

Exhibit 47 – Statement A  
**NATURE OF THE PROPOSAL**  
**PROPOSED ANTENNA SYSTEM**  
prepared for  
**Pacific and Southern Company, Inc.**  
WTSP(TV) St. Petersburg, Florida  
Facility ID: 11290  
Ch. 10 69 kW (MAX-DA) 476.9 m

*Pacific and Southern Company, Inc. (“P&S”)* is the permittee of digital television station WTSP(TV), Channel 10, St. Petersburg, Florida<sup>1</sup>. *P&S* herein proposes to relocate the station to a developed communications site along with other Tampa-St. Petersburg market stations. The instant application has been prepared to provide the pertinent technical specifications and to address the Commission’s concerns regarding changes in coverage resulting from such a transmitter move.

The site selected for the new WTSP(TV) facility is a developed communications site owned by American Towers, Inc. (“American”) bearing the Antenna Structure Registration Number (“ASRN”) 1057473. American filed with the FAA for an increase in overall tower height to accommodate the WTSP(TV) antenna. The FAA responded with a “Determination of No Hazard to Air Navigation”, Aeronautical Study No. 2010-ASO-5520-OE. American will be modifying the ASRN shortly.

The proposed antenna is the currently authorized Dielectric THV-11A10 C150 which is directional in the horizontal plane, is horizontally polarized, and has 0.75° of electrical beam tilt. The relative field pattern data<sup>2</sup> has been entered into FCC Form 301, Section III-D, Question 10e. In addition, a plot of the horizontal plane (azimuth) relative field pattern, properly oriented with respect to True North, is provided in the attached **Exhibit 47-Figure 1**. Plots of the antenna vertical plane (elevation) relative field pattern are provided in the attached **Exhibit 47-Figures 2 and 2A**.

**Exhibit 47-Figure 3** provides a map depicting the service contour for the proposed facility along with principal community coverage contour. As demonstrated therein, the principal community of St. Petersburg, Florida is predicted to receive the enhanced signal level as required in §73.625(a) of the Commission’s Rules. The proposed facility is predicted to provide interference-

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<sup>1</sup> see BPCDT-20100120AAW. This facility was constructed and an *Application for License* was filed, see BLCDDT - 20100212AAA.

<sup>2</sup> *P&S* intends to move the existing directional antenna to the new location. For this application, the existing authorized antenna pattern is rotated 205° clockwise with respect to True North.

free service to 4,159,695 persons, which is 120.7 percent of the 3,447,000 persons that were predicted to have received interference free service from the Appendix B facility<sup>3</sup>.

The proposed 69 kW effective radiated power (“ERP”) exceeds the maximum ERP permitted for an antenna height above average terrain (“HAAT”) of 476.9 meters as specified in Section 73.622(f)(7)(i). However, Section 73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the station having the largest coverage area within the same market. In this case, the largest service area is that of the licensed facility for WTVT(TV) (digital Ch. 12, Tampa, Florida, 72.3 kW ERP / 436 meters HAAT, BLCDDT-20080410AAF). The area within the proposed WTSP(TV) 36 dBμ digital service contour is 43,876.5 square kilometers, which does not exceed the 43,877.9 square kilometers of area within the licensed WTVT(TV) facility 36 dBμ digital service contour. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission’s Rules.

Since the proposed facility extends the service contour past that currently authorized for the Appendix B facility, interference studies were performed in accordance with the methods set forth in the Commission’s OET Bulletin No 69 (“OET 69”). The results of the studies indicate that, with the exception of one facility, no new interference in excess of the 0.5% limit established in the Commission’s Third Periodic Review<sup>4</sup> is caused the proposed WTSP(TV) operation. That facility is WJXX(TV), Facility ID 11893, Orange Park, Florida. A summary of the interference study results is provided in the attached **Exhibit 47-Table I**.

Interference in excess of the 0.5% limit is caused to the licensed and construction permit facilities for WJXX(TV), BLCDDT-20041102AEE and BPCDDT-20081205AGH, respectively. The facility authorized in the WJXX(TV) construction permit has been constructed and an *Application for License* has been filed<sup>5</sup>. Thus, consideration of the licensed WJXX (TV) facility is moot. The proposed WTSP(TV) facility is predicted cause 1.475% new interference, which is a reduction from

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<sup>3</sup> See *Memorandum Opinion And Order On Reconsideration of the Seventh Report and Order and Eighth Report And Order, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, FCC 08-72, Released March 6, 2008

<sup>4</sup> See *Report and Order, Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion To Digital Television*, MB Docket No. 07-91, FCC 07-228, Released December 31, 2007.

<sup>5</sup> see BLCDDT - 20090702AAK.

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the 2.884% caused by the current WTSP(TV) operation<sup>6</sup>. An updated interference acceptance agreement has been executed between P&S and Gannett River States Publishing Corporation (“GRSPC”), licensee of WJXX(TV), wherein GRSPC agrees to accept the new reduced level of interference resulting from the relocation of WTSP(TV). A copy of the signed agreement is provided herein as **Exhibit 47-Attachment I**.

The site proposed herein is approximately 64 kilometers from WTSP(TV)’s authorized site. Located in the Riverview, Florida area, this location is also home to most of the other television stations in the market. A benefit of moving WTSP(TV) to this location is that off-air viewers will not need to rotate their antennas in order to receive the station. As expected with a move of this distance, there are predicted areas of gain and loss using the Commission’s standard contour propagation method.

**Exhibit 47-Figure 4** has been prepared to show the predicted gain and loss areas resulting from the instant proposal. Typically, the area of loss is determined by predicting the location of the service contours for both facilities using the Commission’s standard contour propagation method. The area covered by the authorized facility that would no longer be covered by the proposed facility is considered the “loss area”. Likewise, the area that would be covered by the proposed facility that is not presently covered by the authorized facility is considered the “gain area”.

Since Commission’s policy for this purpose is to count the number of persons within the contours, the data is as follows:

	<b>Contour Population (2000 Census)</b>
Authorized Facility	3,809,929
Proposed Facility	4,632,859
Gain Area	1,001,997
Loss Area	178,942

As shown, the gain in contour population coverage is substantial while the loss represents less than 4.7% of the population currently predicted to be within the authorized facility service contour. A depiction of the predicted loss area is provided in **Exhibit 47-Figure 5**.

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<sup>6</sup> An interference acceptance agreement exists between WTSP(TV) and WJXX(TV).  
**Cavell, Mertz & Associates, Inc.**

WTSP(TV) is a CBS Television Network affiliate. Other CBS affiliate stations are also predicted to provide coverage in the defined “loss” area. When coverage from CBS affiliated stations WGFL<sup>7</sup> and WKMG-TV<sup>8</sup> is considered, the predicted loss area becomes much smaller as depicted in **Exhibit 47-Figure 6**. As shown, the predicted loss area is greatly reduced. With consideration of the coverage contribution from WGFL and WKMG-TV, the number of persons *not* predicted to receive CBS programming is reduced to 23,383.

*P&S* is also authorized to construct a replacement LPTV translator station<sup>9</sup> (see BDRTCDT-20100929ADR). When this facility is considered along with the coverage contribution of WGFL and WKMG-TV, as depicted in **Exhibit 47-Figure 7**, the loss area becomes even smaller and the number of persons *not* predicted to receive CBS programming is further reduced to 4,944 or 0.13% of the population within the authorized WTSP(TV) service contour.

An application to modify the construction permit for the replacement LPTV translator station is being concurrently filed with the instant application. The translator modification application, which specifies a different site and antenna pattern, is necessary due to issues at the authorized site. A positive consequence of the replacement LPTV translator station relocation is improved population coverage. As depicted in **Exhibit 49-Figure 8**, if the Commission should act favorably on the replacement LPTV translator modification application, the improved coverage along with the coverage contribution of WGFL and WKMG-TV, makes further reductions to the predicted loss area. In this scenario, the number of persons *not* predicted to receive CBS programming is further reduced to 2,472 or 0.06% of the population within the authorized WTSP(TV) service contour.

Thus, the loss area is mitigated by coverage from other CBS affiliate stations and the replacement LPTV translator station. In either case (with the authorized or proposed replacement LPTV translator station), no more than 0.13% of the population predicted to receive CBS programming from the authorized facility will be impacted by the proposed transmitter relocation. Such a minimal impact should be considered “de-minimis”.

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<sup>7</sup> WGFL, Channel 28, Facility ID 7727, High Springs, Florida.

<sup>8</sup> WKMG-TV, Channel 26, Facility ID 71293, Orlando, Florida.

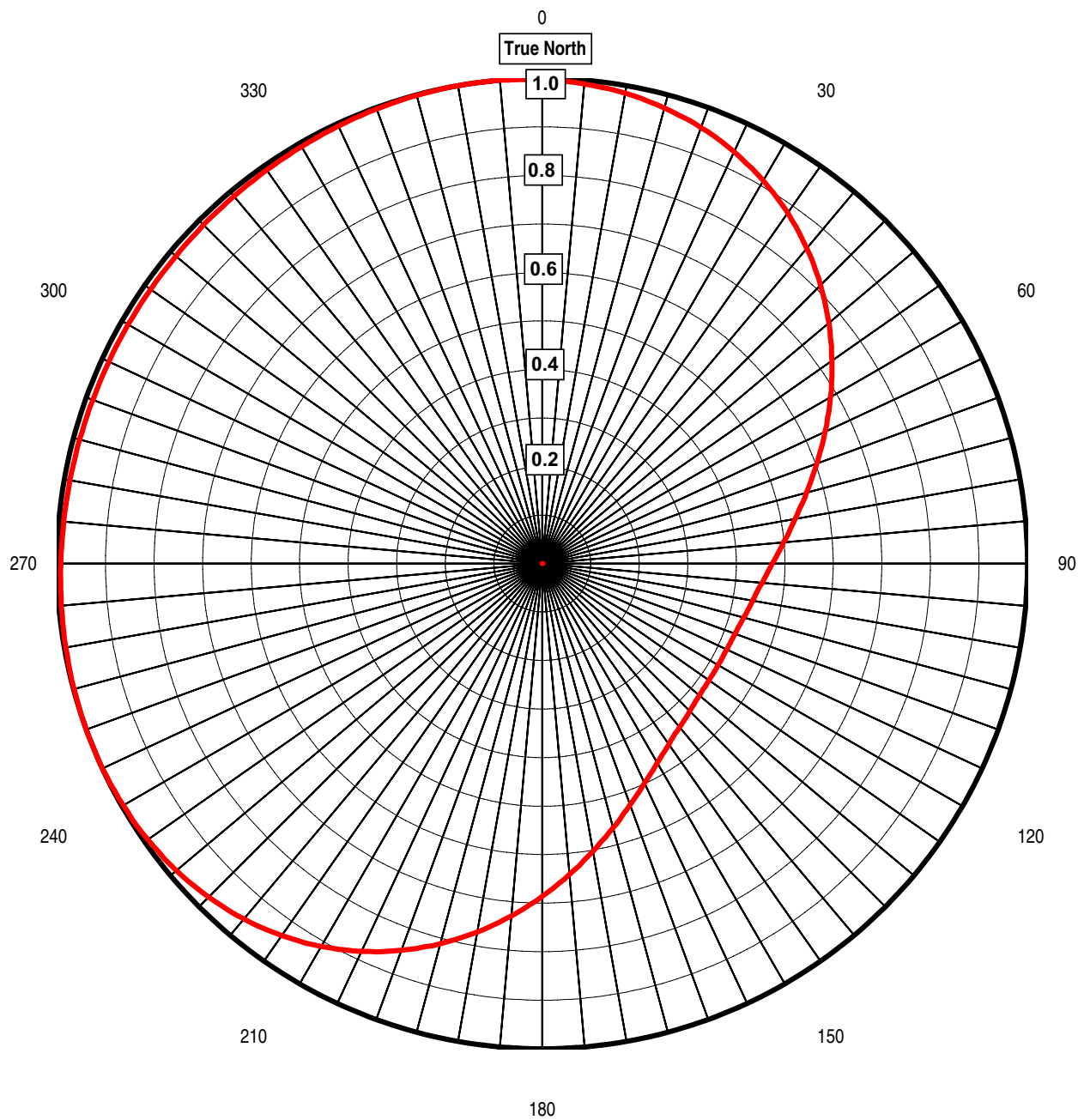
<sup>9</sup> The replacement LPTV translator station is needed to provide coverage to an area about 90 km from the authorized WTSP(TV) site. While this area is within the predicted WTSP(TV) service contour, actual off-air reception is limited.

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The proposed WTSP(TV) digital Channel 10 site is located more than 275 km from the nearest point on the international border with Mexico and does not require international coordination. The nearest FCC monitoring station is Vero Beach, FL at a distance of 208.7 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM stations located within 3.2 km of the existing tower site.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.



**Exhibit 47-Figure 1**  
**ANTENNA HORIZONTAL PLANE**  
**RELATIVE FIELD RADIATION PATTERN**

prepared January 2011 for

**Pacific and Southern Company, Inc.**

WTSP(TV) St. Petersburg, Florida

Facility ID 11290

Ch 10 69 kW (MAX-DA) 476.9 m

**Cavell, Mertz & Associates, Inc.**

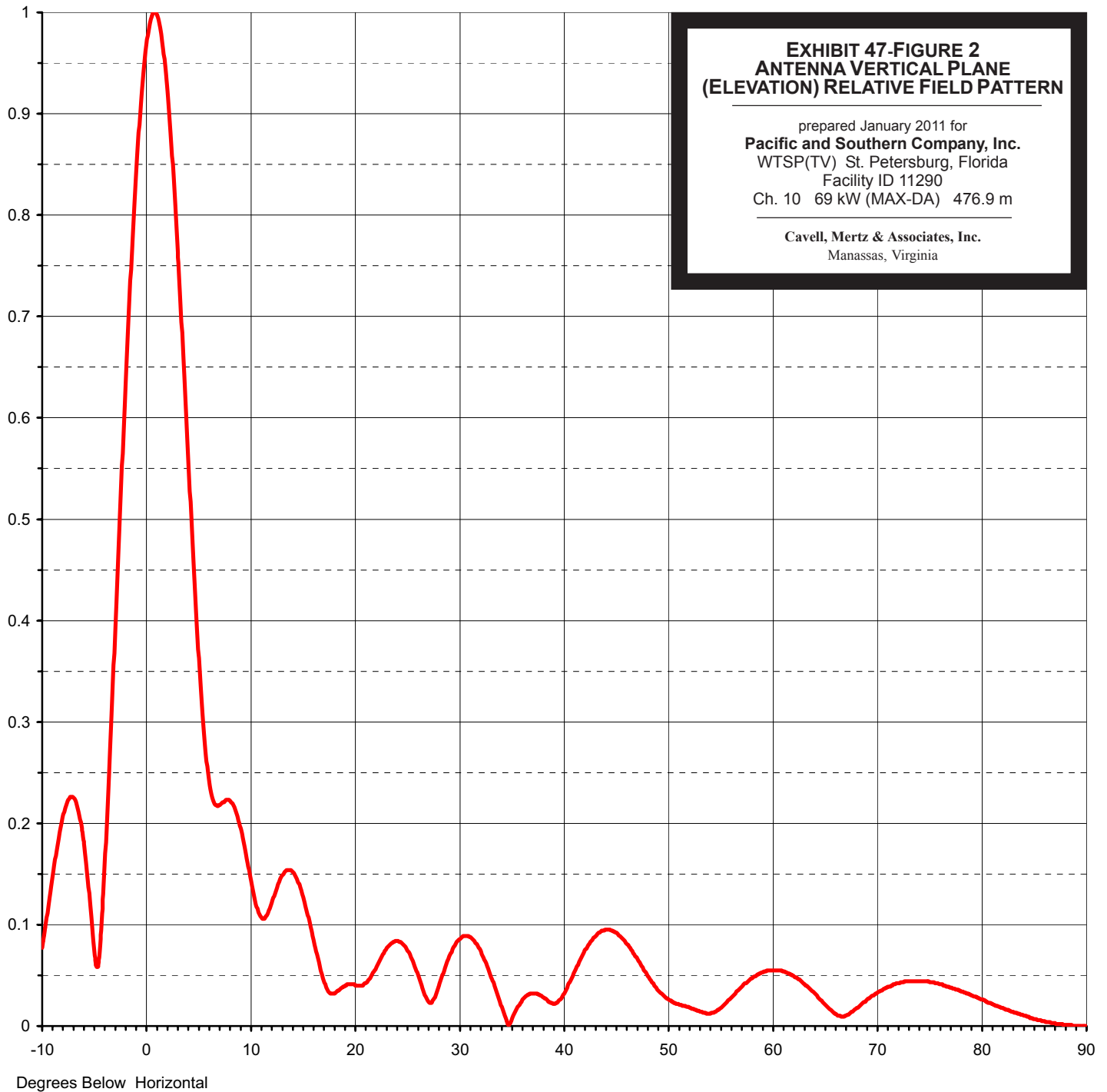
Manassas, Virginia



Proposal Number	<b>DCA-9869</b>	Revision:	<b>1</b>
Date	<b>24-Aug-04</b>		
Call Letters	<b>WTSP-DT</b>	Channel	<b>10</b>
Location	<b>St. Petersburg-Tampa, FL</b>		
Customer	<b>Gannet</b>		
Antenna Type	<b>THV-11A10 C150</b>		

## ELEVATION PATTERN

RMS Gain at Main Lobe	<b>11.00 ( 10.41 dB )</b>	Beam Tilt	<b>0.75 deg</b>
RMS Gain at Horizontal	<b>10.30 ( 10.13 dB )</b>	Frequency	<b>195.00 MHz</b>
Calculated / Measured	<b>Calculated</b>	Drawing #	<b>11V110075-90</b>

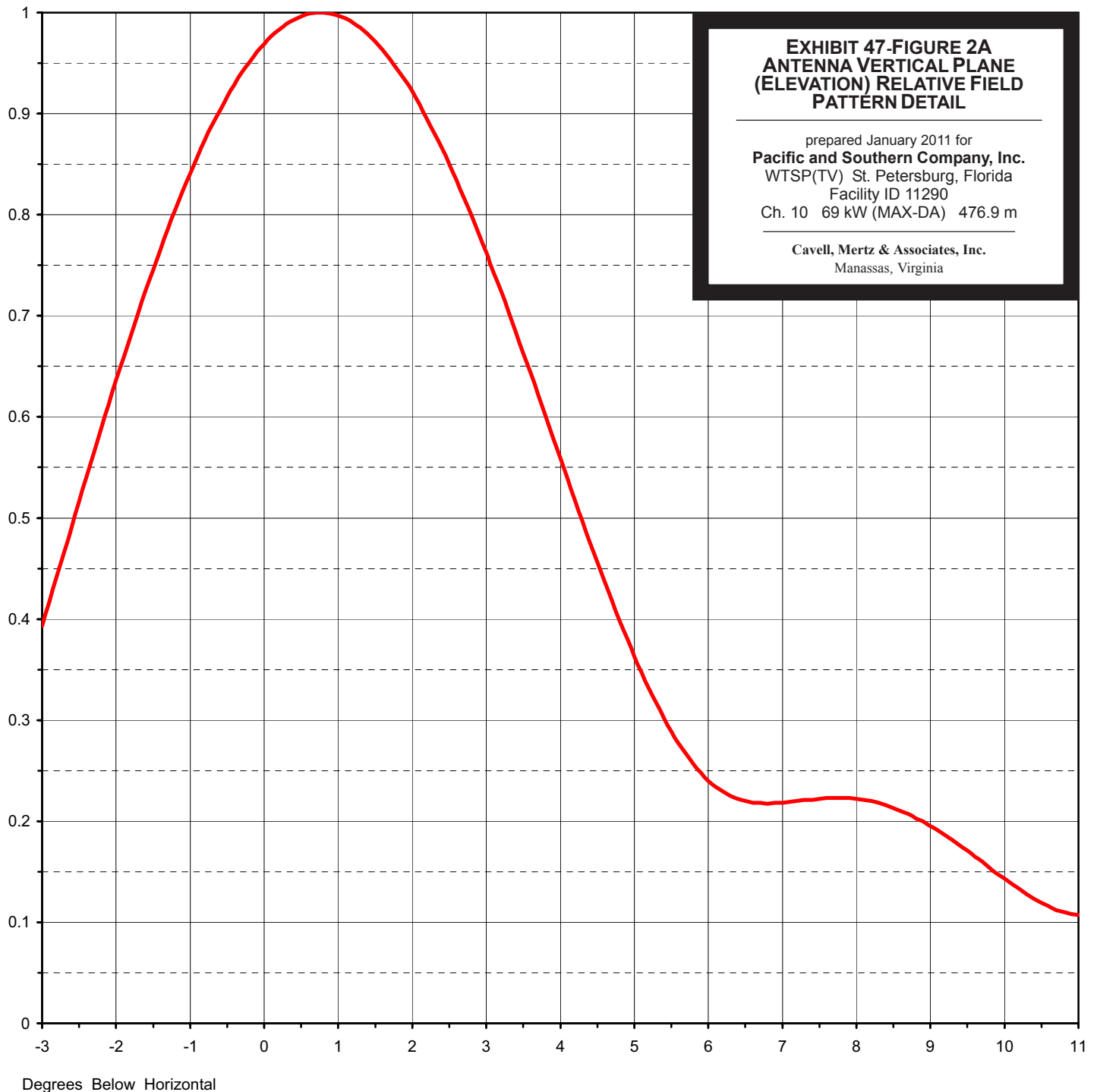




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Calculated / Measured	<b>Calculated</b>	Drawing #	<b>11V110075</b>





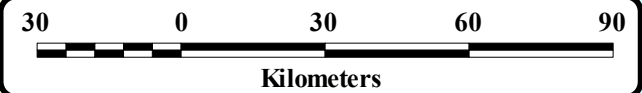
**EXHIBIT 47-FIGURE 3  
PROPOSED COVERAGE CONTOURS**

prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
WTSP(TV) St. Petersburg, Florida  
Facility ID 11290  
Ch. 10 69 kW (MAX-DA) 476.9 m

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Proposed WTSP(TV) Facility  
Ch. 10 69 kW (MAX-DA) 476.9 m  
36 dBu F(50,90) Service Contour  
43 dBu F(50,90)  
Principal Community Contour

St. Petersburg



Authorized WTSP(TV) Facility  
(BPCDT-20100120AAW)  
Ch. 10 78 kW (MAX-DA) 457 m  
36 dBu F(50,90) Service Contour

**EXHIBIT 47-FIGURE 4  
PREDICTED GAIN-LOSS AREAS  
WTSP AUTHORIZED AND  
PROPOSED FACILITIES**

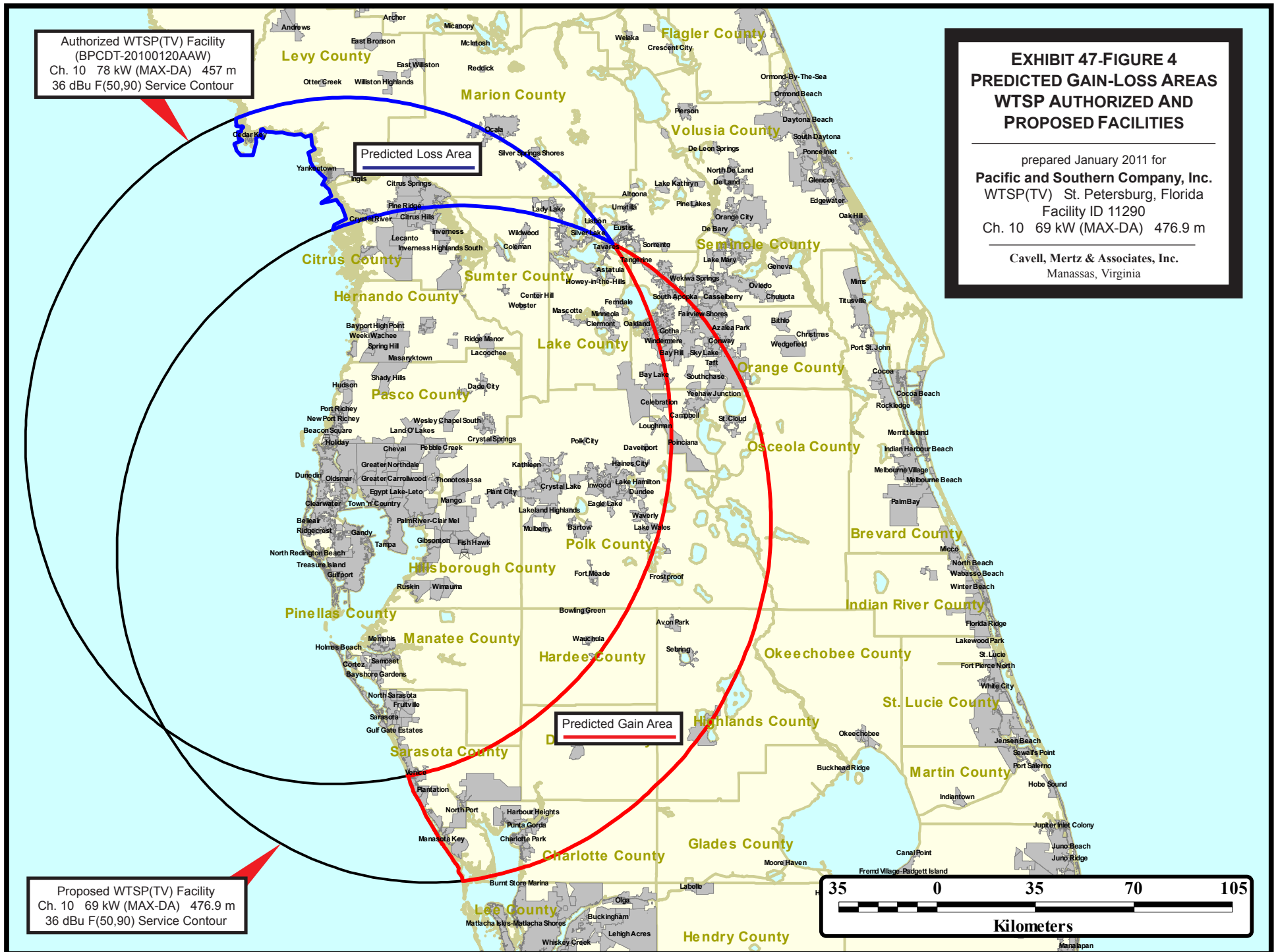
prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
WTSP(TV) St. Petersburg, Florida  
Facility ID 11290  
Ch. 10 69 kW (MAX-DA) 476.9 m

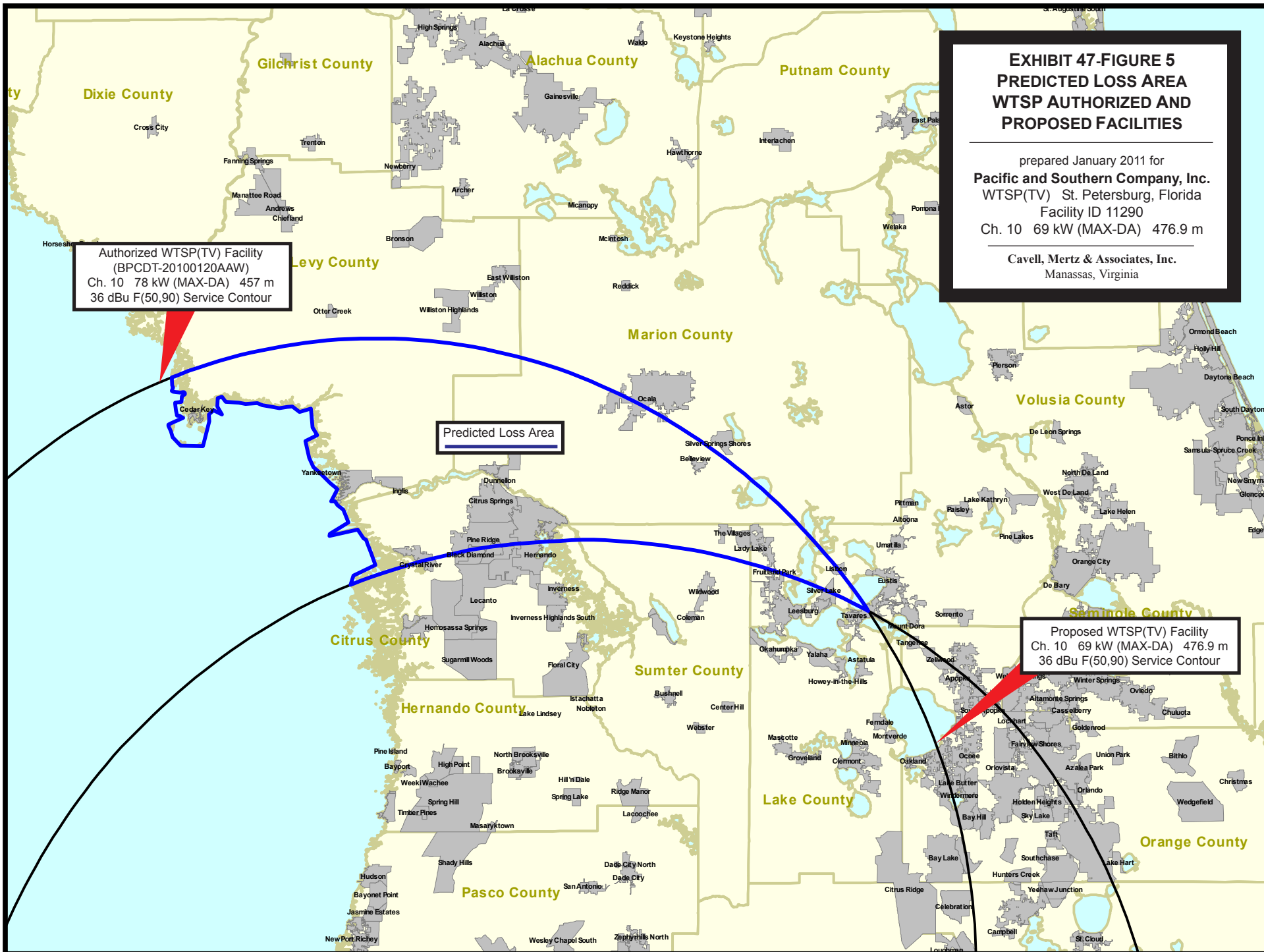
Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

Predicted Loss Area

Predicted Gain Area

Proposed WTSP(TV) Facility  
Ch. 10 69 kW (MAX-DA) 476.9 m  
36 dBu F(50,90) Service Contour





# EXHIBIT 47-FIGURE 5 PREDICTED LOSS AREA WTSP AUTHORIZED AND PROPOSED FACILITIES

prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
WTSP(TV) St. Petersburg, Florida  
Facility ID 11290  
Ch. 10 69 kW (MAX-DA) 476.9 m

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Proposed WTSP(TV) Facility  
Ch. 10 69 kW (MAX-DA) 476.9 m  
36 dBu F(50,90) Service Contour

prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
 WTSP(TV) St. Petersburg, Florida  
 Facility ID 11290  
 Ch. 10 69 kW (MAX-DA) 476.9 m

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**Cavell, Mertz & Associates, Inc.**  
 Manassas, Virginia

prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
 WTSP(TV) St. Petersburg, Florida  
 Facility ID 11290  
 Ch. 10 69 kW (MAX-DA) 476.9 m

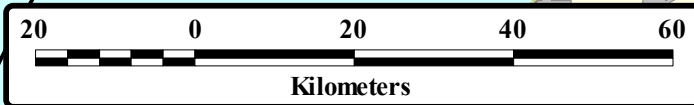
**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Authorized WTSP(TV) Facility  
(BPCDT-20100120AAW)  
Ch. 10 78 kW (MAX-DA) 457 m  
36 dBu F(50,90) Service Contour

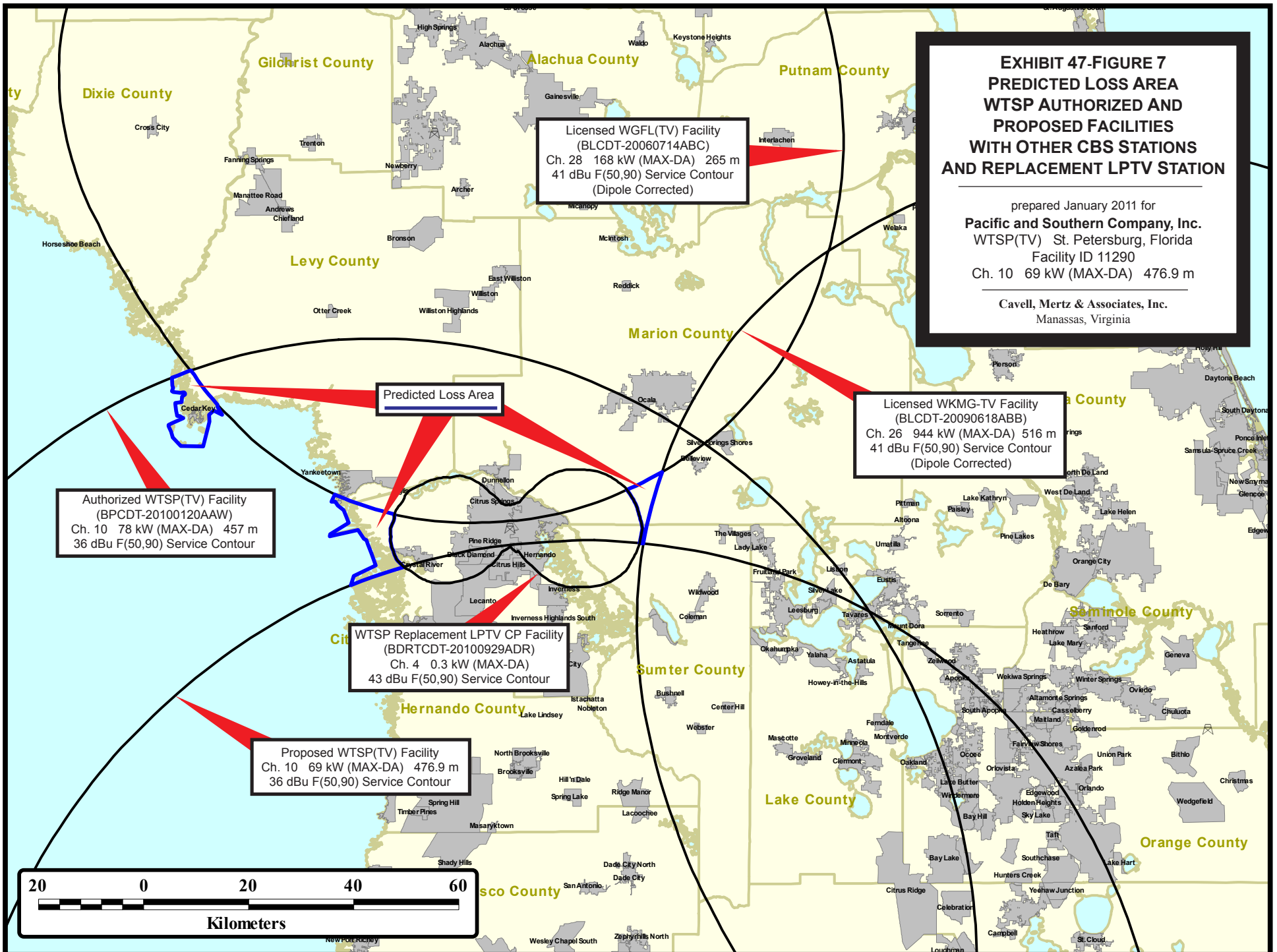
Licensed WGFL(TV) Facility  
(BLCDT-20060714ABC)  
Ch. 28 168 kW (MAX-DA) 265 m  
41 dBu F(50,90) Service Contour  
(Dipole Corrected)

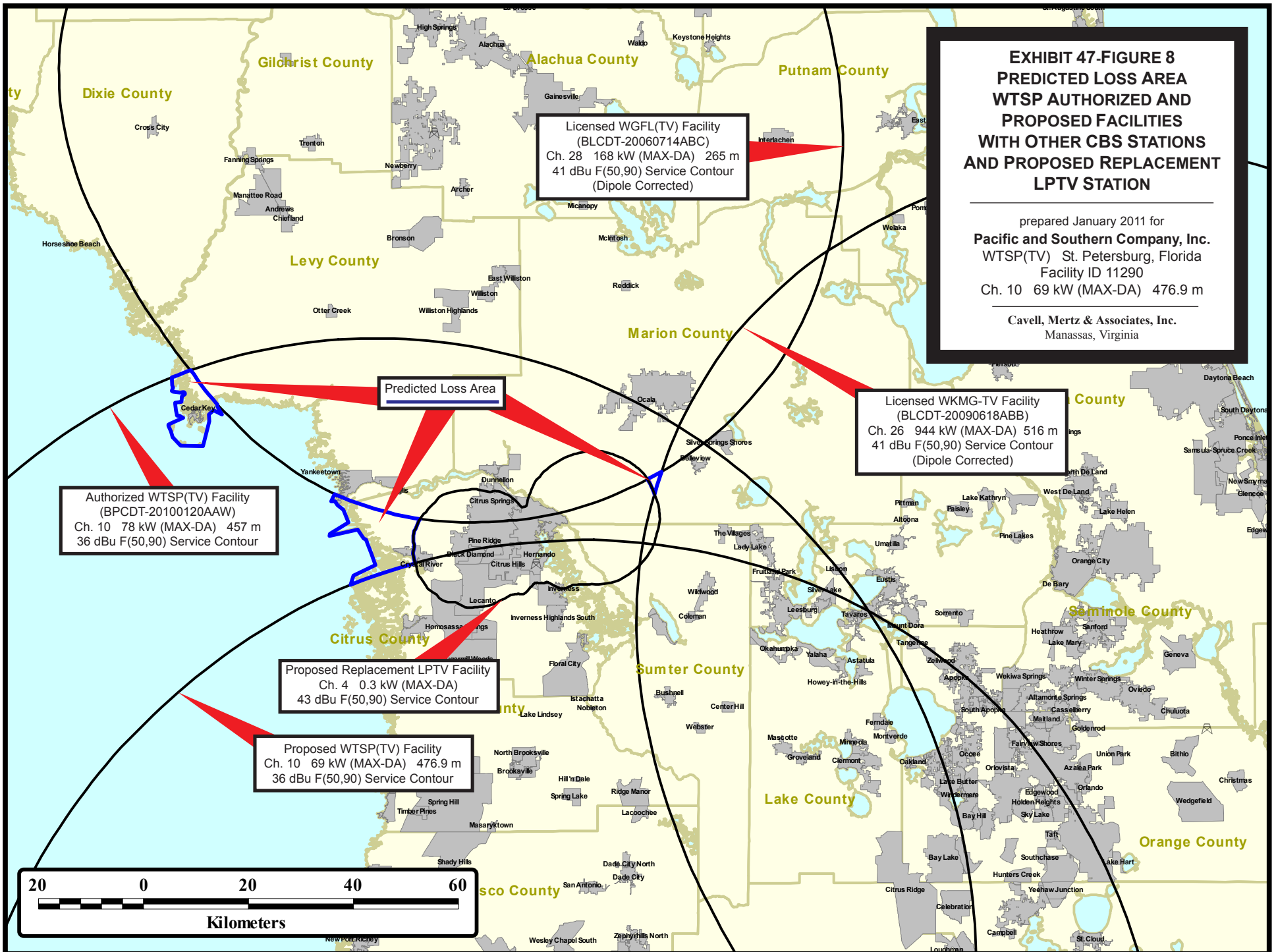
Licensed WKMG-TV Facility  
(BLCDT-20090618ABB)  
Ch. 26 944 kW (MAX-DA) 516 m  
41 dBu F(50,90) Service Contour  
(Dipole Corrected)

Proposed WTSP(TV) Facility  
Ch. 10 69 kW (MAX-DA) 476.9 m  
36 dBu F(50,90) Service Contour









**EXHIBIT 47-FIGURE 8  
PREDICTED LOSS AREA  
WTSP AUTHORIZED AND  
PROPOSED FACILITIES  
WITH OTHER CBS STATIONS  
AND PROPOSED REPLACEMENT  
LPTV STATION**

prepared January 2011 for  
**Pacific and Southern Company, Inc.**  
WTSP(TV) St. Petersburg, Florida  
Facility ID 11290  
Ch. 10 69 kW (MAX-DA) 476.9 m

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Exhibit 47-Table I  
**INTERFERENCE STUDY RESULTS SUMMARY**  
 prepared for  
**Pacific and Southern Company, Inc.**  
 WTSP St. Petersburg, Florida  
 Facility ID: 11290  
 Ch. 10 69 kW (MAX-DA) 476.9 m

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
9	WNBW-DT	Gainesville, FL	BLCDT-20090105AGT			--- No Interference ---		
10	WPLG	Miami, FL	BMPCDT-20100507ACE			--- No Interference ---		
10	WJXX	Orange Park, FL	BLCDT-20041102AEE	1,318,890	10,884	20,822	9,938	0.754 %
10	WJXX	Orange Park, FL	BPCDT-20081205AGH	1,332,914	21,502	41,162	19,660	1.475 %
10	WWCI-CA	Vero Beach, FL	BLTVA-20020726AAE			--- No Interference ---		
10	WWCI-CA	Vero Beach, FL	BSTA-20090618ADW			--- No Interference ---		
10	WWCI-CA	Vero Beach, FL	BDFCDVA-20080804ADJ			--- No Interference ---		
10	WALB	Albany, GA	BMPCDT-20080620ALA			--- No Interference ---		
11	WESH	Daytona Beach, FL	BMLCDT-20040930AXX	3,124,448	145,151	145,151	0	0.000 %

**NEGOTIATED CONFLICT RESOLUTION AGREEMENT**

This Interference Agreement ("Agreement") is entered into as of January 4, 2011 by and between Pacific and Southern Company, Inc., ("PSC"), licensee of WTSP-TV, Tampa-St. Petersburg, Florida, and Gannett River States Publishing Corp., ("GRSPC"), licensee of WJXX-TV, Orange Park, Florida.

1. WTSP is authorized by the Federal Communications Commission ("FCC") to operate on digital Channel 10 in Tampa-St. Petersburg, Florida. WJXX is authorized by the FCC to operate on digital Channel 10 in Orange Park, Florida, which signal also serves Jacksonville, Florida.

2. WTSP proposes to move its transmitter site to a new location and operate at 69 kW ERP using the existing directional antenna. WTSP intends to file an application with the FCC for such authorization.

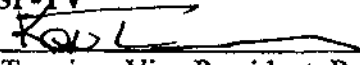
3. Pursuant to an engineering study, it is predicted WTSP's proposed transmitter relocation may result in approximately 1.475% signal interference to WJXX-TV's broadcast within the Jacksonville, Florida DMA. This level of interference is a reduction from 2.9% originally agreed to in a prior agreement.

4. GRSPC hereby accepts such potential interference from WTSP.

5. Except for the mutual agreement set forth in this Agreement, no further consideration, financial or otherwise is required or promised by either party.

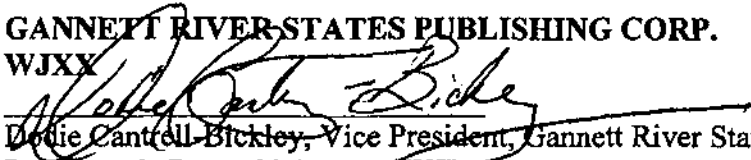
**PACIFIC AND SOUTHERN COMPANY, INC.**

**WTSP-TV**

  
Ken Tanning, Vice President, Pacific and Southern Company, Inc.  
President & General Manager, WTSP

**GANNETT RIVER STATES PUBLISHING CORP.**

**WJXX**

  
Dottie Cantrell-Bickley, Vice President, Gannett River States Publishing Corp.  
President & General Manager, WJXX