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Renard Communications Corp.  
4853 Manor Hill Dr.  
Syracuse, NY 13215-1336  
315-468-0908

July 14, 2000

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FCC MAIL ROOM

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth St., SW  
Washington, DC 20554

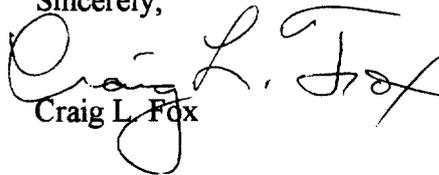
Re: MM Docket 96-19  
RM-8744  
Geneseo, NY

Dear Ms. Salas,

Transmitted herewith on behalf of Renard Communications Corp. are an original and four (4) copies of an Amendment to Petition for Rulemaking for the above-captioned proposed television allotment for Geneseo, NY.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

  
Craig L. Fox

Encs.

cc: Leslie K. Shapiro, Allocations Branch

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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In The Matter Of )  
)  
)  
Amendment of Section 73.606 and 73.622 ) MM Docket 96-19  
Table of Allotments )  
Television Broadcast Stations ) RM-8744  
(Geneseo, NY) )  
)

To: Chief, Allocations Branch

**AMENDMENT TO PETITION FOR RULEMAKING**

Renard Communications Corp. ("RCC") has on file the above captioned Petition for Rulemaking to add NTSC channel 39 to Geneseo, NY. Whereas, channel 39 has been allocated to Buffalo, NY approximately 60 miles west of Geneseo, channel 39 would no longer be available for use at Geneseo and a substitute channel must be proposed.

**Proposal of Petitioner**

1. RCC had proposed channel 39 to Geneseo as that community's first television transmission service. Geneseo is located in the Rochester, NY television market which is in the nation's Top 75 largest markets. The Rochester market, with only six television allotments, is only one of two markets in the Top 75 to have less than eight allotments. Thus, Geneseo and the Rochester market are deprived of having any full power station affiliated with either of the two emerging networks, UPN or WB. The proposal herein will provide for a badly needed additional service.

2. In 1995, RCC had proposed channel 39 for Geneseo and a Notice of Proposed Rulemaking was adopted by the Commission for which no opposing comments or counterproposals were received. However, while the allotment was expected to become effective in due course, the Commission then froze any further action pending the outcome of a final DTV Allotment Table. Further, to accommodate all existing television stations through the transition period, the Commission then assigned all existing NTSC stations with paired DTV channels. As a result, channel 39 has been allotted to the Buffalo, NY market and RCC has performed an exhaustive search for a replacement channel for Geneseo.
3. Engineering studies have revealed that there is no fully spaced NTSC channel available, but that DTV channel 41 appears to be available as shown in the attached spacing study. Although not critical as to its exact location, the proposed reference site, N 42-38-08, W 77-48-50, is approximately 18.1 km. south of Geneseo. The proposal meets all of the domestic spacing requirements except for that of an eight channel spacing with respect to WNYO, channel 49, Buffalo, NY. The rules call for either less than a 24.1 km., or greater than an 80.5 km. spacing for eight channels. This matter was discussed with the Mass Media Bureau's television engineering staff and it was concluded that no interference would occur with this type of short-spacing.
4. The eight channel spacing requirement is that which is the result of the I.F. (intermediate frequency) processing that takes place in a television receiver.

Regardless of whether the service is radio or television, I.F. interference occurs when two stations are physically located too close together when separated in frequency by the I.F. characteristic of the receiver. In the case of FM, it is 10.7 MHz. In TV, it is 41 – 47 MHz which represents an approximate 8 channel difference between two stations. The objective is for one station to be at least the minimum distance from another station separated by eight channels whereby a typical TV receiver will not be overloaded by the combination of the two channels on the resultant I.F. frequency. A discussion with the Commission's OET and Mass Media engineering staff confirmed that a review of the distance required in 73.623(d)(1) would be undertaken to modify this unnecessarily large spacing requirement. Thus, RCC requests a waiver of 73.623(d)(1) with respect to the eight channel spacing requirement as it is likely to be determined that the eight channel spacing will be reduced to a distance not exceeding 32 km.

5. There is also one short-spacing with respect to Canadian station CIII, channel 41 in Toronto, ON. While it is preferred to find and propose fully spaced allotments, it is a common occurrence both in FM and TV to propose short-spaced allotments between the U.S. and Canada where necessary to accommodate a new proposal. In this case, it would be necessary for a new station at Geneseo to protect station CIII. A typical directional antenna pattern such as the well known Bogner "A" pattern was used in studying the protection which would be required to station CIII. A Longley-Rice study was performed at the reference site utilizing 200 kW at 200 m. HAAT with a

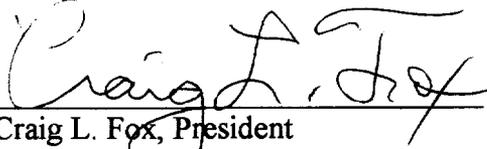
Bogner 'A' pattern at 130 degrees True. The results of the study (see attachment) revealed no interference would be caused to station CIII and that any proposal for service to Geneseo would provide well in excess of 57 dBu (see attachment) over the entire community of license. It is noted that in the Rochester market, no television station has a HAAT exceeding 162 m. and that 200 kW is typical such as that proposed by WXXI-TV, Rochester. Therefore, RCC respectfully requests that the channel 41 DTV allotment be proposed to Canada as a specially negotiated short-spaced allotment with specific parameters to protect station CIII.

6. In summary, RCC states a continuing interest that if assigned to Geneseo, NY RCC will apply for the authorization to construct and operate a new DTV station there. Further, in response to the Commission's Public Notice, 14 FCC Rcd 19559 (1999), RCC is being afforded this opportunity propose a DTV rather than an NTSC channel and to change the proposal to a different channel from that specified in its original petition. Therefore, it is proposed to amend Section 73.622 as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Geneseo, NY	----	41

Respectfully submitted,

RENARD COMMUNICATIONS CORP.

By:   
Craig L. Fox, President

Renard Communications Corp.  
4853 Manor Hill Dr.  
Syracuse, NY 13215-1336  
315-468-0908

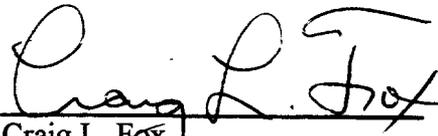
July 14, 2000

**DECLARATION**

Craig L. Fox hereby makes the following declaration:

1. He is president of Renard Communications corp., petitioner for a new television allotment at Geneseo, New York (MM Docket 96-19, RM-8744), whose address is 4853 Manor Hill Dr., Syracuse, NY 13215-1336.
2. He hereby verifies that the facts contained in the Petition for Rulemaking were accurate to the best of his knowledge.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 14, 2000.

  
\_\_\_\_\_  
Craig L. Fox

**Renard Communications Corp.  
Syracuse, NY**

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Friday, July 14, 2000

**Dataworld Digital TV Channel Study**

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**Job Title: Ch. 41, Geneseo, NY**

Channel(s): 41 Zone I  
Coordinates: N 42° 38' 08.0" W 77° 48' 50.0"  
Safety Zone: 60.0 km (37.3 mi)  
TV translators excluded

**Renard Communications Corp.**  
**Syracuse, NY**

Dataworld Digital TV Spacing Study

**Title: Ch. 41, Geneseo, NY**

Channel: 41 Zone I (632-638 MHz) Digital

Latitude: N 42° 38' 08.0"

Longitude: W 77° 48' 50.0"

Safety Zone: 60.0 km

Database: DW 7/14/2000 5:04:17 PM

Call	Auth	Licensee name	Chan	HAAT(m)	ERP	Latitude	Br-to	Dist	Req	
City of License		St	FCC File Number	Zone	HAMSL(m)	(kW)	Longitude	-from	(km)	(km)
WNYB	Lic	Tri-State Christian TV, Inc.	26 +	463.0	5000	N 42° 23' 36.0"	257.4	119.4	80.50	
Jamestown		NY	BLCT-19970115KF	I	858.0	W 79° 13' 44.0"	76.4	38.86	CLEAR	
License granted 9/3/1998 per CDBS (6/9/2000);; DA: AND ODD951102KG @ 0.0°										
ALLOC			40 +			N 44° 06' 00.0"	6.5	163.8	106.0	
Trenton		ON				W 77° 35' 00.0"	186.6	57.77	CLEAR	
CFTO-TV	DTV	Baton Broadcasting Ltd.	40			N 43 38 33.0	311.8	170.0	110.0	
Toronto		ON	I			W 79 23 15.0	130.7	60.0	CLEAR	
Digital channel; DTV channel										
CIII	Lic	Global Communications Ltd.	41 o	501.0	1475	N 43 38 33.0	311.8	170.0	217.3	
Toronto		ON				W 79 23 15.0	130.7	47.29	SHORT	
WPBS-TV	DTV	St Lawrence Valley ETV Council	*41	370.0	50	N 43° 51' 44.0"	50.4	217.4	196.3	
Watertown		NY	II	757.1		W 75° 43' 40.0"	231.8	21.13	CLEAR	
Digital channel; DTV Channel Allotment per MM Doc 87-268 (6th R & O) released 2/19/98;; DA: rep NYWATERTOWN_41 @ 0.0°										
WPBS-TV	App	St Lawrence Valley ETV Council	*41	370.0	39.6	N 43° 51' 46.0"	50.4	217.5	196.3	
Watertown		NY	BPEDT-20000419AAP	II	756.0	W 75° 43' 39.0"	231.8	21.18	CLEAR	
Digital channel; DTV channel;920928DF (15363 100592)FOR PROTECTION OF 15 MILE WIRELESS SERVICE AREA;; DA: DIE TLP-32 A @ 0.0°										
WVIA-TV	App	Northeastern Pennsylvania ETV As	*41	487.0	200	N 41° 10' 55.0"	134.5	228.1	196.3	
Scranton		PA	BPEDT-991017BY	I	872.0	W 75° 52' 17.0"	315.8	31.83	CLEAR	
Digital channel; DTV channel;										
WVIA-TV	DTV	Northeastern Pennsylvania ETV As	*41	509.0	50	N 41° 10' 55.0"	134.5	228.1	196.3	
Scranton		PA	I	890.0		W 75° 52' 17.0"	315.8	31.83	CLEAR	
Digital channel; DTV Channel Allotment per MM Doc 87-268 (6th R & O) released 2/19/98;; DA: rep PASCRANTON_41 @ 0.0°										
ALLOC	DTV		42			N 42° 59' 00.0"	288.8	123.7	110.0	
Welland		ON				W 79° 15' 00.0"	107.8	13.66	CLOSE	
Digital channel; DTV channel;										
WSKG-TV	DTV	WSKG Public Telecommunications C	*42	375.0	50	N 42° 03' 22.0"	112.1	167.0	110.0	
Binghamton		NY	I	769.0		W 75° 56' 39.0"	293.4	56.97	CLEAR	
Digital channel; DTV Channel Allotment per MM Doc 87-268 (6th R & O) released 2/19/98;CP cancelled and call sign deleted per 24294-7/30/98;; DA: rep NYBINGHAMTON42 @ 0.0°										
WSKG-TV	App	WSKG Public Telecommunications C	*42	354.0	9	N 42° 03' 22.0"	112.1	167.0	110.0	
Binghamton		NY	BPEDT-20000307AAB	I	745.0	W 75° 56' 39.0"	293.4	56.97	CLEAR	
Digital channel; DTV channel;; DA: @ 0.0°										
WNYS-TV	Lic	RKM Media, Inc.	43 +	445.0	794	N 42° 52' 50.0"	77.8	134.9	80.50	
Syracuse		NY	BLCT-961202LO	I	799.0	W 76° 11' 59.0"	258.9	54.41	CLEAR	
License granted 9/20/99 per 44594-10/20/99;; DA: HAR ODD960624KN @ 315.0°										

Renard Communications Corp.  
Syracuse, NY

Dataworld Digital TV Spacing Study

**Title: Ch. 41, Geneseo, NY**

Channel: 41 Zone I (632-638 MHz) Digital

Latitude: N 42° 38' 08.0"

Longitude: W 77° 48' 50.0"

Safety Zone: 60.0 km

Database: DW 7/14/2000 5:04:17 PM

Call	Auth	Licensee name	Chan	HAAT(m)	ERP	Latitude	Br-to	Dist	Req
City of License		St	FCC File Number	Zone	HAMSL(m)	Longitude	-from	(km)	(km)
WYDC	Lic	WYDC, Inc.	48 +	166.1	12	N 42° 09' 43.0"	129.3	82.79	80.50
Coming		NY	BLCT-940920KE	I	597.1	W 77° 02' 15.0"	309.8	2.287	CLOSE
DA: SWR ODD940920KE @ 0.0°									
ALLOC			48			N 43° 10' 00.0"	297.3	131.3	80.50
Saint Catharines		ON				W 79° 15' 00.0"	116.3	50.80	CLEAR
WNYO-TV	Lic	Grant Television, Inc.	49 -	376.0	4900	N 42° 46' 58.0"	287.5	55.23	80.50
Buffalo		NY	BLCT-870911KH	I	738.0	W 78° 27' 28.0"	107.1	-25.3	SHORT
DA: AND ODD870911KH @ 0.0°									

>> End of channel 41 Zone I study <<



**CH 41 DTV**  
Latitude: 42-38-08 N  
Longitude: 077-48-50 W  
Power: 200.00 kW  
Channel: 41  
Frequency: 635.0 MHz  
AMSL Height: 537.6 m  
Elevation: 290.215 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

