

EXHIBIT 6.0  
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TV BROADCAST ANALOG STATION PROTECTION

Image Video Teleproductions, Inc.  
Newcomerstown, OH

The predicted 36 dBu contour for the proposed W29CU facilities will overlap the predicted 64 dBu contour of WLPX-TV - Charleston, West Virginia, which operates on Channel 29 with a zero offset, in violation of Section 74.705(d)(1) of the FCC Rules. As shown below, however, an analysis utilizing the methodology outlined in OET Bulletin 69 shows that the proposed W29CU operating facilities will not be predicted to cause any interference whatsoever to the reception of WLPX-TV. Thus, based on this analysis, the attached application requests a waiver of this rule section, pursuant to Section 74.705(e) of the FCC Rules.

Studies were conducted utilizing the procedures outlined in OET Bulletin 69 to evaluate the predicted interference to WLPX-TV from the proposed W29CU operating facilities. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. The version of the "FLR" program utilized in conducting these studies employed the same 2 kilometer cell size as was employed by the FCC in conducting the initial DTV allotment studies. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268 and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that

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this implementation of the “FLR” program faithfully reproduces the results obtained by the FCC in their implementation of this program.

In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service population for the station being studied below the value which occurs when the same station’s DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

Table 6.0.0 presents the results of these OET 69 interference studies to the licensed operating facilities of WLPX-TV. This table contains a complete listing of the stations which were included in this study and the facilities which were considered for each station which was included. It also contains the output of the “FLR” program, both with and without the proposed W29CU operating facilities. As shown in this table, the proposed W29CU facilities are not predicted to cause any interference whatsoever to the presently licensed WLPX-TV operating facilities. Based on this data, a waiver of

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Section 74.705(d)(1) of the FCC Rules is respectfully requested to permit the attached application to be granted in spite of the prohibited contour overlap which is predicted to WLPX-TV.

With the exception of WLPX-TV, the proposed W29CU operating facilities provide the required contour protection to all analog TV broadcast facilities requiring protection consideration.

TABLE 6.0.0

OET 69 INTERFERENCE STUDIES  
 WLPX-TV - CHARLESTON, WV  
(LICENSED FACILITIES)  
 Image Video Teleproductions, Inc.  
 Newcomerstown, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WLPX-TV	Charleston, WV	29	NTSC	Licensed	BLCT-19990426AAA

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WKPI-TV	Pikeville, KY	22	NTSC	Licensed	BMLET-19830426KN
WKSO-TV	Somerset, KY	29	NTSC	Licensed	BLET-19830725KM
WOUC-TV	Cambridge, OH	44	NTSC	CP	BPET-20010321ABH
WHCP	Portsmouth, OH	30	NTSC	Licensed	BLCT-19981116KI
WVIR-TV	Charlottesville, VA	29	NTSC	Licensed	BLCT-19930210KE
WPBY-TV	Huntington, WV	33	NTSC	Licensed	BMLET-20030313AVQ
WKAS-DT	Ashland, KY	26	DTV	Allotment	
WTSF-DT	Ashland, KY	44	DTV	Allotment	
WXIX-DT	Newport, KY	29	DTV	Allotment	
WXLV-DT	Winston-Salem, NC	29	DTV	Allotment	
WOUB-DT	Athens, OH	27	DTV	Licensed	BLEDT-20030411ABC
WPBO-DT	Portsmouth, OH	43	DTV	Licensed	BLEDT-20040323ATV
WGTE-DT	Toledo, OH	29	DTV	Allotment	
WWCP-DT	Johnstown, PA	29	DTV	CP	BPCDT-19991029ADP
W29CU	Newcomerstown, OH	29	NTSC	Applicant	

STUDY RESULTS WITHOUT W29CU

	POPULATION	AREA (sq km)
within Noise Limited Contour	851445	21864.3
not affected by terrain losses	777403	19892.4
lost to NTSC IX	113093	798.4
lost to additional IX by ATV	3275	217.8
lost to all IX	116368	1016.2

TABLE 6.0.0 (cont'd)

OET 69 INTERFERENCE STUDIES  
 WLPX-TV - CHARLESTON, WV  
(LICENSED FACILITIES)

STUDY RESULTS WITH PROPOSED W29CU FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	851445	21864.3
not affected by terrain losses	777403	19892.4
lost to NTSC IX	113093	798.4
lost to additional IX by ATV	3275	217.8
lost to all IX	116368	1016.2

SUMMARY OF STUDY RESULTS

	<u>Without W29CU</u>	<u>With Proposed W29CU</u>	<u>Increase/(Decrease)</u>
NTSC Service	661,035	661,035	0