



STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN
APPLICATION FOR MODIFICATION OF
CONSTRUCTION PERMIT
BPCDT-20000428ABH
WHIZ-DT - ZANESVILLE, OHIO
DTV - CH. 40 - 620 kW - 169 M HAAT

Prepared for: Southeastern Ohio Television System

I am a Consulting Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. I am a registered Professional Engineer in the Commonwealth of Virginia, Registration No. 7418, and in the State of New York, Registration No. 63418.

GENERAL

This office has been authorized by Southeastern Ohio Television System, licensee of WHIZ-TV, channel 18, Zanesville, Ohio, and permittee of paired DTV station WHIZ-DT, channel 40, to prepare this statement, FCC Form 301, Sections III and III-D, and the associated exhibits in support of an Application to modify WHIZ-DT's construction permit, BPCDT-20000428ABH. It is proposed herein to modify the facility authorized by the DTV construction permit to enable WHIZ-TV to operate both its analog and digital stations using a common omni-directional transmitting antenna, as is currently proposed in its pending application for analog construction permit, BPCT-20010808AAS. In order to compensate for the difference in proposed antenna patterns (directional to omni) and heights above average terrain (146 meters to 169 meters) it is herein proposed to reduce the authorized DTV ERP from 1000 kW to 620 kW.

WHIZ-TV proposes to install its transmission facilities on a new structure at its currently licensed site located at 39E 55' 42" N latitude, 81E 59' 7" W longitude. The structure has been registered in the FCC tower registration database, however, no registration number has yet been issued.

PROPOSED OMNI-DIRECTIONAL ANTENNA

The applicant proposes to utilize a TCI model 888-24-ND circularly polarized transmitting antenna, the same antenna proposed to be used by WHIZ-TV in pending application for analog construction permit, BPCT-20010808AAS. It is intended to mount the proposed antenna on top of the new tower support structure at WHIZ-TV's existing licensed site for use by both analog and digital stations.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.684 of the Rules, utilizing the appropriate F(50,90) propagation curves (from 47 CFR Section 73.699, Figures 10b and 10c), power, and antenna height above average terrain as determined for each profile radial. The average terrain on the eight cardinal radials from 3 kilometers to 16 kilometers from the site, was determined using the National Geophysical Data Center Thirty Second Point Database (TPG-0050) as prescribed in the FCC Rules. Exhibit 1 shows both the predicted 41 dBF protected Noise Limited Contour and the 48 dBF principal community contour for the proposed WHIZ-DT facility. The predicted 48 dBF contour completely encompasses Zanesville, Ohio, WHIZ-TV's principal community of license.

ALLOCATION CONSIDERATIONS

WHIZ-TV's DTV allotment was contained in the initial DTV Table of Allotments and is therefore not subject to minimum geographic spacing requirements, however proposed modifications to the allotment are subject to compliance with the 2% and 10% *de minimis* interference criteria contained in Section 73.623(c)(2) of the Commission's Rules.

NTSC Allocation Considerations

The instant application seeks to modify an existing DTV construction permit, and the proposed modified facility is expected to maintain its existing compliance with the Commission's interference criteria. Therefore, in order to establish the existing baseline interference relationship, a complete Longley-Rice interference study was performed, using the Commission's interference analysis software, tv_process, according to the procedures set forth in OET Bulletin 69. The relevant results of the baseline interference analysis of WHIZ-DT's construction permit, BPCDT-20000428ABH, are shown in Exhibit 2.

The baseline analysis results indicate that WHIZ-DT's existing construction permit is predicted to cause interference in excess of the 2% *de minimis* limit to the construction permit, BPET-20010321ABH, of upper fourth adjacent channel analog station WOUC-TV, channel 44, Cambridge, Ohio. WOUC-TV filed its application for BPET-20010321ABH after the DTV cutoff date of January 18, 2001 established in the *Report and Order and Further Notice of Proposed Rule Making*¹. According to the DTV processing rules in Section 73.623, which were established in that *Report and Order*, and further clarified in

¹ *Report and Order and Further Notice of Proposed Rule Making, In the Matter of Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MM Docket No. 00-39, 16 FCC Rcd 8 at 5946 (2001).

the *Order on Reconsideration*², Section 73.623(h)(1) requires that: "...DTV applications for a construction permit or a modified construction permit pending as of January 18, 2001: (i) shall be afforded the interference protection set forth in paragraph (c) or (d) of this section as applicable: (A) by all NTSC minor change applications, ..." Since WOUC-TV's application for construction permit was filed after January 18, 2001 it is required to protect WHIZ-DT's pending cutoff application, and must accept any interference which might be caused to it by WHIZ-DT's cutoff application, and subsequent authorized facility.

Accordingly, in order to modify WHIZ-DT's construction permit and not increase the existing authorized baseline interference to WOUC-TV's construction permit, the FCC's interference analysis software, tv_process, was used to determine what value of ERP, at the proposed HAAT, will achieve that goal. Exhibit 3 shows the results of a tv_process study based on an ERP of 620 kW. As can be seen in all four scenarios, the "after analysis" interference populations for WOUC-TV shown in Exhibit 3 are smaller than the comparable "after analysis" interference populations shown in the baseline study in Exhibit 2. For example: CP scenario 1 = 31465, application scenario 1 = 31432; CP scenario 2 = 31183, application scenario 2 = 31150, CP scenario 3 = 31465, application scenario 3 = 31432, CP scenario 4 = 31183, application scenario 4 = 31150. In all four scenarios the application results show a reduction in WOUC-TV's interference population of 33 persons.

It is clear that the 620 kW ERP proposed for WHIZ-DT's modified facility affords at least equal, and actually improved interference protection, by 33 persons, to WOUC-TV's construction permit, BPET-20010321ABH.

² *Memorandum Opinion and Order on Reconsideration, In the Matter of Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television*, MM Docket No. 00-39, 16 FCC Rcd 28 at 20594 (2001).

DTV Allocation Considerations

The Longley-Rice tv_process study performed at an ERP of 620 kW was also evaluated to determine if the proposed modification of WHIZ-DT's construction permit is predicted to cause any level of new prohibited interference to DTV stations, expansion construction permits or DTV allotments. The results indicate that the instant proposal is predicted to cause no level of new interference in excess of the *de minimis* criteria to the populations served by any DTV station, expansion construction permit or allotment.

Class A Television Allocation Considerations

As required in Section 73.613 of the FCC's Rules, as established in the Report and Order establishing Class A Television Service, released April 4, 2000, a study of interference contour overlap was performed, based on the proposed modified WHIZ-DT facility, to establish compliance with the protection requirements contained therein. The study results indicate that no prohibited contour overlap is predicted to occur with any LPTV station which was granted a Certificate of Eligibility for Class A Status in Public Notice DA 00-1224, Released June 2, 2000, or any LPTV station which has since obtained Class A licensed status.

BLANKETING AND INTERMODULATION INTERFERENCE

A number of broadcast and non-broadcast facilities are located within 10 km of the proposed WHIZ-DT transmitter/antenna site. The applicant recognizes its responsibility to remedy complaints of interference created by this proposal in accordance with applicable Rules.

ENVIRONMENTAL CONSIDERATIONS

The proposal described herein meets the criteria specified in Section 1.1306 of the FCC Rules and Regulations as an action, which is categorically excluded from environmental processing. The proposed TV facility involves neither a site location specified under Section 1.1307(a)(1)-(7) of the Rules nor high intensity lighting as specified in Section 1.1307(a)(8).

RADIO FREQUENCY IMPACT

Effective October 15, 1997, the FCC adopted new guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions. The guidelines are generally based on recommendations by the National Council on Radiation Protection and Measurements (NCRP) in NCRP Report No. 86 (1986), and by the American National Standards Institute and the Institute of Electrical and Electronic Engineers, LLC (IEEE) in ANSI/IEEE C95.1-1992 (IEEE C95.1-1991). The guidelines provide a maximum permissible exposure (MPE) level for occupational or "controlled" situations that apply in cases that affect the general public. The FCC Office of Engineering and Technology's technical bulletin No. 65 entitled, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields" (Edition 97-01, August 1997), provides assistance in the determination of whether FCC-regulated transmitting facilities, operations or devices comply with guidelines limits for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC's policies and

guidelines.

The FCC Maximum Permitted Exposure (MPE) level for “uncontrolled” environments is derived from the formula, $(\text{frequency}/1500)$, for UHF TV stations. The MPE level for UHF stations in a “controlled” environment is derived from the formula, $(\text{frequency}/300)$. We must consider the contributions of our own station, WHIZ-DT channel 40, and the other proposed and existing stations at the proposed site. For WHIZ-DT, which operates on television channel 40 (629 MHz), the MPE is 0.419 milliwatts per centimeter squared (mW/cm^2) in an “uncontrolled” environment and $2.097 \text{ mW}/\text{cm}^2$ in a “controlled” environment. The proposed WHIZ-DT facility will operate with a maximum ERP of 620 kW from a circularly polarized omni-directional transmitting antenna with a centerline height of 145 meters above ground level (AGL). Considering a very conservative vertical plane relative field factor of 0.3, the WHIZ-DT facility produces a predicted power density at two meters above ground level of $0.09114 \text{ mW}/\text{cm}^2$, which is 21.73% of the FCC guideline value for “uncontrolled” environments, and 4.35% of the FCC guideline value for “controlled” environments (see Appendix A). The total percentage of the ANSI value at the proposed site, considering the cumulative radiation of all stations at the site, is only 57.51% of the limit for “uncontrolled” environments, and 11.50% of the limit for “controlled” environments.

OCCUPATIONAL SAFETY

The licensee of WHIZ-TV is committed to the protection of station personnel and/or tower contractors working in the vicinity of its antenna. The applicant is committed to

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reducing power and/or ceasing operation during times of service or maintenance of the transmission systems, when necessary, to ensure protection to personnel. In light of the above, the proposed facility should be categorically excluded from RF environmental processing under Section 1.1307(b) of the Commission's Rules.

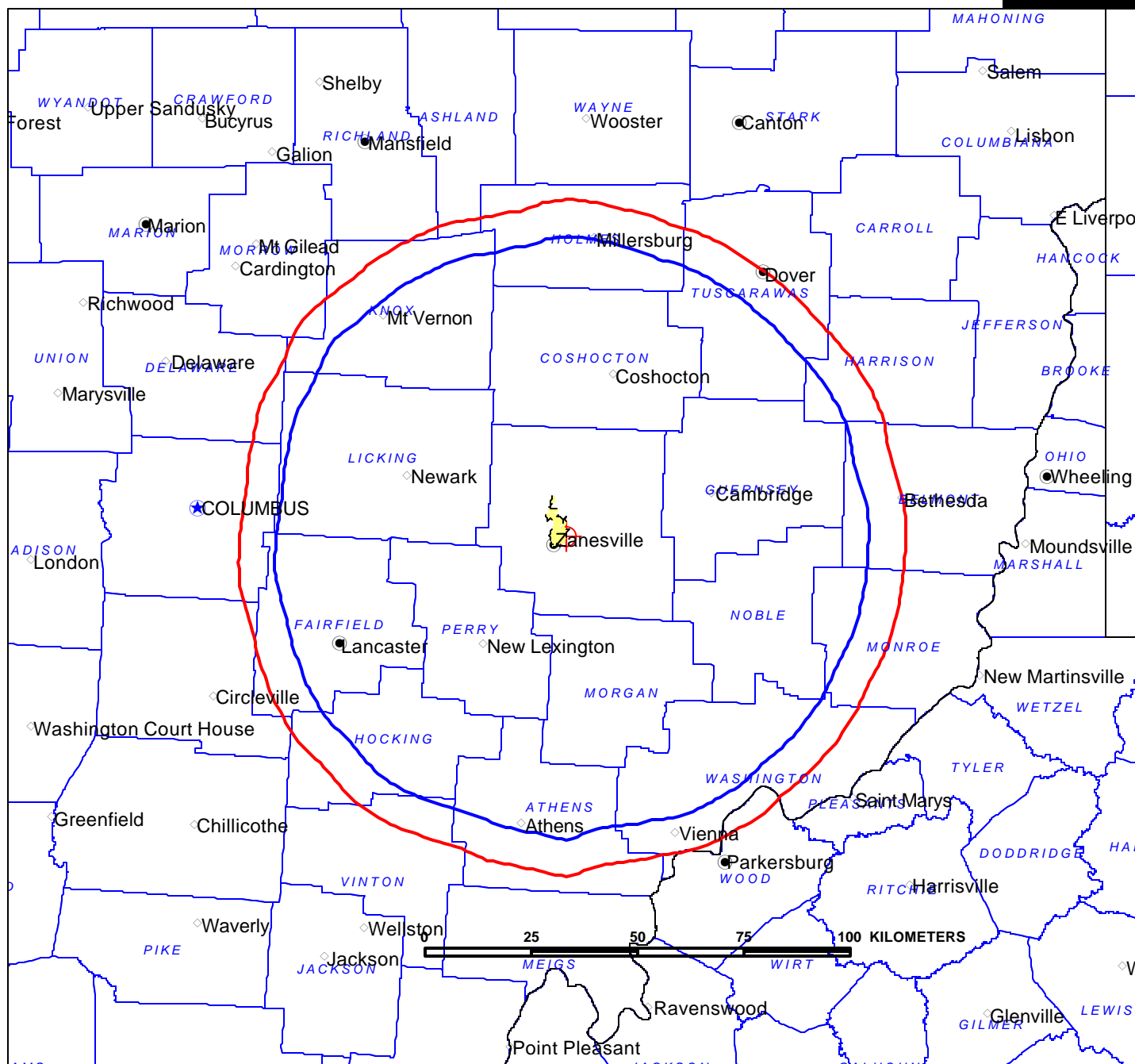
SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement, FCC Form 301, and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

DATED: March 13, 2002


John E. Hidle, P.E.





WHIZ-DT Proposed Coverage
 41 dBu F(50,90) Protected Coverage Contour
 Omnidirectional Antenna
 620 kW ERP, 169 m HAAT

WHIZ-DT Proposed Coverage
 48 dBu F(50,90) "City Grade" Coverage Contour
 Omnidirectional Antenna
 620 kW ERP, 169 m HAAT

 Zanesville Corporate Limits

WHIZ-TV Channel 40, Zanesville, Ohio
Predicted Coverage Contours at
Site of WHIZ(TV) Channel 18
March, 2002

CARL T. JONES
CORPORATION

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 1

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-07-2002 Time: 13:47:11

Record Selected for Analysis

WHIZ-TV BPCDT -20000428ABH ZANESVILLE OH US
Channel 40 ERP 1000.0 kW HAAT 146.0 m RCAMSL 399.4 m
Latitude 039-55-42 Longitude 0081-59-7.
Status CP Zone 3 Border C
Dir Antenna Make CDB Model 00000000032949 Beam tilt Y Ref Azimuth 0.0
Last update Cutoff date 20010118 Docket
Comments
Applicant SOUTHEASTERN OHIO TELEVISION SYSTEM

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	790.321	155.6	78.2
45.0	442.225	136.9	73.3
90.0	379.456	153.1	73.9
135.0	454.950	151.0	74.7
180.0	375.769	153.4	73.8
225.0	453.602	145.5	74.2
270.0	806.404	120.6	75.2
315.0	997.002	155.1	79.5

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WHIZ-TV 40 ZANESVILLE OH BPCDT 20000428ABH

and station

SHORT TO: WOUC-TV 44 CAMBRIDGE OH BPET 20010321ABH
040-05-32 0081-17-19
Req. separation => 24.1 <= 80.5 Actual separation 62.2 Short 18.3(38.1) km

SHORT TO: WOUC-TV 44 CAMBRIDGE OH BMLET 19910905KG
040-05-32 0081-17-19
Req. separation => 24.1 <= 80.5 Actual separation 62.2 Short 18.3(38.1) km

SHORT TO: WPCB-TV 40 GREENSBURG PA BLCT 19990706KF
040-23-34 0079-46-54
Req. separation 217.3 Actual separation 194.7 Short 22.6 km

SHORT TO: WPCB-TV 40 GREENSBURG PA BPCT 19991004ABW
040-23-34 0079-46-54
Req. separation 217.3 Actual separation 194.7 Short 22.6 km

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 2

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is within the Canadian coordination distance
Distance to border = 197.7km

Proposed facility is beyond the Mexican coordination distance

Proposed station is 0.02km from AM station
ZANESVILLE OH WHIZ Status: L Antenna: ND1
Proposed station is 0.00km from AM station
ZANESVILLE OH WHIZ Status: Antenna: ND1

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN	
40	WHIZ-TV	ZANESVILLE OH	BPCDT	20000428ABH

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
44	WOUC-TV	CAMBRIDGE OH	62.0	CP	BPET	-20010321ABH
44	WOUC-TV	CAMBRIDGE OH	62.0	LIC	BMLET	-19910905KG
40	WPCB-TV	GREENSBURG PA	194.2	LIC	BLCT	-19990706KF
40	WPCB-TV	GREENSBURG PA	194.2	CP	BPCT	-19991004ABW
39	WDLI	CANTON OH	129.6	CP	BPCDT	-19990423KE
39	WLPX-TV	CHARLESTON WV	163.1	CP	BPCDT	-19990513KH
40	WFWA	FORT WAYNE IN	300.7	CP	BPEDT	-20000414AAY
40	WHMB-TV	INDIANAPOLIS IN	359.8	LIC	BLCT	-19990922AAW
40	WTVQ-TV	LEXINGTON KY	296.0	CP	BPCDT	-19991025ADD
40	WTVQ-TV	LEXINGTON KY	296.0	STA	BDSTA	-20020129ACB
40	WLMB	TOLEDO OH	264.5	LIC	BLCT	-19981029KE
40	WLFB	BLUEFIELD WV	307.7	CP MOD	BMPCT	-19960531KE
40	WLFB	BLUEFIELD WV	307.7	LIC	BLCT	-20001121AIB
41	WHIO-TV	DAYTON OH	194.3	CP	BPCDT	-19991027ABD
41	WKBN-TV	YOUNGSTOWN OH	169.0	APP	BPCDT	-19991025ACU
41	WCHS-TV	CHARLESTON WV	169.2	CP	BPCDT	-19991019ABT
39	WDLI-DT	CANTON OH	118.8	PLN	DTVPLN	-DTVP1042
39	WKRP-DT	CHARLESTON WV	163.1	PLN	DTVPLN	-DTVP1054
40	WFWA-DT	FORT WAYNE IN	300.7	PLN	DTVPLN	-DTVP1063
40	WTVQ-DT	LEXINGTON KY	296.0	PLN	DTVPLN	-DTVP1065
41	WHIO-DT	DAYTON OH	194.3	PLN	DTVPLN	-DTVP1108
41	WKBN-DT	YOUNGSTOWN OH	169.1	PLN	DTVPLN	-DTVP1109
41	WCHS-DT	CHARLESTON WV	169.2	PLN	DTVPLN	-DTVP1119

Carl T. Jones Corporation

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EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 3

[illegible]

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
44	WOUCTV	CAMBRIDGE OH	DTVPLN	-NPLN1170

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WHIZ-DT	ZANESVILLE OH	62.0	PLN	DTVPLN	-DTVP1076
36	WTTE-DT	COLUMBUS OH	139.1	PLN	DTVPLN	-DTVP0972
36	WYTV-DT	YOUNGSTOWN OH	121.1	PLN	DTVPLN	-DTVP0973
41	WKBN-DT	YOUNGSTOWN OH	120.3	PLN	DTVPLN	-DTVP1109
42	WPTT-DT	PITTSBURGH PA	138.6	PLN	DTVPLN	-DTVP1146
43	WPGH-DT	PITTSBURGH PA	117.7	PLN	DTVPLN	-DTVP1177
44	WTSF-DT	ASHLAND KY	209.1	PLN	DTVPLN	-DTVP1200
44	WKON-DT	OWENTON KY	349.4	PLN	DTVPLN	-DTVP1201
44	WWPB-DT	HAGERSTOWN MD	287.2	PLN	DTVPLN	-DTVP1203
44	WWJ-DT	DETROIT MI	305.5	PLN	DTVPLN	-DTVP1206
46	WNEO-DT	ALLIANCE OH	96.0	PLN	DTVPLN	-DTVP1269
47	WOAC-DT	CANTON OH	113.1	PLN	DTVPLN	-DTVP1302
48	WPXI-DT	PITTSBURGH PA	116.4	PLN	DTVPLN	-DTVP1332
51	WTAE-DT	PITTSBURGH PA	127.9	PLN	DTVPLN	-DTVP1420
52	WBOY-DT	CLARKSBURG WV	121.6	PLN	DTVPLN	-DTVP1451
58	WDTV-DT	WESTON WV	135.2	PLN	DTVPLN	-DTVP1565
59	WAKC-DT	AKRON OH	110.9	PLN	DTVPLN	-DTVP1582
43	WUAB	LORAIN OH	147.6	PLN	DTVPLN	-NPLN1169
44	WTLW	LIMA OH	256.0	PLN	DTVPLN	-NPLN1171
45	WNEO	ALLIANCE OH	96.0	PLN	DTVPLN	-NPLN1173
51	WSFJTV	NEWARK OH	96.7	PLN	DTVPLN	-NPLN1180
46	WLYJ	CLARKSBURG WV	119.5	PLN	DTVPLN	-NPLN1745

Results for: 44N OH CAMBRIDGE	DTVPLN	NPLN1170	PLN
	POPULATION	AREA (sq km)	
within Noise Limited Contour	626566	15604.0	
not affected by terrain losses	560119	14903.0	
lost to NTSC IX	9482	467.4	
lost to additional IX by ATV	626	8.1	
lost to all IX	10108	475.4	

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
44	WOUC-TV	CAMBRIDGE OH	BPET	-20010321ABH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WHIZ-TV	ZANESVILLE OH	62.0	CP	BPCDT	-20000428ABH
40	WHIZ-DT	ZANESVILLE OH	62.0	PLN	DTVPLN	-DTVP1076
36	WYTV	YOUNGSTOWN OH	121.1	CP	BPCDT	-19991028ADP
41	WKBN-TV	YOUNGSTOWN OH	120.2	APP	BPCDT	-19991025ACU
42	WCWB	PITTSBURGH PA	117.7	APP	BMPCDT	-20000428ABY
42	WCWB	PITTSBURGH PA	117.7	CP	BPCDT	-19990112KFL
43	WUAB	LORAIN OH	147.6	CP MOD	BMPCT	-20001227ABI
43	WUAB	LORAIN OH	147.6	LIC	BLCT	-19910923KL
43	WPGH-TV	PITTSBURGH PA	117.7	CP	BPCDT	-19980803KS

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44	WTSF	ASHLAND KY	209.1	CP	BPCDT	-20000501AEQ
44	WAGV	HARLAN KY	406.5	APP	BMPCT	-19961022KF
44	WKON	OWENTON KY	349.4	CP	BPEDT	-20000302AAI
44	WWPB	HAGERSTOWN MD	287.2	CP	BPEDT	-20000501AHC
44	WWJ-TV	DETROIT MI	305.5	CP	BPCDT	-19980427KK
44	WTLW	LIMA OH	256.0	LIC	BLCT	-19820714KG
45	WNEO	ALLIANCE OH	96.0	LIC	BMLET	-19891204KE
46	WNEO	ALLIANCE OH	96.0	APP	BPEDT	-20000426ABK
46	WVFX	CLARKSBURG WV	119.5	LIC	BLCT	-19810824KE
47	WOAC	CANTON OH	113.1	APP	BPCDT	-19991101AEX
48	WPXI	PITTSBURGH PA	116.4	LIC	BLCDT	-19991222AAT
51	WSFJ-TV	NEWARK OH	119.6	APP	BPCT	-20010213ABM
51	WSFJ-TV	NEWARK OH	96.7	LIC	BLCT	-19841029KF
51	WTAE-TV	PITTSBURGH PA	127.9	APP	BPCDT	-20000421AAP
52	WBOY-TV	CLARKSBURG WV	121.6	CP	BPCDT	-19991029AEU
58	960919LA	YOUNGSTOWN OH	166.0	APP	BPET	-19960919LA
59	WVPX	AKRON OH	110.9	APP	BPCDT	-19990128KN
36	WTTE-DT	COLUMBUS OH	139.1	PLN	DTVPLN	-DTVP0972
36	WYTV-DT	YOUNGSTOWN OH	121.1	PLN	DTVPLN	-DTVP0973
41	WKBN-DT	YOUNGSTOWN OH	120.3	PLN	DTVPLN	-DTVP1109
42	WPTT-DT	PITTSBURGH PA	138.6	PLN	DTVPLN	-DTVP1146
43	WPGH-DT	PITTSBURGH PA	117.7	PLN	DTVPLN	-DTVP1177
44	WTSF-DT	ASHLAND KY	209.1	PLN	DTVPLN	-DTVP1200
44	WKON-DT	OWENTON KY	349.4	PLN	DTVPLN	-DTVP1201
44	WWPB-DT	HAGERSTOWN MD	287.2	PLN	DTVPLN	-DTVP1203
44	WWJ-DT	DETROIT MI	305.5	PLN	DTVPLN	-DTVP1206
46	WNEO-DT	ALLIANCE OH	96.0	PLN	DTVPLN	-DTVP1269
47	WOAC-DT	CANTON OH	113.1	PLN	DTVPLN	-DTVP1302
48	WPXI-DT	PITTSBURGH PA	116.4	PLN	DTVPLN	-DTVP1332
51	WTAE-DT	PITTSBURGH PA	127.9	PLN	DTVPLN	-DTVP1420
52	WBOY-DT	CLARKSBURG WV	121.6	PLN	DTVPLN	-DTVP1451
58	WDTV-DT	WESTON WV	135.2	PLN	DTVPLN	-DTVP1565
59	WAKC-DT	AKRON OH	110.9	PLN	DTVPLN	-DTVP1582

Total scenarios = 4

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	581	8.1	
lost to all IX	18426	503.7	

Potential Interfering Stations Included in above Scenario 1

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 5

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	13620	128.9	
lost to all IX	<u>31465</u>	624.5	

Potential Interfering Stations Included in above Scenario 1

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	BPCDT	20000428ABH	CP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE BPCDT 20000428ABH
ERP 1000.00 kW HAAT 146.0 m RCAMSL 399.4 m
Antenna CDB 00000000032949

Due to interference to the following station and scenario: 1

44N OH CAMBRIDGE BPET 20010321ABH
ERP 871.00 kW HAAT 390.0 m RCAMSL 704.0 m
Antenna CDB 00000000039320

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 2
Scenario 2 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	581	8.1	
lost to all IX	18144	487.5	

Potential Interfering Stations Included in above Scenario 2

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 6

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	13620	128.9	
lost to all IX	<u>31183</u>	608.4	

Potential Interfering Stations Included in above Scenario 2

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	BPCDT	20000428ABH	CP

The following station failed the de minimis interference criteria.
40D OH ZANESVILLE BPCDT 20000428ABH
ERP 1000.00 kW HAAT 146.0 m RCAMSL 399.4 m
Antenna CDB 00000000032949

Due to interference to the following station and scenario: 2

44N OH CAMBRIDGE	BPET	20010321ABH
ERP 871.00 kW HAAT 390.0 m RCAMSL 704.0 m		
Antenna CDB 00000000039320		

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 3
Scenario 3 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	581	8.1	
lost to all IX	18426	503.7	

Potential Interfering Stations Included in above Scenario 3

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 7

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	13620	128.9	
lost to all IX	<u>31465</u>	624.5	

Potential Interfering Stations Included in above Scenario 3

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	BPCDT	20000428ABH	CP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE BPCDT 20000428ABH
ERP 1000.00 kW HAAT 146.0 m RCAMSL 399.4 m
Antenna CDB 00000000032949

Due to interference to the following station and scenario: 3

44N OH CAMBRIDGE BPET 20010321ABH
ERP 871.00 kW HAAT 390.0 m RCAMSL 704.0 m
Antenna CDB 00000000039320

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 4
Scenario 4 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	581	8.1	
lost to all IX	18144	487.5	

Potential Interfering Stations Included in above Scenario 4

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 2 - WHIZ-DT-1000-KW-CP - PAGE 8

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	13620	128.9	
lost to all IX	<u>31183</u>	608.4	

Potential Interfering Stations Included in above Scenario 4

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	BPCDT	20000428ABH	CP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE BPCDT 20000428ABH
ERP 1000.00 kW HAAT 146.0 m RCAMSL 399.4 m
Antenna CDB 00000000032949

Due to interference to the following station and scenario: 4

44N OH CAMBRIDGE BPET 20010321ABH
ERP 871.00 kW HAAT 390.0 m RCAMSL 704.0 m
Antenna CDB 00000000039320

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

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EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 1

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-08-2002 Time: 12:06:13

Record Selected for Analysis

WHIZ-TV BPCDT -20000428ABH ZANESVILLE OH US
Channel 40 ERP 620.00 kW HAAT 169.1 m RCAMSL 422.0 m
Latitude 039-55-42 Longitude 0081-59-7.
Status APP Zone 3 Border C
Last update Cutoff date 20010118 Docket
Comments
Applicant SOUTHEASTERN OHIO TELEVISION SYSTEM

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	620.000	178.2	78.6
45.0	620.000	159.5	77.1
90.0	620.000	175.7	78.4
135.0	620.000	173.6	78.3
180.0	620.000	176.0	78.5
225.0	620.000	168.1	77.8
270.0	620.000	143.2	75.7
315.0	620.000	177.7	78.6

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WHIZ-TV 40 ZANESVILLE OH BPCDT 20000428ABH

and station

SHORT TO: WOUC-TV 44 CAMBRIDGE OH BPET 20010321ABH
040-05-32 0081-17-19
Req. separation => 24.1 <= 80.5 Actual separation 62.2 Short 18.3(38.1) km

SHORT TO: WPCB-TV 40 GREENSBURG PA BLCT 19990706KF
040-23-34 0079-46-54
Req. separation 217.3 Actual separation 194.7 Short 22.6 km

SHORT TO: WPCB-TV 40 GREENSBURG PA BPCT 19991004ABW
040-23-34 0079-46-54
Req. separation 217.3 Actual separation 194.7 Short 22.6 km

SHORT TO: WOUC-TV 44 CAMBRIDGE OH BMLET 19910905KG
040-05-32 0081-17-19
Req. separation => 24.1 <= 80.5 Actual separation 62.2 Short 18.3(38.1) km

EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 2

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is within the Canadian coordination distance
Distance to border = 197.7km

Proposed facility is beyond the Mexican coordination distance

Proposed station is 0.02km from AM station
ZANESVILLE OH WHIZ Status: L Antenna: ND1
Proposed station is 0.00km from AM station
ZANESVILLE OH WHIZ Status: Antenna: ND1

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN	
40	WHIZ-TV	ZANESVILLE OH	BPCDT	20000428ABH

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
44	WOUC-TV	CAMBRIDGE OH	62.0	CP	BPET	-20010321ABH
40	WPCB-TV	GREENSBURG PA	194.2	LIC	BLCT	-19990706KF
40	WPCB-TV	GREENSBURG PA	194.2	CP	BPCT	-19991004ABW
44	WOUC-TV	CAMBRIDGE OH	62.0	LIC	BMLET	-19910905KG
39	WDLI	CANTON OH	129.6	CP	BPCDT	-19990423KE
39	WLPX-TV	CHARLESTON WV	163.1	CP	BPCDT	-19990513KH
40	WFWA	FORT WAYNE IN	300.7	CP	BPEDT	-20000414AAY
40	WHMB-TV	INDIANAPOLIS IN	359.8	LIC	BLCT	-19990922AAW
40	WTVQ-TV	LEXINGTON KY	296.0	CP	BPCDT	-19991025ADD
40	WTVQ-TV	LEXINGTON KY	296.0	STA	BDSTA	-20020129ACB
40	WLMB	TOLEDO OH	264.5	LIC	BLCT	-19981029KE
40	WLFB	BLUEFIELD WV	307.7	CP MOD	BMPCT	-19960531KE
40	WLFB	BLUEFIELD WV	307.7	LIC	BLCT	-20001121AIB
41	WHIO-TV	DAYTON OH	194.3	CP	BPCDT	-19991027ABD
41	WKBN-TV	YOUNGSTOWN OH	169.0	APP	BPCDT	-19991025ACU
41	WCHS-TV	CHARLESTON WV	169.2	CP	BPCDT	-19991019ABT
39	WDLI-DT	CANTON OH	118.8	PLN	DTVPLN	-DTVP1042
39	WKRPT-DT	CHARLESTON WV	163.1	PLN	DTVPLN	-DTVP1054
40	WFWA-DT	FORT WAYNE IN	300.7	PLN	DTVPLN	-DTVP1063
40	WTVQ-DT	LEXINGTON KY	296.0	PLN	DTVPLN	-DTVP1065
41	WHIO-DT	DAYTON OH	194.3	PLN	DTVPLN	-DTVP1108
41	WKBN-DT	YOUNGSTOWN OH	169.1	PLN	DTVPLN	-DTVP1109
41	WCHS-DT	CHARLESTON WV	169.2	PLN	DTVPLN	-DTVP1119

Carl T. Jones Corporation

7901 Yarnwood Court, Springfield, Virginia 22153-2899 (703) 569-7704 Fax: (703) 569-6417

[illegible]

NTSC Baseline Analysis

Stations Potentially Affecting This Station

Analysis of current record

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WHIZ-TV	ZANESVILLE OH	62.0	APP	BPCDT	-20000428ABH
40	WHIZ-DT	ZANESVILLE OH	62.0	PLN	DTVPLN	-DTVP1076
36	WYTV	YOUNGSTOWN OH	121.1	CP	BPCDT	-19991028ADP
41	WKBN-TV	YOUNGSTOWN OH	120.2	APP	BPCDT	-19991025ACU
42	WCWB	PITTSBURGH PA	117.7	APP	BMPCDT	-20000428ABY
42	WCWB	PITTSBURGH PA	117.7	CP	BPCDT	-19990112KF
43	WUAB	LORAIN OH	147.6	CP MOD	BMPCT	-20001227ABI
43	WUAB	LORAIN OH	147.6	LIC	BLCT	-19910923KL
43	WPGH-TV	PITTSBURGH PA	117.7	CP	BPCDT	-19980803KS

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EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 4

44	WTSF	ASHLAND KY	209.1	CP	BPCDT	-20000501AEQ
44	WAGV	HARLAN KY	406.5	APP	BMPCT	-19961022KF
44	WKON	OWENTON KY	349.4	CP	BPEDT	-20000302AAI
44	WWPB	HAGERSTOWN MD	287.2	CP	BPEDT	-20000501AHC
44	WWJ-TV	DETROIT MI	305.5	CP	BPCDT	-19980427KK
44	WTLW	LIMA OH	256.0	LIC	BLCT	-19820714KG
45	WNEO	ALLIANCE OH	96.0	LIC	BMLET	-19891204KE
46	WNEO	ALLIANCE OH	96.0	APP	BPEDT	-20000426ABK
46	WVFX	CLARKSBURG WV	119.5	LIC	BLCT	-19810824KE
47	WOAC	CANTON OH	113.1	APP	BPCDT	-19991101AEX
48	WPXI	PITTSBURGH PA	116.4	LIC	BLCDT	-19991222AAT
51	WSFJ-TV	NEWARK OH	119.6	APP	BPCT	-20010213ABM
51	WSFJ-TV	NEWARK OH	96.7	LIC	BLCT	-19841029KF
51	WTAE-TV	PITTSBURGH PA	127.9	APP	BPCDT	-20000421AAP
52	WBOY-TV	CLARKSBURG WV	121.6	CP	BPCDT	-19991029AEU
58	960919LA	YOUNGSTOWN OH	166.0	APP	BPET	-19960919LA
59	WVPX	AKRON OH	110.9	APP	BPCDT	-19990128KN
36	WTTE-DT	COLUMBUS OH	139.1	PLN	DTVPLN	-DTVP0972
36	WYTV-DT	YOUNGSTOWN OH	121.1	PLN	DTVPLN	-DTVP0973
41	WKBN-DT	YOUNGSTOWN OH	120.3	PLN	DTVPLN	-DTVP1109
42	WPTT-DT	PITTSBURGH PA	138.6	PLN	DTVPLN	-DTVP1146
43	WPGH-DT	PITTSBURGH PA	117.7	PLN	DTVPLN	-DTVP1177
44	WTSF-DT	ASHLAND KY	209.1	PLN	DTVPLN	-DTVP1200
44	WKON-DT	OWENTON KY	349.4	PLN	DTVPLN	-DTVP1201
44	WWPB-DT	HAGERSTOWN MD	287.2	PLN	DTVPLN	-DTVP1203
44	WWJ-DT	DETROIT MI	305.5	PLN	DTVPLN	-DTVP1206
46	WNEO-DT	ALLIANCE OH	96.0	PLN	DTVPLN	-DTVP1269
47	WOAC-DT	CANTON OH	113.1	PLN	DTVPLN	-DTVP1302
48	WPXI-DT	PITTSBURGH PA	116.4	PLN	DTVPLN	-DTVP1332
51	WTAE-DT	PITTSBURGH PA	127.9	PLN	DTVPLN	-DTVP1420
52	WBOY-DT	CLARKSBURG WV	121.6	PLN	DTVPLN	-DTVP1451
58	WDTV-DT	WESTON WV	135.2	PLN	DTVPLN	-DTVP1565
59	WAKC-DT	AKRON OH	110.9	PLN	DTVPLN	-DTVP1582

Total scenarios = 4

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	581	8.1	
lost to all IX	18426	503.7	

Potential Interfering Stations Included in above Scenario 1

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 5

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	13587	133.0	
lost to all IX	<u>31432</u>	628.6	

Potential Interfering Stations Included in above Scenario 1

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	BPCDT	20000428ABH	APP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE	BPCDT	20000428ABH
ERP 620.00 kW HAAT 169.1 m	RCAMSL	422.0 m
Antenna	none	

Due to interference to the following station and scenario: 1

44N OH CAMBRIDGE	BPET	20010321ABH
ERP 871.00 kW HAAT 390.0 m	RCAMSL	704.0 m
Antenna CDB 00000000039320		

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 2
Scenario 2 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	581	8.1	
lost to all IX	18144	487.5	

Potential Interfering Stations Included in above Scenario 2

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 6

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	13587	133.0	
lost to all IX	<u>31150</u>	612.4	

Potential Interfering Stations Included in above Scenario 2

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
40A OH ZANESVILLE	BPCDT	20000428ABH	APP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE	BPCDT	20000428ABH
ERP 620.00 kW HAAT 169.1 m	RCAMSL	422.0 m
Antenna	none	

Due to interference to the following station and scenario: 2

44N OH CAMBRIDGE	BPET	20010321ABH
ERP 871.00 kW HAAT 390.0 m	RCAMSL	704.0 m
Antenna CDB 00000000039320		

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 3
Scenario 3 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	581	8.1	
lost to all IX	18426	503.7	

Potential Interfering Stations Included in above Scenario 3

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 7

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17845	495.6	
lost to additional IX by ATV	13587	133.0	
lost to all IX	<u>31432</u>	628.6	

Potential Interfering Stations Included in above Scenario 3

43N OH LORAIN	BMPCT	20001227ABI	CP
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	BPCDT	20000428ABH	APP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE	BPCDT	20000428ABH
ERP 620.00 kW HAAT 169.1 m	RCAMSL	422.0 m
Antenna	none	

Due to interference to the following station and scenario: 3

44N OH CAMBRIDGE	BPET	20010321ABH
ERP 871.00 kW HAAT 390.0 m	RCAMSL	704.0 m
Antenna CDB 00000000039320		

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

Result key: 4
Scenario 4 Affected station 1
Before Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	581	8.1	
lost to all IX	18144	487.5	

Potential Interfering Stations Included in above Scenario 4

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	DTVPLN	DTVP1076	PLN

EXHIBIT 3 - WHIZ-DT - 620 kW - APPLICATION - PAGE 8

After Analysis

Results for: 44N OH CAMBRIDGE	BPET	20010321ABH	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	575754	15303.0	
not affected by terrain losses	510138	14622.1	
lost to NTSC IX	17563	479.5	
lost to additional IX by ATV	13587	133.0	
lost to all IX	<u>31150</u>	612.4	

Potential Interfering Stations Included in above Scenario 4

43N OH LORAIN	BLCT	19910923KL	LIC
44N OH LIMA	BLCT	19820714KG	LIC
45N OH ALLIANCE	BMLET	19891204KE	LIC
51N OH NEWARK	BLCT	19841029KF	LIC
43A PA PITTSBURGH	BPCDT	19980803KS	CP
44A MI DETROIT	BPCDT	19980427KK	CP
46A OH ALLIANCE	BPEDT	20000426ABK	APP
40A OH ZANESVILLE	BPCDT	20000428ABH	APP

The following station failed the de minimis interference criteria.

40D OH ZANESVILLE	BPCDT	20000428ABH
ERP 620.00 kW HAAT 169.1 m	RCAMSL	422.0 m
Antenna	none	

Due to interference to the following station and scenario: 4

44N OH CAMBRIDGE	BPET	20010321ABH
ERP 871.00 kW HAAT 390.0 m	RCAMSL	704.0 m
Antenna CDB 00000000039320		

Percent new DTV interference without proposal:	0.1	BPET	20010321ABH
Percent new DTV interference with proposal:	2.4	BPET	20010321ABH

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APPENDIX A

**SUMMARY OF RADIOFREQUENCY
RADIATION STUDY
WHIZ-DT ZANESVILLE, OHIO
CHANNEL 40, 1000 kW (MAX), 162 m HAAT
MARCH, 2002**

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLARIZATION</u>	<u>ANTENNA HEIGHT **</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>PREDICTED POWER DENSITY (mW/cm²)</u>	<u>FCC UNCONTROLLED LIMIT (mW/cm²)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WHIZ-FM	FM	273	102.5	H & V	124.9	50.000	0.300	0.01927	0.200	9.64%
WHIZ(TV)	TV	18	497	H & V	143	589.000	0.300	0.08661	0.331	26.14%
WHIZ-DT	DT	40	629	H & V	143	620.000	0.300	0.09114	0.419	21.73%

TOTAL PERCENTAGE OF ANSI VALUE= 57.51%

*** The antenna heights indicated above are 2 meters less than the actual antenna heights so that the predicted power densities consider the 2 meter human height allowance.*