

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)
)
Amendment of Section 73.622(i),)
Post-Transition Table of)
DTV Allotments)
(Bridgeport, Connecticut))

BPRM-20080620AOK

FILED/ACCEPTED
AUG - 1 2008
Federal Communications Commission
Office of the Secretary

To: Office of the Secretary
Attn: Chief
Policy and Rules Division
Media Bureau

AMENDMENT TO PETITION FOR RULE MAKING

MTB Bridgeport-NY Licensee LLC ("MTB Bridgeport") hereby submits this Amendment to the above-captioned Petition for Rule Making filed by MTB Bridgeport to amend Section 73.622(i), the Post-Transition Table of DTV Allotments, to substitute DTV Channel 41 as the post-transition DTV allocation for WSAH-DT in lieu of DTV Channel 42, as originally allotted.

The purpose of this Amendment is to supply a new Technical Statement, prepared by S. Merrill Weiss of Merrill Weiss Group LLC, that sets forth modified technical facilities for WSAH-DT that eliminate the potential interference to the licensed (DTV Table of Allotments Appendix B) facilities of Station WVIA-DT, Scranton, Pennsylvania, and the facilities for WVIA-DT proposed in the station's pending maximization application (FCC File No. BPEDT-20080619ADK). In addition, this Amendment supplies a revised Engineering Statement, prepared by Kevin T. Fisher of Smith and Fisher, that provides revised service contour population and area coverage

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values, as well as revised values for the gain and loss areas that will result from the operation of WSAH-DT with the facilities proposed herein.

Respectfully submitted,

MTB BRIDGEPORT-NY LICENSEE LLC

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**Amendment #2 to Technical Statement for
MTB Bridgeport-NY Licensee LLC
Petition for Rulemaking:
WSAH-DT
Channel 41
Bridgeport, CT
File No. BPRM-20080620AOK**

Introduction

On June 20, 2008, a Technical Statement was filed with the Commission in conjunction with a Petition for Rulemaking ("Petition") by MTB Bridgeport-NY Licensee LLC ("MTB"), proposing substitution of the channel of, and the making of other changes to, the digital television facility of Station WSAH-DT, Bridgeport, CT. The Petition since has been given File Number BPRM-20080620AOK. In the Petition, MTB seeks the substitution of Channel 41 for Channel 42 in the DTV Table of Allotments. The WSAH-DT facility currently is licensed in File Number BLCDT-20061218ACB.

On July 3, 2008, an Amendment to the Technical Statement supporting the Petition was filed to correct certain errors in the proposed antenna azimuth pattern data that had inadvertently been included in the original document. The changes were necessary to obtain the levels of interference protection to the DTV Plan facilities and to the licensed facilities of Station WVIA-DT that were described in the original Technical Statement.

Subsequent to the filing of that first Amendment, it was learned that the licensee of Station WVIA-DT had filed an application for maximization that, because of the timing, could not have been considered in the original efforts to provide interference protection to that station. Consequently, additional interference studies have been conducted, and

several small modifications to the antenna azimuth pattern for the WSAH-DT reference facility on Channel 41 are now proposed. Those modifications and the necessary supporting documentation are provided in this Second Amendment to the Technical Statement in support of the Petition.

Modified Azimuth Pattern

The modification now proposed is to eight relative field values in the tabulated data for the proposed antenna azimuth pattern and to the rotation required in the pattern. The changed values are at headings of 140, 150, 160, 170, 190, 200, 210, and 220 degrees of the **un-rotated** azimuth pattern. (These changes are in addition to the modifications made in the first amendment to the values at headings of 130 and 230 degrees, which remain in effect.) The azimuth pattern now must be rotated to a bearing of **108 degrees**. Updated information, including both the relative field values and the power values in dBk, is included in the table of Figure 5 below, which is intended to replace Figure 5 of both the original and the first amendment of the Technical Statement. Since the azimuth pattern plots in both relative field and power values included in the original and amended Technical Statements were derived either from erroneous tabulated data or from data that now has been superseded, replacements for those plots are provided below in Figures 3 and 4, which are replacements for the corresponding figures in both the original Technical Statement and the first amendment thereof.

The antenna pattern supplied with the original Technical Statement was assigned Antenna Identification Number 87940. The values for that pattern in the Commission's CDBS database were updated on July 21, 2008, with the values supplied in the first amendment to the Petition. The relative field values for that pattern for the headings listed above now must be changed one more time to provide the requisite protection to the WVIA-DT maximization facility requested by that station's licensee in File Number BPEDT-20080619ADK. With the modified values provided herein, the required protection to WVIA-DT is achieved with respect to its recently applied-for facility. Consequently, it is respectfully requested that the antenna pattern values for the WSAH-DT proposal be modified to those provided herein, by correction of the values in Antenna ID No. 87940, and that the orientation of the antenna be changed to 108 degrees.

Proposed Table Changes

The changes proposed by the Petition are the substitution of Channel 41 for Channel 42 in the Table of Allotments, a change in the geographic reference point for the station, and increases in height and power for the reference facilities. Besides the channel change, the other proposed modifications to the Appendix B data include relocation of the transmitter to the Empire State Building, an increase in height of the antenna center of radiation from 284.5 m AMSL to 381 m AMSL, an increase in effective radiated power from 780 kW to 990 kW, and a change in the station's antenna pattern from non-directional to directional. The proposed antenna height corresponds to a height above average terrain of 368 meters, as compared to the 168.5 m HAAT of the current facility. Reference specifications for the proposed facility, as amended herein, are provided below in Figure 1, which is a replacement for Figure 1 of the original Technical Statement. The combination of height above average terrain (HAAT) and effective radiated power (ERP) proposed for WSAH-DT falls within the maximum facilities permitted for UHF DTV operations under §73.622(f)(8)(i) of the Commission's rules. Data for updating §73.622(i) Post-Transition Table of DTV Allotments and its associated Appendix B, should the Commission grant the Petition, as amended herein, are included in Figure 2, which is a replacement for Figure 2 of the original Technical Statement.

A plot of the azimuthal radiation pattern in relative field values, as amended, is included as Figure 3. The azimuthal power pattern expressed in decibels relative to 1 kW (dBk), as amended, is plotted in Figure 4. Figure 5 provides amended extracts of the tabulated data from which the plots of the field and power patterns were generated. Figure 6 shows the 41.3- and 48-dBu contours (in black and blue, respectively) of the amended proposed reference facility on a map of the coverage area, using 1-degree-radial contours. (41.3 dBu is the Noise Limited threshold after adjustment for the dipole factor on Channel 41.) Each of Figures 1 through 6 is a replacement for the corresponding figure of the original Technical Statement accompanying the Petition and of the corresponding figures of the first amendment thereto, if such figures existed in that amendment.

Principal Community Coverage

There is no change in principal community coverage from that indicated in the original Technical Statement accompanying the Petition. The 48 dBu contour extends beyond the principal community – Bridgeport, CT. This is demonstrated by the 48-dBu contour on the updated coverage map of Figure 6 herein. Furthermore, a shadow study demonstrates that there is not a major obstruction in the path from the proposed new reference point over Bridgeport.

Interference to Other Stations

Since this amendment proposes to change some of the characteristics of the facility proposed in the original Petition, new interference studies were conducted to determine that adequate protection under these conditions would be provided to all stations within the distances prescribed by the FCC rules. A version of the Commission's TV_Process program designed to evaluate post-transition interference was used to perform the studies. A summary of the studies is shown in Table 1, which replaces the corresponding table in the original Technical Statement.

In the table, the channel, call sign, city of license, and application record number of each station studied are given in the left four columns. These are followed by the DTV baseline or Class A service contour population in the fifth column, the total population predicted to be impacted by interference with WSAH-DT assumed to be operating with the parameters of its licensed facility, as included in the Table of Allotments (Appendix B), in the sixth column, and the number of scenarios studied for each station in the seventh column. In the two columns on the right, the populations predicted to be impacted by additional interference with use of the proposed reference facilities are shown alongside the percent changes in population predicted to be impacted relative to those predicted to be impacted by the current Table of Allotment values.

The dashes shown on nine rows in Table 1 indicate instances in which the TV_Process program reported that the "proposal causes no interference," meaning that there were no cells in its initial culling study that indicated interference. Thus, in these cases, no further examination was required, and the number of scenarios studied was zero. Similarly, there

Technical Statement — Amendment #2 to WSAH-DT Petition for Rulemaking

is one row containing plus signs, which indicate that the TV_Process program reported that the “proposed station is beyond the site to nearest cell evaluation distance,” meaning that not even an initial culling study was required. In the remaining cases, in which multiple scenarios existed and TV_Process studied them, the worst-case population impact was selected for presentation in the table.

Table 1 summarizes twenty-two cases involving nine stations implicated in the proposed changes to the reference facilities of WSAH-DT and therefore requiring analysis. Included are four cases of filings subsequent to the Commission’s lifting of the filing freeze, filed on or before June 20, 2008, and therefore considered to be contemporaneous with the Petition, which was filed on June 20, 2008. Nine cases show that nothing beyond the initial culling study was required, while one other case shows that even a culling study analysis was unnecessary. The twelve remaining cases required full analysis. Of these, four indicate a reduction of interference from the proposed changes in the reference WSAH-DT facilities, two show no change resulting from the WSAH-DT proposal, one shows a minuscule amount of predicted new interference, and five show a small amount of predicted new interference – smaller than the limit of 0.5 percent permitted under FCC rules.

From this analysis, it can be concluded that the reference facilities proposed for WSAH-DT in the Petition, as amended herein, are predicted to cause no new impermissible interference to any other stations.

Table 1 – WSAH-DT Interference Studies to Neighboring Stations Using FCC TV_Process Program

Chnl	Station	City	ARN	DTV Baseline / Service Pop	Appendix B Interference Population	Scen-arios	CP Mod Interference Population	% Change
38	WPHA-CA	Philadelphia, PA	BLTTA-20041115ACE	+	+	+	+	+
40	WGGB-DT	Springfield, MA	BPCDT-20080317AGW	—	—	—	—	—
40	WGGB-DT	Springfield, MA	DTVPLN-DTVP1438	—	—	—	—	—
40	WXTV-DT	Paterson, NJ	BLCDT-20050214AGS	—	—	—	—	—
40	WXTV-DT	Paterson, NJ	DTVPLN-DTVP1446	—	—	—	—	—
41	WLVI-DT	Cambridge, MA	BLCDT-20070212ABF	6,895,294	17,279	10	29,503	0.1777
41	WLVI-DT	Cambridge, MA	DTVPLN-DTVP1474	6,884,191	16,526	10	28,804	0.1788
41	WUTB-DT	Baltimore, MD	BPCDT-20080619AJG	6,740,686	463,640	26	463,640	0.0000
41	WUTB-DT	Baltimore, MD	BMPCDT-20051118ADM	6,437,438	481,533	26	481,834	0.0051
41	WUTB-DT	Baltimore, MD	DTVPLN-DTVP1475	6,514,557	358,750	26	358,750	0.0000
41	WPBS-DT	Watertown, NY	BPEDT-20080619ABP	—	—	—	—	—
41	WPBS-DT	Watertown, NY	BLEDT-20050923AGH	—	—	—	—	—
41	WPBS-DT	Watertown, NY	DTVPLN-DTVP1479	—	—	—	—	—
41	WVIA-DT	Scranton, PA	BPEDT-20080619ADK	2,288,704	53,343	192	64,481	0.4983
41	WVIA-DT	Scranton, PA	BLEDT-20010109AAP	1,950,348	40,161	96	48,852	0.4550
41	WVIA-DT	Scranton, PA	DTVPLN-DTVP1482	1,950,348	40,161	96	48,852	0.4550
42	WSKG-DT	Binghamton, NY	BLEDT-20050526ACA	—	—	—	—	—
42	WSKG-DT	Binghamton, NY	DTVPLN-DTVP1511	—	—	—	—	—
42	WTFX-DT	Philadelphia, PA	BMPCDT-20080616AAQ	8,730,546	862,778	194	756,421	-1.3518
42	WTFX-DT	Philadelphia, PA	BPCDT-20080313ACO	8,270,385	687,409	486	643,635	-0.5773
42	WTFX-DT	Philadelphia, PA	BLCDT-20070914AAK	7,996,884	578,895	486	530,225	-0.6561
42	WTFX-DT	Philadelphia, PA	DTVPLN-DTVP1514	8,307,867	741,835	194	695,653	-0.6104

Consideration of Class A Stations

The Commission's Rules specify protection to be afforded by full service DTV stations to analog and digital LPTV stations that have achieved Class A status.¹ For purposes of this investigation, the Commission's TV_Process program was used to locate any Class A stations that might be impacted by the proposed changes to the WSAH-DT facility. The TV_Process program reported only one such station that it located to evaluate. It then found the single Class A station that it examined to be "beyond the site to nearest cell evaluation distance" (as indicated by plus signs in Table 1). Thus, there is no interference to Class A stations predicted for the proposed WSAH-DT facility with the changes proposed in the Petition, as amended herein.

Short-Spacing Issue

The question arises whether it is necessary in this Petition for the proposal to meet the geographic spacing requirements of Section 73.623(d) of the Commission's rules. §73.623(d) establishes "minimum geographic spacing requirements for DTV allotments not included in the initial DTV Table of Allotments." §73.616(b) specifies that "a petition to add a new channel to the post-transition DTV Table of Allotments contained in §73.622(i) of this subpart will not be accepted unless it meets: the DTV-to-DTV geographic spacing requirements of §73.623(d) with respect to all existing DTV allotments in the post-transition DTV Table." Since an allotment for WSAH-DT was included in the initial DTV Table of Allotments, the provisions of §73.623(d) must not apply to it, and its Petition instead must be governed by §73.623(c), which defines the "minimum technical criteria for modification of DTV allotments included in the initial DTV Table of Allotments." Under the provisions of §73.623(c), only the prediction of interference protection using the Longley-Rice methodology of OET Bulletin No. 69 (OET-69) is required for changes in facilities, and there are no minimum geographic spacing requirements. It also should be noted that §73.616(b) discusses "a petition to add a new channel" to the post-transition DTV table, when invoking the geographic spacing

¹ Section 73.623(c)(5), *Minimum technical criteria for modification of DTV allotments included in the initial DTV Table of Allotments and for applications filed pursuant to this section.*

provisions, and requires the use of the OET-69 methods, with updated interference population threshold criteria, when dealing with other situations than new channels.

The MTB Petition is not for a **new** channel, as in the case of a totally new allotment being made, but rather is for assignment of a **substitute** channel for an existing allotment. It is for the **change** of a channel, not for a **new** channel. Except for the time of its occurrence, this is no different than if the channel change sought had been made during the Commission's repacking process, when there would have been no question about this issue. The difference cited here is underscored by the Commission's differentiation in its recent Public Notice lifting the application freeze, in which it permitted petitions from stations to **change** channels but not for the assignment of **additional** or **new** channels where there had been none before. The fact that the current Petition includes requests for the alteration of other parameters of a station's operation at the same time as the request for a change in channels is being made in no way alters the fact that an allotment exists in the city of Bridgeport, CT, and, to improve the technical operations of the station, a request is herein made for the assignment of a different channel. Thus, it is posited that the geographic spacing provisions do not apply with respect to the Petition of MTB for WSAH-DT.

If the preceding discussion is correct, then the following information is immaterial. Nevertheless, in the event that the Commission's interpretation of its rules does not agree with that just elaborated, it is the case that the proposed location for the WSAH-DT transmitter is 30.4 km short of the required spacing of 196.3 km with respect to co-channel station WVIA-DT in Scranton, PA (i.e., the spacing between the two facilities would be 165.9 km). Despite that potential short-spacing, as demonstrated in Table 1, the provisions with respect to interference protection to that station would be fully met by the reference facilities proposed in the Petition and detailed in this document. Consequently, though none is believed to be necessary, should the Commission determine that a waiver of §73.616, §73.623, or any other section of the rules is necessary due to the spacing between the proposed location of the WSAH-DT transmitter and that of WVIA-DT, then such a waiver is respectfully requested.

International Coordination

The proposed new WSAH-DT reference site is within the Canadian coordination zone — 395.7 km distant from the nearest point on the US-Canada border. A Letter of Understanding between the US and Canada establishes a series of distance separations required by stations of various classes on both sides of the border.² The largest such distance separation required is 386 km. Since the proposed facility is more distant from the border than the largest required separation between stations, there can be no Canadian station within the required separation distance, and coordination with Canada for the reference facility proposed in the Petition should be only a formality.

Summary

The change in channel of WSAH-DT from 42 to 41, the relocation of the WSAH-DT transmitter, the increase in effective radiated power of the WSAH-DT facility to 990 kW, the increase in height of the station's antenna, and the proposed change in its antenna pattern, as amended herein, have been shown to fall within the maximum values permitted by the Commission's rules and also have been shown not to produce impermissible interference to any other stations. The proposed location for the transmitter falls short of the spacing requirements with respect to one other station, but it is argued that those requirements do not apply in this case; should the Commission adopt an alternative interpretation of the rules, a waiver of the spacing requirement is requested.

Respectfully submitted,



S. Merrill Weiss
Merrill Weiss Group LLC

² *Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border*, dated September 12 and September 22, 2000.

**Figure 1 — Technical Specifications — Proposed WSAH-DT Facility
Channel 41 — Bridgeport, CT**

Frequency

Channel	41
Frequency Band	632 - 638 MHz
Center Frequency	635 MHz

Location

Site	Empire State Building, New York, NY
Geographic Coordinates (NAD27)	40° 44' 54" N 73° 59' 10" W
Tower Registration (FAA Study Number)	1007048 (1990-AEA-0601-OE)

Elevation

Elevation of site above mean sea level	15.5 m
Overall height of tower above site elevation	443.0 m
Overall height of tower above mean sea level	458.5 m
Height of antenna radiation center above site elevation	365.5 m
Elevation of average terrain (45-degree spaced radials, 3.2-16.1 km)	13.6 m
Height of antenna radiation center above mean sea level	381.0 m
Height of antenna radiation center above average terrain (HAAT)	367.4 m

Antenna

Manufacturer	RFS
Model	RD16AQ-578704H6S67
Description	Side-Mounted UHF Cavity Slot Array
Orientation (direction of primary axis of azimuth pattern)	108 degrees true
Electrical beam tilt	1.3°
Mechanical beam tilt	None
Polarization	Horizontal

Power

Effective radiated power (ERP) (main beam – 1.3° depression)	990 kW
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Technical Statement — Amendment #2 to WSAH-DT Petition for Rulemaking

§73.622(i)		Post Transition Table of DTV Allotments										
Connecticut												
Bridgeport		From 42	To 41									

Facility ID	State & City		NTSC		DTV							
			Chnl	Chnl	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousands)	Percent Interference Received
70493	CT	Bridgeport	43	41	990	368	TBD	404454	735910	26471	19471	1.2

Figure 2 — Table of Allotments & Appendix B Data for Proposed WSAH-DT Facility

Notes: Since 144 scenarios existed for the proposed facility when studied by the TV_Process program, the one selected for derivation of the interference and other values was the one that included only the DTV Plan facilities for all interfering stations. Use of other scenarios would lead to slightly different results. The Percent Interference Received was calculated using population values and varied from 1.17 to 1.69 percent, depending upon the scenario evaluated. If it were calculated using area values instead, the range of Percent Interference Received would be from 3.37 to 4.69 percent, depending on the scenario selected. Similarly, the Area and Population values vary according to which scenario is evaluated.

Since the antenna pattern proposed has not been used previously and thus has not been registered in the CDBS, its Antenna ID is shown as TBD (to be determined).

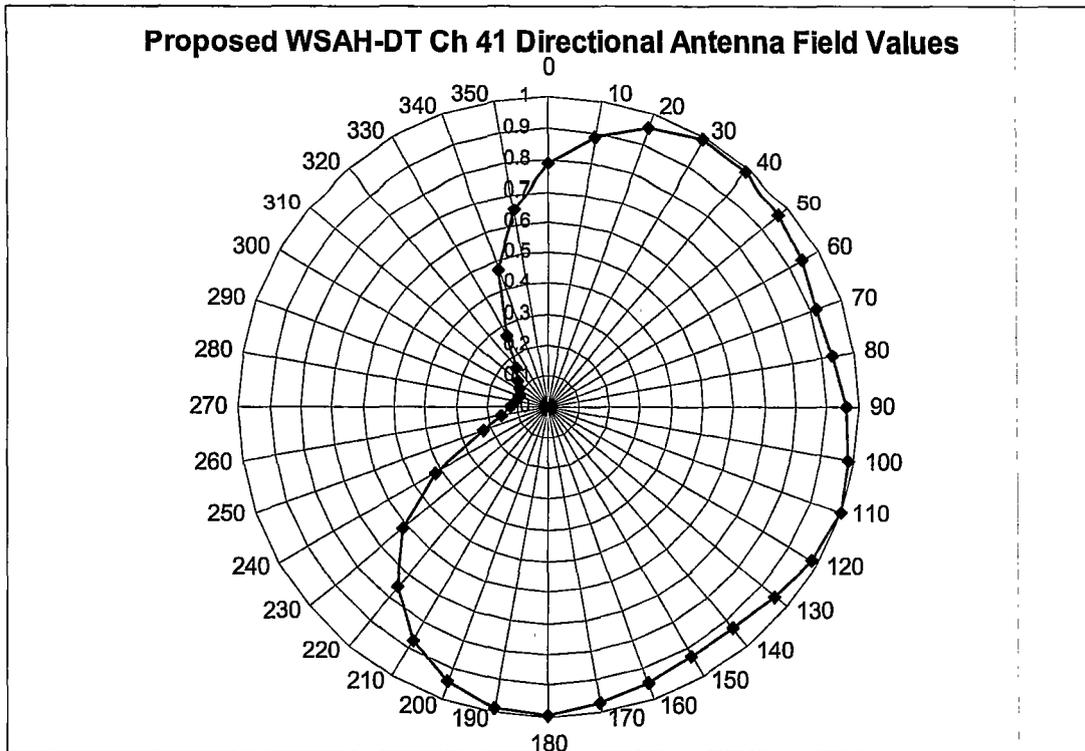


Figure 3 — WSAH-DT Azimuth Pattern in Relative Field Values

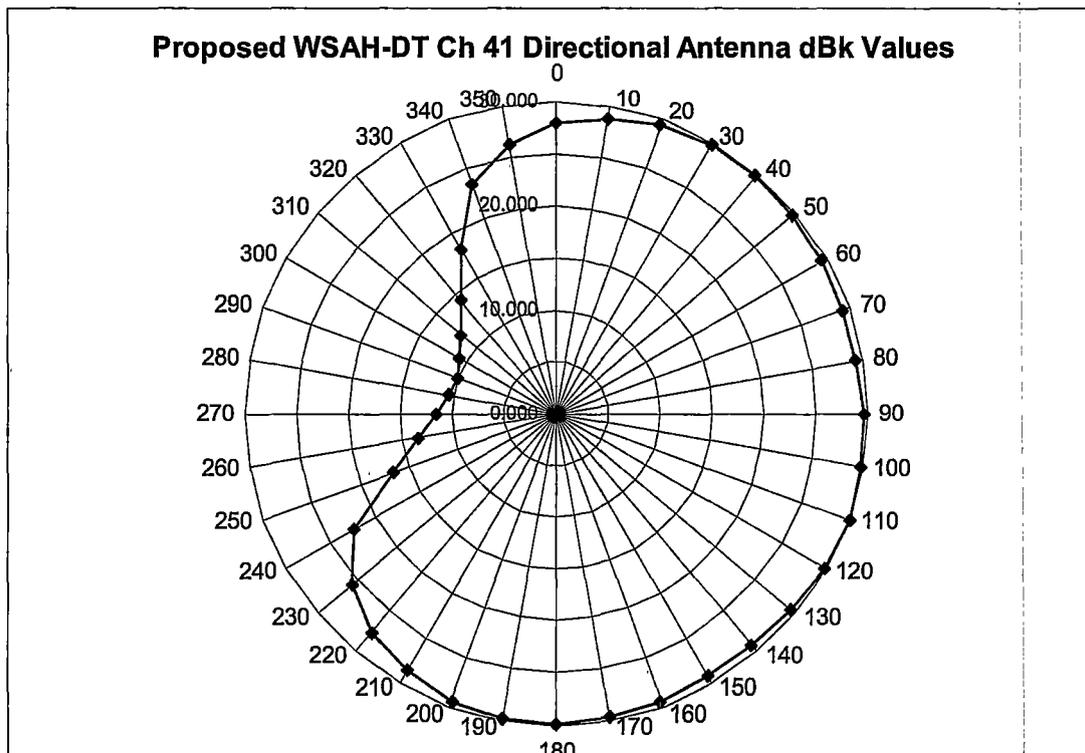


Figure 4 — WSAH-DT Azimuth Pattern in dBk (at Depression w/Maximum)

Figure 5 — WSAH-DT Azimuthal Radiation Pattern Tabulated Values

Azimuth	Relative Field	Effective Radiated Power (dBk)	Azimuth	Relative Field	Effective Radiated Power (dBk)
0	1.000	29.956	180	0.100	9.956
10	0.980	29.781	190	0.107	10.544
20	0.955	29.556	200	0.123	11.754
30	0.925	29.279	210	0.157	13.874
40	0.920	29.232	220	0.240	17.560
50	0.945	29.465	230	0.450	23.020
60	0.970	29.692	240	0.630	25.943
70	0.990	29.869	250	0.770	27.686
75	1.000	29.956	260	0.870	28.747
80	0.990	29.869	270	0.950	29.511
90	0.950	29.511	280	0.990	29.869
100	0.870	28.747	285	1.000	29.956
110	0.770	27.686	290	0.990	29.869
120	0.630	25.943	300	0.970	29.692
130	0.450	23.020	310	0.945	29.465
140	0.240	17.560	320	0.920	29.232
150	0.157	13.874	330	0.925	29.279
160	0.123	11.754	340	0.955	29.556
170	0.107	10.544	350	0.980	29.781

Derived from data supplied by manufacturer

Note: The plots in Figures 3 & 4 show the azimuth pattern after rotation of the antenna to 108 degrees true. The data in Figure 5 represents the antenna pattern prior to rotation. To duplicate the interference study results, it is necessary to input the **un-rotated** values in the table above and to allow the TV_Process software to carry out the data rotation to 108 degrees.

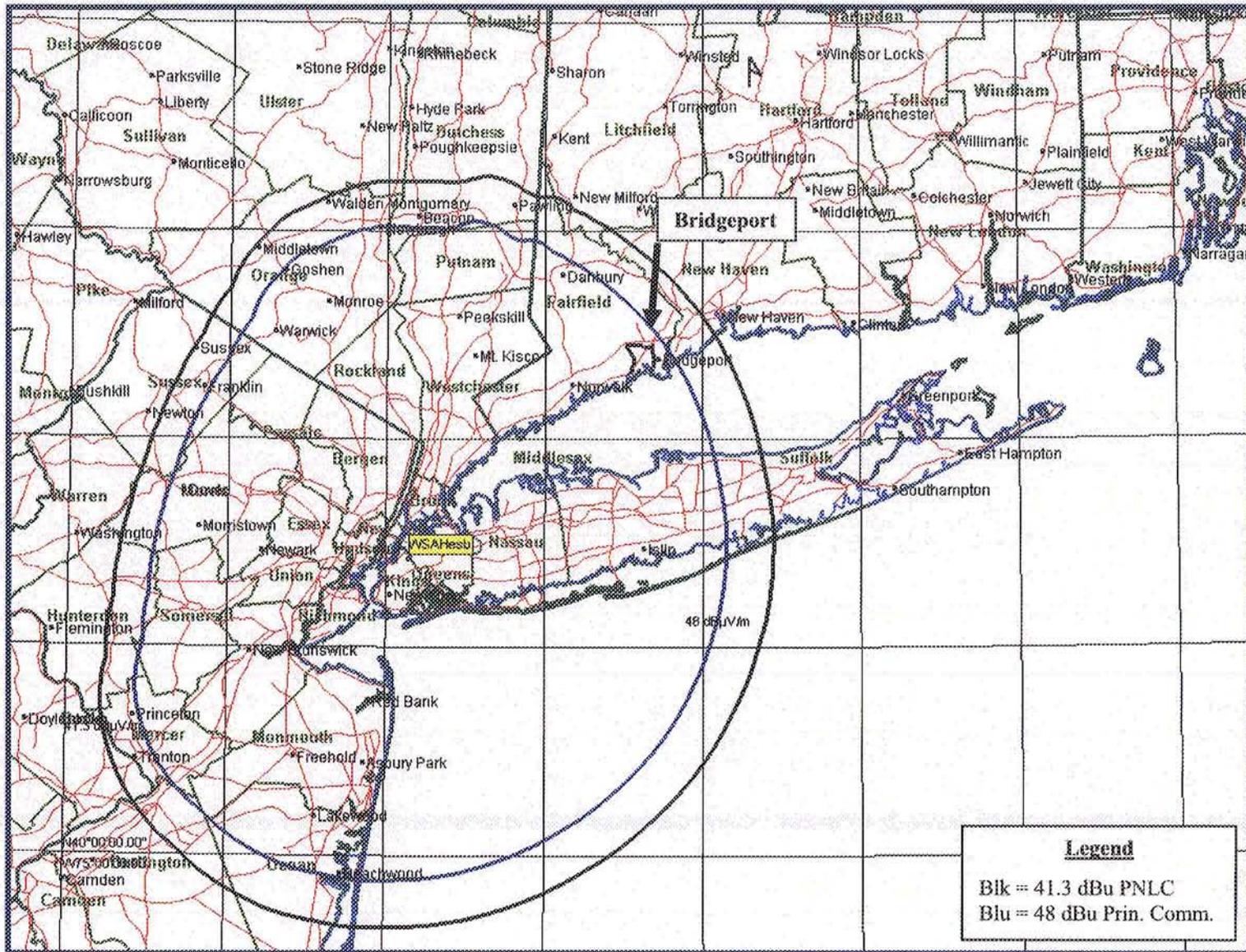


Figure 6 — 41.3 dBU Noise Limited and 48 dBU Principal Community Contours of Proposed WSAH-DT Facility

ENGINEERING STATEMENT

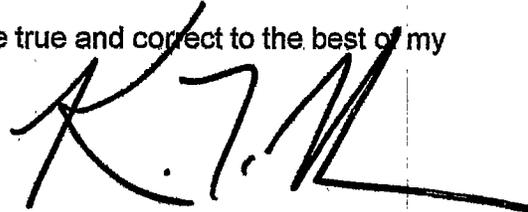
The engineering data contained herein have been prepared on behalf of MTB BRIDGEPORT-NY LICENSEE LLC, licensee of WSAH-DT, Channel 42 in Bridgeport, Connecticut, in support of this amendment to its Petition for Rulemaking (BPRM-20080620AOK), a proposal seeking to substitute Channel 41 for Channel 42 in the Commission's Digital Table of Allotments for this station. In the engineering portion of this amendment, a slightly revised directional antenna pattern is specified. The purpose of this exhibit is to provide revised service contour population and area values as well as those values for gain and loss areas created by the station's newly proposed operating parameters.

Figure 1 is a map upon which we have plotted the 41 dBu service contours of WSAH-DT as allotted in Appendix B of the Commission's Digital Television Table of Allotments and as proposed from the Empire State Building on Channel 41. As shown, there are sizeable gain and loss areas generated by the station's proposed move and channel change. On this map, the area and population numbers are provided for the pertinent WSAH-DT service contours as well as for the gain and loss areas. It is important to note that the areas were computed using software algorithms and the population numbers within the service contours are based on 2000 U.S. Census data (as opposed to the Longley-Rice-based service population numbers provided in the Commission's table in Appendix B of the DTV Table of Allotments).

In Figure 2, we have added the 36 dBu service contour of WTNH-DT, Channel 10 in New Haven, Connecticut, with which the owner of WSAH-DT has an agreement to lease channel space. The combined WSAH-DT/WTNH-DT service area and population numbers are provided on the map, as well as revised gain and loss area values.

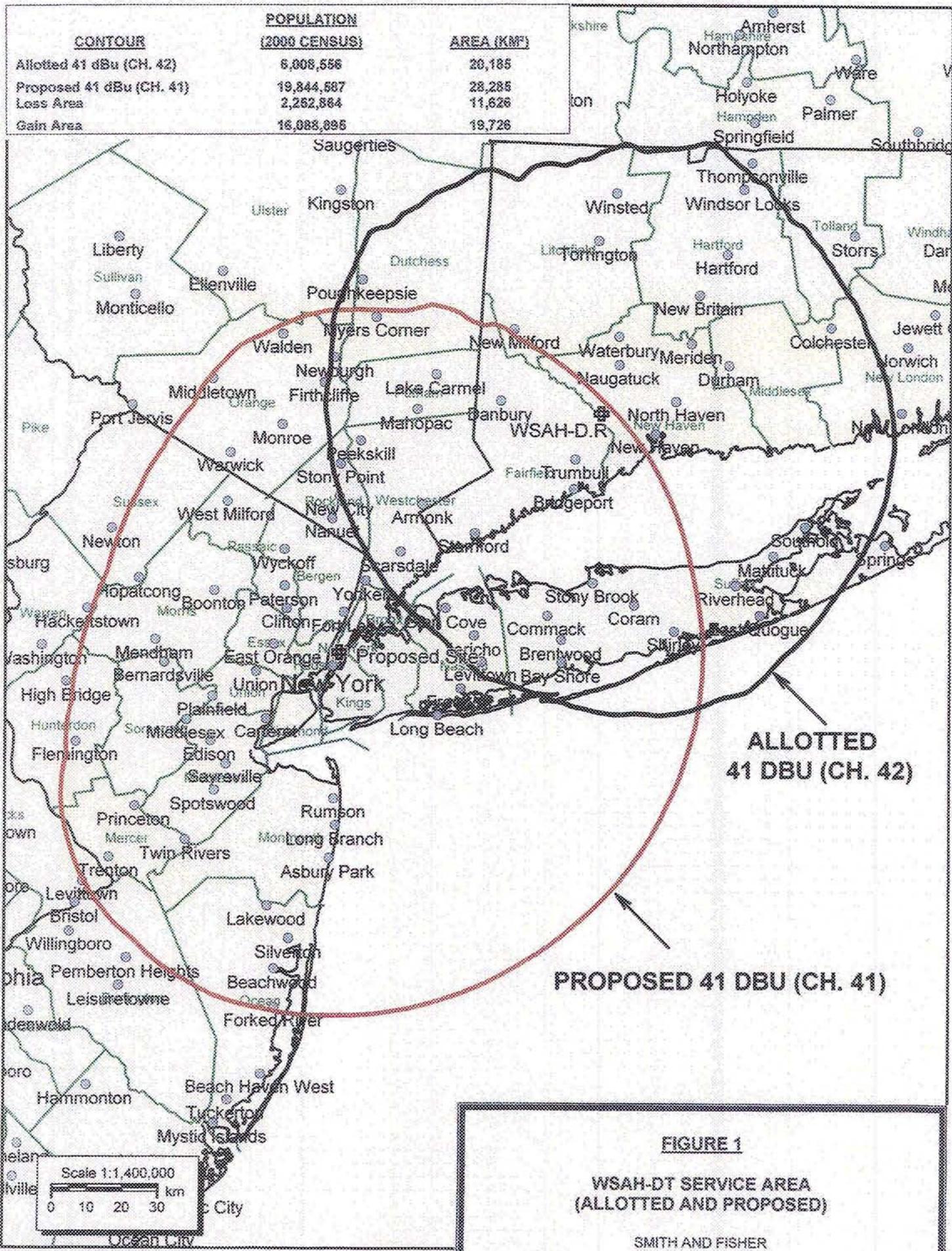
As shown, with the addition of the WTNH-DT service contour, there is no loss area generated by the move of WSAH-DT to the Empire State Building on Channel 41 with the facilities described in the engineering portion of the Petition for Rulemaking, as amended.

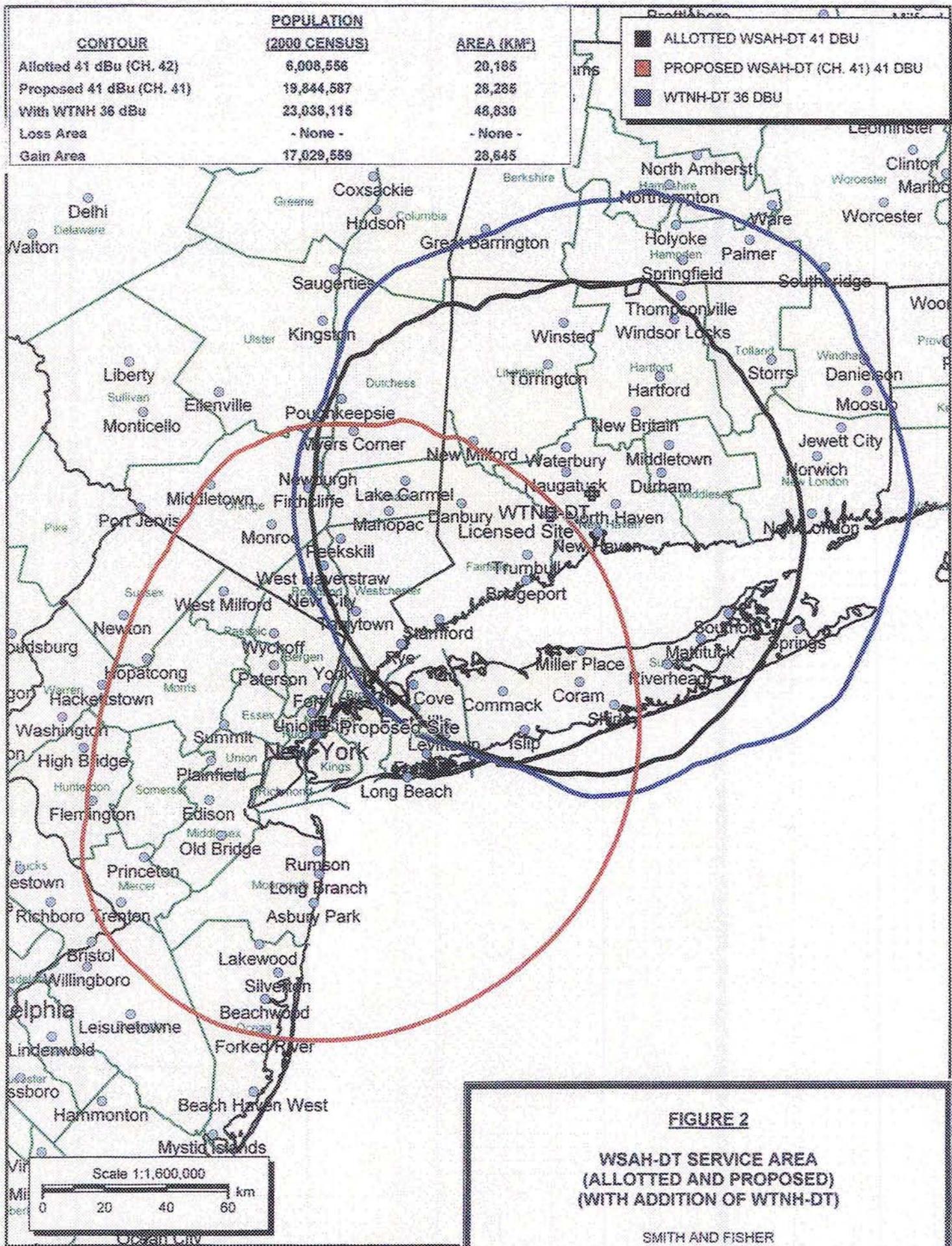
I declare, under penalty of perjury, that the foregoing statements and the attached maps, which were prepared by me, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K.T. Fisher', with a long horizontal stroke extending to the right.

KEVIN T. FISHER

July 31, 2008





CERTIFICATE OF SERVICE

I, Deborah Morris, a secretary at Leventhal Senter & Lerman PLLC, do hereby certify that on this 1st day of August, 2008, I caused a copy of this Amendment to Petition for Rule Making of MTB Bridgeport-NY Licensee LLC to be sent via first-class U.S. Mail, postage prepaid, to the following:

Margaret L. Miller, Esq.
Dow Lohnes PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

*Counsel to Northeastern Pennsylvania Educational
Television Association*

A handwritten signature in cursive script that reads "Deborah Morris". The signature is written in black ink and is positioned above a horizontal line.

Deborah Morris