discuss the fact that individual small businesses will be severely harmed by these approaches. Indeed, judging by the New York ADI, it appears that these approaches tend to benefit VHF stations licensed to large entities, such as Westinghouse, Disney, General Electric and Fox, which are obviously not small businesses, at the expense of the UHF stations such as WMBC that are more likely to be small businesses. The Sixth Order thus violates the RFA for failure to properly tailor its regulatory requirements to the scale of the businesses affected and to fully assess the impact of its actions on small businesses such as WMBC.

IV. SPECIFIC PROPOSALS ON RECONSIDERATION.

The Commission should make appropriate adjustments in its DTV allotment scheme to ensure that all stations in the New York ADI have the same ability to replicate their current audience reach, and that no station suffers interference losses disproportionate to any other station, regardless of whether it is VHF or UHF, or licensed to New York City or New Jersey. Mountain proposes for FCC consideration the following changes to alleviate the severe harm that would be caused to WMBC's ability to serve existing viewers.

A. Changes To Allotments.

1. Reallotment Of DTV Channel 61.

The proposed DTV allotment of channel 61 to WNET for DTV imposes significant interference on WMBC's existing NTSC allotment. Under the Commission's governing policies for implementation of DTV, a channel should not be allotted which would cause such extensive interference to the existing NTSC operations of any station during the transition period. Accordingly, the Commission must allot another DTV channel to WNET,

in the 60-69 band or elsewhere.[50] Moreover, as discussed below, in making further revisions to the Table the Commission should not provide DTV allotments the same protection from interference as NTSC stations during the transition where doing so would cause significant harm to NTSC service.

2. Reallotment Of WMBC's DTV Channel.

Consistent with the goal of service area replication, Mountain must be assigned a DTV allotment with which it does not face an extensive loss of service area population on a permanent basis. Based upon the programming tools available to Mountain, it appears that one such possibility is channel 34, which would require no other change to the allotment table. Mr. du Treil has evaluated a minimum DTV facility (50 kw average ERP) operating on that channel from the WMBC site, and concluded that this operation seems to more closely replicate WMBC's present NTSC service area than would channel 8, with improvements in interference received and given. See Exhibit 1 at 7-8.

Mountain offers this proposal for consideration in light of the concerns it has raised herein. In doing so, however, Mountain notes that the Commission's DTV allotment study incorporates the complex Longley-Rice irregular terrain propagation model. While the Commission has released the software it utilized, most private firms lack the particular platforms and data bases necessary to make this software effectively usable. Mountain's engineering consultant has employed a program available through the Department of Commerce, which has proven to have limitations. Nor has the Commission released OET

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[50]Presumably, the Commission now plans to relocate the DTV stations given non-core DTV allotments from recovered spectrum in the future. Sixth Order at ¶ 84.

Bulletin 69 dealing with the Longley-Rice model. Thus, the suitability of channel 34 for WMBC must be assessed utilizing the FCC software, and will depend on other possible modifications to the allotments and other licensee's ultimate decisions.[51] As an alternative, Mountain proposes that the Commission rerun the New York area DTV allotments in a manner that fully utilizes the spectrum between channels 60 and 69, as discussed below.

B. Changes In Policies Underlying Those Allotments.

1. Elimination Of The Core Spectrum/Spectrum Recovery Policies.

The Sixth NPRM proposed to concentrate all future DTV service in a smaller "core region" of VHF and UHF spectrum, excluding channels 60 to 69.[52]

> Studies by our staff indicate that the service area replication and interference differences associated with attempting to locate all DTV operations within a core spectrum area and minimize use of channels 60-69 are small.[53]

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[51]As noted above, Mountain understands that the OET staff has, commendably, made its allotment code available to engineering firms on an informal basis. However, the Commission does not appear to have released a formal public notice concerning the availability of this software to all commenters. Moreover, most firms appear to lack the resources necessary to fully run this extremely sophisticated allotment software, and thus analyze the proposed allotments and ascertain alternatives. Thus, it appears that a significant component in the Commission's methodology has not been fully and effectively made available to all affected parties and subject to public comment. Compare Portland Cement Association v. Ruckelshaus, 486 F.2d 375, 393 (D.C. Cir. 1973) ("It is not consonant with the purpose of a rule-making proceeding to promulgate rules on the basis of inadequate data, or on data that [to a] critical degree, is known only to the agency") (emphasis added); U.S. v. Nova Scotia Food Produces Corp., 568 F.2d 240 (2nd Cir. 1977) (failure to notify interested persons of the scientific research relied upon by the agency prevented relevant comment). Mountain must reserve the right to supplement this Petition upon a full and effective opportunity to analyze the Commission's allotment methodology.

[52]Sixth NPRM at ¶¶ 18-19.

[53]Id. at ¶ 32.

Thus, the Sixth Order's Table of Allotments primarily utilizes channels 2 to 51 for DTV.[54] According to the Sixth Order, this approach is intended to facilitate the eventual recovery of existing analog spectrum and the early recovery of channels 60 to 69.[55] The Table does contain numerous instances where a station's NTSC and DTV assignments are both outside the core spectrum. Such stations are to be assigned new channels for DTV from "recovered" spectrum within the "core."[56]

The Sixth Order concluded that these core spectrum/spectrum recovery approaches would not have a significant impact on the "flexibility" needed to implement DTV and that, if problems did arise, they would be better addressed through "technical solutions" rather than reliance on channels 60-69.[57] The Sixth Order further concluded that such approaches are consistent with the principles underlying the DTV proceeding:

> We find that the impact of our core and spectrum recovery approaches on interference and service replication to be insubstantial. . . . We disagree with those parties that assert that these approaches would impact the implementation of DTV by full service broadcasters. Under the DTV Table we are adopting, almost 99% of all existing NTSC service areas and viewers will be unaffected by the implementation of DTV operations.[58]

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[54]Sixth Order at ¶ 83. The Commission indicated that it would consider retaining channels 2 to 6 for DTV use on a permanent basis if they prove "acceptable." Id.

[55]Id. at ¶ 76.

[56]Id. at ¶ 84.

[57]Id. at ¶ 77.

[58]Id. at ¶ 78 (footnotes omitted) (emphasis added).

This conclusion is erroneous, however. The harm caused by the proposed allotments to WMBC and its existing viewers clearly demonstrates that the assumptions underlying the core spectrum/spectrum recovery policies are defective and must be reassessed. The impact of those policies on the preeminent goals of minimizing interference and maximizing service area replication is not "insubstantial." The "service area replication and interference differences" resulting from the policies are by no means "small." Quite obviously, the Commission will need as much television spectrum as possible in congested areas such as the New York ADI in order to "ensure that broadcasters have the ability to reach the audiences that they now serve" and provide for a "high degree of service replication by all stations."[59]

Nor can the desire to auction spectrum justify imposing such significant service losses. It is grossly inequitable for any individual station and its viewers to effectively subsidize spectrum recovery and resale for an entire market. In order to fulfill the established DTV policy goals of minimizing transitional interference and replicating service areas, the Commission must fully utilize channels 60-69, at least in congested areas such as the New York ADI.[60]

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[59]Sixth Order at ¶¶ 29-30 (emphasis added).

[60]Mountain understands that numerous Los Angeles stations have been assigned DTV channels outside the core spectrum for the transition period. Mountain also understands that a group of licensees on channels 2 to 6 have petitioned the Commission to include those channels in the ultimate DTV core spectrum. See Petition For Reconsideration Of Decision Regarding Channels 2-6, filed May 29, 1997.

2. Qualification Of The Decision To Protect DTV And NTSC Equally During The Transition Period.

While the Sixth Order eliminated the priority that was previously placed on maximizing DTV service areas over protecting NTSC service areas, it attempted to balance interference between both DTV and NTSC "equally."[61] In a congested area such as the New York ADI, however, providing equivalent protection to DTV at this stage of the transition is a luxury which is enjoyed at the unjustified expense of the existing NTSC service that viewers have come to expect. The priority for most viewers in the near future will clearly be the preservation of their existing television service as they know it. The Commission's final Table of Allotments during the transition must not protect DTV allotments to the extent that significant service area losses are imposed on existing NTSC stations.

3. Extension Of The Choice In Surrendering Channels.

The Sixth Order permits stations now located within the arbitrary "core" spectrum to select either their original NTSC allotment or their core spectrum DTV allotment to keep as their final DTV allotment. Thus, such stations ultimately may choose between the better of their two allotments based upon the overall makeup of allotments at the end of the transition period. But stations which now operate outside the core spectrum are not given any such choice. They may keep only their core spectrum DTV allotment, regardless of whether that allotment will create a significant permanent loss of their service area coverage, as is likely to be the case with WMBC.

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[61] Sixth Order at ¶ 87.

Clearly, this policy discriminates against NTSC stations located outside the core spectrum, leaving them at the mercy of other stations' ultimate choices. Accordingly, the Commission should not only fully utilize channels 60 to 69 for DTV allotments, at least in congested areas such as the New York ADI, but also afford NTSC stations currently licensed to those channels with the same opportunity to choose either of their allotments for permanent DTV service at the end of the transition period.[62]

V. WMBC IS ENTITLED TO A HEARING ON THE PROPOSED MODIFICATION OF ITS LICENSE IF THE FCC DOES NOT GRANT RECONSIDERATION.

If the Commission does not grant Mountain's Petition, then it must designate a hearing concerning whether the proposed DTV allotments affecting WMBC will be in the public interest. Section 316 of the Communications Act authorizes the Commission to modify a license if its action will promote the public interest, provided that the licensee (or another licensee affected) is given the opportunity to protest that modification. Such a protest is governed by Section 309 of the Act.[63] Pursuant to Section 309(e), if a substantial and material question of fact is presented, then the Commission must designate a hearing.[64]

The allotments proposed in the Sixth Order will effectively modify Mountain's NTSC license by reducing the station's coverage significantly. Mountain believes that it has fully

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[62]The Telecommunications Act of 1996 does not mandate that the original allotment be surrendered, but rather that "either the additional license or the original license held by the licensee be surrendered . . ." 47 U.S.C. § 336(c) (emphasis added).

[63]47 U.S.C. § 316(a)(1)-(3).

[64]47 U.S.C. § 309(e). Pursuant to Section 316(b), in any case where a hearing is conducted under that Section, both the burden of proceeding and burden of proof are generally on the Commission. 47 U.S.C. § 316(b).

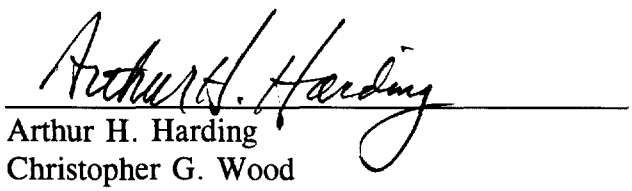
demonstrated that this result would not be in the public interest. At the very least, it has raised a substantial and material question of fact as to that conclusion. Accordingly, if the Commission does not reconsider the allotments impacting WMBC, it must designate a hearing concerning whether they will serve the public interest.

VI. CONCLUSION.

The proposed allotments will not minimize interference to WMBC during the transition to DTV or ensure that its existing service area will be replicated following the transition period, contrary to the very policies underlying this proceeding. The harm caused to WMBC also undermines other longstanding Congressional and FCC policies, to prevent loss of service, encourage UHF stations, further minority ownership, establish local service to New Jersey and tailor regulatory burdens to the size of the business affected. The Commission must reconsider the harmful impact of the Sixth Order's allotments on WMBC.

Respectfully submitted,

MOUNTAIN BROADCASTING CORPORATION



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Dated: June 13, 1997

Its Attorneys

EXHIBIT 1

STATEMENT OF ROBERT du TREIL

ENGINEERING STATEMENT
IN SUPPORT OF EMERGENCY PETITION FOR RECONSIDERATION
PREPARED FOR
MOUNTAIN BROADCASTING CORPORATION
NEWTON, NEW JERSEY
CHANNEL 63

This Engineering Statement was prepared on behalf of Mountain Broadcasting Corporation, licensee of WMBC-TV, Newton, New Jersey (NTSC Channel 63), in support of an Emergency Petition for Reconsideration concerning the FCC's digital television ("DTV") Sixth Report and Order ("Sixth Order").

Existing WMBC-TV NTSC Coverage

Appendix B of the Sixth Order outlines the calculated coverage and interference figures for all eligible television stations' authorized and proposed DTV allotment service areas. For the licensed WMBC-TV NTSC service these figures are as follows:

Region of Interest	Population	Area (sq. km)
Existing WMBC-TV Grade B Contour Less Areas Below Grade B Threshold Level Based on Longley-Rice Less Existing Interference Areas based on Longley-Rice	8,387,000	10,979
New Interference from DTV facilities (3.2% of area and 19.0% of population within the above)	1,594,000	352
WMBC-TV Service Area including DTV Interference	6,793,000	10,627

From the above it is evident that, while WMBC-TV suffers a relatively small area of interference, the interference area itself amounts to a huge reduction in population within the WMBC-TV service area.

Detailed studies were prepared based on the FCC Longley-Rice calculation procedure to determine the source and location of the predicted interference. Based on these studies it was determined that the primary source of the DTV interference to WMBC-TV is the DTV proposal for WNET, Newark, New Jersey, on Channel 61 ("DWNET"). DWNET would operate on Channel 61 from the World Trade Center with an average effective radiated power of 190 kW and an antenna height above average terrain of 500 m. Figure 1 is a map illustrating the interference to the WMBC-TV FCC/Longley-Rice service area. As indicated in Figure 1, the interference area includes a large part of the metropolitan New York including most of Manhattan, portions of Bronx, Kings and Richmond Counties, New York and portions of Bergen, Essex, Hudson, Middlesex, Morris, Passaic, Somerset and Union Counties, New Jersey.*

WMBC-TV's Proposed DTV Allotment

WMBC-TV was allotted Channel 8, with an average ERP of 3.2 kW, for its transitional DTV operation. With respect to the transitional DTV service of WMBC-TV

* We note some differences in the calculated area and population for the predicted interference zone. Based on our estimates the population and area within the predicted DWNET interference zone, less WMBC-TV unserved areas, are 3,172,904 and 503 sq. km, respectively. There is concern that the FCC procedure underestimates the predicted interference to WMBC-TV (and in general).

("DWMBC-TV"), Appendix B of the Sixth Report lists the following population and area figures:

Region of Interest	Population	Area (sq. km)
Current NTSC Service (based on Appendix B)	8,387,000	10,979
DTV Service During Transition	6,011,000	11,904

As indicated, although there is an apparent geographical service area improvement, the population within the service area has decreased dramatically by 2,376,000 persons; a 28% reduction in population served.

An examination of the basis for these numbers reveals the following:

1. The increase in the geographic DTV service area appears to be the result of the superior propagation characteristics of Channel 8 as compared to Channel 63 in more rugged terrain conditions. The geographical service area of DWMBC-TV increases, but apparently in the more rugged and remote areas of the region where there is low population density. (For example, compare Figures 1 and 2 and note how the Longley-Rice predicted coverage increases along the western portion of Sussex County, New Jersey. This is the Kittatinny Mountain range, which includes the Delaware Water Gap National Recreation Area, High Point State Park and Stokes State Forest.)
2. On the other hand, the service area population decreases apparently as a result of interference to the

DWMBC-TV allotment from other co-channel and first-adjacent channel facilities. Initial estimates of the sources of the interference to DWMBC-TV are summarized in the table below:

Interference to Proposed DWMBC-TV, Channel 8	
Station	**Interference Area (sq. km)**
WABC-TV, New York, NY Ch. 7, 64.6 kW, 491 m	140
WTNH, New Haven, CT Ch. 8, 166 kW, 369 m	1,461
WGAL, Lancaster, PA Ch. 8, 112 kW, 415 m	139
WWOR-TV, Secaucus, NJ Ch. 9, 61.7 kW, 500 m	102
DWICZ-TV, Binghamton, NY Ch. 8, 3.2 kW, 375 m	245
Approximate total NTSC interference (considering common interference areas)	**1,550**
Approximate total DTV interference (considering common interference areas)	**250**

A study of the situation reveals that the interference from WTNH, WABC-TV and WWOR-TV occurs largely in the New York metropolitan area. Figure 2 is an illustration of the interference from WTNH alone. The population within this area alone is estimated to be 3,593,000 persons based on the 1990 Census. The interference from WABC-TV and WWOR-TV will occur in the densely population New York area as well more or less centered on the World Trade Center transmitter sites of WABC-TV and WWOR-TV.

Possible Alternative Channel

Allocation studies were prepared to the greatest extent possible† to identify possible alternative channels for DWMBC-TV. Of all possible TV channels, Channel 34 appeared to be a viable alternative that requires no other change in the allotment table issued with the Sixth Order.‡ The primary sources of interference to Channel 34 are summarized in the table below:

Interference to Channel 34 DWMBC-TV Proposal	
Station	**Interference Area (sq. km)**
WBIS-TV, New York, NY Ch. 31, 2820 kW, 475 m	9
WMGC-TV, Binghamton, NY Ch. 34, 1480 kW, 281 m	239
WXTV, Paterson, NJ Ch. 41, 2340 kW, 421 m	31
DWPIX, New York, NJ Ch. 33, 111.8 kW, 506 m	84
DWYBE, Philadelphia, PA Ch. 34, 50 kW, 284 m	1,255
DWTWS, New London, CT Ch. 34, 111.7 kW, 381 m	108
DWMHT, Schenectady, NY Ch. 34, 149. 7 kW, 299 m	71
Approximate total NTSC interference **(considering common interference areas)**	**270**
Approximate total DTV interference **(considering common interference areas)**	**1,520**

† A working version of the FCC's allotment software is not generally available. Computer allocation tools are available through the Department of Commerce's NTIA; however, this software has proven to have some limitations. As the Commission has not released OET Bulletin No. 69 dealing with the Longley-Rice propagation model, it is difficult to replicate the Commission's results. For example, we understand that there may be varying approaches to the interpretation of the Longley-Rice "error codes" generated during a run of the program. The Longley-Rice tools that are available were used with good engineering judgement to conduct allocation studies.

‡ An average ERP of 50 kW non-directional is assumed for the Channel 34 allotment.

The most significant interference would come from DWYBE. Figure 3 is a map illustrating the estimated interference area to the Channel 34 proposed DTV allotment from DWYBE. As indicated the interference is located toward the less densely populated southern portion of the WMBC-TV service area. It is estimated that the population within the DWYBE interference area would be 798,000 persons based on the 1990 Census.

While interference will exist from three stations located at New York's Empire State Building and the World Trade Center, this interference appears to be much less severe than that on Channel 8 where co-channel interference from WTNH occurred in addition to first-adjacent channel interference from Channels 7 and 9. On Channel 34 the primary sources of interference in the downtown New York area will be WBIS, Channel 31; WXTV, Channel 41; and DWPIX, Channel 33. Furthermore, if stations are permitted to return to their original NTSC channels after the DTV transition, there is a much greater likelihood that WPIX will return to its present NTSC Channel 11 rather than remain on Channel 33.

With respect to interference-given, study indicates that the Channel 34 allotment would be superior to Channel 8 as well. Calculations indicate that the Channel 8 proposal would result in interference to the following:

Interference–Given from Channel 8 DWMBC-TV Allotment	
Station	**Interference Area (sq. km)**
WTNH, Channel 8	3,581
WWOR-TV, Channel 9	550
DWICZ-TV, Channel 8	303
WGAL, Channel 8	883
Approximate total NTSC interference (not considering common interference areas)	**5,014**
Approximate total DTV interference (not considering common interference areas)	**303**
Approximate total DTV interference (not considering common interference areas)	**5,317**

The interference-given by the Channel 34 proposed allotment are summarized in the table below:

Interference–Given from Channel 34 DWMBC-TV Allotment Proposal	
Station	**Interference Area (sq. km)**
DWTWS, Channel 34	40
WXTV, Channel 41	15
DWWOR-TV, Channel 38	30
WMGC-TV, Channel 34	275
DWPIX, Channel 33	390
WBIS-TV, Channel 31	26
DWBIS-TV, Channel 30	8
DWMHT, Channel 34	59
DWYBE, Channel 34	1024
Approximate total NTSC interference (not considering common interference areas)	**316**
Approximate total DTV interference (not considering common interference areas)	**1,551**
Approximate total DTV interference (not considering common interference areas)	**1,867**

As indicated, compared with Channel 8, the Channel 34 DWMBC-TV allotment would result in approximately 4,698 square kilometers less NTSC interference and 1,248 square kilometers greater DTV interference; with a net interference reduction of 3,450 square kilometers. Not only is the predicted interference total substantially reduced, but the impact on existing NTSC viewers is substantially improved by the Channel 34 allotment compared to the Channel 8 allotment.

It is thus concluded that a minimum 50 kW average ERP UHF DTV allotment for WMBC-TV on Channel 34 has superior service and interference characteristics than the FCC Channel 8 allotment. This is without disruption of the Sixth Order allotment table.

Louis Robert du Treil, Jr., P.E.

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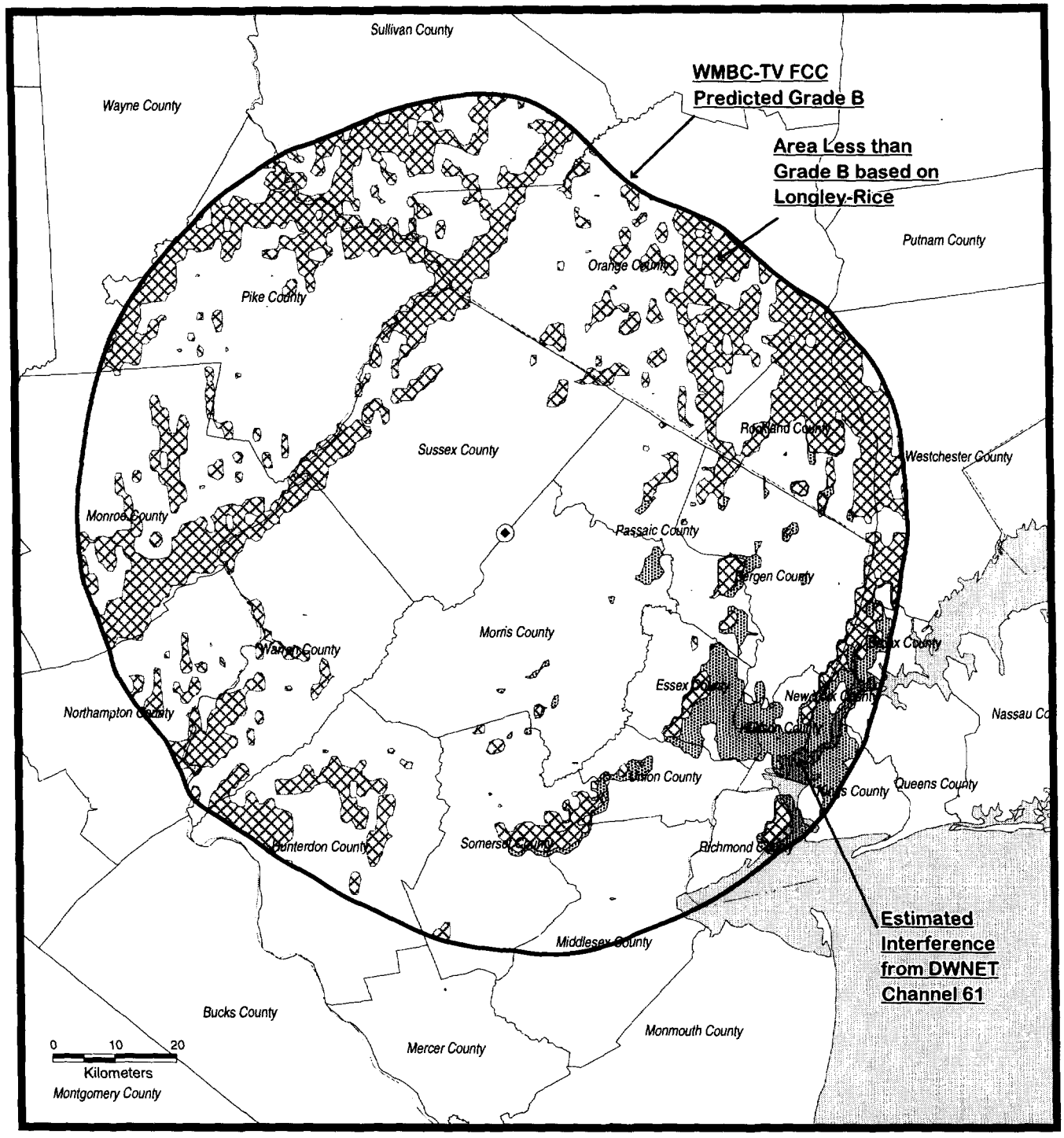
June 12, 1997

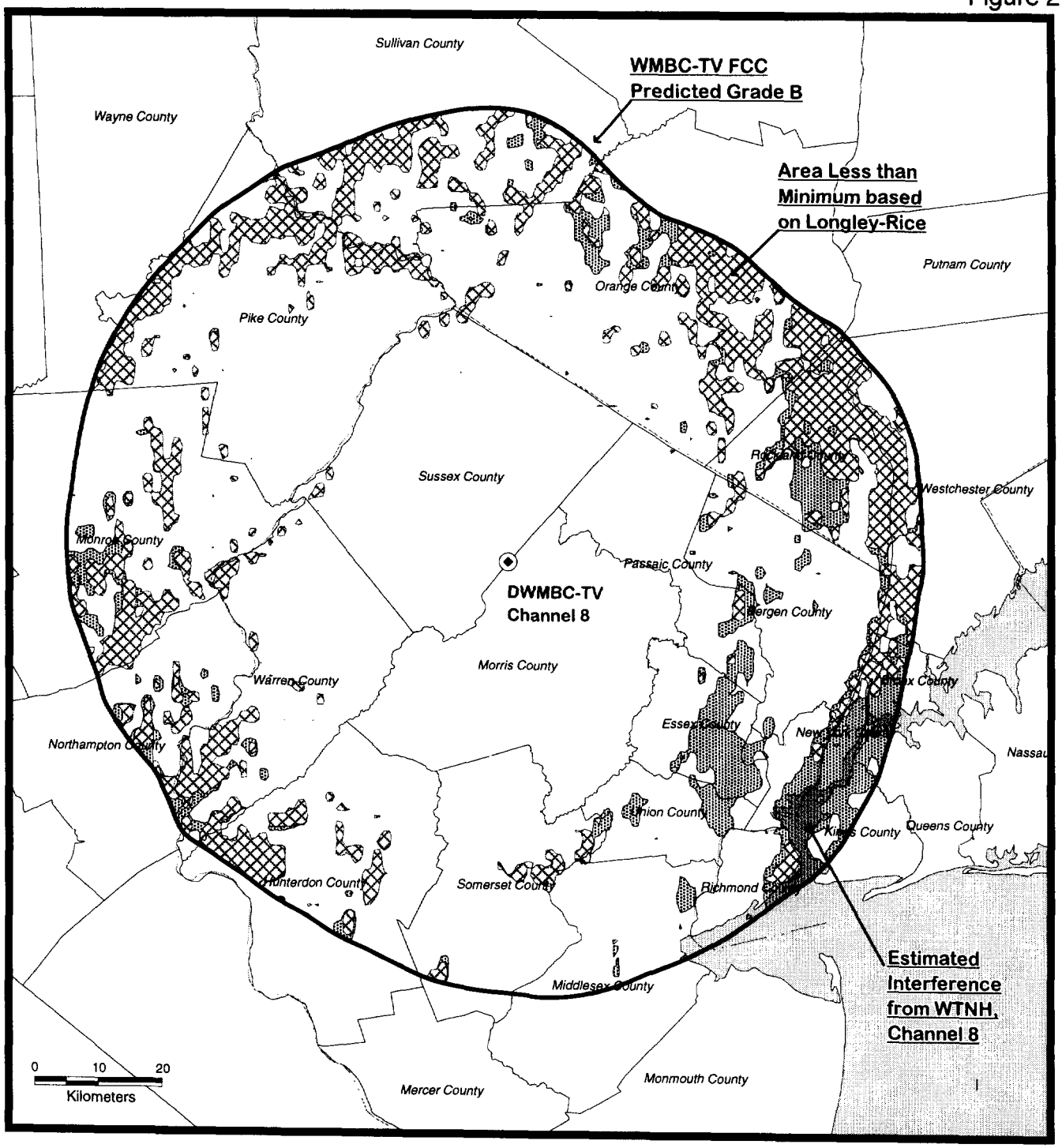
Figure 1



WMBC-TV FCC PREDICTED GRADE B CONTOURS (WITH DIPOLE FACTOR ADJUSTMENT) AND PREDICTED LONGLEY-RICE COVERAGE WITH INTERFERENCE FROM DWNET, NEWARK, NEW JERSEY, CH 61

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

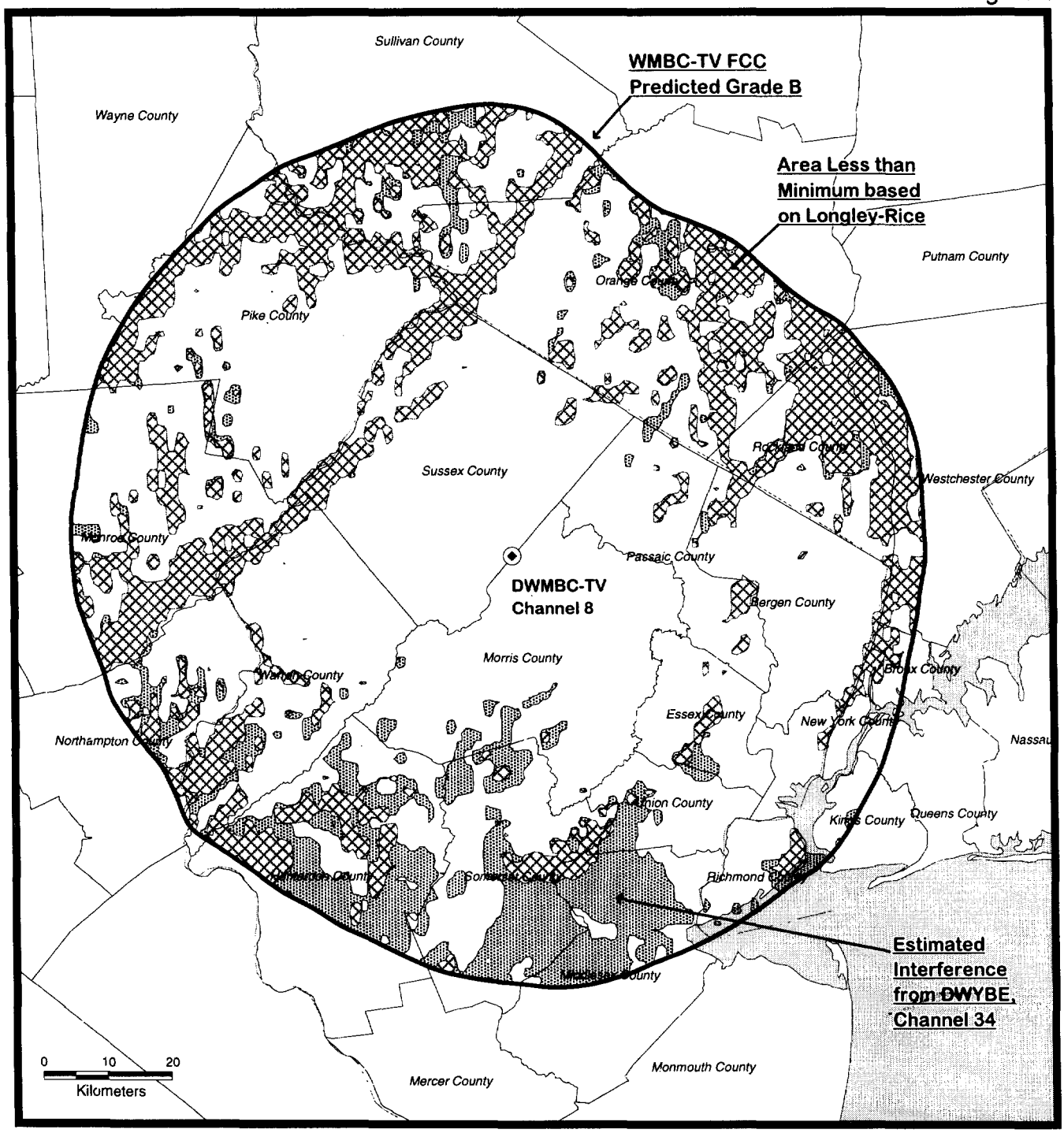
Figure 2



DWMBC-TV FCC PREDICTED SERVICE AREA AND PREDICTED INTERFERENCE FROM WTNH, CHANNEL 8

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3



DWMBC-TV FCC PREDICTED SERVICE AREA AND PREDICTED INTERFERENCE FROM DWYBE, CHANNEL 34

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

EXHIBIT 2

NY ADI DTV ALLOTMENTS

CALLS[1]	CITY AND STATE[2]	NTSC CHAN	DTV CHAN	DIGITAL TELEVISION SERVICE DURING TRANSITION		EXISTING NTSC				DTV NTSC AREA MATCH (%)	DIFFERENCE IN POPULATION[3]
						CURRENT SERVICE		NEW INTERFERENCE			
				AREA (Sq km)	PEOPLE (thou)	AREA (Sq km)	PEOPLE (thous)	AREA (% NL Area)	PEOPLE (% NL Pop)		DTV-NTSC (THOU)
WHAI-TV	Bridgeport, CT	43	42	9657	2661	9725	2690	3.1	4.2	97.5	-29
WEDW	Bridgeport, CT	49	52	9997	3173	9696	3157	6.6	10.6	97.4	16
WLIW	Garden City, NY	21	22	10544	12575	9063	11134	1.3	0.4	99.8	1441
WRNN-TV	Kingston, NY	62	21	18797	1798	15917	1457	0.2	0.2	99.0	341
WCBS-TV	New York, NY	2	56	28758	18202	24094	16955	0.0	0.0	97.9	1247
WNBC	New York, NY	4	28	28734	18233	25109	17181	0.7	0.1	96.5	1052
WNYW	New York, NY	5	44	29029	18246	25117	17159	9.3	5.0	98.3	1087
WABC-TV	New York, NY	7	45	26438	17881	23891	17189	2.0	0.3	99.9	692
WPIX	New York, NY	11	33	27065	17999	23184	17102	11.1	5.1	99.9	897
WNYE-TV	New York, NY	25	24	18867	16706	18359	16695	6.4	1.6	99.1	11
WBIS	New York, NY	31	30	17709	16256	18052	16449	6.4	1.9	96.0	-193
WTBY	Poughkeepsie, NY	54	27	18617	2988	14948	1743	1.5	0.4	99.8	1245
WLNY	Riverhead, NY	55	57	10327	3371	10190	3221	3.8	14.9	100.0	150
WHSI-TV	Smithtown, NY	67	23	11259	3233	10985	3074	0.1	0.2	99.7	159
WNJU	Linden, NJ	47	36	15112	16235	14745	16110	0.9	0.2	99.7	125
WNJN	Montclair, NJ	50	51	14658	15537	14154	15298	0.0	0.0	94.8	239
WNJB	New Brunswick, NJ	58	18	12005	12745	9001	10886	2.1	8.7	100.0	1859
WNET	Newark, NJ	13	61	23252	17043	23140	17110	1.7	0.6	94.3	-67
WHSE-TV	Newark, NJ	68	53	16235	16027	15416	15684	0.2	0.0	99.8	343
WMBC-TV	**Newton, NJ**	**63**	**8**	**11904**	**6011**	**10979**	**8387**	**3.2**	**19.0**	**94.5**	**-2376**
WXTV	Paterson, NJ	41	40	17907	16592	17036	16236	1.1	0.3	99.9	356
WWOR-TV	Secaucus, NJ	9	38	26658	17969	22677	16641	1.7	0.3	99.7	1328
WFME-TV	West Milford, NJ	66	29	4176	4092	2891	2439	1.2	0.3	100.0	1653

NOTES TO TABLE

1. List of New York ADI stations from 1997 Broadcast and Cable Yearbook at C-198.

2. All other information (except final column) from Sixth Report and Order, Appendix B, Table 1, at B-12, B-30, B-32.

3. Final column represents DTV service area population during transition period minus current NTSC service area population.

EXHIBIT 2-A

INTERFERENCE TO NTSC COVERAGE (LOSS OF POPULATION)

ADI STATIONS WITH GREATEST INTERFERENCE

1.	**WMBC-TV, Newton, NJ (NTSC 63)**	**-19.0%**
2.	WLNY, Riverhead, NY (NTSC 55)	-14.9%
3.	WEDW, Bridgeport, CT (NTSC 49)	-10.6%
4.	WNJB, Brunswick, NJ (NTSC 58)	-8.7%
5.	WPIX, New York, NY (NTSC 11)	-5.1%

INTERFERENCE TO NEW YORK CITY LICENSEES

1.	WCBS-TV (NTSC 2)	-0.0%
2.	WNBC (NTSC 4)	-0.1%
3.	WNYW (NTSC 5)	-5.0%
4.	WABC-TV (NTSC 7)	-0.3%
5.	WPIX (NTSC 11)	-5.1%
6.	WNYE-TV (NTSC 25)	-1.6%
7.	WBIS (NTSC 31)	-1.9%
		Average -2.0%

EXHIBIT 2-B

DIFFERENCES IN POPULATION COVERAGE BETWEEN EXISTING NTSC AND TRANSITIONAL DTV

ADI STATIONS WITH GREATEST LOSS

1.	**WMBC-TV, Newton, NJ (NTSC 63)**	**-2,376,000**
2.	WBIS, New York, NY (NTSC 31)	-193,000
3.	WNET, Newark, NJ (NTSC 13)	-67,000
4.	WHAI-TV, Bridgeport, CT (NTSC 43)	-29,000

DIFFERENCES FOR NEW YORK CITY LICENSEES

1.	WCBS-TV	+1,247,000
2.	WNBC	+1,052,000
3.	WNYW	+1,087,000
4.	WABC-TV	+692,000
5.	WPIX	+897,000
6.	WNYE-TV	+11,000
7.	WBIS	-193,000