

### **Engineering Statement and Interference Analysis**

This application proposes a digital companion channel facility to be associated with Class A television station WTSD-CA on channel 14 in Philadelphia, PA, Facility ID 53579, licensed to the Local Media TV Philadelphia, LLC (“LMTV Philadelphia” or “Applicant”).

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

It is believed that the proposed facility complies with the requirements Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 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.

#### **Dismissal Request**

Prior to the grant of this instant digital companion channel application, the Applicant requests that the Commission dismiss BMPDTA-20120221ABQ and BLDTA-20120627AAX for WTSD-CA.

#### **Digital TV Station Protection**

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and 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 A.