Analysis of Interference to Affected Station 4

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
15	NEW	CHRISTIANSTED VI	DTVPLN	-NPLN0940

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
14	WTIN	PONCE PR	193.6	PLN	DTVPLN	-NPLN0900
15	WTIN-DT	PONCE PR	193.6	PLN	DTVPLN	-DTVP0189
16	WMTJ-DT	FAJARDO PR	122.0	PLN	DTVPLN	-DTVP0239
17	WVXF	CHARLOTTE AMALIE VI	68.6	PLN	DTVPLN	-NPLN1006
18	WSJU	SAN JUAN PR	122.0	PLN	DTVPLN	-NPLN1029
30	WRWRTV	SAN JUAN PR	148.5	PLN	DTVPLN	-NPLN1390

Results for: 15N VI CHRISTIANSTED DTVPLN NPLN0940 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	0	3924.5
not affected by terrain losses	0	3856.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	678.2
lost to all IX	0	678.2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
15	WVIF	CHRISTIANSTED VI	BLCT	-20001227ABK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WTIN	PONCE PR	193.5	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	193.6	PLN	DTVPLN	-DTVP0189
16	WMTJ	FAJARDO PR	121.9	CP MOD	BMPEDT	-20030324ACY
16	WMTJ-DT	FAJARDO PR	121.9	PLN	DTVPLN	-DTVP0239
17	WVXF	CHARLOTTE AMALIE VI	68.7	LIC	BLCT	-19990701KF
18	WTCV	SAN JUAN PR	121.9	LIC	BLCT	-19840808KN
23	WCVI-TV	CHRISTIANSTED VI	7.6	CP MOD	BMPCDT	-20030121AAY
23	WCVI-DR	CHRISTIANSTED VI	7.6	LIC	BPRM	-20020304ALU
30	WSJU-TV	SAN JUAN PR	148.5	LIC	BLCT	-19841129LB
14	WMEI	ARECIBO PR	190.8	APP	USERRECORD-01	

Proposed station is beyond the site to
nearest cell evaluation distance

##

Analysis of Interference to Affected Station 5

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
16	WTRA	MAYAGUEZ PR	DTVPLN	-NPLN0965

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
14	WTIN	PONCE PR	65.6	PLN	DTVPLN	-NPLN0900
15	WTIN-DT	PONCE PR	65.6	PLN	DTVPLN	-DTVP0189
16	WMTJ-DT	FAJARDO PR	146.0	PLN	DTVPLN	-DTVP0239
17	WVEO-DT	AGUADILLA PR	0.0	PLN	DTVPLN	-DTVP0278
19	WKPV-DT	PONCE PR	52.6	PLN	DTVPLN	-DTVP0369
20	WKPV	PONCE PR	52.6	PLN	DTVPLN	-NPLN1089
23	WNJX-DT	MAYAGUEZ PR	27.3	PLN	DTVPLN	-DTVP0540
24	WSJNTV	SAN JUAN PR	139.8	PLN	DTVPLN	-NPLN1223
30	WRWRTV	SAN JUAN PR	114.6	PLN	DTVPLN	-NPLN1390
31	WRWR-DT	SAN JUAN PR	114.6	PLN	DTVPLN	-DTVP0839

Results for: 16N PR MAYAGUEZ DTVPLN NPLN0965 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	801306	8828.1
not affected by terrain losses	619834	8052.1
lost to NTSC IX	16903	116.0
lost to additional IX by ATV	79776	2636.0
lost to all IX	96679	2752.0

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
16	WOST	MAYAGUEZ PR	BPCT	-19920102KE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WTIN	PONCE PR	66.7	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	66.6	PLN	DTVPLN	-DTVP0189
16	WMTJ	FAJARDO PR	147.2	CP MOD	BMPEDT	-20030324ACY
16	WMTJ-DT	FAJARDO PR	147.2	PLN	DTVPLN	-DTVP0239
17	WVEO	AGUADILLA PR	1.3	CP	BPCDT	-20000501AFS
17	WVEO-DT	AGUADILLA PR	1.3	PLN	DTVPLN	-DTVP0278
19	WKPV-DT	PONCE PR	53.5	PLN	DTVPLN	-DTVP0369
19	WKPV	PONCE PR	53.4	CP MOD	BMPCDT	-20040318ABY
20	WKPV	PONCE PR	53.4	LIC	BLCT	-20010130ABD
23	WNJX-DT	MAYAGUEZ PR	27.9	PLN	DTVPLN	-DTVP0540
23	WNJX-TV	MAYAGUEZ PR	28.4	CP MOD	BMPCDT	-20040115ACG
24	WJPX	SAN JUAN PR	141.1	LIC	BLCT	-20000821ACE
30	WSJU-TV	SAN JUAN PR	115.8	LIC	BLCT	-19841129LB
31	WSJU-TV	SAN JUAN PR	115.8	CP MOD	BMPCDT	-20060628ACE
31	WRWR-DT	SAN JUAN PR	115.8	PLN	DTVPLN	-DTVP0839
14	WMEI	ARECIBO PR	69.4	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 6

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.	
18	WSJU	SAN JUAN PR	DTVPLN	-NPLN1029

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
15	WTIN-DT	PONCE PR	84.1	PLN	DTVPLN	-DTVP0189
15	NEW	CHRISTIANSTED VI	122.0	PLN	DTVPLN	-NPLN0940
16	WMTJ-DT	FAJARDO PR	0.0	PLN	DTVPLN	-DTVP0239
17	WVEO-DT	AGUADILLA PR	146.0	PLN	DTVPLN	-DTVP0278
17	WVXF	CHARLOTTE AMALIE VI	89.7	PLN	DTVPLN	-NPLN1006
19	WKPV-DT	PONCE PR	103.8	PLN	DTVPLN	-DTVP0369
20	WKPV	PONCE PR	103.8	PLN	DTVPLN	-NPLN1089
20	WSVI-DT	CHRISTIANSTED VI	121.9	PLN	DTVPLN	-DTVP0423
21	WSJN-DT	SAN JUAN PR	7.1	PLN	DTVPLN	-DTVP0454
22	WNJXTV	MAYAGUEZ PR	127.3	PLN	DTVPLN	-NPLN1155
25	WQTO-DT	PONCE PR	103.9	PLN	DTVPLN	-DTVP0616
26	WQTO	PONCE PR	103.9	PLN	DTVPLN	-NPLN1290
32	WELU	AGUADILLA PR	146.8	PLN	DTVPLN	-NPLN1436
32	WSJU-DT	SAN JUAN PR	0.0	PLN	DTVPLN	-DTVP0879
33	WPRV-DT	FAJARDO PR	0.0	PLN	DTVPLN	-DTVP0916

Results for: 18N PR SAN JUAN DTVPLN NPLN1029 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	2520595	19937.3
not affected by terrain losses	2306305	18834.1
lost to NTSC IX	324	131.9
lost to additional IX by ATV	8761	20.0
lost to all IX	9085	151.9

Analysis of current record

Channel	Call	City/State	Application Ref. No.	
18	WTCV	SAN JUAN PR	BLCT	-19840808KN

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WTIN	PONCE PR	84.0	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	84.1	PLN	DTVPLN	-DTVP0189
15	WVIF	CHRISTIANSTED VI	121.9	LIC	BLCT	-20001227ABK
16	WMTJ	FAJARDO PR	0.0	CP MOD	BMPEDT	-20030324ACY
16	WMTJ-DT	FAJARDO PR	0.0	PLN	DTVPLN	-DTVP0239
17	WVEO	AGUADILLA PR	146.0	CP	BPCDT	-20000501AFS
17	WVEO-DT	AGUADILLA PR	146.0	PLN	DTVPLN	-DTVP0278
17	WVXF	CHARLOTTE AMALIE VI	89.6	LIC	BLCT	-19990701KF
19	WKPV-DT	PONCE PR	103.8	PLN	DTVPLN	-DTVP0369
19	WKPV	PONCE PR	103.9	CP MOD	BMPCDT	-20040318ABY
20	WKPV	PONCE PR	103.9	LIC	BLCT	-20010130ABD
20	WSVI	CHRISTIANSTED VI	121.9	CP	BPCDT	-19991028AED
20	WSVI-DT	CHRISTIANSTED VI	121.9	PLN	DTVPLN	-DTVP0423
21	WJPX	SAN JUAN PR	7.1	CP MOD	BMPCDT	-20060418AEK
21	WSJN-DT	SAN JUAN PR	7.1	PLN	DTVPLN	-DTVP0454
22	WNJX-TV	MAYAGUEZ PR	126.7	CP MOD	BPCT	-20030306ABR
25	WQTO	PONCE PR	103.9	LIC	BLEDT	-20060615ACV
25	WQTO-DT	PONCE PR	103.9	PLN	DTVPLN	-DTVP0616
26	WQTO	PONCE PR	103.9	LIC	BLET	-20030818AEG
32	WELU	AGUADILLA PR	146.8	CP	BPET	-20020502AAO
32	WTCV	SAN JUAN PR	31.8	CP MOD	BMPCDT	-20040108AJY
32	WSJU-DT	SAN JUAN PR	0.0	PLN	DTVPLN	-DTVP0879
33	WPRV-DT	FAJARDO PR	0.0	PLN	DTVPLN	-DTVP0916
33	WORO-TV	FAJARDO PR	0.0	CP	BPCDT	-19991101AGY
14	WMEI	ARECIBO PR	82.0	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 7

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.	
22	WNJXTV	MAYAGUEZ PR	DTVPLN	-NPLN1155

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
14	WTIN	PONCE PR	43.5	PLN	DTVPLN	-NPLN0900
15	WTIN-DT	PONCE PR	43.5	PLN	DTVPLN	-DTVP0189
19	WKPV-DT	PONCE PR	26.7	PLN	DTVPLN	-DTVP0369
20	WKPV	PONCE PR	26.7	PLN	DTVPLN	-NPLN1089
21	WSJN-DT	SAN JUAN PR	120.7	PLN	DTVPLN	-DTVP0454
23	WNJX-DT	MAYAGUEZ PR	0.0	PLN	DTVPLN	-DTVP0540
24	WSJNTV	SAN JUAN PR	120.7	PLN	DTVPLN	-NPLN1223
25	WQTO-DT	PONCE PR	26.6	PLN	DTVPLN	-DTVP0616
26	WQTO	PONCE PR	26.6	PLN	DTVPLN	-NPLN1290
29	WORA-DT	MAYAGUEZ PR	0.1	PLN	DTVPLN	-DTVP0763
30	WRWRTV	SAN JUAN PR	95.5	PLN	DTVPLN	-NPLN1390
36	WDWL	BAYAMON PR	93.8	PLN	DTVPLN	-NPLN1527

Results for: 22N PR MAYAGUEZ DTVPLN NPLN1155 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	1531370	23167.1
not affected by terrain losses	1269313	22274.1
lost to NTSC IX	161182	292.3
lost to additional IX by ATV	15246	32.0
lost to all IX	176428	324.4

Analysis of current record

Channel	Call	City/State	Application Ref. No.	
22	WNJX-TV	MAYAGUEZ PR	BLCT	-20030307ADG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
15	WTIN	PONCE PR	43.0	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	42.9	PLN	DTVPLN	-DTVP0189
19	WKPV-DT	PONCE PR	26.1	PLN	DTVPLN	-DTVP0369
19	WKPV	PONCE PR	26.0	CP MOD	BMPCDT	-20040318ABY
20	WKPV	PONCE PR	26.0	LIC	BLCT	-20010130ABD
21	WJPX	SAN JUAN PR	120.1	CP MOD	BMPCDT	-20060418AEK
21	WSJN-DT	SAN JUAN PR	120.1	PLN	DTVPLN	-DTVP0454
23	WNJX-DT	MAYAGUEZ PR	0.6	PLN	DTVPLN	-DTVP0540
23	WNJX-TV	MAYAGUEZ PR	0.0	CP MOD	BMPCDT	-20040115ACG
24	WJPX	SAN JUAN PR	120.1	LIC	BLCT	-20000821ACE
25	WQTO	PONCE PR	26.0	LIC	BLEDT	-20060615ACV
25	WQTO-DT	PONCE PR	26.0	PLN	DTVPLN	-DTVP0616
26	WQTO	PONCE PR	26.0	LIC	BLET	-20030818AEG
29	WORA-DT	MAYAGUEZ PR	0.6	PLN	DTVPLN	-DTVP0763
29	WORA-TV	MAYAGUEZ PR	0.6	CP MOD	BMPCDT	-20060414AAR
30	WSJU-TV	SAN JUAN PR	95.0	LIC	BLCT	-19841129LB
36	WDWL	BAYAMON PR	93.2	LIC	BLCT	-19910322KF
14	WMEI	ARECIBO PR	45.3	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
22	WNJX-TV	MAYAGUEZ PR	BPCT	-20030306ABR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WTIN	PONCE PR	43.0	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	42.9	PLN	DTVPLN	-DTVP0189
19	WKPV-DT	PONCE PR	26.1	PLN	DTVPLN	-DTVP0369
19	WKPV	PONCE PR	26.0	CP MOD	BMPCDT	-20040318ABY
20	WKPV	PONCE PR	26.0	LIC	BLCT	-20010130ABD
21	WJPX	SAN JUAN PR	120.1	CP MOD	BMPCDT	-20060418AEK
21	WSJN-DT	SAN JUAN PR	120.1	PLN	DTVPLN	-DTVP0454
23	WNJX-DT	MAYAGUEZ PR	0.6	PLN	DTVPLN	-DTVP0540
23	WNJX-TV	MAYAGUEZ PR	0.0	CP MOD	BMPCDT	-20040115ACG
24	WJPX	SAN JUAN PR	120.1	LIC	BLCT	-20000821ACE
25	WQTO	PONCE PR	26.0	LIC	BLEDT	-20060615ACV
25	WQTO-DT	PONCE PR	26.0	PLN	DTVPLN	-DTVP0616
26	WQTO	PONCE PR	26.0	LIC	BLET	-20030818AEG
29	WORA-DT	MAYAGUEZ PR	0.6	PLN	DTVPLN	-DTVP0763
29	WORA-TV	MAYAGUEZ PR	0.6	CP MOD	BMPCDT	-20060414AAR
30	WSJU-TV	SAN JUAN PR	95.0	LIC	BLCT	-19841129LB
36	WDWL	BAYAMON PR	93.2	LIC	BLCT	-19910322KF
14	WMEI	ARECIBO PR	45.3	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application Ref. No.
14	WMEI	ARECIBO PR	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
15	WTIN	PONCE PR	2.9	CP MOD	BMPCDT	-20040803ABE
15	WTIN-DT	PONCE PR	2.9	PLN	DTVPLN	-DTVP0189
15	WVIF	CHRISTIANSTED VI	190.8	LIC	BLCT	-20001227ABK

Total scenarios = 2

Result key: 5
Scenario 1 Affected station 9
Before Analysis

Results for: 14A PR ARECIBO USERRECORD01 APP
HAAT 839.0 m, ATV ERP 10.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3346732	19344.4
not affected by terrain losses	2860643	18187.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	376231	2269.5
lost to ATV IX only	376231	2269.5
lost to all IX	376231	2269.5

Potential Interfering Stations Included in above Scenario 1

15A PR PONCE BMPCDT 20040803ABE CP

Result key: 6
Scenario 2 Affected station 9
Before Analysis

Results for: 14A PR ARECIBO USERRECORD01 APP
HAAT 839.0 m, ATV ERP 10.0 kW

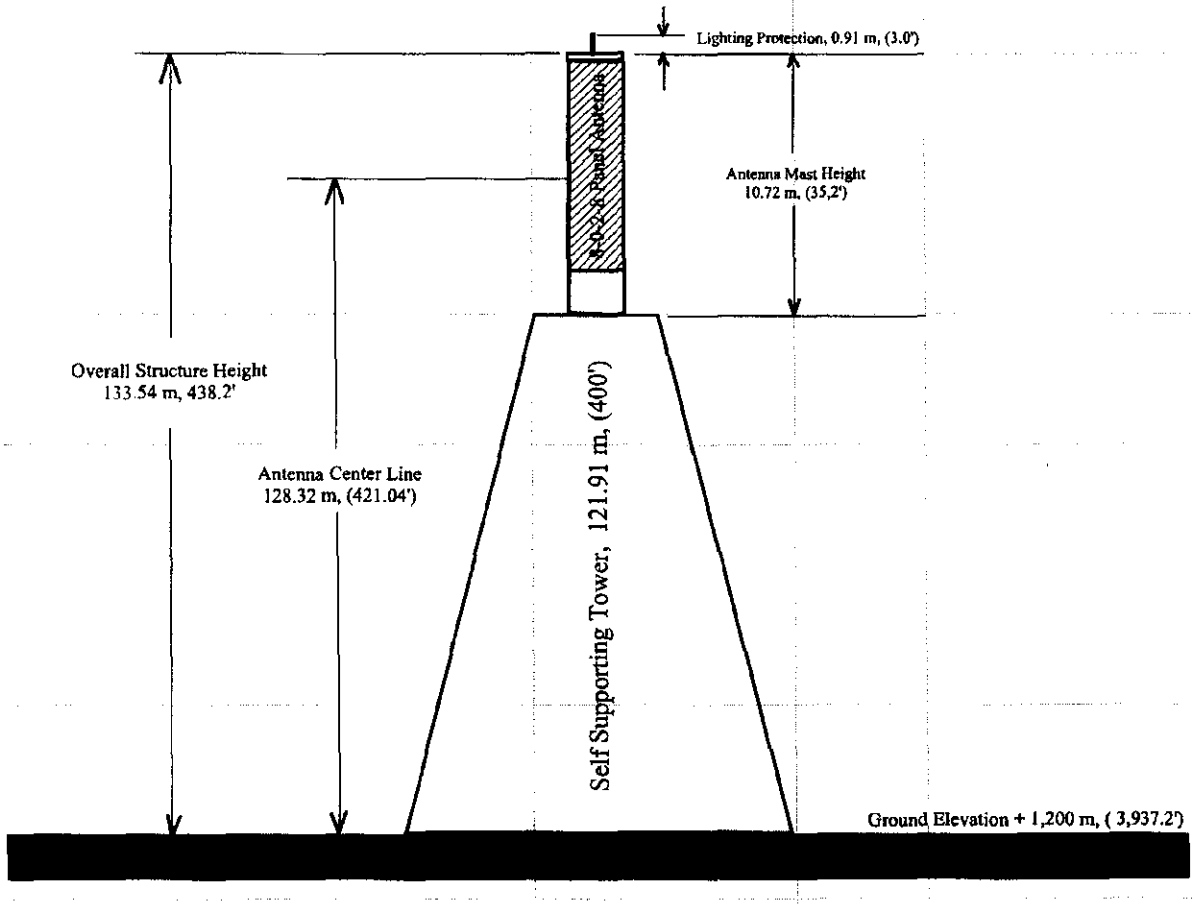
	POPULATION	AREA (sq km)
within Noise Limited Contour	3346732	19344.4
not affected by terrain losses	2860643	18187.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	298273	1036.7
lost to ATV IX only	298273	1036.7
lost to all IX	298273	1036.7

Potential Interfering Stations Included in above Scenario 2

15A PR PONCE DTVPLN DTVP0189 PLN

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

WMEI Maravilla Tower Site



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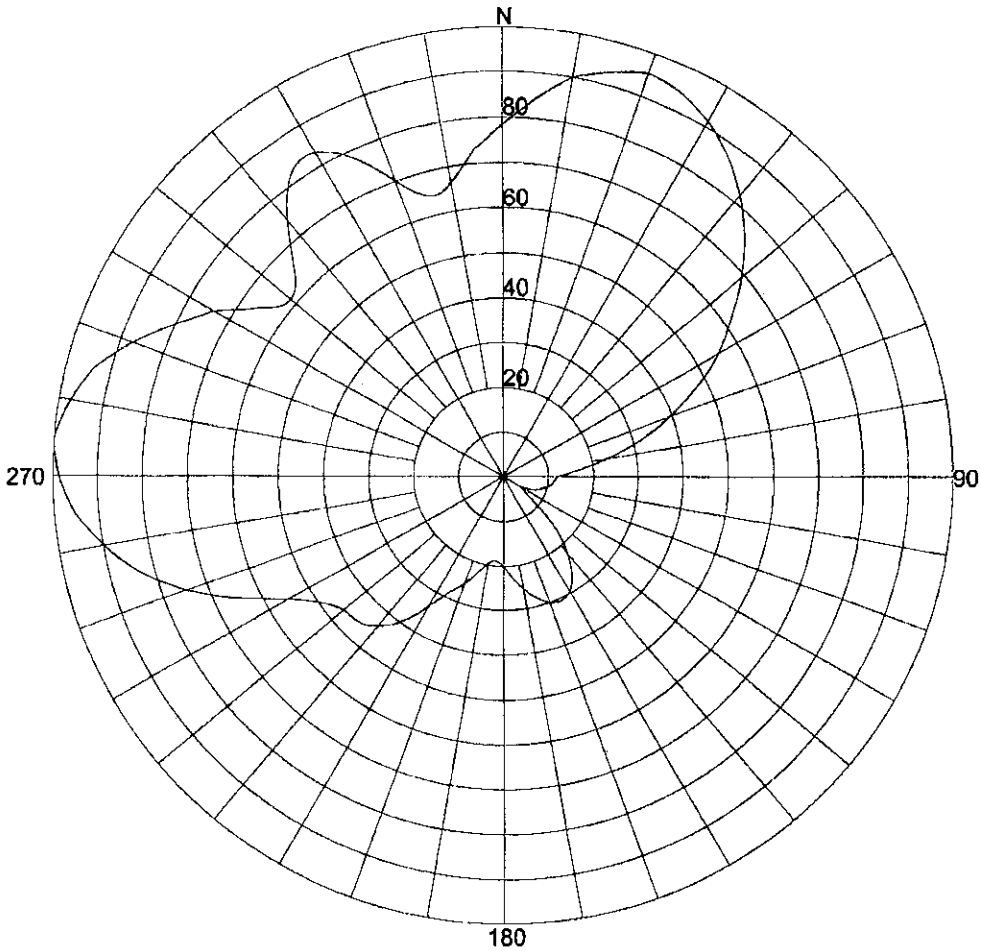


Azimuth Pattern

Scale: Linear

Unit: Relative Field

Systems With Reliability

CLIENT: *Charlie Stanton* Date: 12/6/2005

ANTENNA TYPE: SWDDP 8-0-2-8/14&60

FREQUENCY: Ch : 14 & 60

PATTERN POL.: Horizontal CIRCULARITY(+/-dB):

AZ. DIRECTIVITY: 2.698 / 4.31 dB PATTERN RMS: *0.607*

Micro-Tek Eng. Ver. 2000

Relative Field Tabulation(Azimuth)

Azimuth Heading	Normalized Field(dB)	Azimuth Heading	Normalized Field(dB)
0	.7843 (-2.11)	180	.1997 (-13.994)
5	.8431 (-1.482)	185	.1894 (-14.455)
10	.9005 (-0.911)	190	.1958 (-14.162)
15	.9299 (-0.631)	195	.2211 (-13.11)
20	.9538 (-0.411)	200	.2545 (-11.887)
25	.9422 (-0.517)	205	.2847 (-10.912)
30	.9144 (-0.778)	210	.3360 (-9.472)
35	.8726 (-1.184)	215	.3948 (-8.072)
40	.8201 (-1.723)	220	.4359 (-7.212)
45	.7597 (-2.387)	225	.4591 (-6.762)
50	.6928 (-3.188)	230	.4656 (-6.64)
55	.6186 (-4.171)	235	.4955 (-6.099)
60	.5528 (-5.149)	240	.5520 (-5.162)
65	.4730 (-6.503)	245	.6485 (-3.762)
70	.3952 (-8.063)	250	.7472 (-2.531)
75	.3107 (-10.153)	255	.8313 (-1.604)
80	.2321 (-12.687)	260	.8993 (-0.922)
85	.1662 (-15.586)	265	.9524 (-0.423)
90	.1213 (-18.32)	270	.9867 (-0.116)
95	.1138 (-18.878)	275	1.0000 (0)
100	.1073 (-19.386)	280	.9738 (-0.231)
105	.0949 (-20.451)	285	.9388 (-0.549)
110	.0816 (-21.767)	290	.8730 (-1.18)
115	.0652 (-23.711)	295	.8035 (-1.9)
120	.0452 (-26.894)	300	.7399 (-2.616)
125	.0612 (-24.263)	305	.6571 (-3.648)
130	.1040 (-19.658)	310	.6155 (-4.215)
135	.1652 (-15.641)	315	.6562 (-3.659)
140	.2210 (-13.111)	320	.7430 (-2.58)
145	.2671 (-11.465)	325	.8191 (-1.733)
150	.2957 (-10.584)	330	.8329 (-1.588)
155	.3058 (-10.29)	335	.7799 (-2.159)
160	.2996 (-10.468)	340	.7017 (-3.077)
165	.2810 (-11.025)	345	.6486 (-3.761)
170	.2548 (-11.875)	350	.6664 (-3.526)
175	.2268 (-12.886)	355	.7326 (-2.703)

Systems With Reliability

CLIENT: *Charlie Stanton* Date: 12/6/2005

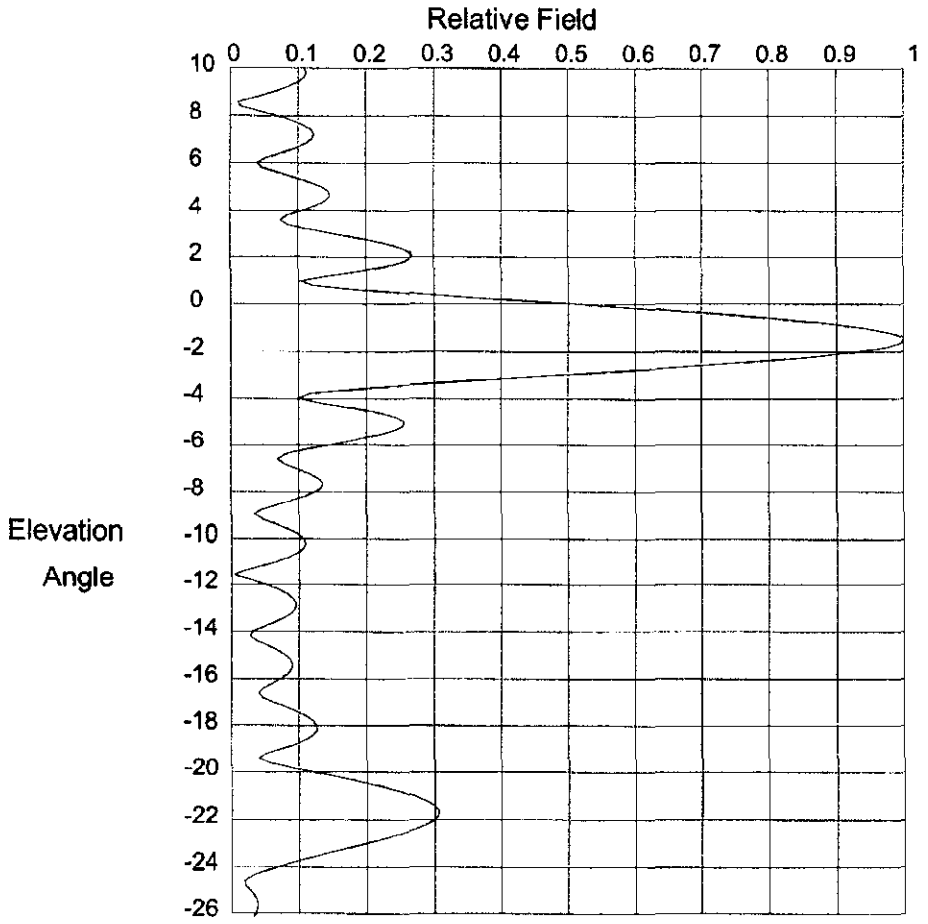
ANTENNA TYPE: SWDDP 8-0-2-8/14&60

FREQUENCY: Ch : 14 & 60

PATTERN POL.: Horizontal CIRCULARITY(+/-dB):

AZ. DIRECTIVITY: 2.698 / 4.31 dB PATTERN RMS: *0.607*

Micro-Tek Eng. Ver. 2000



Elevation Pattern

Scale: Linear

Units: Field, Relative

Systems With Reliability L.L.P.

CLIENT: *Charlie Stanton* Date: 3/16/2006

ANTENNA TYPE: SWDDP 8-0-2-8/14&60(8 Panel)

FREQUENCY: 749

PATTERN POL.: Horizontal

DIRECTIVITY(Peak): 19.776/12.961 dBd Beam Tilt (Deg.) : *-1.5*

DIRECTIVITY(Horiz): 5.106/7.081 dBd Null Fill(s)(%) : *10, 0, 0*

Micro-Tek Eng. Version 2005

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
90.0	.00 (-50)	52.0	.02 (-33.824)	14.0	.089 (-21.025)
89.0	.00 (-94.091)	51.0	.027 (-31.436)	13.0	.083 (-21.647)
88.0	.00 (-81.101)	50.0	.019 (-34.342)	12.0	.101 (-19.89)
87.0	.00 (-73.349)	49.0	.018 (-34.768)	11.0	.034 (-29.32)
86.0	.00 (-67.876)	48.0	.042 (-27.541)	10.0	.109 (-19.241)
85.0	.001 (-63.765)	47.0	.052 (-25.625)	9.8	.112 (-18.993)
84.0	.001 (-60.629)	46.0	.032 (-29.88)	9.6	.109 (-19.244)
83.0	.001 (-58.296)	45.0	.04 (-28.005)	9.4	.10 (-20.035)
82.0	.001 (-56.707)	44.0	.114 (-18.855)	9.2	.084 (-21.491)
81.0	.002 (-55.902)	43.0	.177 (-15.057)	9.0	.064 (-23.91)
80.0	.002 (-56.024)	42.0	.194 (-14.229)	8.8	.039 (-28.114)
79.0	.001 (-57.314)	41.0	.157 (-16.096)	8.6	.012 (-38.281)
78.0	.001 (-59.33)	40.0	.083 (-21.643)	8.4	.016 (-35.902)
77.0	.001 (-57.373)	39.0	.018 (-34.691)	8.2	.044 (-27.183)
76.0	.002 (-52.251)	38.0	.039 (-28.173)	8.0	.069 (-23.182)
75.0	.004 (-48.144)	37.0	.037 (-28.524)	7.8	.091 (-20.793)
74.0	.005 (-45.284)	36.0	.015 (-36.62)	7.6	.108 (-19.312)
73.0	.007 (-43.499)	35.0	.014 (-37.085)	7.4	.119 (-18.476)
72.0	.007 (-42.756)	34.0	.015 (-36.605)	7.2	.123 (-18.176)
71.0	.007 (-43.194)	33.0	.005 (-46.836)	7.0	.121 (-18.379)
70.0	.006 (-45.155)	32.0	.006 (-45.119)	6.8	.111 (-19.11)
69.0	.004 (-48.587)	31.0	.004 (-48.541)	6.6	.095 (-20.449)
68.0	.004 (-47.69)	30.0	.00 (-50)	6.4	.075 (-22.546)
67.0	.007 (-43.225)	29.0	.003 (-50.348)	6.2	.053 (-25.501)
66.0	.009 (-40.663)	28.0	.008 (-41.601)	6.0	.039 (-28.069)
65.0	.01 (-40.275)	27.0	.004 (-47.09)	5.8	.047 (-26.474)
64.0	.007 (-42.513)	26.0	.017 (-35.23)	5.6	.07 (-23.091)
63.0	.004 (-48.409)	25.0	.024 (-32.547)	5.4	.095 (-20.431)
62.0	.006 (-43.996)	24.0	.02 (-33.916)	5.2	.118 (-18.592)
61.0	.012 (-38.586)	23.0	.064 (-23.853)	5.0	.135 (-17.413)
60.0	.014 (-36.891)	22.0	.063 (-23.993)	4.8	.145 (-16.785)
59.0	.012 (-38.679)	21.0	.072 (-22.913)	4.6	.147 (-16.662)
58.0	.004 (-48.89)	20.0	.271 (-11.352)	4.4	.141 (-17.043)
57.0	.007 (-42.581)	19.0	.431 (-7.315)	4.2	.126 (-17.964)
56.0	.017 (-35.488)	18.0	.411 (-7.722)	4.0	.106 (-19.464)
55.0	.02 (-34.189)	17.0	.205 (-13.763)	3.8	.085 (-21.394)
54.0	.013 (-37.611)	16.0	.076 (-22.364)	3.6	.074 (-22.656)
53.0	.008 (-42.378)	15.0	.165 (-15.626)	3.4	.085 (-21.432)

Systems With Reliability L.L.P.

CLIENT: *Charlie Stanton* Date: 3/16/2006
ANTENNA TYPE: SWDDP 8-0-2-8/14&60(8 Panel)
FREQUENCY: 749
PATTERN POL.: Horizontal
DIRECTIVITY(Peak): 19.776/12.961 dBd Beam Tilt (Deg.) : *-1.5*
DIRECTIVITY(Horiz): 5.106/7.081 dBd Null Fill(s)(%) : *10, 0, 0*

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
3.2	.115 (-18.769)	-4.4	.182 (-14.809)	-12.0	.05 (-25.959)
3.0	.153 (-16.288)	-4.6	.22 (-13.151)	-12.2	.069 (-23.252)
2.8	.192 (-14.355)	-4.8	.245 (-12.206)	-12.4	.083 (-21.622)
2.6	.225 (-12.95)	-5.0	.257 (-11.816)	-12.6	.092 (-20.701)
2.4	.251 (-12.012)	-5.2	.254 (-11.894)	-12.8	.096 (-20.334)
2.2	.266 (-11.51)	-5.4	.24 (-12.402)	-13.0	.095 (-20.461)
2.0	.268 (-11.44)	-5.6	.215 (-13.342)	-13.2	.088 (-21.08)
1.8	.256 (-11.84)	-5.8	.183 (-14.744)	-13.4	.077 (-22.237)
1.6	.229 (-12.794)	-6.0	.147 (-16.667)	-13.6	.063 (-24.04)
1.4	.189 (-14.462)	-6.2	.11 (-19.135)	-13.8	.047 (-26.642)
1.2	.141 (-17.032)	-6.4	.081 (-21.827)	-14.0	.032 (-29.873)
1.0	.103 (-19.773)	-6.6	.069 (-23.208)	-14.2	.028 (-31.145)
.8	.121 (-18.373)	-6.8	.079 (-22.086)	-14.4	.038 (-28.494)
.6	.195 (-14.207)	-7.0	.098 (-20.18)	-14.6	.053 (-25.536)
.4	.292 (-10.684)	-7.2	.117 (-18.67)	-14.8	.068 (-23.396)
.2	.399 (-7.981)	-7.4	.13 (-17.733)	-15.0	.08 (-21.984)
.0	.508 (-5.88)	-7.6	.136 (-17.335)	-15.2	.088 (-21.158)
-.2	.615 (-4.224)	-7.8	.134 (-17.436)	-15.4	.091 (-20.834)
-.4	.715 (-2.913)	-8.0	.125 (-18.035)	-15.6	.089 (-20.981)
-.6	.805 (-1.886)	-8.2	.11 (-19.172)	-15.8	.083 (-21.603)
-.8	.881 (-1.104)	-8.4	.09 (-20.946)	-16.0	.073 (-22.735)
-1.0	.94 (-0.539)	-8.6	.067 (-23.514)	-16.2	.06 (-24.405)
-1.2	.98 (-0.175)	-8.8	.045 (-26.862)	-16.4	.048 (-26.439)
-1.4	1.00 (0)	-9.0	.036 (-28.964)	-16.6	.041 (-27.77)
-1.6	.999 (-0.011)	-9.2	.046 (-26.791)	-16.8	.046 (-26.777)
-1.8	.977 (-0.206)	-9.4	.065 (-23.791)	-17.0	.06 (-24.408)
-2.0	.934 (-0.591)	-9.6	.083 (-21.609)	-17.2	.078 (-22.164)
-2.2	.873 (-1.177)	-9.8	.098 (-20.199)	-17.4	.095 (-20.42)
-2.4	.796 (-1.979)	-10.0	.107 (-19.409)	-17.6	.11 (-19.168)
-2.6	.706 (-3.025)	-10.2	.11 (-19.146)	-17.8	.121 (-18.356)
-2.8	.606 (-4.355)	-10.4	.107 (-19.379)	-18.0	.127 (-17.946)
-3.0	.50 (-6.029)	-10.6	.099 (-20.129)	-18.2	.127 (-17.928)
-3.2	.392 (-8.145)	-10.8	.084 (-21.485)	-18.4	.121 (-18.32)
-3.4	.286 (-10.859)	-11.0	.066 (-23.661)	-18.6	.11 (-19.176)
-3.6	.191 (-14.388)	-11.2	.044 (-27.204)	-18.8	.093 (-20.6)
-3.8	.118 (-18.57)	-11.4	.02 (-34.126)	-19.0	.073 (-22.759)
-4.0	.099 (-20.058)	-11.6	.005 (-46.194)	-19.2	.052 (-25.695)
-4.2	.135 (-17.368)	-11.8	.029 (-30.849)	-19.4	.042 (-27.611)

Systems With Reliability L.L.P.

CLIENT: *Charlie Stanton* Date: 3/16/2006
ANTENNA TYPE: SWDDP 8-0-2-8/14&60(8 Panel)
FREQUENCY: 749
PATTERN POL.: Horizontal
DIRECTIVITY(Peak): 19.776/12.961 dBd Beam Tilt (Deg.) : *-1.5*
DIRECTIVITY(Horiz): 5.106/7.081 dBd Null Fill(s)(%) : *10, 0, 0*

Relative Field Tabulation

Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)	Elev. Angle	Rel. Fld(dB)
-19.6	.056 (-25.071)	-27.2	.01 (-39.776)	-54.0	.013 (-37.824)
-19.8	.085 (-21.384)	-27.4	.007 (-42.806)	-55.0	.016 (-35.829)
-20.0	.12 (-18.439)	-27.6	.006 (-44.692)	-56.0	.021 (-33.541)
-20.2	.155 (-16.194)	-27.8	.006 (-44.575)	-57.0	.017 (-35.424)
-20.4	.189 (-14.467)	-28.0	.007 (-43.717)	-58.0	.008 (-42.026)
-20.6	.221 (-13.13)	-28.2	.007 (-43.16)	-59.0	.006 (-43.808)
-20.8	.248 (-12.104)	-28.4	.007 (-43.159)	-60.0	.012 (-38.432)
-21.0	.271 (-11.335)	-28.6	.007 (-43.735)	-61.0	.013 (-37.526)
-21.2	.289 (-10.788)	-28.8	.006 (-44.898)	-62.0	.01 (-39.798)
-21.4	.301 (-10.439)	-29.0	.005 (-46.691)	-63.0	.005 (-46.558)
-21.6	.306 (-10.272)	-29.2	.003 (-49.229)	-64.0	.001 (-59.296)
-21.8	.306 (-10.277)	-29.4	.002 (-52.746)	-65.0	.005 (-45.308)
-22.0	.30 (-10.448)	-29.6	.001 (-57.772)	-66.0	.008 (-42.455)
-22.2	.289 (-10.783)	-29.8	.001 (-65.885)	-67.0	.007 (-42.531)
-22.4	.273 (-11.282)	-30.0	.00 (-50)	-68.0	.006 (-44.649)
-22.6	.253 (-11.952)	-31.0	.003 (-50.966)	-69.0	.004 (-48.959)
-22.8	.229 (-12.801)	-32.0	.007 (-42.818)	-70.0	.002 (-55.338)
-23.0	.203 (-13.843)	-33.0	.003 (-50.244)	-71.0	.002 (-54.228)
-23.2	.176 (-15.101)	-34.0	.009 (-40.897)	-72.0	.003 (-50.841)
-23.4	.148 (-16.606)	-35.0	.016 (-35.826)	-73.0	.003 (-49.658)
-23.6	.12 (-18.405)	-36.0	.009 (-41.137)	-74.0	.003 (-49.967)
-23.8	.094 (-20.569)	-37.0	.014 (-36.973)	-75.0	.003 (-51.377)
-24.0	.069 (-23.208)	-38.0	.025 (-32.006)	-76.0	.002 (-53.723)
-24.2	.047 (-26.482)	-39.0	.017 (-35.614)	-77.0	.001 (-56.925)
-24.4	.03 (-30.494)	-40.0	.025 (-32.085)	-78.0	.001 (-60.789)
-24.6	.02 (-34.126)	-41.0	.049 (-26.2)	-79.0	.001 (-64.416)
-24.8	.02 (-33.801)	-42.0	.044 (-27.088)	-80.0	.00 (-66.198)
-25.0	.027 (-31.471)	-43.0	.021 (-33.373)	-81.0	.00 (-66.629)
-25.2	.033 (-29.711)	-44.0	.087 (-21.214)	-82.0	.00 (-67.252)
-25.4	.037 (-28.695)	-45.0	.158 (-16.005)	-83.0	.00 (-68.596)
-25.6	.039 (-28.268)	-46.0	.196 (-14.167)	-84.0	.00 (-70.752)
-25.8	.038 (-28.313)	-47.0	.184 (-14.699)	-85.0	.00 (-73.778)
-26.0	.036 (-28.765)	-48.0	.132 (-17.615)	-86.0	.00 (-77.832)
-26.2	.033 (-29.591)	-49.0	.063 (-24.043)	-87.0	.00 (-83.28)
-26.4	.029 (-30.786)	-50.0	.018 (-34.799)	-88.0	.00 (-91.025)
-26.6	.024 (-32.369)	-51.0	.04 (-27.897)	-89.0	.00 (-50)
-26.8	.019 (-34.374)	-52.0	.045 (-26.947)	-90.0	.00 (-50)
-27.0	.014 (-36.847)	-53.0	.03 (-30.357)	90.0	.00 (-50)

Systems With Reliability L.L.P.

CLIENT: *Charlie Stanton* Date: 3/16/2006
ANTENNA TYPE: SWDDP 8-0-2-8/14&60(8 Panel)
FREQUENCY: 749
PATTERN POL.: Horizontal
DIRECTIVITY(Peak): 19.776/12.961 dBd Beam Tilt (Deg.) : *-1.5*
DIRECTIVITY(Horiz): 5.106/7.081 dBd Null Fill(s)(%) : *10, 0, 0*

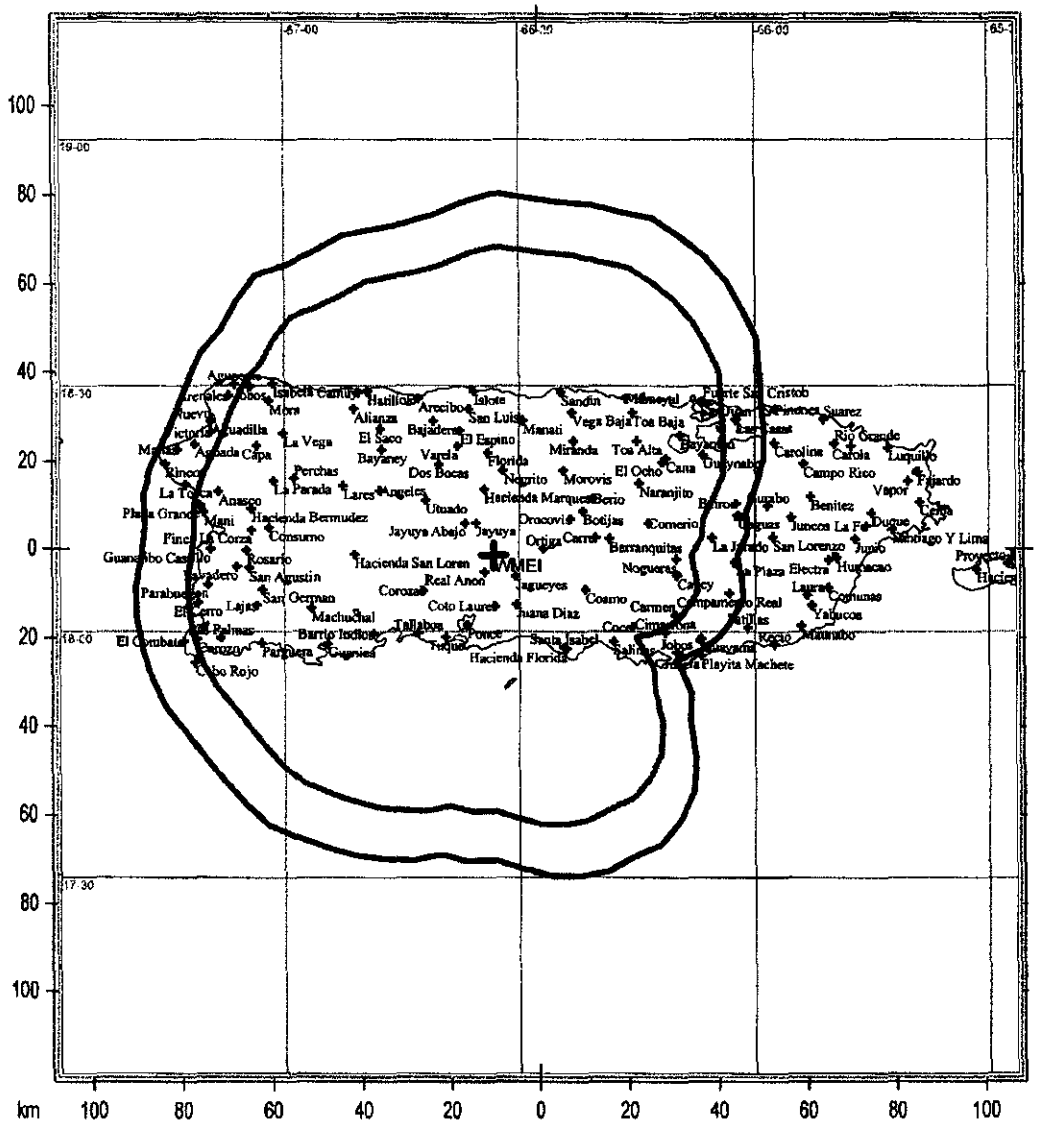
Micro-Tek Eng. Version 2005

FIGURE 4

NORMALIZED HORIZONTAL PLANE RADIATION PATTERN

SEE FCC FORM 301 SECTION III-D QUESTION 10-e

WMEICH 14 DTV 10 kW MAX DA @ 833 M HAAT ARECIBO, PUERTO RICO



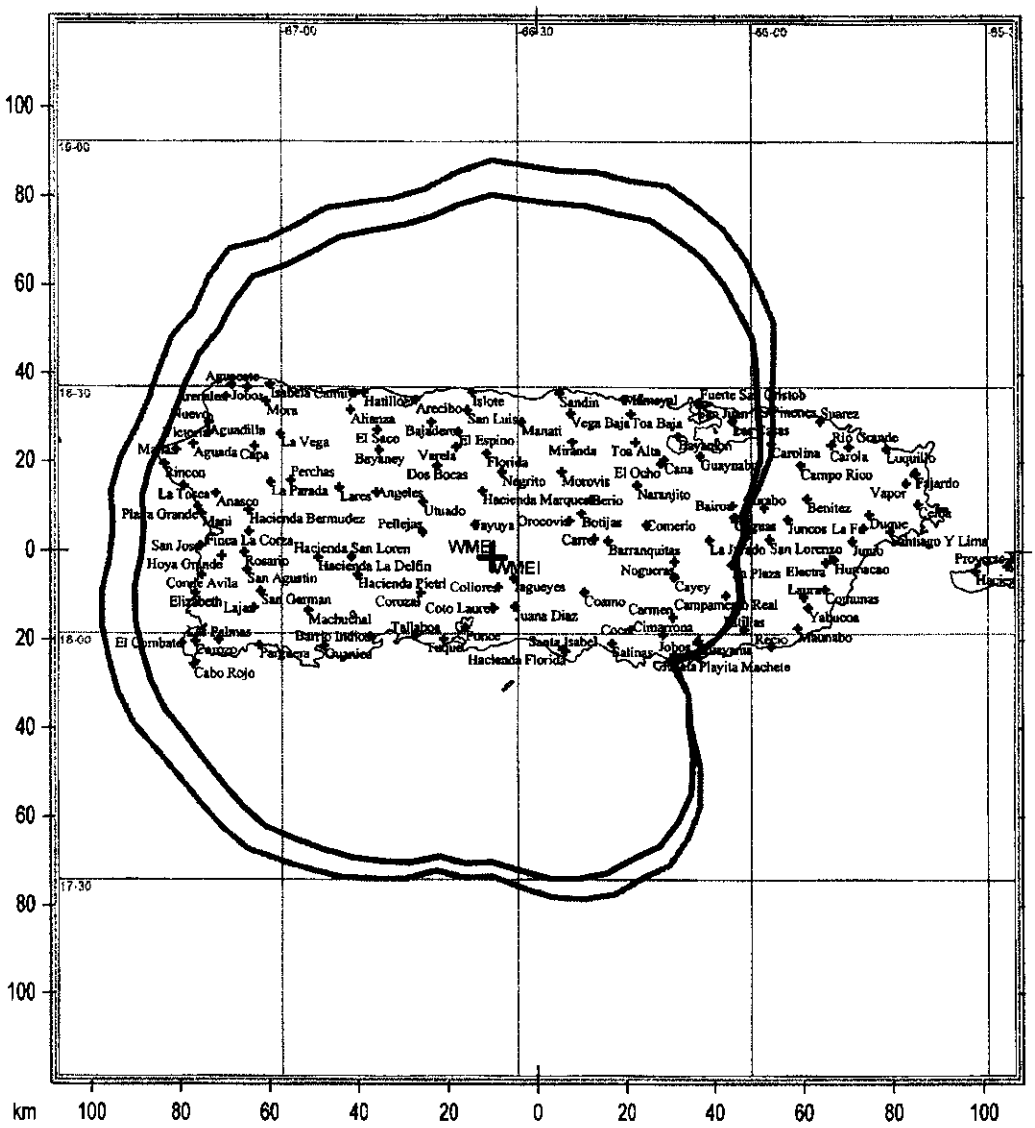
Communications Technologies, Inc. Marlton, New Jersey

National Borders County Borders City Borders Lat/Lon Grid

Map Scale: 1:1500000 1 cm = 15.00 km V|H Size: 237.28 x 214.36 km

Figure 5

WMEI CH 60 NTSC GRADE B = GREEN WMEI DTV CH 14 = BLUE

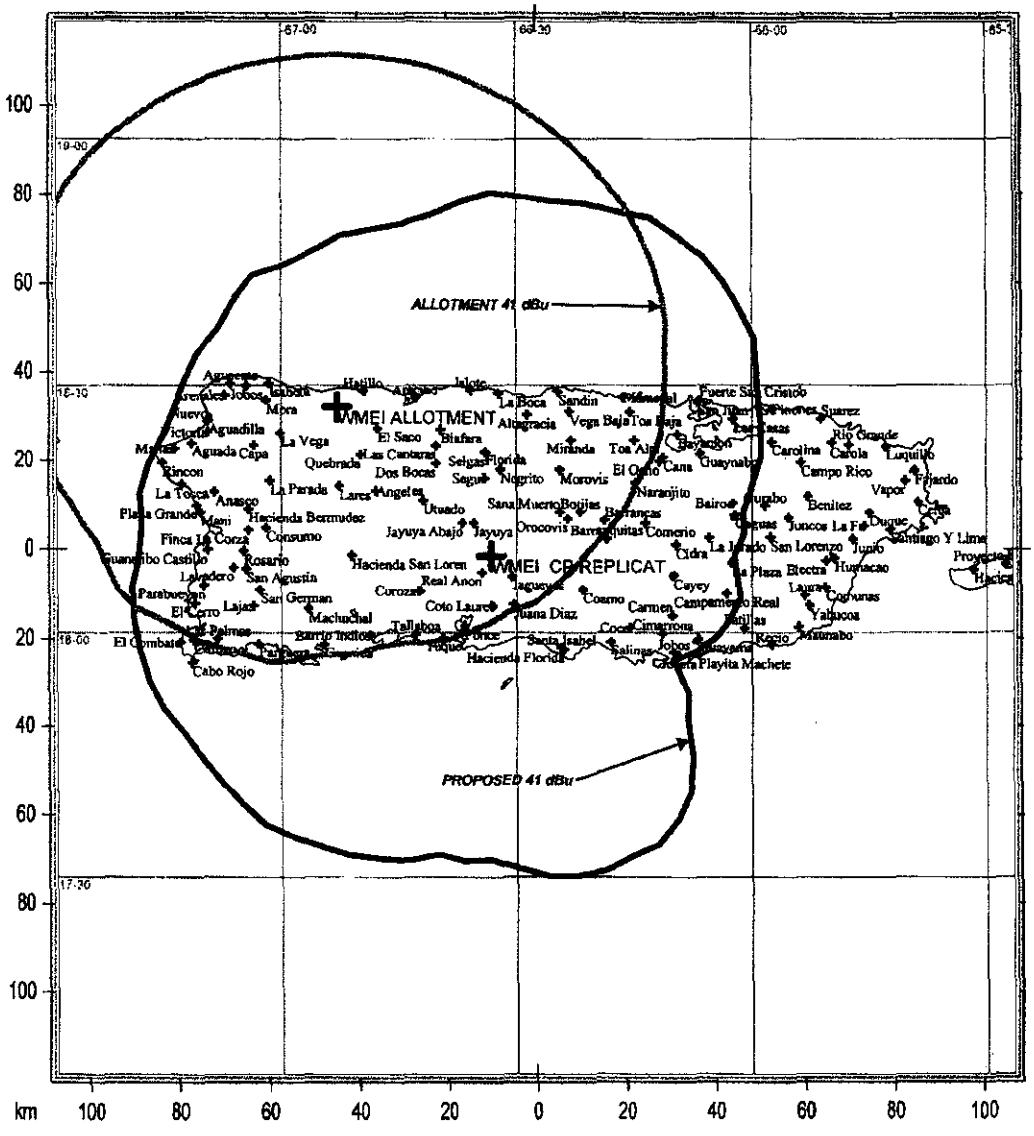


Communications Technologies, Inc. Marlton, New Jersey

National Borders County Borders City Borders Lat/Lon Grid

Map Scale: 1:1500000 1 cm = 15.00 km V|H Size: 237.28 x 214.36 km **Figure 6**

WMEI CH 14 DTV ALLOTMENT COMPARED TO 10 kW MAX DA @ 833 M HAAT ARECIBO, PUERTO RICO



Communications Technologies, Inc. Marlton, New Jersey

National Borders County Borders City Borders Lat/Lon Grid

Map Scale: 1:1500000 1 cm = 15.00 km V|H Size: 237.28 x 214.36 km

Figure 7

EXHIBIT 2

REQUEST FOR WAIVER

This application proposes to construct digital facilities at WMEI's current NTSC coordinates on Channel 14, WMEI's tentative digital channel assignment. The filing of this application now, before the Channel 14 DTV channel assignment is final, is necessary to bring to the Commission's attention a problem resulting from an error in the Commission's broadcast television engineering database, in need of urgent correction before the Commission's DTV Table of Allotments is finalized in an upcoming rulemaking proceeding. CMCG Puerto Rico License LLC ("CMCG"), the permittee of broadcast station WMEI(TV) ("WMEI"), hereby requests a temporary waiver of Section 73.622 of the Commission's Rules, 47 C.F.R. § 73.622, only to the extent necessary to permit this application to be accepted for filing.

Section 73.622(c)(1), 47 C.F.R. § 73.622(c)(1), limits applications for DTV construction permits only to those applications proposing service on channels designated in the DTV Table of Allotments set forth in Section 73.622(b) of the Commission's Rules, 47 C.F.R. § 73.622(b), and only in the communities listed therein. On May 23, 2006, the Commission issued a Public Notice granting 1,789 licensees tentative DTV channel assignments resulting from their first and second round channel elections, including Channel 14 for WMEI.[1] While these channel assignments arguably are not yet final, Section 73.622(c)(1) provides that applications specifying channels that are in accord with publicly announced FCC orders changing the DTV Table of Allotments will be accepted for filing even if such applications are tendered before the effective dates of such channel change.

WMEI's NTSC Channel 60 was initially paired with DTV Channel 61 at coordinates (N.L. 18-27-21, W.L. 66-52-59). Those coordinates did not match the coordinates

[1] *Tentative Digital Channel Designations for Stations Participating in the First and Second Rounds of the DTV Channel Election Process*, DA 06-1082, released May 23, 2006.

for this station's analog allotment (N.L. 18-10-09, W.L. 66-34-30).[2] The specification of such coordinates appears to be an error in the initial DTV Table that was not corrected in advance of Round One of the DTV channel election process. At the time such corrections were required to have been brought to the attention of the Commission by television licensees (November 5, 2004), the WMEI construction permit had lapsed because of an initial FCC decision not to toll the construction deadline for WMEI. On subsequent review, the WMEI construction permit was reinstated due to construction delays beyond the permittee's control (a hurricane). The order reinstating the WMEI construction permit is dated May 18, 2005, well after the deadline for filing corrections to the broadcast television database had passed.

The Commission has the authority to waive its rules "where particular facts would make strict compliance inconsistent with the public interest."[3] A waiver is appropriate where it would not undermine the policy objectives of the rule, and "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest."[4] This request satisfies these conditions and temporary waiver of Section 73.622 is in the public interest.

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[2] The instant 301 application specifies the current WMEI CH 60 analog CP coordinates (N.L.18-09-17.1, W.L. 66-33-16.4) which are 2.7 kM from the analog reference coordinates described herein.

[3] *Northeast Cellular Telephone, Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (hereinafter "*Northeast*") (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *rehearing denied*, 459 F.2d 1203 (D.C. Cir. 1972), *cert denied*, 409 U.S. 1027 (hereinafter "*WAIT*")).

[4] *Northeast*, 897 F.2d at 1166. *See also, Dominion Video Satellite, Inc., Order & Authorization*, 14 FCC Rcd 8182, 8185 (1999); *WAIT*, 418 F.2d at 1157.

I. TEMPORARY WAVIER OF SECTIONS 73.622 WILL FURTHER THE COMMISSION'S POLICY OBJECTIVES

The Commission intended to base its initial DTV allotments on the NTSC transmitter sites in order to facilitate replication of each station's NTSC service area.[5] This policy helps ensure uninterrupted service to viewers during the transition, and allow stations to "realize cost savings both in converting to DTV service and in operating dual facilities during the transition."[6] Unless this waiver is granted, this application will not be acceptable for filing until after the DTV Table of Allotments is finalized. At the present time, there are no known interference issues with this application, thereby presenting a clear path to correction of the coordinates discrepancy without harm to any other licensee, permittee, or applicant. If the coordinates are not amended to reflect the current WMEI NTSC transmitter site, over 1.7 million people who are currently encompassed in WMEI's 64 dBu analog contour area will be unable to receive the WMEI DTV signal.[7] Further, CMCG will incur substantially higher costs to construct digital facilities that will reach barely half of WMEI's current NTSC viewer population.[8]

II. THIS APPLICATION SERVES THE PUBLIC INTEREST

Grant of this temporary waiver request will serve the public interest by ensuring the continued availability of new broadcast service to those viewers encompassed in WMEI's NTSC service area. WMEI is a new broadcast station that will only broadcast in analog for a short period of time, as the DTV transition date is fast approaching. At the coordinates currently

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[5] *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Sixth Report & Order*, 12 FCC Rcd 14588, para. 102 (1997).

[6] *Id.* at para. 98.

[7] Engineering Report, Attachment 1, Exhibit 1.

[8] *Id.*

referenced in the DTV Table of Allotments, WMEI will lose the ability to serve more than 1.7 million members of its current analog coverage area, post transition.[9] A staggering figure in its own right, but in the highly competitive and financially strained broadcast market of Puerto Rico, a loss in service of such magnitude could cripple WMEI's DTV broadcast operations.

Additionally, use of this application to correct the coordinates discrepancy in the DTV Table of Allotments promotes judicious use of the Commission's administrative resources. Acceptance of this application will allow the Commission to correct the DTV Table of Allotments before the new version is finalized, thereby avoiding the need to address these same issues in the far more procedurally cumbersome context of a rule making. Further, the Commission's own rules acknowledge the administrative benefit of the traditional Part 73 application procedures as a means to amend the DTV Table of Allotments in certain circumstances.[10]

Public policy is best served in this instance by using this application as a vehicle to expeditiously amend the DTV Table of Allotments, ensuring maximum coverage by the WMEI DTV facility and efficient use of the Commission's scarce administrative resources.

III. CONCLUSION

Strict adherence to Section 73.622(c)(1) will simply compound an error in the DTV Table of Allotments that could potentially prevent over 1.7 million people from receiving the WMEI DTV broadcast signal. By accepting this application, the Commission will be able to correct an inaccuracy in the DTV Table of Allotments in an efficient manner without causing injury to any foreseeable parties. For the foregoing reasons, CMCG respectfully submits that

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[9] Engineering Report, *supra*, note 7.

[10] 47 C.F.R. § 73.622(c)(2). *See also Service Rules for the 746-764 and 776-794 MHz Bands, Third Report & Order*, 16 FCC Rcd 2703, para. 32 (2001).

this temporary waiver request and underlying application will not only serve the public interest, but will provide the Commission with an effective mechanism for implementing its own policy concerns. In light of the special circumstances and policy objectives set forth above, the application should be granted.

EXHIBIT 3