

Engineering Statement and Interference Analysis

This technical statement supports this application to modify BMPDTA-20120221ABQ for WTSD-CD (“WTSD”) on channel 16, Philadelphia, PA, Facility ID 53579 (“WTSD”), licensed to the Applicant here in.

Displacement Relief

The Applicant was issued the above-referenced construction permit for WTSD on digital channel 16 and began operating with its authorized digital facility on June 27, 2012.

On July 3, 2012, WTSD was contacted by representatives from the Department of Information Technology and Telecommunications of the City of New York (“NY DOITTT”). The representatives NY DOITT indicated that their system users, including the NYPD and NYFD, were receiving increased interference and requested WTSD to cease operations. WTSD immediately ceased operations and filed for authority to remain silent, pursuant to BLSTA-20120713AEE. WTSD also received interference notice from the Township of Woodbridge, New Jersey, see Exhibit 11, Attachment A.

In cooperation with the NY DOITT and the City of Woodbridge, WTSD hired Broadcast Sciences and Communications Technologies Inc. to propose and conduct a series of tests and make recommendations for a swift resolution of this matter. For testing purposes, a STA was filed at a lower power (BSTA-20120910ACU) and WTSD operated pursuant to this STA before taking the station silent again at NY DOITT’s request.

Although WTSD has attempted to work with NY DOITT in good faith to conduct testing to resolve NY DOITT’s concerns, this process has moved very slowly and has prevented WTSD from resuming operations. Therefore, WTSD proposes to move to digital channel 23 so that it may expeditiously resume operations.

Proposed Facility

The proposed facility on channel 23 was studied using the Techware’s tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The Applicant requests that the Commission processes this instant application using the standard Longley-Rice analysis settings:

- Cell Size for Service Analysis is 1.0 km/side
- Distance Increments for Longley-Rice Analysis is 1.00 km

This application does not cause any predicted interference to any of the other proposals. It is believed that the proposed facility complies with the requirements of Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, 74.794(b) and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Class A, Low Power TV and TV Translator Station Protection

Except as referenced below, the proposed facility causes less than 0.5% interference to surrounding low power and Class A authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

The proposed facility of channel 23 will interfere with BDISDTL-20101206ABZ on channel 23 in Springville, NJ for WNAI-LD, licensed to Marcia Cohen. The Applicant entered into an Interference Acceptance Agreement with Marcia Cohen, see Exhibit 11, Attachment B.