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Law Offices of
Scott C. Cinnamon, PLLC
1250 Connecticut Ave., NW
Suite 200, # 144
Washington, D.C. 20036
(202) 216-5798 (phone)
(202) 379-9754 (fax)
www.cinnamonlaw.com

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Attention: Chief, Video Division
Media Bureau

DOCKET FILE COPY ORIGINAL

Re: WSST-TV, Cordele, GA
Fac ID 63867
Petition for Rule Making to
Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Sunbelt-South Tele-Communications, Ltd., licensee of WSST-TV, Cordele, Georgia, we are filing the original and four copies of a Petition for Rule Making requesting the substitution of Channel 22 for Channel 51 in the DTV Table of Allotments at Cordele, Georgia.

If there is any question concerning this filing, please contact the undersigned.

Sincerely,


Scott C. Cinnamon

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The proposed amendment would be in the public interest. Licensee is seeking the channel substitution because the cessation of operations on Channel 51 would eliminate potential interference with wireless operations in the adjacent Lower 700MHz A Block.³

As the attached Technical Exhibit demonstrates, the proposed facility complies with the Commission's Rules for post-transition DTV operation. The Station's proposed service area encompasses its community of license, and the proposed parameters comply with the Commission's interference standards.⁴

As demonstrated in the Technical Exhibit, the proposed Channel 22 noise limited service contour of the Station would be fully within the Station's existing Channel 51 contour, so that grant of the Petition will not affect the Commission's repacking flexibility.

For the convenience of the Commission, here are the present and proposed parameters for the operation of the Station:

Present:

Fac ID	State and City	NT SC	DTV				
			Ch	ERP KW	HAAT (m)	LAT	LONG.
63867	GA Cordele	-	51	91	110	315336	0834818

Proposed:

Fac ID	State and City	NT SC	DTV				
			Ch	ERP KW	HAAT (m)	LAT	LONG.
63867	GA Cordele	-	22	91	107	315336	0834818

³ See, *Greenville, North Carolina*, 27 FCC Rcd 8865 (MB 2012); *Lincoln, Nebraska*, 27 FCC Rcd 433 (MB 2012), and *Jackson, Mississippi*, 26 FCC Rcd 3935 (MB 2011) (public interest served by clearing DTV broadcasters from Channel 51 to provide new or advanced wireless services in the Lower 700 MHz A Block to consumers).

⁴ See, Attachment A, Technical Exhibit.

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WSST-TV
CORDELE, GEORGIA

January 28, 2016

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WSST-TV
CORDELE, GEORGIA

Technical Statement

This Technical Exhibit was prepared on behalf of television broadcast station WSST-TV, Cordele, Georgia (Channel 51), in support of a Petition for Rulemaking to amend Section 73.622(i) of the FCC Rules to change the WSST-TV digital television channel.

WSST-TV is authorized for operation on Channel 51 with a non-directional effective radiated power (ERP) of 91 kW and antenna height above average terrain (HAAT) of 110 m.* WSST-TV has entered into a voluntary agreement with the licensee of the lower 700-MHz Block A spectrum (T-Mobile) that contemplates the migration of WSST-TV from Channel 51 to Channel 22. Accordingly, the licensee of WSST-TV is proposing the substitution of Channel 22 for Channel 51 at Cordele, Georgia in its Petition for Rulemaking.

The FCC has recognized the significant public interest benefits of clearing Channel 51 to the extent possible prior to the auction and repacking plan. In 2011, the FCC lifted the freeze on channel substitution rulemaking petitions to allow channel changes to Channel 51 stations.† The FCC has also stated in its recent *Report and Order (R&O)* in the auction and repacking plan, that such petitions are exempt from

* See FCC File No. BLCDDT-20080814AAK.

† *Public Notice*, "General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications," 26 FCC Rcd 11409 (MB 2011).

requirements of the FCC Rules and FCC OET Bulletin No. 69^{**}. The results of the interference analyses for the proposed facility are summarized herein at Figure 3. As indicated therein, the proposed facility will meet the 0.5% *de minimis* interference criterion outlined in the FCC Rules to all pertinent allotments and assignments.

The proposed facility is located beyond any international border zone. Therefore, the proposal does not require international coordination.

Repacking Flexibility Analysis

In order to evaluate the effect of this proposal on the repacking flexibility in the auction and repacking process, a comparison of the predicted 41 dBu noise-limited service contour coverage was prepared. As indicated in the map at Figure 2 herein, the proposal will not result in any increase in the predicted 41 dBu noise-limited service contour in any direction relative to the licensed Channel 51 facility. Therefore, there would be no adverse effect on the FCC's repacking flexibility in the auction and repacking process.

Conclusion

The instant proposal was designed to meet the FCC's *de minimis* interference requirements for protection to other facilities and the coverage requirements of the WSST-TV community of license of Cordele, Georgia. In addition, the proposal will not adversely affect the FCC's repacking flexibility in the auction and repacking

^{**} See *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, OET Bulletin 69, Federal Communications Commission (February 6, 2004).

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WSST-TV
CORDELE, GEORGIA

Technical Specifications

Channel / Frequency Band	22 / 518-524 MHz
Zone	III
Antenna Structure Registration Number (ASRN):	1025900
Reference Coordinates (NAD27):	
Latitude	31°53'35.4" N
Longitude	083°48'18.4" W
Reference Coordinates (NAD83):	
Latitude	31°53'36.0" N
Longitude	083°48'18.0" W
Antenna Make and Model:	ERI, ALP-24M3-HSO-22
Antenna Azimuth Pattern:	non-directional
Antenna Electrical Beam Tilt:	0.75°
Antenna Mechanical Beam Tilt:	none
Polarization:	horizontal
Height of Radiation Center Above Mean Sea Level	205 m
Height of Radiation Center Above Ground Level	114 m
Height of Radiation Center Above Average Terrain (HAAT)	107 m ^{††}
Maximum Effective Radiated Power (ERP)	91 kW

^{††} The antenna HAAT has been updated to harmonize with the FCC OET-69 analysis results. But there is no actual change in the height of the antenna proposed at this stage.

OET-69 Interference Analysis (WSST-TV, Cordele, GA, Channel 22)(Summary Results)

Percent allowed new interference: 0.500
 Percent allowed new interference to non Class A LPTV: 2.000
 TW Census data selected 2000
 Data Base Selected
 /export/home/cdbs/pt tvdb.sff
 TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 01-27-2016

Record Selected for Analysis

WSST-TV USERRECORD-01 CORDELE GA US
 Channel 22 ERP 91. kW HAAT 107. m RCAMSL 00205 m
 Latitude 031-53-35 Longitude 0083-48-18
 Status APP Zone 3 Border Site number: 01
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

Site number	1			
Azimuth	ERP	HAAT	41.0	dBu F(50,90)
(Deg)	(kW)	(m)		(km)
0.0	91.000	113.2		63.238
45.0	91.000	95.7		61.237
90.0	91.000	88.4		60.271
135.0	91.000	94.3		61.059
180.0	91.000	103.6		62.202
225.0	91.000	115.6		63.475
270.0	91.000	123.7		64.178
315.0	91.000	123.3		64.146

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap
 to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

- Proposed facility OK to FCC Monitoring Stations
- Proposed facility OK toward West Virginia quiet zone
- Proposed facility OK toward Table Mountain
- Proposed facility is beyond the Canadian coordination distance
- Proposed facility is beyond the Mexican coordination distance
- Proposed station is OK toward AM broadcast stations

 Start of Interference Analysis

Channel	Proposed Station	Call	City/State	ARN
22	WSST-TV	CORDELE	GA	USERRECORD01

Stations Potentially Affected by Proposed Station

OET-69 Interference Analysis (WSST-TV, Cordele, GA, Channel 22)(Summary Results)

Total scenarios = 2

Result key: 2
 Scenario 2 Affected station 3
 Before Analysis

Results for: 22A AL TUSKEGEE BLCDT 20090428ABH LIC
 HAAT 341.0 m, ATV ERP 65.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	533915	18071.4
not affected by terrain losses	533892	18043.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1944	183.5
lost to ATV IX only	1944	183.5
lost to all IX	1944	183.5

Potential Interfering Stations Included in above Scenario 2

21A AL DOTHAN	BLCDT	20090303ACR	LIC
22A AL FLORENCE	BLEDT	20060718ACG	LIC
22A MS HATTIESBURG	BLANK	0000002705	APP
23A GA COLUMBUS	BLEDT	20080521AAH	LIC

After Analysis

Results for: 22A AL TUSKEGEE BLCDT 20090428ABH LIC
 HAAT 341.0 m, ATV ERP 65.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	533915	18071.4
not affected by terrain losses	533892	18043.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2162	223.3
lost to ATV IX only	2162	223.3
lost to all IX	2162	223.3

Potential Interfering Stations Included in above Scenario 2

21A AL DOTHAN	BLCDT	20090303ACR	LIC
22A AL FLORENCE	BLEDT	20060718ACG	LIC
22A MS HATTIESBURG	BLANK	0000002705	APP
23A GA COLUMBUS	BLEDT	20080521AAH	LIC
22A GA CORDELE	USERRECORD01		APP

Percent new IX = 0.0410%

Worst case new IX 0.0410% Scenario 2

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
22	WPFN-CD	PANAMA CITY FL	BLDTA	-20141222AAC

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
21	WDHN	DOTHAN AL	125.9	LIC	BLCDT	-20090303ACR
22	WEMM	TUSKEGEE AL	210.3	LIC	BLCDT	-20090428ABH
22	W22EV-D	DESTIN FL	72.9	CP	BDISDTL	-20140507AAR
22	WHLT	HATTIESBURG MS	357.1	LIC	BLCDT	-20091216AAL
22	WHLT	HATTIESBURG MS	357.2	APP	BLANK	-0000002705
23	WRGX-LD	DOTHAN AL	82.2	LIC	BLDTL	-20130531ATB
23	NEW	PANAMA CITY FL	26.0	APP	BNPDTL	-20090825ASZ
22	WSST-TV	CORDELE GA	267.5	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 5

OET-69 Interference Analysis (WSST-TV, Cordele, GA, Channel 22)(Summary Results)

After Analysis

Results for: 22A GA ATLANTA BLDTA 20130417AAG LIC
 HAAT 122.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2557539	3669.5
not affected by terrain losses	2556159	3661.4
lost to NTSC IX	2445	8.0
lost to additional IX by ATV	268199	336.9
lost to ATV IX only	270644	344.9
lost to all IX	270644	344.9

Potential Interfering Stations Included in above Scenario 1

22N TN DUCKTOWN	BLTTL	20070622ADD	LIC
21A GA ATLANTA	BLEDT	20041013ABK	LIC
22A GA SUMMERVILLE/TRION	BDISDTL	20091214ABM	CF
22A TN COOKEVILLE	BLEDT	20110413ACS	LIC
22A GA CORDELE	USERRECORD01		APP

Percent new IX = 0.0000%

Worst case new IX 0.0000% Scenario 1

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
22	WJCL	SAVANNAH GA	BLCDDT	-20091013AFS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
22	WOFL	ORLANDO FL	384.7	LIC	BLCDDT	-20110708AAV
22	WCNC-TV	CHARLOTTE NC	365.9	LIC	BLCDDT	-20031211AEN
22	WSST-TV	CORDELE GA	233.3	APP	USERRECORD-01	

Total scenarios = 1

Result key: 4
 Scenario 1 Affected station 7
 Before Analysis

Results for: 22A GA SAVANNAH BLCDDT 20091013AFS LIC
 HAAT 436.0 m, ATV ERP 350.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	792177	32248.4
not affected by terrain losses	792155	32244.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 22A GA SAVANNAH BLCDDT 20091013AFS LIC
 HAAT 436.0 m, ATV ERP 350.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	792177	32248.4
not affected by terrain losses	792155	32244.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	11	4.0
lost to ATV IX only	11	4.0
lost to all IX	11	4.0

Potential Interfering Stations Included in above Scenario 1