

**Tribune Broadcasting Company
Seventh FNPRM Comments
MB Docket No. 87-268
January 2007
Exhibit 2**

TECHNICAL EXHIBIT
SUPPORTING THE COMMENTS FROM
WPIX, INC.
STATION WPIX-DT (FACILITY ID 73881)
NEW YORK, NEW YORK
CHANNEL 11

Technical Narrative

This Technical Exhibit supports the comments submitted on behalf of WPIX, Inc. licensee of station WPIX-DT, which currently operates on channel 33 at New York, New York (Facility ID 73881). These comments address the Federal Communications Commission (FCC) Seventh Further Notice of Proposed Rule Making (7th FNPRM) in MB Docket No. 87-268.

The proposed post transition digital allotment for WPIX-DT specified in the FCC's 7th FNPRM is based on the original facility certification and channel election for WPIX-DT established in the post transition digital channel election process. The proposed allotment for WPIX-DT in the 7th FNPRM specifies operation on channel 11 with a maximum ERP of 5.89 kW using antenna pattern ID 74502. The transmitter site is specified with coordinates of 40-42-43 N.L. / 74-00-49 W.L. with an antenna HAAT of 448 m. This facility specification is based on the original channel 33 construction permit for WPIX-DT, FCC File No. BPCDT-19991019ABH, which was located on the World Trade Center. Construction of the WPIX-DT facility was completed in July 2001, but the facility was destroyed in the September 11, 2001 terrorist attacks. See FCC File No. BLCDDT-20010725AFK.

WPIX-DT plans to build its final post transition digital facility on top of the new Freedom Tower, which is under construction and will replace the destroyed World Trade Center WTC1 and WTC2 towers. It now appears that constraints on the Freedom Tower antenna stack design will require that the WPIX-DT channel 11 facility be combined into a non-directional master high-band VHF antenna to be shared with other digital high-band VHF facilities in the market such as WABC-DT (Channel 7), and WNET-DT (Channel 13).

However, the allotment pattern specified in the FCC’s digital allotment table is based on the original WPIX-DT channel 33 construction permit and it is directional antenna with some deep nulls. See Figure 1, herein. Use of this pattern will result in a non-directional ERP for the WPIX-DT facility of no greater than an estimated 300 watts at the Freedom Tower facility, a power reduction that results in a loss of service to 1,468,000 persons. The WPIX-DT allotment from the proposed DTV Table of Allotments serves a population of 19,044,000 persons. It is estimated that the WPIX-DT 300-watt non-directional facility would have a post-transition noise-limited service population of 17,576,000. This represents a loss of approximately 1,468,000, or nearly 8%, of the WPIX-DT proposed allotment facility. Therefore, WPIX, Inc. hereby requests that its digital allotment facility be changed to its “replication” facility allotment, with an ERP equivalent to that specified for the other high-band VHF stations located at the former World Trade Center site.

It is noted that the FCC employs a minimum ERP of 3.2 kW for digital allotments for high-band VHF facilities. For example, the allotment for WABC-DT on channel 7 is given as 3.2 kW with an antenna HAAT of 491 m at the World Trade Center site. The antenna pattern is the replication pattern, which is essentially non-directional. The WNET-DT allotment on Channel 13 is essentially the same as the WABC-DT allotment with an ERP of 3.2 kW and an antenna HAAT of 500 m.

Based on the foregoing, it is requested that the WPIX-DT allotment be changed to reflect the following specifications:

Proposed DTV Table of Allotments Information for WPIX-DT	
Parameter	Specification
Facility ID	73381
State and City	NY, New York
NTSC Channel	11
DTV Channel	11
ERP (kW)	3.2
HAAT (m)	506 (Radiation Center = 518 m AMSL)

Proposed DTV Table of Allotments Information for WPIX-DT	
Parameter	Specification
Antenna ID	27198 (See Figure 2, herein.)
Latitude	404243
Longitude	740049
Area (sq. km)	25991
Population (thousand)	19248
Percent Interference Received	1.9

Interference calculations for the proposed WPIX-DT allotment have been made using the procedures outlined in the FCC's the OET-69 Bulletin. A 2-kilometer grid, a 1-kilometer terrain increment, and the 2000 Census have been employed. The following lists the assignments requiring consideration and the amount of new interference caused by the proposed WPIX-DT allotment on channel 11 as described above.

Post-Transition DTV Allotment Facility	New WPIX-DT interference
WTNH-DT, Ch. 10, New Haven, CT	134,780 people (2.3%)(per agreement)*
WWLP-DT, Ch. 11, Springfield, MA	2,596 people (0.11%) [†]
WBAL-DT, Ch. 11, Baltimore, MD	0 people (0.0%)
WENH-DT, Ch. 11, Durham, NH	0 people (0.0%)
WBRE-DT, Ch. 11, Wilkes-Barre, PA	0 people (0.0%)
WHYY-DT, Ch. 12, Wilmington, DE	0 people (0.0%)
WNYT-DT, Ch. 12, Albany, NY	0 people (0.0%)

* There is an existing interference agreement with WTNH-DT that allows for predicted interference of up to 4.6% of the WTNH-DT baseline population. The Commission has previously approved WPIX's reliance on this interference agreement. See FCC File No. BFRCCCT-20050815ABQ. The proposed 3.2-kW non-directional allotment meets the terms of the agreement.

[†] This meets the 0.1% criteria, which allows for 0.15% interference in consideration of rounding.

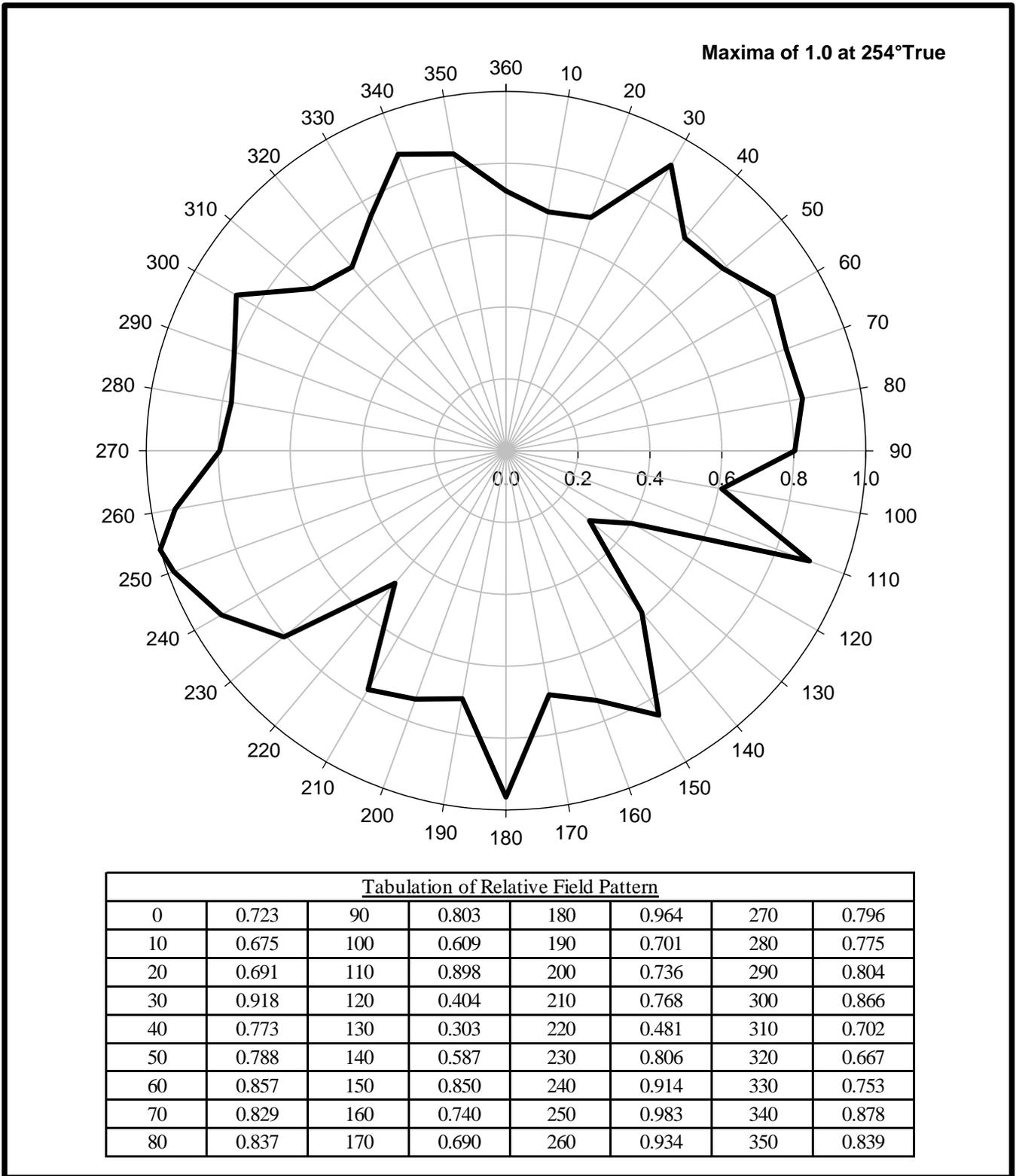
Based on the foregoing, the FCC is respectfully requested to change the WPIX-DT specified allotment facility as described herein.



Louis R. du Treil Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000 voice
(941) 329-6030 fax
bobjr@DLR.com e-mail

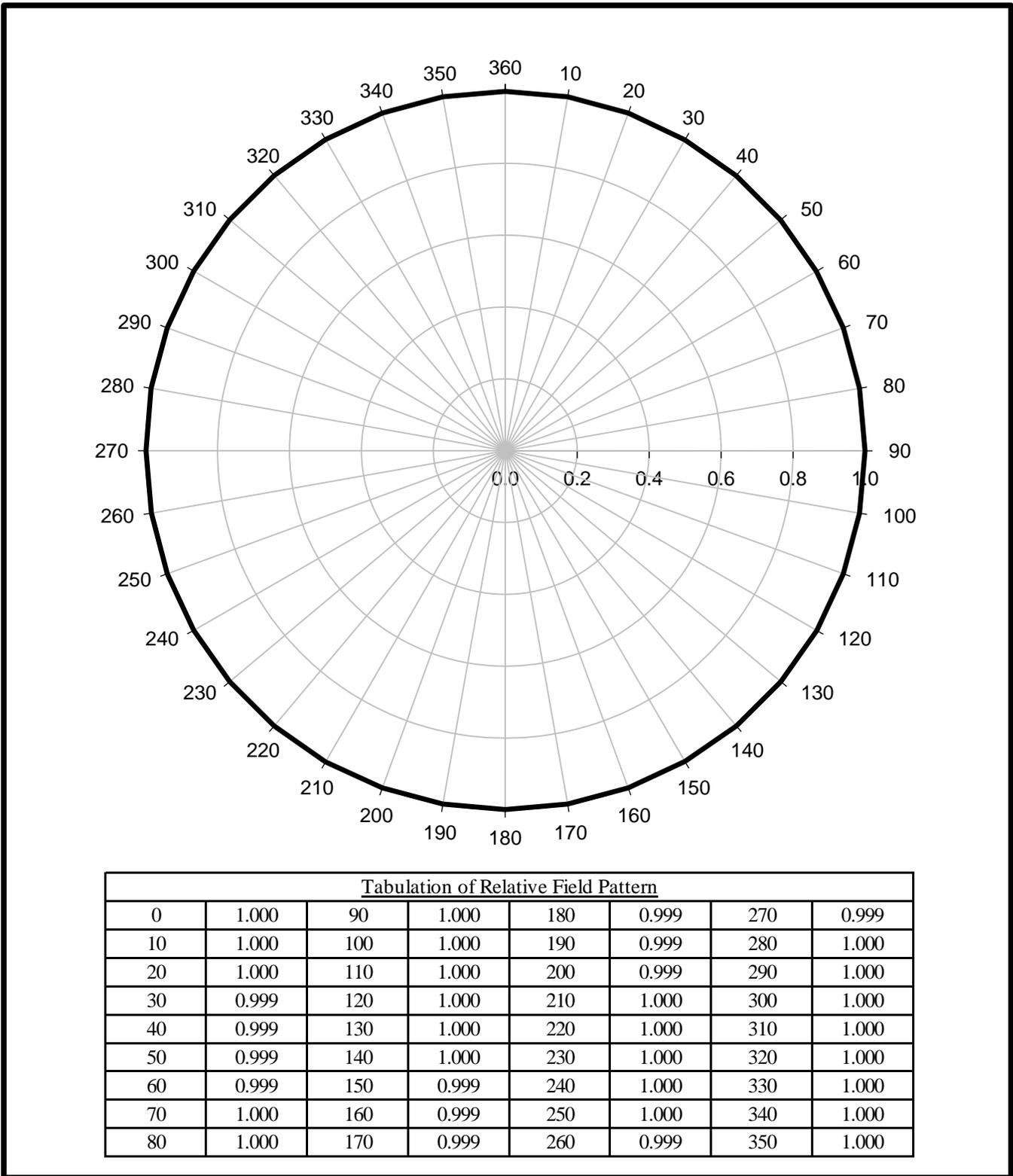
January 7, 2007



PATTERN FOR WPIX-DT ALLOTMENT IN SEVENTH FNPRM

WPIX, INC.
NEW YORK, NEW YORK

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



PROPOSED REVISED PATTERN FOR WPIX-DT ALLOTMENT

WPIX, INC.
NEW YORK, NEW YORK

du Treil, Lundin & Rackley, Inc. Sarasota, Florida