

**Allocation Conditions – Waiver Requests  
FCC Form 346, Question 13.**

The proposed operation of WRMD-LP on Channel 49 satisfies the Commission's applicable contour protection and spacing requirements for all authorized co-channel, adjacent-channel, and "taboo" channel stations, except for six. With respect to these six stations, the Longley-Rice terrain-sensitive propagation prediction method demonstrates that the proposed facility would not be likely to cause interference, and waiver of the applicable rule is respectfully requested. Specific waiver requests for the six stations involved (all in Florida) are discussed more fully below.

**NTSC TV Protection**

WRXY-TV, Channel 49, Tice. The 64 dBu protected contour of the licensed facility of Station WRXY-TV overlaps the proposed WRMD-LP 36 dBu F(50,10) interfering contour. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no unique interference within the WRXY-TV Grade B contour. Pursuant to Section 74.705(e), waiver is respectfully requested of Sections 74.705(b)(1) and 74.705(d)(1).

WFTT(TV), Channel 50, Tampa. The 64 dBu protected contour of the licensed and permitted facilities of TV Station WFTT encompasses the proposed WRMD-LP transmitter site and therefore overlaps the 79 dBu interfering contour. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no unique interference within the WFTT Grade B contours. Pursuant to Section 74.705(e), waiver is respectfully requested of Sections 74.705(b)(1) and 74.705(d)(4).

**DTV Protection**

WVEN-DT, Channel D49, Daytona Beach. The 41 dBu protected contours of both the allotted and permitted facilities for this DTV station overlap the proposed WRMD-LP 20 dBu F(50,10) contour. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no interference whatsoever to either the allotted or applied-for facilities of WVEN-DT. Pursuant to Section 74.706(d)(1), waiver is respectfully requested of Section 74.706(b)(1).

WFGC-DT, Channel D49, Palm Beach. The 41 dBu protected contours of both the allotted and applied-for facilities for this DTV station overlap the proposed WRMD-LP 20 dBu F(50,10) interfering contour. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no interference whatsoever to either the allotted or applied-for facilities of WFGC-DT. Pursuant to Section 74.706(d)(1), waiver is respectfully requested of Section 74.706(b)(1).



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**Class A TV Protection**

W48AY, Channel 48, Oldsmar. The 74 dBu protected contour of the licensed facility of Class A TV Station W48AY encompasses the proposed WRMD-LP transmitting site and therefore also overlaps the proposed 89 dBu interfering contour. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no unique interference within the W48AY protected contour. Pursuant to Sections 74.708(c) and 74.707(e), waiver is respectfully requested of Sections 74.707(b)(1) and 74.707(d)(4).

WYKE-LP, Channel 49, Inglis / Yankeetown. The 74 dBu protected contour of the licensed facility of Class A TV Station WYKE-LP is encompassed by proposed 29 dBu F(50,10) interfering contour of WRMD-LP. As shown in Exhibit 6C, analysis using the method of OET-69 demonstrates that the proposed operation of WRMD-LP causes no unique interference within the WYKE-LP protected contour. Pursuant to Sections 74.708(c) and 74.707(e), waiver is respectfully requested of Sections 74.707(b)(1) and 74.707(d)(1).

## Summary of OET-69 Interference Calculation Results

Interference analysis  
tvixstudy 2.4b1

## Station parameters:

	--Modified-----	--Original-----
Station:	N49+L WRMD-LP LIC	N57zL WRMD-LP LIC
City:	TAMPA, FL	TAMPA, FL
Coordinates:	N 27-56-49.9	N 27-56-50.0
	W 82-27-34.7	W 82-27-35.0
Height AMSL:	153.3 m	152.0 m
Maximum ERP:	50.7 kW	14.0 kW
Azimuth pattern:	acs12e.apat	ANT-17800_ACS8P3
Orientation:	255.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	74.9 dBu	75.5 dBu

Protected station		Base Pop	IX Change	%Base	Unique	IX
N48+A W48AY LIC	OLDSMAR, FL	516,294	0	0.0		0
N49nA WYKE-LP LIC	INGLIS/YANKEETOWN, FL	35,344	5,104	14.4		0
N49z WRXY-TV LIC	TICE, FL	552,314	21	0.0		0
D49 WVEN-TV CP	DAYTONA BEACH, FL	1,271,000	-747,722	-58.8		0
D49 WVENDT allot	DAYTONA BEACH, FL	1,271,000	27,572	2.2		0
D49 WFGC APP	PALM BEACH, FL	1,445,000	-1,057,530	-73.2		0
D49 WFGCDT allot	PALM BEACH, FL	1,445,000	51,725	3.6		0
N50z WFTT CP	TAMPA, FL	3,081,323	79,729	2.6		0
N50z WFTT LIC	TAMPA, FL	3,051,992	61,434	2.0		0

Note: The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.



HAMMETT & EDISON, INC.  
CONSULTING ENGINEERS  
SAN FRANCISCO

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Exhibit 6C