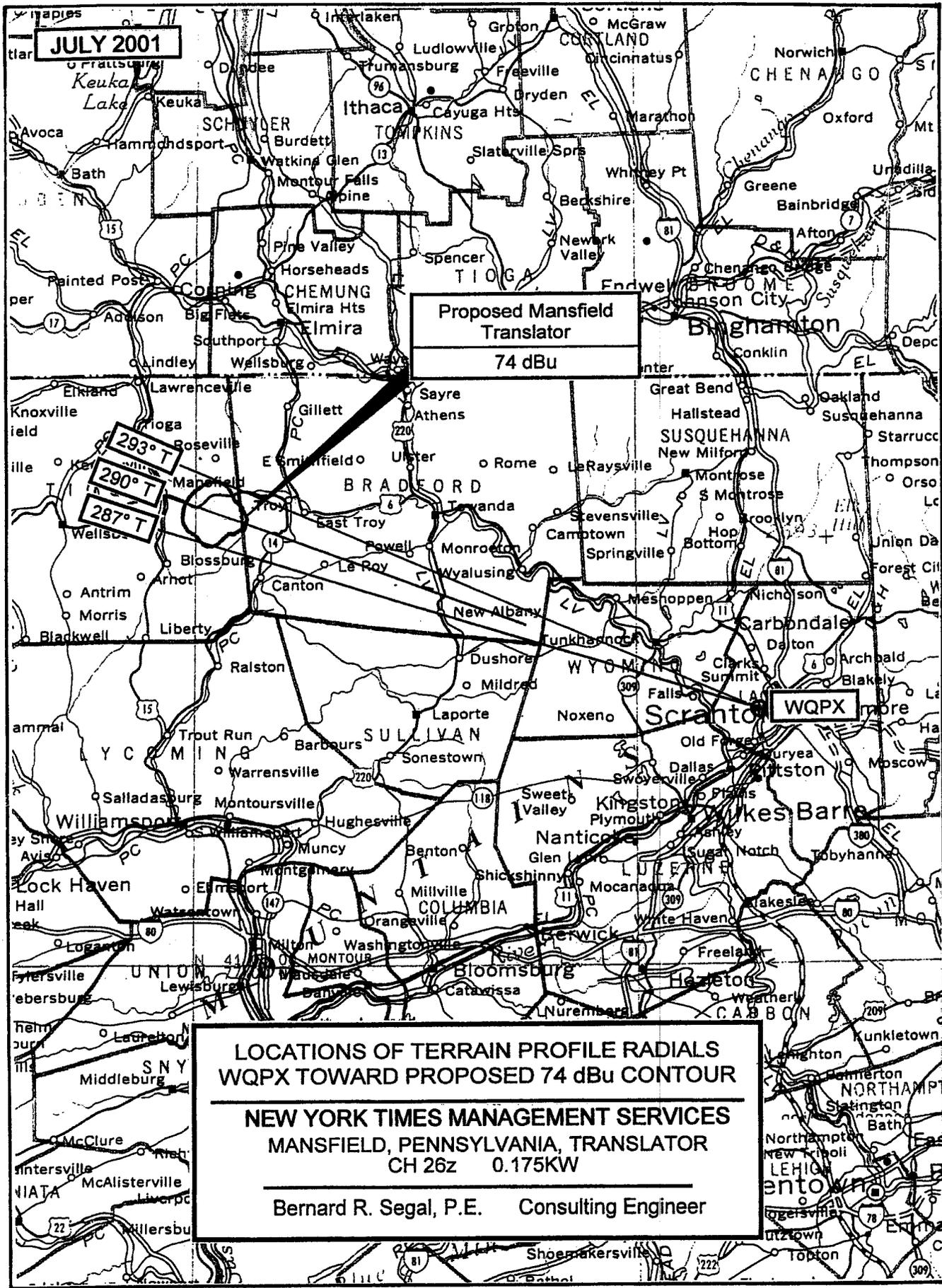
As to worker exposure concerns, all work on the tower that would place a worker close to an antenna, requires prior coordination with the tower owner for terminating excitation to the antenna so as to prevent possible overexposure to rfr. NYTMS will adhere to this requirement.

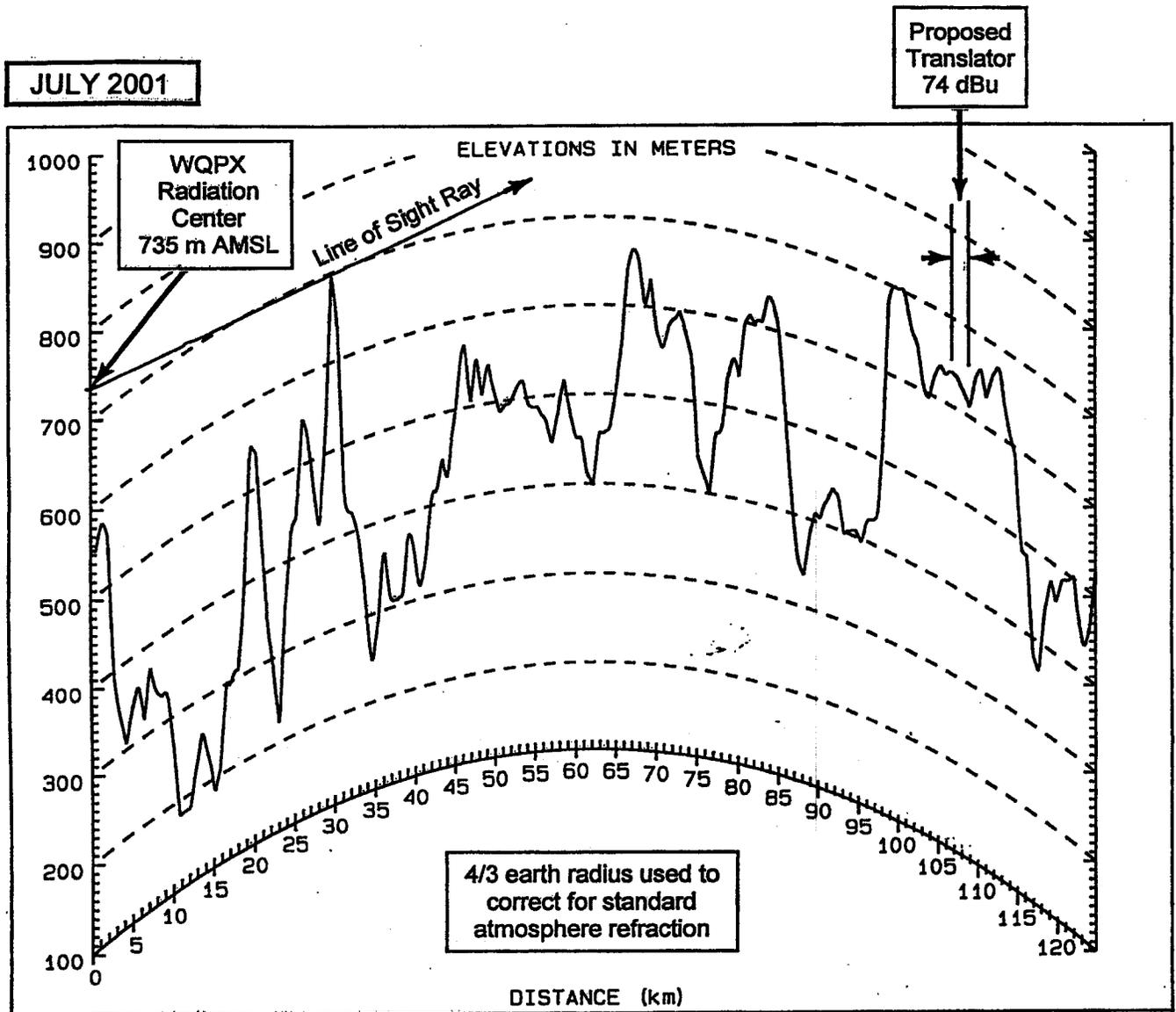
Based on the foregoing analysis, compliance with the FCC's adopted standard regarding rfr exposure will be achieved. An environmental assessment of the proposal is not required.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on July 23, 2001.


Bernard R. Segal, P. E..

Figure 1



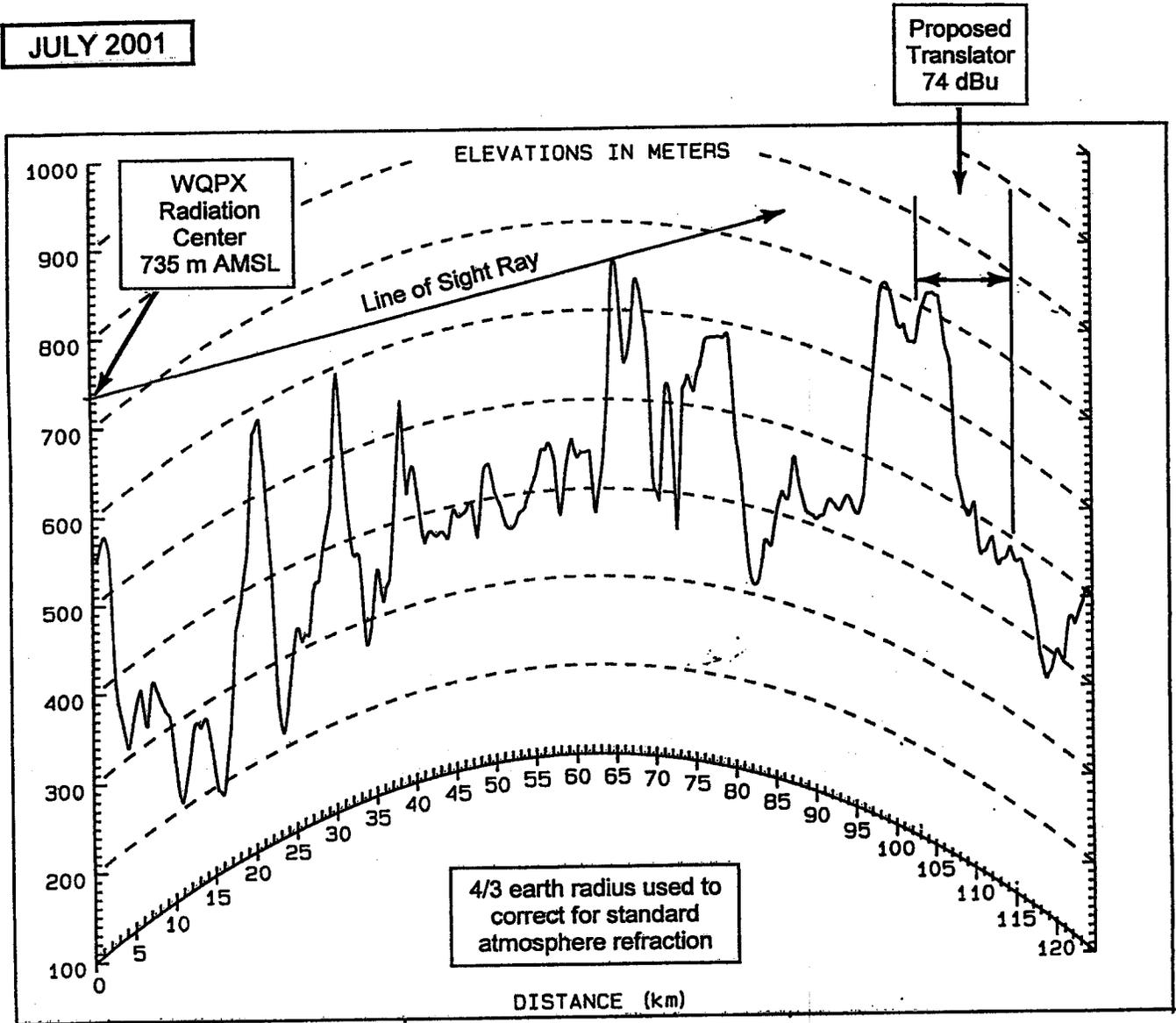


**287° TRUE TERRAIN PROFILE FROM
WQPX TOWARD PROPOSED 74 dBu CONTOUR**

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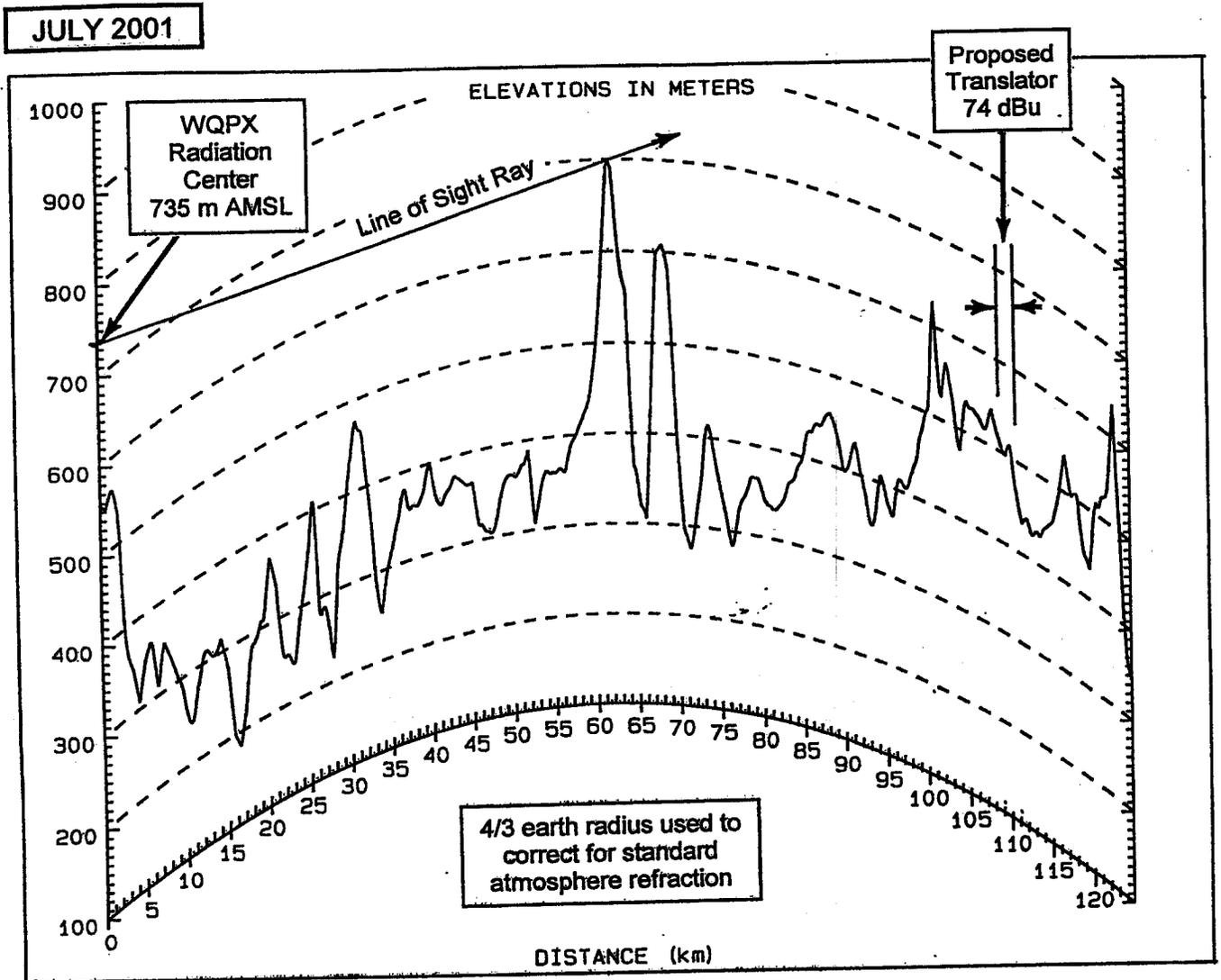
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290° TRUE TERRAIN PROFILE FROM
WQPX TOWARD PROPOSED 74 dBu CONTOUR

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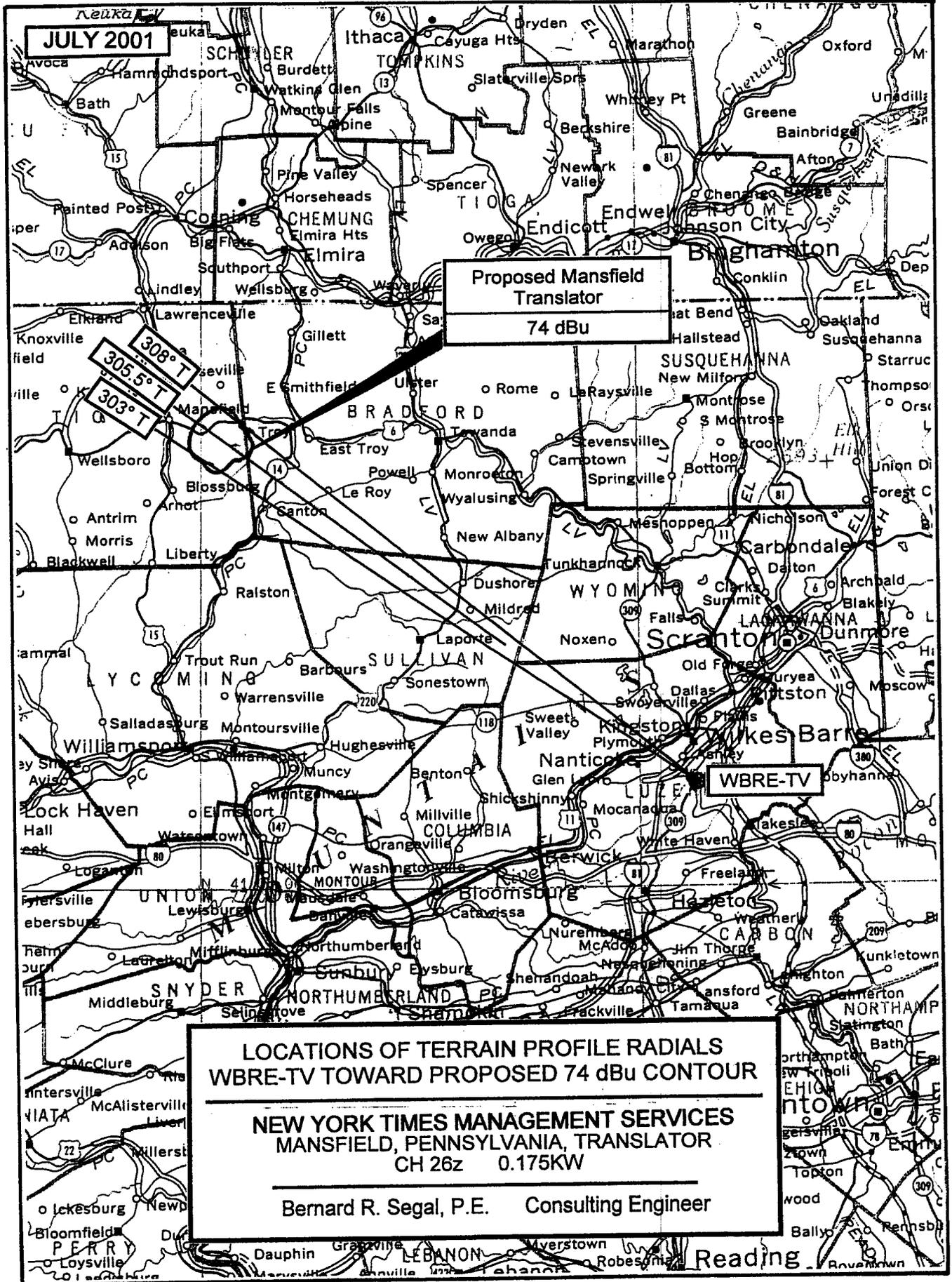


**293° TRUE TERRAIN PROFILE FROM
WQPX TOWARD PROPOSED 74 dBu CONTOUR**

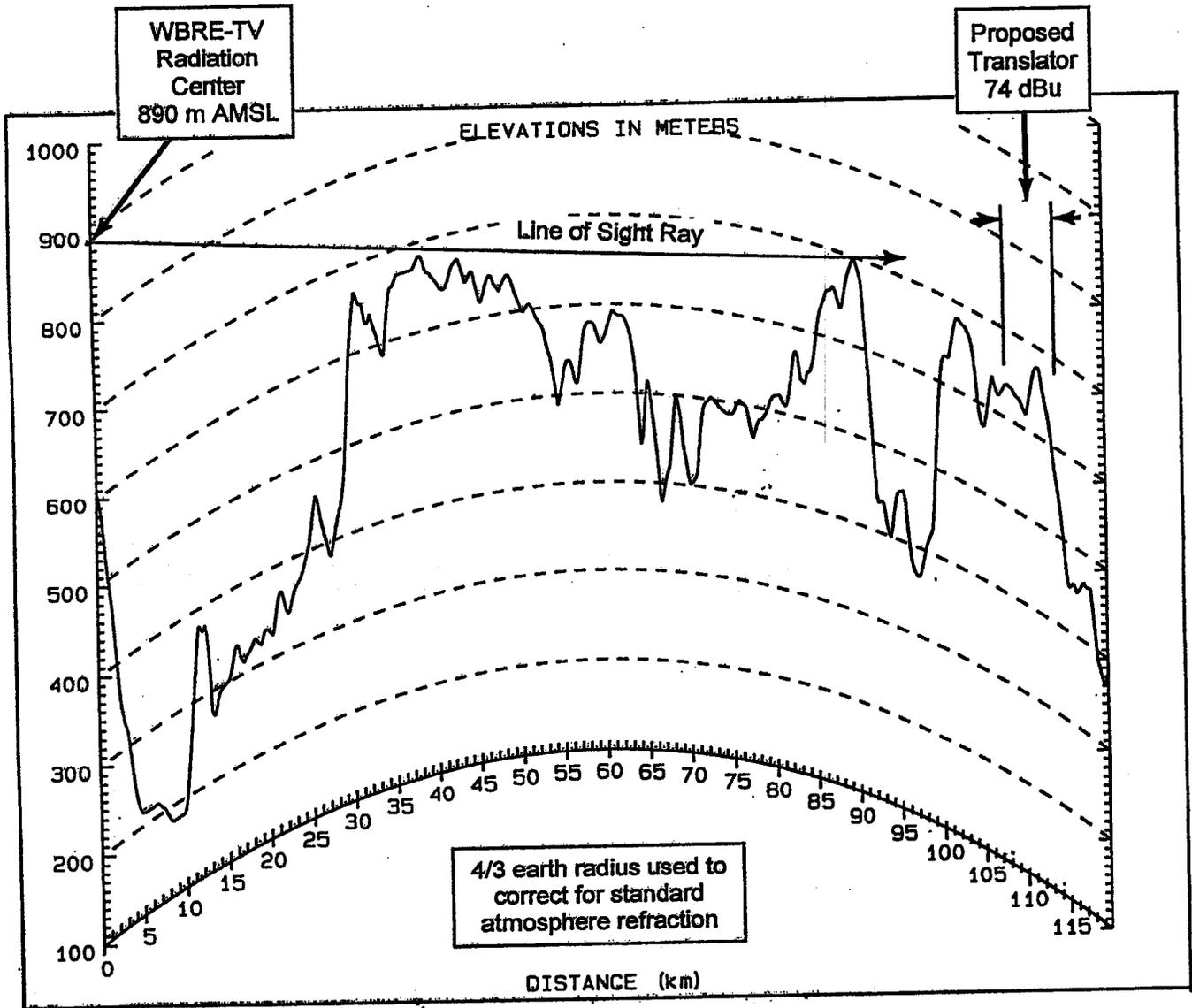
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Figure 3



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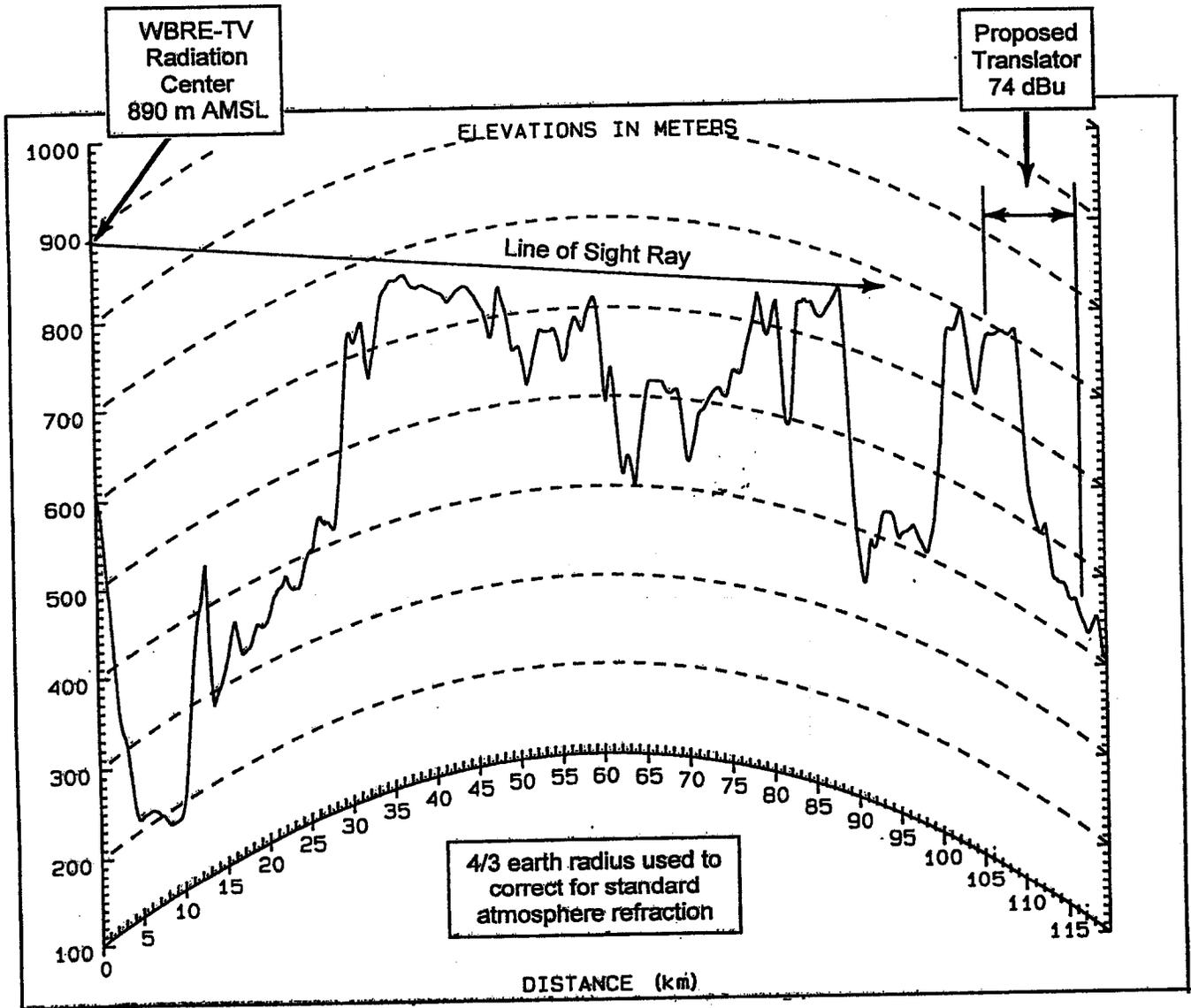


**303° TRUE TERRAIN PROFILE FROM
WBRE-TV TOWARD PROPOSED 74 dBu CONTOUR**

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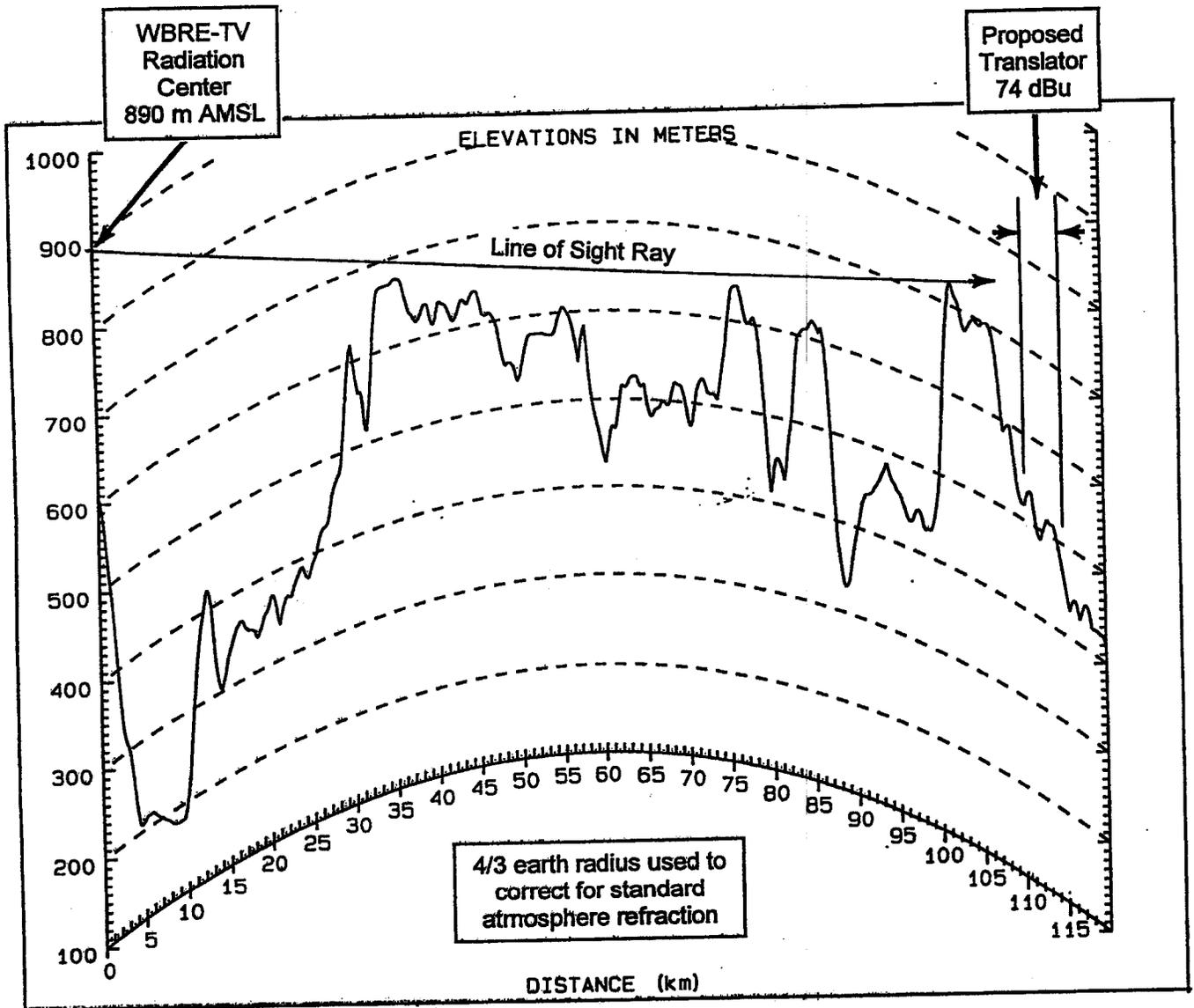


**305.5° TRUE TERRAIN PROFILE FROM
WBRE-TV TOWARD PROPOSED 74 dBu CONTOUR**

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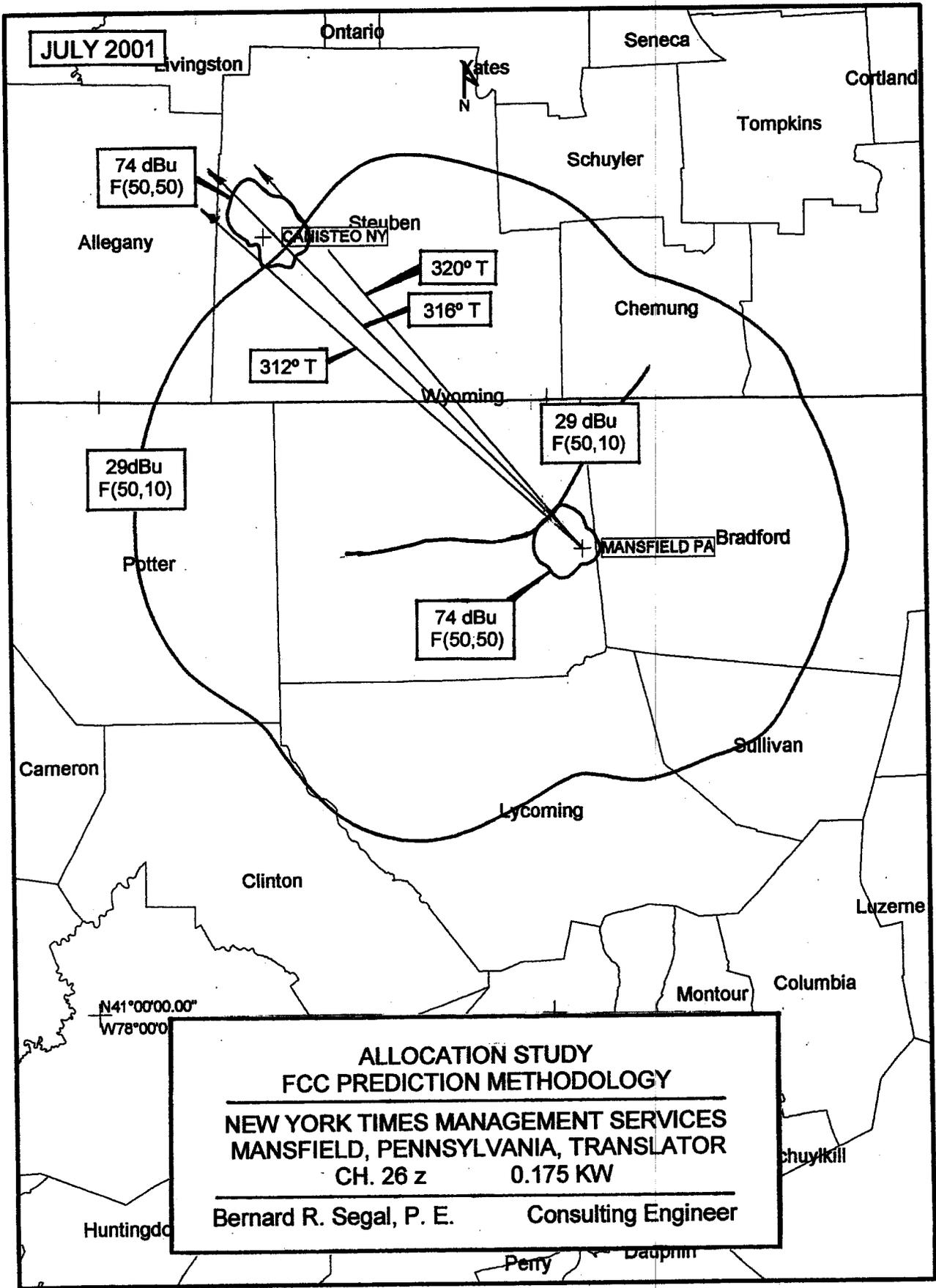
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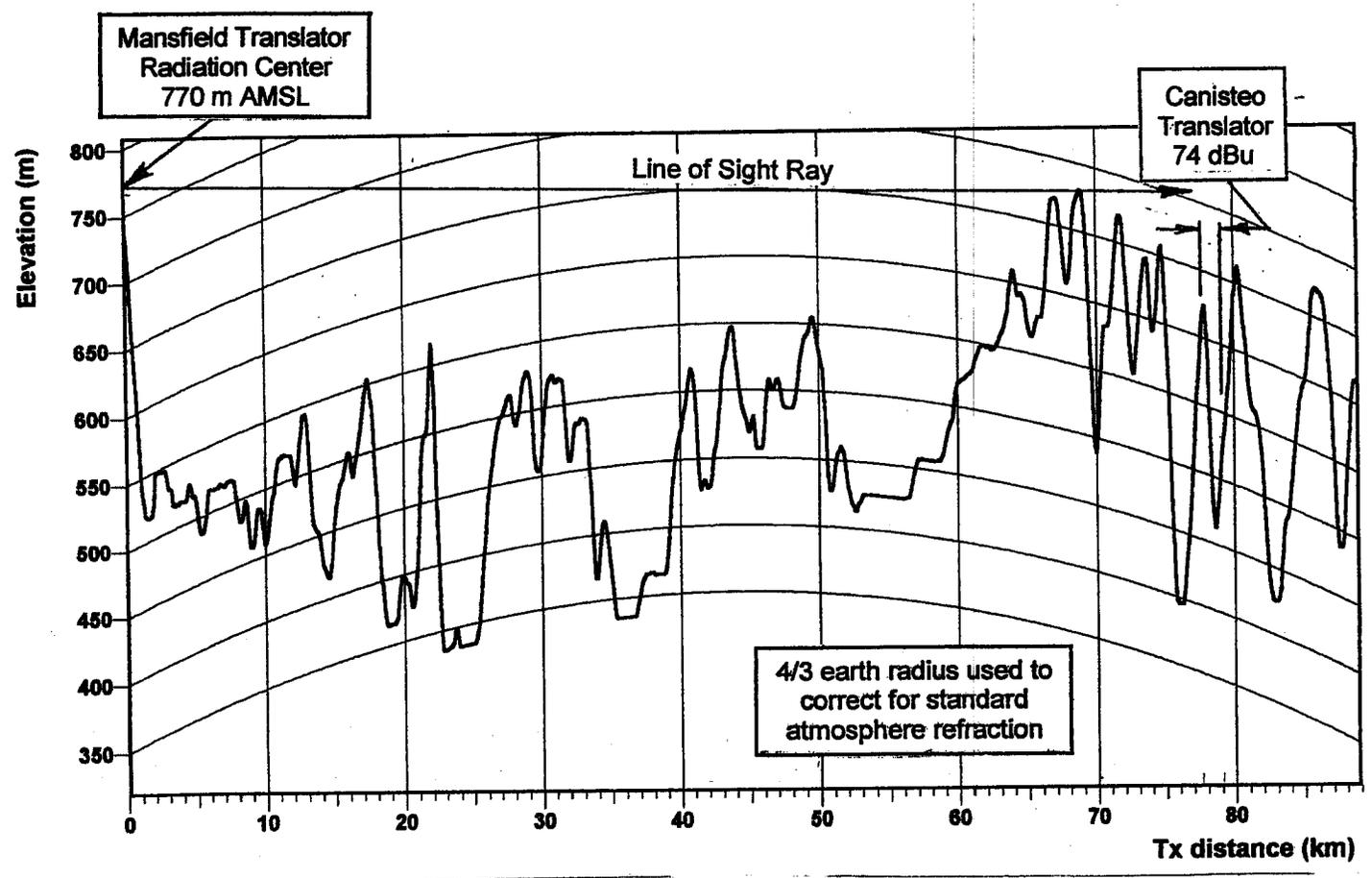
**308° TRUE TERRAIN PROFILE FROM
WBRE-TV TOWARD PROPOSED 74 dBu CONTOUR**

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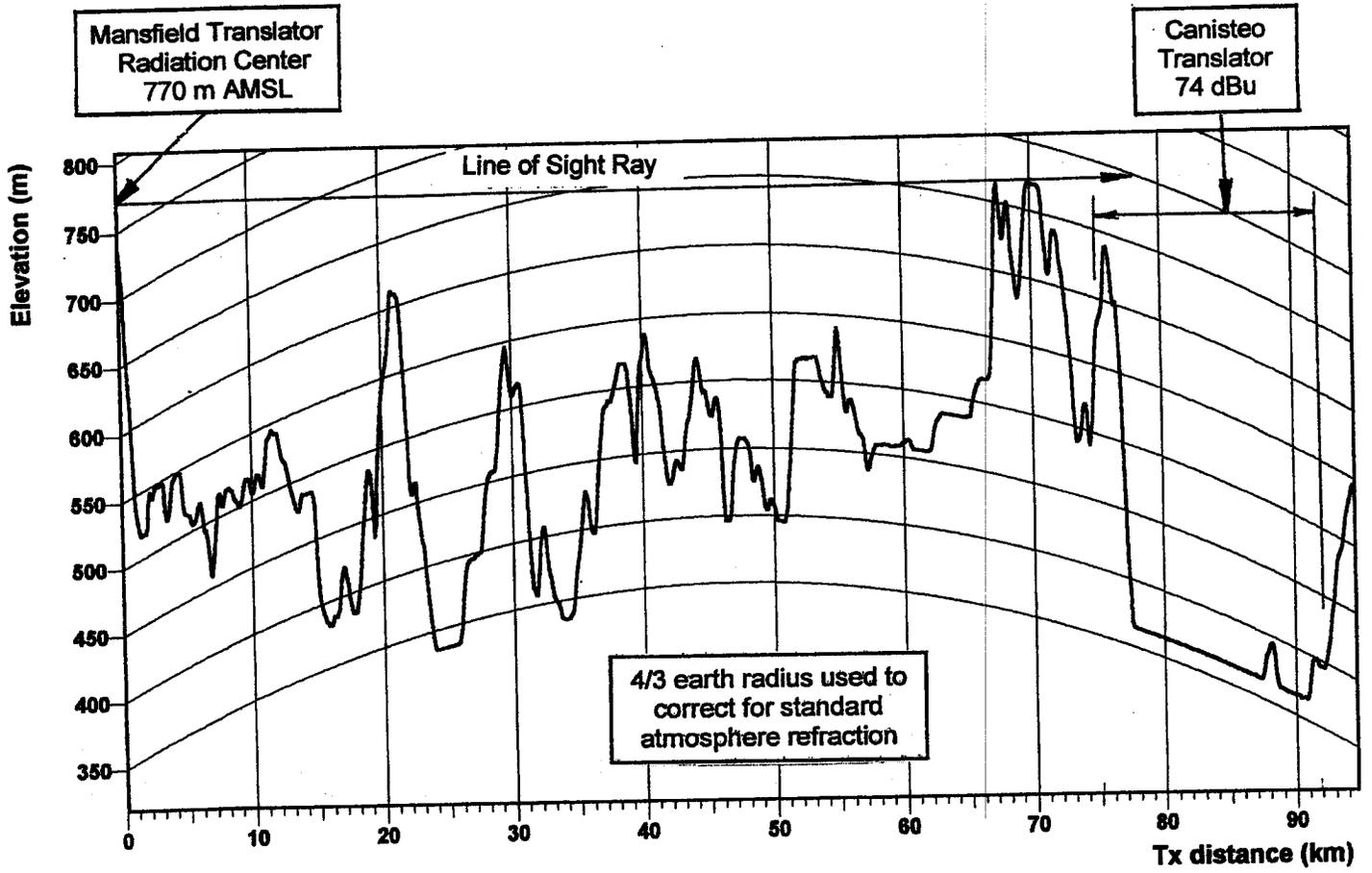


**312° TRUE TERRAIN PROFILE FROM
PROPOSED MANSFIELD TRANSLATOR TO
PROPOSED CANISTEO 74 DBU CONTOUR**

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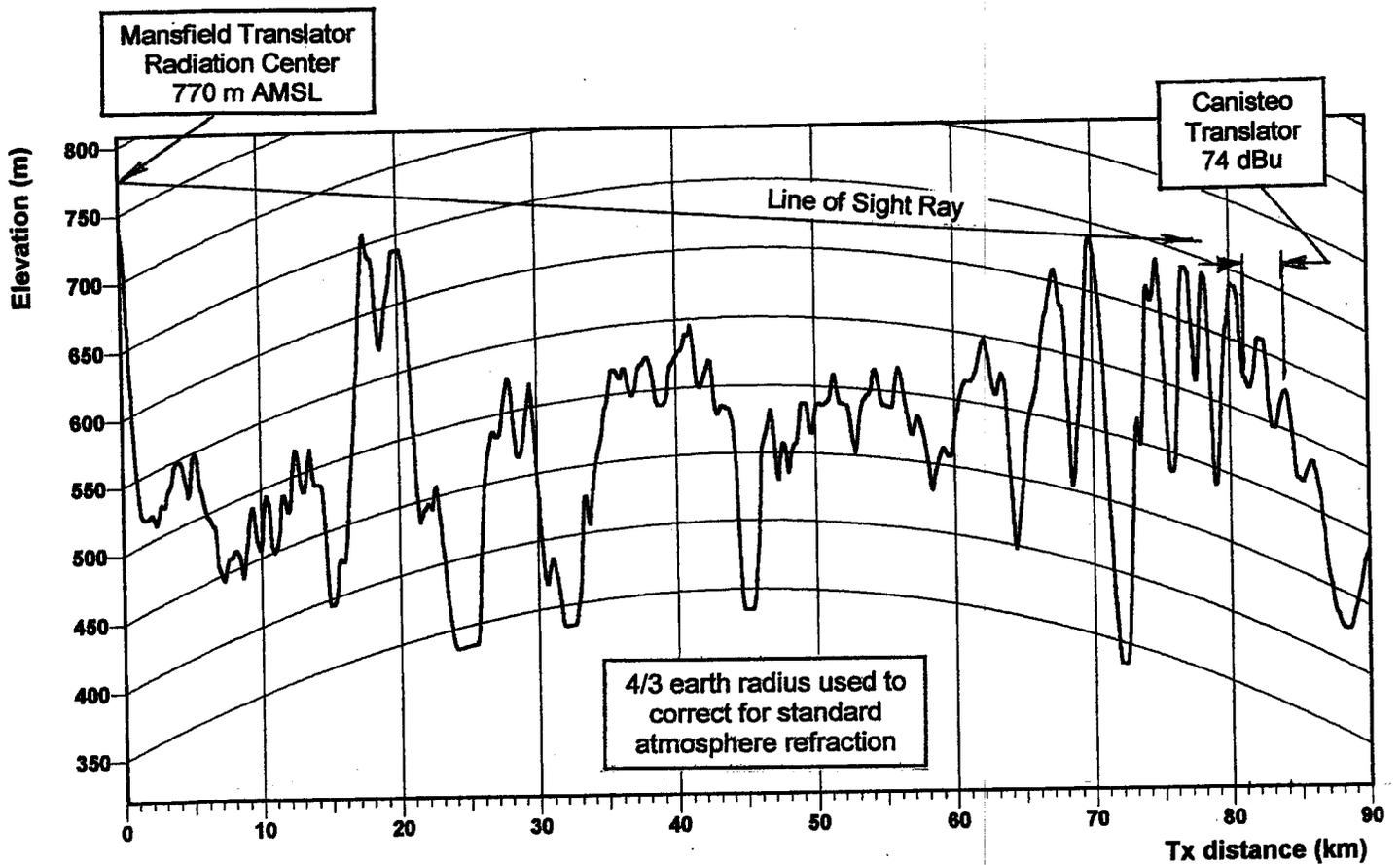


**316° TRUE TERRAIN PROFILE FROM
PROPOSED MANSFIELD TRANSLATOR TO
PROPOSED CANISTEO 74 DBU CONTOR**

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**320° TRUE TERRAIN PROFILE FROM
PROPOSED MANSFIELD TRANSLATOR TO
PROPOSED CANISTEO 74 DBU CONTOUR**

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