

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast ) MB Docket No. 87-268  
Service )  
 )  
To: The Commission )

**COMMENTS**

WHDH-TV, the licensee of WHDH-TV and WHDH-DT, Boston, Massachusetts, Facility ID No. 72145 (“WHDH”), hereby submits these comments through counsel in response to the Commission’s *Seventh Further Notice of Proposed Rulemaking* (“*Further Notice*”) in this proceeding.<sup>1</sup> In the *Further Notice*, the Commission proposed a new digital television Table of Allotments (“DTV Table”) which provides each eligible broadcast television station with a channel allotment for DTV operations after the February 17, 2009 transition.

As demonstrated in the attached Engineering Statement prepared by Jules Cohen, P.C., WHDH may operate a maximized post-transition facility on Channel 7 with an effective radiated power of 30 kW and a directional antenna with an antenna height above average terrain of 305 meters. Operation with these maximized parameters would permit WHDH to significantly increase its area of service with only *de minimis* new interference to other broadcast stations.

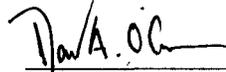
---

<sup>1</sup> *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Services*, Seventh Further Notice of Proposed Rulemaking, MB Docket No. 87-268, FCC 06-150, 21 FCC Rcd 12100 (rel. Oct. 20, 2006) (“*Further Notice*”). On January 9, 2007, the Commission extended the comment deadline to January 25, 2007. See *Order Granting Extension of Time for Filing Comments and Reply Comments*, MB Docket No. 87-268, DA 07-38 (MB rel. Jan. 9, 2007). Therefore, these comments are timely filed.

For these reasons, WHDH submits that the proposed changes herein would serve the public interest by maximizing DTV service to the public.

Respectfully submitted,

WHDH-TV



---

David A. O'Connor  
Holland & Knight LLP  
2099 Pennsylvania Ave., NW  
Suite 100  
Washington, DC 20006-6801  
Tel: 202-955-3000  
Fax: 202-955-5564  
*Its Counsel*

January 25, 2007

Filed Via ECFS

# 4321630\_v1

**ENGINEERING STATEMENT ON BEHALF OF WHDH-TV  
LICENSEE OF WHDH-DT, BOSTON, MASSACHUSETTS**

This Engineering Statement, prepared on behalf of WHDH-TV, (“WHDH”) licensee of WHDH-DT, Boston, Massachusetts, is in support of comments relative to the Commission’s Seventh Further Notice of Proposed Rule Making (“NPRM”), MB Docket No. 87-268, Adopted October 10, 2006.

In the subject NPRM, the assignment proposed for WHDH-DT after the transition to an all-digital television broadcast system is the use of channel 7 with maximum effective radiated power (“ERP”) of 16.8 kilowatts and antenna height above average terrain (“HAAT”) of 288 meters. This Engineering Statement supports, for post-transition use, channel 7 with ERP of 30 kilowatts and HAAT of 305 meters (a maximized facility).

As reported in the NPRM, WHDH-DT would provide the potential of interference-free service to a population of 6,966,000 within the noise-limited contour. Interference from other digital operations would constitute 0.2 percent of the population not limited by terrain. If allowed to maximize, as proposed, WHDH-DT would provide the potential of interference-free service to 7,182,000 people within the noise-limited contour. Interference from other digital operations would constitute 0.13 percent of population not limited by terrain.

Computer analyses were made, using the Commission’s “tv\_process” program, for the facilities assigned in the NPRM and as proposed by WHDH. Stations potentially affected by WHDH-DT post transition include WVII-DT, Bangor, Maine, and WXAA-DT, Albany, New York.

*Jules Cohen, P.E.*  
*Consulting Engineer*

---

As assigned in the NPRM, WVII-DT would receive 0.56 percent interference from WHDH-DT. If WHDH-DT is allowed to maximize, the percent interference would increase to only 0.58. (All percentages relate to population not affected by terrain.) WHDH-DT appears to be the sole source of interference to WVII-DT.

As assigned in the NPRM, WXAA-DT would receive interference amounting to 0.91 percent without consideration of WHDH-DT, and 1.13 percent interference when WHDH-DT is included - an increase of 0.22 percent. If allowed to maximize, WHDH-DT would contribute 0.38 percent, increasing total interference to WXAA-DT to 1.29 percent.

In conclusion, permitting WHDH-DT to operate with maximum facilities, improving the likelihood of increasing the population able to receive programming with indoor antennas, and providing the potential of extending service within its noise-free area to in excess of an additional 200,000 people, would involve an interference increase potential of only 0.02 percent at WVII-DT and 0.16 percent at WXAA-DT.

The foregoing is accurate to the best of my opinion and belief.



Jules Cohen, P.E.

January 8, 2007

