

Exhibit 9 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
The Union Mission
WJGN-CA Chesapeake, Virginia
Facility ID 66549
Ch. 38 (Digital Displacement) 15 kW

The Union Mission (“*Mission*”) is the licensee of Class A television station WJGN-CA, Channel 5, Chesapeake, Virginia, Facility ID 66549 (file number BLTVA-20010926ABL). *Mission* is hereby submitting a proposal for a digital displacement for WJGN-CA in the July 2010 filing opportunity, as permitted in a recent Public Notice.¹ It is believed that WJGN-CA may be considered displaced due to the quality of digital LPTV reception in the low VHF Band and due to the potential use of television Channels 5 and 6 for digital AM and FM broadcast, as discussed in the text of Form 346 Section I, Exhibit 1.

The proposed WJGN-CA digital Channel 38 antenna will be side mounted on the existing WJGN-CA antenna support structure, having FCC Antenna Structure Registration (“ASR”) number 1047304. No increase in overall structure height is necessary for the instant proposal.

The proposed facility will operate on Channel 38 using a “stringent” out of channel emission mask, with an omni-directional antenna having an effective radiated power of 15 kW. The proposed antenna is an ERI model ALP24L1-HSO-38, horizontally polarized. **Exhibit 9 – Figure 1** depicts the coverage contours of the licensed analog facility and the proposed digital companion facility. The service area overlap with each facility demonstrates compliance with the minor change criteria of §73.3572.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all DTV, television translator, LPTV, and Class A stations. A detailed

¹ “Initiation of Nationwide, First-Come, First-Served Digital Licensing for Low Power Television and TV Translator Services Postponed Until Further Notice,” Public Notice, DA 10-1168, released June 28, 2010.

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interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET 69").² The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

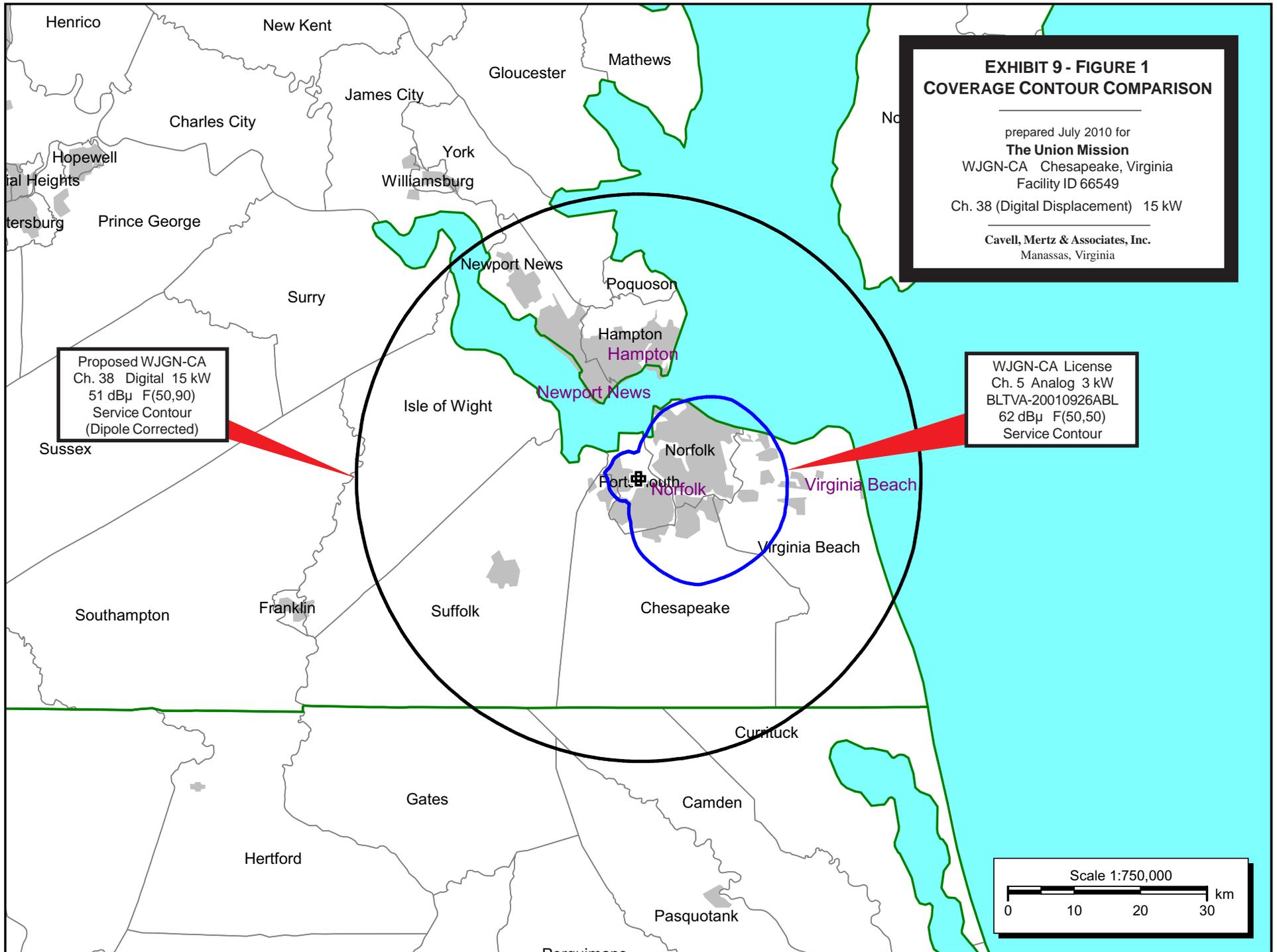
The results, summarized in **Exhibit 9 - Table I**, show that no new interference is predicted to full power, Class A stations, or to secondary stations. Accordingly, the instant proposal complies with §74.793 regarding interference protection to digital television, low power television, television translator, and Class A television facilities.

International Coordination and Other Matters

The proposed facility is located 693.3 km from the nearest U.S. - Canadian border, which is well beyond the coordination distance specified for international coordination. The nearest FCC monitoring station is at Laurel, Maryland, at a distance of 259 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required. Based on information extracted from the Commission's engineering database, directional AM broadcast station WGPL(AM), 1350 kHz, Portsmouth, VA, is located within 3.2 km of the proposed site. Since the proposal involves mounting a relatively small antenna on an existing structure, with no change in overall height, *Mission* respectfully requests that the CP not be conditioned to require proof measurements on WGPL(AM) as specified in §73.1692(d) of the Rules.

As described fully above, it is believed that the instant proposal complies with the Commission's allocation Rules and policies.

² The implementation of OET 69 for this study followed the guidelines of OET 69 as specified therein. **A cell size of 1 km was employed.**



**EXHIBIT 9 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared July 2010 for
The Union Mission
 WJGN-CA Chesapeake, Virginia
 Facility ID 66549

Ch. 38 (Digital Displacement) 15 kW

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Proposed WJGN-CA
 Ch. 38 Digital 15 kW
 51 dBμ F(50,90)
 Service Contour
 (Dipole Corrected)

WJGN-CA License
 Ch. 5 Analog 3 kW
 BLTVA-20010926ABL
 62 dBμ F(50,50)
 Service Contour

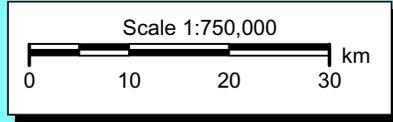


Exhibit 9 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
The Union Mission
WJGN-CA Chesapeake, Virginia
Facility ID 66549
Ch. 38 (Digital Displacement) 15 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>----Population (2000 Census)----</u>	
						<u>Baseline</u>	<u>New Interference</u>
23	WITD-CA	Chesapeake, VA	14.7	LIC	BLTTA-20060614AAE	---	none
24	W24OI	Virginia Beach, VA	33.1	LIC	BLTT-19960603JA	---	none
30	W30BV	Norfolk, VA	9.9	LIC	BLTTL-20020520AA Y	---	none
30	W30CI	Onancock, VA	129.1	LIC	BLTT-20070531ANE	---	none
34	W34DN	Onancock, VA	129.1	LIC	BLTT-20070531ANG	---	none
35	WCTX-CA	Virginia Beach, VA	21.0	LIC	BLTTL-19970415IB	---	none
36	WPMC-CA	Mapps ville, VA	128.9	LIC	BLTTL-19960503JF	---	none
38	WWTD-LD	Washington, DC	239.8	CP	BDCCDTL-20061013AEG	---	none
38	WMAR-TV	Baltimore, MD	276.2	CP	BPCDT-20080222ABC	---	none
38	W38BN	Salisbury, MD	184.1	LIC	BLTTL-19990812JA	---	none
38	WUVC-DT	Fayetteville, NC	279.1	CP	BPCDT-20090630ABX	---	none
38	WUVC-DT	Fayetteville, NC	279.1	LIC	BLC DT-20060912ACZ	2,894,857	0 / 0.00%
38	W38ER-D	Wilmington, NC	326.5	CP	BNPDTL-20090825AFH	---	none
38	WQAV-LD	Atlantic City, NJ	322.6	CP	BDCCDTL-20061023AHS	---	none
38	WPHA-CA	Philadelphia, PA	366.3	CP	BDFCDTA-20090630AHY	---	none
38	WPHA-CA	Philadelphia, PA	366.3	LIC	BLTTA-20041115ACE	---	none
38	WPJT-DT	Georgetown, SC	405.3	CP MOD	BMPE DT-20040503AFV	---	none
38	NEW	Crozet, VA	250.3	APP	BNPDTL-20090825ASK	199,641	0 / 0.00%
38	WDCN-LD	Fairfax, VA	236.4	APP	BDCCDTL-20061030AON	---	none
38	NEW	Harrisonburg, VA	285.5	APP	BNPDTL-20090825ARD	---	none
38	W34DW-D	Hampshire, Etc., WV	336.5	CP	BDCCDTT-20061025ADT	---	none
39	NEW	Washington, NC	176.8	APP	BNPDTL-20100210AAX	---	none
39	WERI-LP	Keysville, VA	190.3	LIC	BLTTL-19931020JK	---	none
39	WJHJ-LP	Newport News, VA	0.0	CP	BDFCDTL-20090824AFH	---	none
39	WJHJ-LP	Newport News, Etc., VA	0.0	LIC	BLTTL-20060221ABX	---	none

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<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>----Population (2000 Census)----</u>	
						<u>Baseline</u>	<u>New Interference</u>
39	W39CS	Onancock, VA	129.1	LIC	BLTT-20070531AMY	---	none
39	W39CO	Richmond, VA	125.4	LIC	BLTT-20020614AAM	---	none
42	W42DP	Craddockville, VA	94.1	CP	BDISTT-20071130AQW	---	none
45	W45CL	Manteo, NC	127.4	LIC	BLTTL-20070501AGD	---	none
45	W45CL	Manteo, NC	127.4	APP	BSTA-20070629CCD	---	none
45	WZTD-LP	Keysville, VA	132.1	APP	BSTA-20070614AEI	---	none
45	WZTD-LP	Richmond, VA	132.1	LIC	BLTTL-20071102AQS	---	none