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ALLOCATION CONSIDERATIONS

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The proposed W10CK Channel 52 operating facilities will provide the required contour protection to all analog TV broadcast stations requiring protection consideration pursuant to Section 74.705 of the FCC Rules, and also to all LPTV, Class A TV, and TV Translator stations requiring protection consideration pursuant to Sections 74.707 and 74.708 of the FCC Rules. With one exception, they will also provide the required contour protection to all DTV facilities requiring protection consideration pursuant to Section 74.706 of the FCC Rules.

This one exception involves WBOY-DT - Clarksburg, West Virginia. Channel 52 is allotted to Clarksburg, West Virginia for use by WBOY-DT with a maximum effective radiated power of 1000 kilowatts at 262 meters above average terrain utilizing a directional antenna to replicate, to the greatest extent possible, WBOY-TV's present Channel 12 analog service area. WBOY-DT also holds a construction permit (BPCDT-19991029AEU) for DTV operation from its present transmitter site with a maximum effective radiated power of 324 kilowatts at 249.8 meters above average terrain utilizing a directional antenna. The proposed W10CK facilities fail to provide the contour protection required by Section 74.706 of the FCC Rules to both the allotment and construction permit facilities for WBOY-DT.

Further studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to WBOY-DT from the proposed W10CK 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

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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 and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the "FLR" program faithfully reproduces the results obtained by the FCC in their implementation of this program.

These interference studies were conducted on the WBOY-DT DTV allotment facilities. Although the WBOY-DT construction permit facilities are considered to be "check-list" facilities, and thus not normally subject to evaluation under the OET 69 procedures, interference studies were also conducted on these construction permit facilities to document that the proposed W10CK operating facilities will not cause any interference to these construction permit facilities. In conducting these studies, the "FLR" program was run in the "paired" mode in order to evaluate service and interference to the entire area within the WBOY-TV Channel 12 Grade B contour, including the portions of this area which fall outside the noise limited contour for the DTV facilities being studied.

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

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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 WBOY-DT below the value which occurs when the same station's DTV allotment facilities are considered.

The results of these studies for the WBOY-DT DTV allotment facilities are tabulated in Table 6.0. Similarly, Table 6.1 presents the results of these studies for the facilities authorized by the WBOY-DT construction permit. These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program both with and without the proposed W10CK Channel 52 operating facilities.

As shown by this data, the proposed W10CK operating facilities are not predicted to cause any new interference whatsoever to either the WBOY-DT allotment facilities or the facilities authorized by the WBOY-DT construction permit. Based on this information, it is obvious that the Channel 52 operating facilities proposed in the attached application will not result in any interference to WBOY-DT, in spite of the prohibited contour overlap which would occur. This OET 69 analysis to WBOY-DT serves as the basis for the certification in response to Question 13(b) of Section III of FCC Form 346 that the proposed facilities protect DTV facilities as required by Section 74.706 of the FCC Rules.

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If it is deemed to be necessary, a waiver of Section 74.706 of the FCC Rules is respectfully requested with regard to this situation to permit the attached application to be granted in spite of this prohibited contour overlap with WBOY-DT.

TABLE 6.0

OET 69 INTERFERENCE STUDIES  
WBOY-DT - CLARKSBURG, WV  
(ALLOTMENT FACILITIES)

Lucinda DeVaul  
Canton, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WBOY-DT	Clarksburg, WV	52	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGGN-TV	Sandusky, OH	52	NTSC	Licensed	BLCT-19940310KE
WPGH-TV	Pittsburgh, PA	53	NTSC	CP	BPCT-19930708KF
WMSY-TV	Marion, VA	52	NTSC	Licensed	BLET-19810722KF
WVPT	Staunton, VA	51	NTSC	Licensed	BLET-222
WMAR-DT	Baltimore, MD	52	DTV	Allotment	
WICU-DT	Erie, PA	52	DTV	Allotment	
WTAE-DT	Pittsburgh, PA	51	DTV	Allotment	
WSWP-DT	Grandview, WV	53	DTV	Allotment	
W10CK	Canton, OH	52	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W10CK

	POPULATION	AREA (sq km)
within Noise Limited Contour	680066	25938.0
not affected by terrain losses	592841	23593.9
lost to NTSC IX	3211	108.7
lost to additional IX by ATV	23522	366.5
lost to ATV IX only	25599	406.8
lost to all IX	26733	475.3

TABLE 6.0(cont'd)

OET 69 INTERFERENCE STUDIES  
WBOY-DT - CLARKSBURG, WV  
(ALLOTMENT FACILITIES)

STUDY RESULTS WITH PROPOSED W10CK

	POPULATION	AREA (sq km)
within Noise Limited Contour	680066	25938.0
not affected by terrain losses	592841	23593.9
lost to NTSC IX	3211	108.7
lost to additional IX by ATV	23522	366.5
lost to ATV IX only	25599	406.8
lost to all IX	26733	475.3

SUMMARY OF STUDY RESULTS

	Without Proposed W10CK	With Proposed W10CK	Increase/(Decrease)
DTV Service	566,108	566,108	0
Percent Loss(Gain)*	3.89%	3.89%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 589,000 from 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.

TABLE 6.1

OET 69 INTERFERENCE STUDIES  
 WBOY-DT - CLARKSBURG, WV  
 (CONSTRUCTION PERMIT FACILITIES)

Lucinda DeVaul  
 Canton, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WBOY-DT	Clarksburg, WV	52	DTV	CP	BPCDT-19991029AEU

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGGN-TV	Sandusky, OH	52	NTSC	Licensed	BLCT-19940310KE
WPGH-TV	Pittsburgh, PA	53	NTSC	CP	BPCT-19930708KF
WMSY-TV	Marion, VA	52	NTSC	Licensed	BLET-19810722KF
WVPT	Staunton, VA	51	NTSC	Licensed	BLET-222
WMAR-DT	Baltimore, MD	52	DTV	Allotment	
WICU-DT	Erie, PA	52	DTV	Application	BPCDT-19991015AAK
WTAE-DT	Pittsburgh, PA	51	DTV	Allotment	
WSWP-DT	Grandview, WV	53	DTV	Allotment	
W10CK	Canton, OH	52	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W10CK

	POPULATION	AREA (sq km)
within Noise Limited Contour	680202	25950.1
not affected by terrain losses	534818	22023.1
lost to NTSC IX	3995	237.6
lost to additional IX by ATV	19850	439.0
lost to ATV IX only	22191	539.7
lost to all IX	23845	676.6

TABLE 6.1(cont'd)

OET 69 INTERFERENCE STUDIES  
WBOY-DT - CLARKSBURG, WV  
(CONSTRUCTION PERMIT FACILITIES)

STUDY RESULTS WITH PROPOSED W10CK

	POPULATION	AREA (sq km)
within Noise Limited Contour	680202	25950.1
not affected by terrain losses	534818	22023.1
lost to NTSC IX	3995	237.6
lost to additional IX by ATV	19850	439.0
lost to ATV IX only	22191	539.7
lost to all IX	23845	676.6

SUMMARY OF STUDY RESULTS

	Without Proposed W10CK	With Proposed W10CK	Increase/(Decrease)
DTV Service	510,973	510,973	0
Percent Loss(Gain)*	13.25%	13.25%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 589,000 from 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.