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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION AND CLARIFICATION

Cannell Cleveland, L.P., licensee of Television Station WUAB(TV), NTSC Channel 43, Lorain, Ohio ("Cannell"), by its attorneys, hereby supplements its Petition for Reconsideration and Clarification (the "Petition") of the FCC's *Sixth Report and Order* in the above-captioned proceeding.^{1/}

In its Petition, Cannell urged the Commission to adopt specific interim measures to minimize co-channel and adjacent channel interference among digital television ("DTV") and NTSC operations during the DTV transition period. Cannell expressed particular concern about possible interference from DTV cochannel operations in the Detroit area resulting from the unique propagation conditions across Lake Erie.^{2/} Petition at 9. Using the technical

^{1/} *Sixth Report and Order*, MM Docket No. 87-268, FCC 97-115 (released April 21, 1997 ("*Sixth R&O*"). This supplement is filed pursuant to the FCC's July 2, 1997 *Order* granting petitioners a 45-day period in which to supplement their petitions for reconsideration based on an analysis of their DTV allotment using OET Bulletin No. 69. *See Order*, MM Docket No. 87-268, DA-97-1377 (rel. July 2, 1997).

^{2/} Other broadcasters have expressed the same concern regarding the propagation conditions across Lake Erie. *See, e.g.,* Petition for Reconsideration of Fox Television Stations, Inc. at 7 (discussing effect of atmospheric conditions near Detroit, Michigan).

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criteria outlined in OET Bulletin No. 69, Cannell has now confirmed that WTVS(TV)'s DTV operations on Channel 43 in Detroit, Michigan, and WGGN(TV)'s DTV operations on Channel 42 in Sandusky, Ohio will cause significant interference to WUAB(TV)'s existing NTSC service and requests that the Commission adopt measures to ensure against this type of interference.

Included in Exhibit A hereto is the Engineering Statement of Donald Everist of Cohen, Dippell and Everist, P.C. (the "Engineering Statement") which describes the impact WTVS(TV)'s and WGGN(TV)'s DTV operations will have on WUAB(TV)'s NTSC operations. As indicated in the Engineering Statement, WGGN(TV)'s operation on DTV Channel 42 is predicted to cause interference in an area within WUAB(TV)'s Grade B contour comprising 69,000 households and a population of 183,000 individuals. Engineering Statement at 2. The interference created by WTVS(TV)'s operation on DTV Channel 43 will be even more significant, affecting 215,000 households and 586,000 individuals within WUAB(TV)'s Grade B service area. *Id.*^{3/} Because of this potential for interference, Cannell requests that WTVS(TV) and WGGN(TV) not be permitted to increase DTV power until WUAB has ceased NTSC operation.

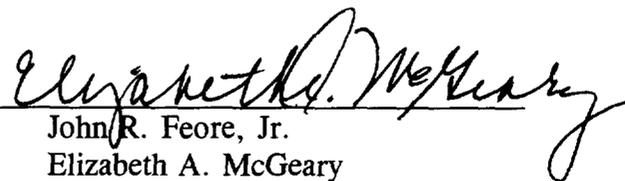
In situations where such excessive interference is predicted or actually occurs, stations should be able to rely on Commission rules to protect their NTSC service areas during the DTV transition period. A case-by-case approach will not provide stations the certainty they need to ensure their NTSC service areas are protected. Accordingly, Cannell urges the

^{3/} The above household figures are based on a simulated variation in signal level due to varying propagation conditions.

Commission to adopt specific rules that would govern interference to NTSC operations during the DTV implementation period.

Respectfully submitted,

CANNELL CLEVELAND, L.P.

By: 
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August 22, 1997

EXHIBIT A

Engineering Statement of Cohen, Dippell & Everist

ENGINEERING STATEMENT
ON BEHALF OF
CANNELL CLEVELAND, L.P.
CONCERNING SUPPLEMENT
TO PETITION FOR RECONSIDERATION
MM DOCKET NO. 87-268

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Cannell Cleveland, L.P. ("Cannell") and supplements the "Engineering Statement in Support of Petition for Reconsideration, MM Docket 87-268 on Behalf of Cannell Cleveland, L.P., June 1997" submitted with Cannell's Petition for Reconsideration in MM Docket No. 87-268. This further assessment is based upon examination of OET Bulletin No. 69 released July 2, 1997. Cannell is the licensee of broadcast station WUAB(TV), Lorain, Ohio. WUAB(TV) has examined the impact to its NTSC service area by DTV operations assigned in MM Docket 87-268.

Attached hereto is a tabulation of the DTV allocations that are in the vicinity of WUAB(TV)'s NTSC Channel 43 Grade B contour and present concern for WUAB's NTSC operation. The Commission has selected Grade B contour as the service area which is to receive protection. However, as shown on the attached maps, that protection will not result when unusual propagation conditions prevail. For example, it is a well known phenomena along Lake Erie that weather conditions often result in atypical propagation conditions such that signal levels exceed those predicted by the methodology used in OET Bulletin No. 69. As examples, two DTV stations have been selected that are situated along Lake Erie: co-channel station WTVS(TV) assigned to Detroit, Michigan and first-adjacent Channel 42, WGGN(TV) assigned to Sandusky, Ohio. Calculations have been performed which simulate a 6 dB difference in signal levels by an increase in the proposed DTV signal, a decrease in the WUAB(TV) signal, or a specific combination of both. As demonstrated, DTV operations on these

stations will cause significant interference to existing WUAB(TV) existing NTSC service area.

The predicted interference is as follows.

<u>Station</u>	<u>DTV Channel</u>	<u>WUAB(TV) Service Area Impacted</u>	
		<u>Households</u>	<u>Population</u>
WGGN(TV)	42	69,000	183,000
WTVS(TV)	43	215,000	586,000

Therefore, WUAB(TV) urges the Commission to consider the impact to NTSC service areas along propagation paths where signal anomalies can result and not permit those stations to increase DTV power until WUAB(TV)'s NTSC service is concluded.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
NTSC 43 TO DTV
ALLOCATION STUDY
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>		
			<u>Actual</u> km	<u>Required</u> km	
N	43	WUAB	Lorain, OH	--	--
N	43	WTVS(DTV)	Detroit, MI	180.2*	217.3
N	43	WPGH(DTV)	Pittsburgh, PA	174.6*	217.3
N-1	42	WGGN(DTV)	Sandusky, OH	89.7	88.5

*Reduced-spacing

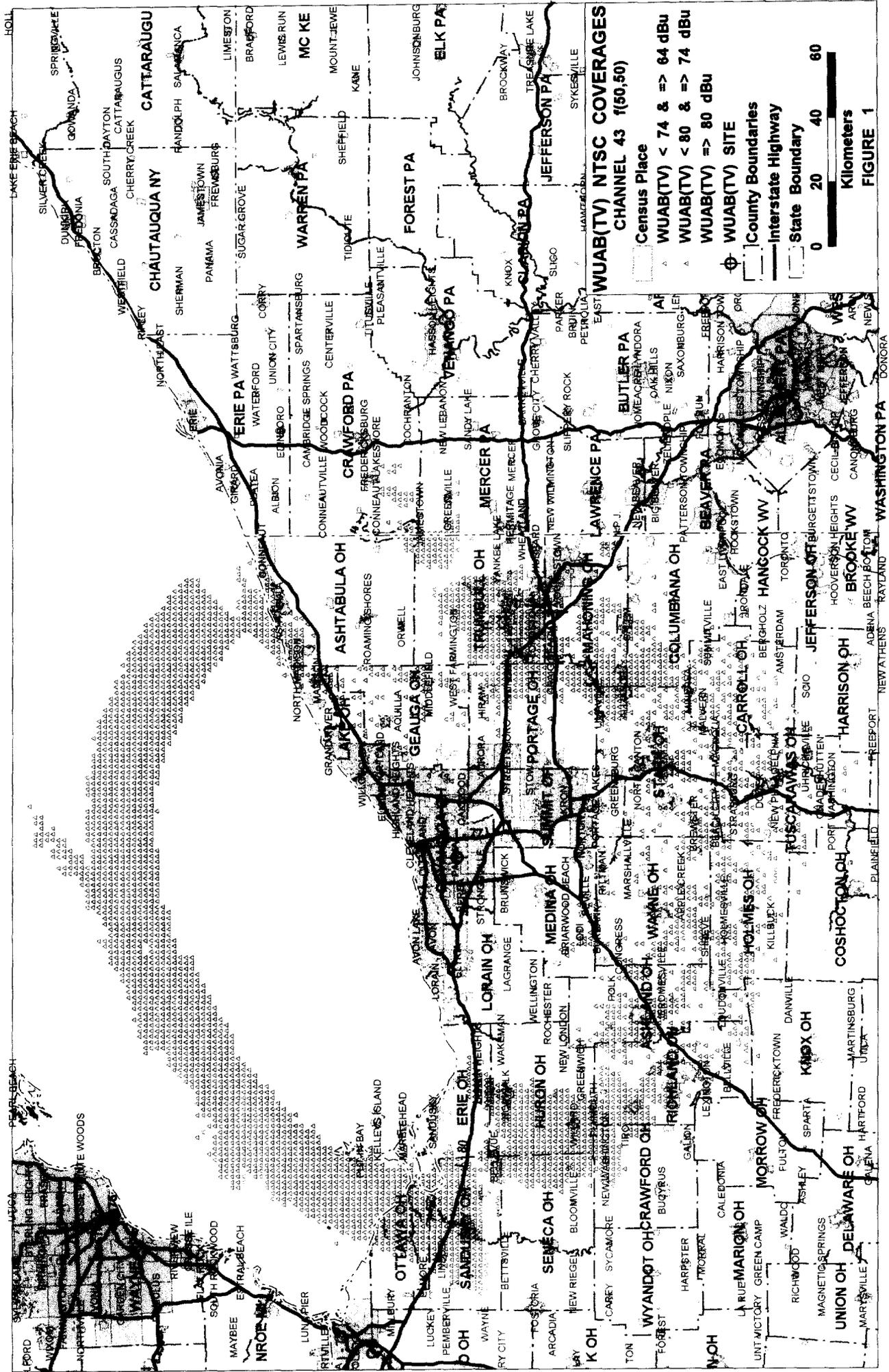
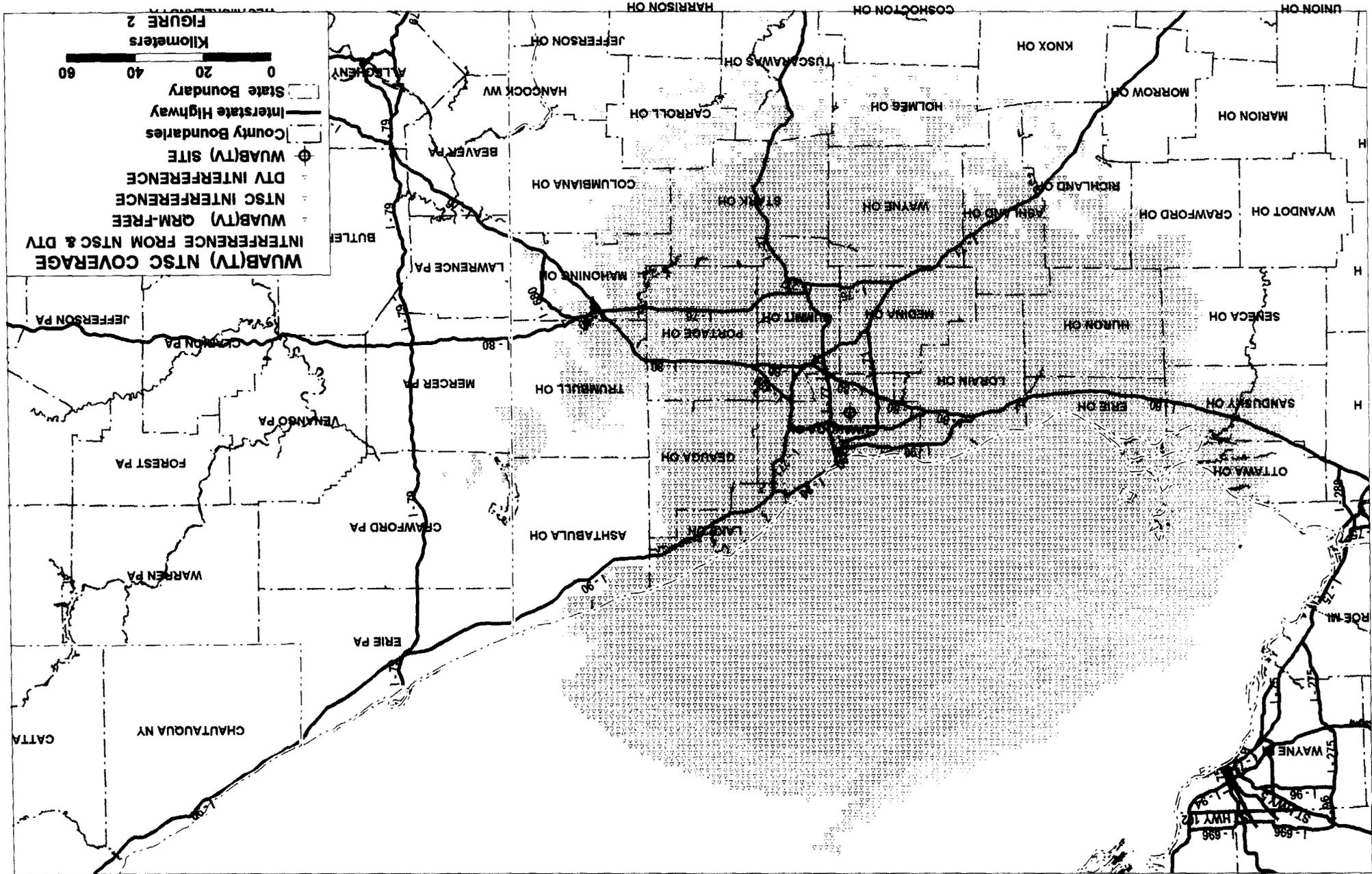


FIGURE 1



WUAB-TV NTSC COVERAGE

INTERFERENCE FROM NTSC & DTV

WUAB-TV ORM-FREE

NTSC INTERFERENCE

DTV INTERFERENCE

WUAB-TV SITE

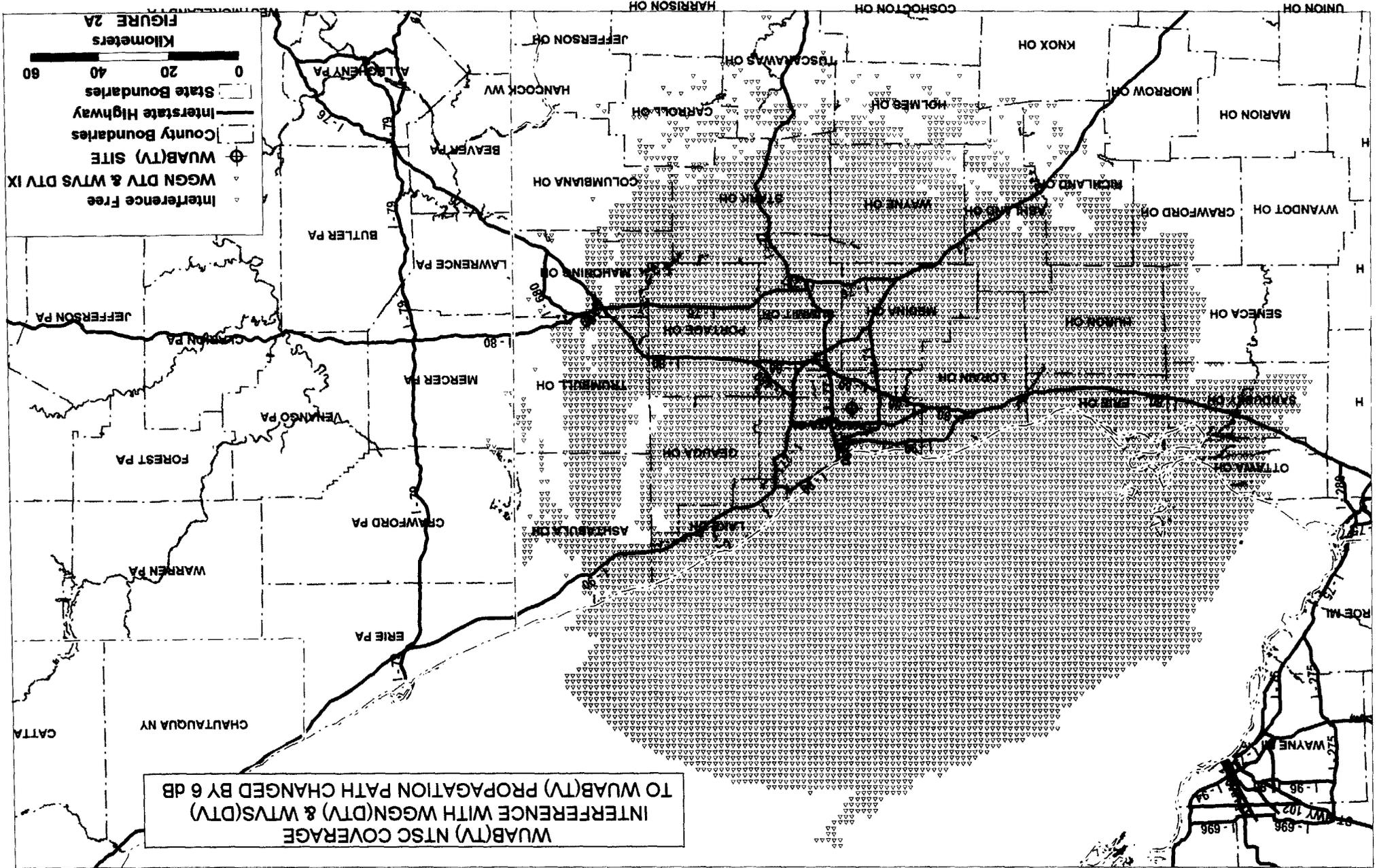
County Boundaries

Interstate Highway

State Boundary

Kilometers

FIGURE 2



WUAB(TV) NTSC COVERAGE
 TO WUAB(TV) PROPAGATION PATH CHANGED BY 6 DB
 INTERFERENCE WITH WGN(DTV) & WTVS(DTV)

FIGURE 2A

Kilometers

0 20 40 60

State Boundaries

Interstate Highway

County Boundaries

WUAB(TV) SITE

WGN DTV & WTVS DTV IX

Interference Free

