

REQUEST FOR EXTENSION OF TRANSITION PHASE COMPLETION DATE AND WAIVER OF DEADLINE TO CEASE OPERATIONS ON PRE-AUCTION CHANNEL

Gray Television Licensee, LLC (“Gray”), licensee of television station WVFX(TV), Clarksburg, West Virginia (“WVFX” or “Station”) hereby submits this request for an extension of the Phase Completion Date for WVFX and a waiver of the requirement in Section 73.3700(b)(4)(iii) of the Commission’s Rules that WVFX must cease operating on its pre-auction channels within 39 months of the issuance of the *Closing and Channel Reassignment Public Notice*, or by July 3, 2020.¹ As demonstrated below, grant of the requested extension and waiver will not frustrate the underlying policy of the Federal Communications Commission (“FCC” or “Commission”) and good cause exists for a grant of the requested relief to allow the Station to continue to operate on its pre-auction channel until it can transition to its post-auction channel.

I. INTRODUCTION AND SUMMARY

When the FCC adopted the *Incentive Auction Report and Order* in 2014, it sought to strike a balance between the interests of various stakeholders by “provid[ing] sufficient flexibility to both broadcasters and the Commission to ensure a successful, expeditious transition, while minimizing disruption to consumers and providing appropriate certainty to the wireless industry.”² Accordingly, the Commission adopted a 36-month post-incentive auction transition period (the “Broadcast Construction Period”), designating authority to the Media Bureau to establish individual deadlines within the construction period subject to an outside date after which no stations may operate on their pre-auction channels. At the time, the Commission recognized that “the transition will be complex and time-consuming for a number of stations” and that some stations would require “up to the full 36 months” to complete their transitions.³ Now, as the final repack deadline approaches, the Commission has acknowledged that “some

¹ See 47 C.F.R. § 73.3700(b)(4)(iii); *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd. 6567, 6797, para. 563 (2014) (“*Incentive Auction Report and Order*”), *aff’d*, *Nat’l Assoc. of Broadcasters, et al. v. FCC*, 789 F.3d 165 (D.C. Cir. 2015); *Incentive Auction Closing and Channel Reassignment Public Notice*, 32 FCC Rcd. 2786, para. 68 (2017) (“*Closing and Channel Reassignment Public Notice*”).

² *Incentive Auction Report and Order*, para. 561. Although a number of parties petitioned for reconsideration of the 36-month construction period, the Commission deferred consideration of those arguments. See *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Second Order on Reconsideration, 30 FCC Rcd. 6746, para. 160 (2015).

³ *Id.*, para. 569.

limited number of additional stations may also need to seek waivers of the phase 10 phase completion date and the post-auction transition period end date.”⁴ The Commission has committed to “work diligently with stations to ensure that service disruptions are minimized to the fullest extent possible.”⁵

Gray has managed many complex and difficult repack builds over the past three years, with 43 Gray stations involved in the repack effort. However, circumstances outside of its control have left it unable to complete the WVFX repack facility by the Phase 10 deadline. With the July 3, 2020 deadline for stations to cease operations on their pre-auction channels looming, WVFX faces the possibility of having to discontinue over-the-air service—potentially for a several month period. Without a grant of the relief sought herein, WVFX’s viewers will experience the very disruption that the Commission sought to avoid. This request seeks approval of a transition plan that will allow WVFX to continue operations on its pre-auction channel for a short period of time until it can complete construction of an interim facility on its post-auction channel. Importantly, WVFX’s continued operation on its pre-auction channel will not interfere with or delay any other station’s repack transition. Accordingly, it is in the public interest to extend WVFX’s Phase Completion Date until September 8, 2020 when it will be able to transition to an interim facility on its post-auction channel.

II. SUMMARY OF CONSTRUCTION EFFORTS

In the *Closing and Reassignment Public Notice*, the FCC assigned WVFX to Transition Phase 10, for which the Phase Completion Date is July 3, 2020. As explained herein, despite best efforts and years of careful planning, WVFX will be unable to move to its post-auction channel by the end of Transition Phase 10 because of unexpected and significant structural issues with its tower, necessitating construction of a completely new tower.

Gray acquired WVFX on May 1, 2017. In the Asset Purchase Agreement to acquire the Station, the Seller represented that “all Equipment is (i) in reasonable operating condition and repair, subject to normal wear and tear, adequate for its current use, and available for use in the operation of the Stations and the conduct of the Stations and presently conducted, and (ii)

⁴ Post-Incentive Auction Transition Request for Waiver of Cox Television Jacksonville LLC, FCC 20-82, para. 16 (WFOX Order).

⁵ *Incentive Auction Report and Order*, para. 569; *see also* WFOX Order at para. 16 (directing the Media Bureau to “consider future requests seeking such waivers consistent with the considerations” established in the WFOX Order).

maintained in material compliance with industry practice and all applicable FCC rules and policies.”⁶ However, as Gray discovered once it conducted a structural analysis in preparation for the repack, this representation was untrue for the WVFX tower.

Shortly after its acquisition of WVFX in May 2017, Gray requested quotes for a structural analysis and commissioned Worldwide Communications Consultants (“Worldwide”) to map the tower and perform a structural analysis. Worldwide ultimately was unable to add the Station to its schedule forcing WVFX to search out an alternate vendor. The Station contacted Hodge Structural Engineers, Inc. (“Hodge”) in March 2018 to prepare a structural analysis. As a Phase 10 station, WVFX was given a lower priority position in the queue for a structural analysis. Hodge requested a new mapping of the tower, which it performed in early February 2019. The initial structural analysis concluded that the tower failed the EIA-RS-222-G (“Rev. G”) standard. Subsequently, Hodge performed several additional structural analyses, including one in October 2019 where it was determined that the tower also failed when evaluated using the EIA-RS-222-C (“Rev. C”) standard. Then two additional analyses were performed in November 2019, using both Rev. C and Rev. G standards to evaluate whether the tower could pass either standard if certain combinations of equipment were removed from the tower. The tower failed both such analyses. Finally, in January 2020, Gray commissioned an analysis to evaluate the benefit of reinforcing the tower over building a new tower. As the cost of reinforcement was significantly greater than the cost of constructing a new tower and reinforcement could not be completed faster than a new build; Gray made the decision to construct a new tower.

Gray immediately shifted efforts to construct the new tower. In late March 2020, Gray reached out to ERI to begin the process of designing and building the new tower. To determine the most effective tower design for this site, various surveys and assessments were needed. ERI’s efforts to move forward quickly were hampered by the nationwide shut-down due to COVID-19.⁷ Crews were unable to travel during this time, delaying efforts to complete the needed surveys, including a geotechnical survey and topographical survey, to complete the final tower design.

⁶ Asset Purchase Agreement dated May 13, 2016, Section 4.5.

⁷ See *Guidance for Stations in Phase 9 of the Post-Incentive Auction Transition As a Result of the Novel Coronavirus (COVID-19) Pandemic*, Public Notice, DA 20-282, MB Dkt. No. 16-306; GN Dkt. No. 12-268 (rel. Mar. 17, 2020).

The existing tower will remain in service while the new tower is built. The new tower will be built adjacent to the existing tower so that the current tenants—WVFX and others—may continue to operate while the new tower is constructed. The existing tower is on Gray-owned land, but the guy wire anchors are located on leased adjacent parcels of land not owned by Gray. Gray is negotiating revised leases with these property owners to accommodate the second set of guy wire anchors needed for the replacement tower.

Although the final repack facility cannot be completed until the new tower is complete, WVFX has secured all other equipment needed for construction of its final facility. The Channel 13 transmitter is installed and ready for air. The final Channel 13 antenna has been ordered and will be ready to ship when the tower is complete.

III. ALTERNATIVE APPROACHES

Gray has considered alternate methods for WVFX to cease operations on its pre-auction channel by the Phase 10 deadline, including those suggested by the Commission of moving to interim facilities on the post-auction channel, operating on a vacant channel and temporary channel sharing.⁸ Gray will be able to move WVFX to an interim facility on its post-auction channel, but not by the deadline. The other options considered by Gray were determined to be infeasible or so severely disruptive to its viewers that it would not serve the public interest.

Gray evaluated whether WVFX could engage in a temporary channel share arrangement with its sister station WDTV, Weston, West Virginia. Both WVFX and WDTV have a robust use of their allotted spectrum, with the stations airing three program streams each. WVFX carries Fox programming in high-definition on its primary stream and CW and Start in standard-definition on multicast streams. WDTV, meanwhile, carries CBS programming in high-definition on its primary stream, and ME and H&I in standard-definition on multicast streams. For WDTV to share its spectrum with WVFX and maintain high-definition carriage of each station's associated network affiliated programming at an acceptable bit rate, the stations would

⁸ See *Incentive Auction Report & Order*, 29 FCC Rcd 6567 (2014); *Incentive Auction Task Force and Media Bureau Adopt a Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 32 FCC Rcd 890 (2017); *Incentive Auction Task Force and Media Bureau Remind Repacked Stations of Certain Post-Auction Transition Requirements and Deadlines*, Public Notice, 33 FCC Rcd 8240 (2018).

have to cease programming some of its multicast channels – removing several program streams from viewers.

Gray also considered whether it could operate WVFX using the channel assigned to its low power station, W22CY. However, W22CY is not operational because it lost its tower lease. It also is not feasible to re-construct the station on the WVFX tower because that tower is overloaded and cannot support another antenna.

Ultimately, Gray determined that, although disruptive to viewers, it would be able to construct an interim facility for WVFX on the post-auction channel by September 8, 2020. Gray requests authority to continue to operate WVFX on its pre-auction channel until the interim facility is complete. WVFX can continue to operate on Channel 10 after July 3, 2020 with minimal outgoing and incoming interference. Importantly, WVFX's transition plan will not impede or delay the transition of any other station.⁹ As explained in the attached Engineering Statement, WVFX's continued operation on Channel 10 will cause .68 percent interference above the baseline to its co-owned station WOIO, Shaker Heights, Ohio. This level of interference represents the "status quo" as it has existed for over five years. Further, Gray consents to this interference. WVFX will receive 2.5 percent interference from WOWK-TV, Huntington, West Virginia. This is not a significant increase in incoming interference currently received by WVFX from other channel 10 stations.¹⁰ Gray consents to receive this interference to WVFX until the Station can transition to its post-auction channel.

WVFX originally did not plan to construct an interim facility because it did not believe an interim facility would be necessary. However, the tower simply cannot support additional equipment. In order to add an interim antenna to the tower, WVFX will have to go dark for several days to allow for removal of the Channel 10. As explained above, WVFX can operate on Channel 10 after the Phase 10 deadline with minimal incoming and outgoing interference. While WVFX would prefer to remain on Channel 10 until the new tower is complete and it can

⁹ See WFOX Order at para. 13

¹⁰ See Attachment A, Engineering Statement of Chesapeake RF Consultants, LLC; See WFOX Order at para. 12 finding "that an individual station's request for a waiver of sections 73.3700(b)(4)(iii) and 73.616(d) of our rules, and modification of the station's phase completion date beyond July 13, 2020, and application of the post-auction transition period standard of two percent temporary pairwise interference may be justified where, notwithstanding the station's reasonable diligence during the post-auction transition period to vacate its pre-auction channel, specific circumstances beyond the station's control prevent it from vacating its pre-auction channel by July 13, 2020, other than by going dark."

complete its final repack facility on Channel 13, Gray understands that the Media Bureau has delegated authority to extend its repack deadline only until September 8, 2020. Therefore, WVFX has moved forward with plans to build and operate an interim facility on Channel 13. The interim antenna is scheduled to be delivered by mid-August and a tower crew has been scheduled to be on-site for immediate installation. WVFX will robustly communicate with its viewers about the need to rescan as well as the expected period of time where it will be silent.

WVFX therefore seeks authority to remain on its existing pre-auction channel until no later than September 8, 2020, while it constructs an interim facility on Channel 13 and continues to move forward with construction of its new tower and final repack facility. To ensure that its viewers are fully informed as to the delayed transition date for WVFX, the Station commits to conducting a robust viewer notification campaign including PSAs, news stories and social media posts beyond that required by the Commission's rules.¹¹

IV. GOOD CAUSE EXISTS TO WAIVE SECTION 73.3700(B)(4)(III) OF THE COMMISSION'S RULES AND EXTEND WVFX'S PHASE TRANSITION DATE.

Given the number of factors beyond WVFX's control that have contributed to its inability to transition to its post-auction channel by July 3, 2020, Gray requests that the Commission extend WVFX's Phase Transition Date and waive the requirement for WVFX to cease operations on its pre-auction channel by July 3, 2020. The Commission may waive any provision of its rules on its own motion and for good cause shown.¹² A rule may be waived where the particular facts make strict compliance inconsistent with the public interest.¹³ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹⁴ In sum, waiver is appropriate if special

¹¹ See WFOX Order, para. 14, noting with favor the commitment to provide "additional viewer education and outreach above and beyond what is required by the Commission's rules to mitigate any viewer disruption caused by the change to the transition schedule."

¹² 47 CFR §1.3.

¹³ *Northeast Cellular Telephone Co. v. FCC*, 897 F2d 1164, 1166 (DC Cir 1990) (Northeast Cellular).

¹⁴ *WAIT Radio v. FCC*, 418 F2d 1153, 1157, (DC Cir 1969), affirmed by *WAIT Radio v. FCC*, 459 F2d 1203 (DC Cir 1972).

circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.¹⁵

Here, Gray has worked diligently to complete construction of WVFX's post-auction facilities prior to the July 3, 2020 Phase Transition Deadline. Gray completed its acquisition of WVFX in 2017 on the eve of the repack. Relying on the representations made in the Asset Purchase Agreement to acquire the Station, Gray did not anticipate that the structural analysis would show that the tower was severely overloaded and could not support the repack facility. These unexpected and significant structural issues with the tower were completely outside of Gray's control. Gray diligently evaluated numerous options that would allow for the continued use of this antenna. However, after exhausting all other options, it concluded that a new tower was required. Unfortunately, efforts to quickly move forward with tower construction were derailed by the nationwide shutdown for COVID-19. Gray has determined a path forward that requires WVFX to remain on its pre-auction channel for a short period of time while the interim facility is completed, but allow it to transition to its post-auction channel in advance of September 8, 2020. Without a grant of the instant waiver, WVFX will be required to go dark at 11:59 on July 3. Heading into a long holiday weekend, its viewers will be left without vital news, information and entertainment programming for an unforeseen amount of time.

Grant of this waiver will serve the public interest not only because no Commission policy is undermined by grant of the requested waiver, but also because it will allow the Station to continue to provide essential news and information programming to its community while it completes construction of its final repack facility. In response to Congressional concerns about the possibility viewers would lose service if stations were unable to transition channels within the 36-month Broadcast Construction Period, Chairman Pai agreed with then-Commissioner Mignon Clyburn's statement of support for "any effort that would complement our goal of ensuring that no consumer is negatively harmed."¹⁶ More recently, Chairman Pai reiterated that the Commission is "doing everything we can to keep all transitioning stations on the air for their

¹⁵ Northeast Cellular, 897 F2d at 1166. Accord, NetworkIP, LLC v. FCC, 548 F3d 116, 127 (DC Cir 2008) (stating that in addition to the public interest being well-served, there must also be a sufficiently "unique situation" to grant waiver).

¹⁶ Oversight of the Federal Communications Commission: Hearing Before the S. Comm. on Commerce, Science, and Transportation, 115th Cong. 20 (2018) (response of FCC Chairman Pai to Sen. Brian Schatz).

viewers throughout the transition period.”¹⁷ Grant of the instant request is consistent with the FCC’s repeated statements about minimizing disruption to consumers through the transition.

V. CONCLUSION

For the foregoing reasons, the Commission should grant the instant request, extent WVFX’s Phase Completion Date through and including September 8, 2020, and grant a waiver of Section 73.3700(b)(4)(iii) of the Commission’s Rules to allow WVFX to remain on its pre-auction channel until September 8, 2020.

¹⁷ Remarks of FCC Chairman Pai at the National Association of Tower Erectors Conference at 3 (Feb. 6, 2019), <https://docs.fcc.gov/public/attachments/DOC-356096A1.pdf>.

DECLARATION OF TIMOTHY DEFAZIO

I, Timothy DeFazio, Vice-President of Gray Media Group, Inc., the parent of Gray Television Licensee, LLC (“Gray”), the licensee of WVFX(TV) (FID 10976), Clarksburg, West Virginia (“WVFX” or the “Station”), pursuant to 47 CFR 1.16, declare under penalty of perjury that the following is true and correct.

1. I am a Vice-President of Gray Television Group, Inc. and the General Manager of WVFX. I make this declaration based on my personal knowledge and information available to me in my position with Gray.
2. Gray is the licensee of 127 full power television stations in 93 markets nationwide. 43 of Gray’s full power and Class A stations were required to change channels as part of the repack associated with the Incentive Auction.
3. WVFX was assigned to Transition Phase 10. Transition Phase 10 ends on July 3, 2020.
4. I have been working with the WVFX Chief Engineer to implement the WVFX channel change since the Station was acquired by Gray in May 2017.
5. Gray did not conduct its own structural analysis prior to acquiring WVFX, nor would it constitute a standard industry practice to do so.
6. After acquiring the Station, as part of its planning for the repack, Gray requested a structural analysis of the WVFX tower.
7. Due to the demand on structural engineers at the time and their need to prioritize stations in earlier phases of the repack, it took longer than normal for Gray to obtain a structural analysis of the WVFX tower.
8. Worldwide Communications Consultants (“Worldwide”) was contacted in May 2017 to map the tower and perform a structural analysis.
9. Worldwide was unable to complete this analysis, requiring the Station to commission a structural analysis from an alternate vendor. In March 2018, the Station contacted Hodge Structural Engineers, Inc. (“Hodge”) to perform this analysis. Hodge performed a mapping of the tower and the structural analysis in early February 2019.
10. The initial structural analysis performed by Hodge concluded that the tower failed the EIA-RS-222-G (“Rev. G”) standard. Subsequently, Hodge performed several additional structural analyses, including one in October 2019 where it was determined that the tower also failed when evaluated using the EIA-RS-222-C (“Rev. C”) standard.
11. Hodge performed two additional analyses in November 2019, using both Rev. C and Rev. G standards to evaluate whether the tower could pass either standard if certain combinations of equipment were removed from the tower. The tower failed both such analyses.
12. In January 2020, Gray evaluated both reinforcing the existing tower and building a new tower. Because the cost of reinforcement was significantly greater than the cost of constructing a new tower and would not have been completed any faster, Gray decided to construct a new tower.

13. In late March 2020, Gray contacted ERI to design and build the tower. ERI's efforts to move forward quickly were hampered by the nationwide shut-down due to COVID-19, which precluded crews from completing the needed surveys, including a geotechnical survey and topographical survey, to complete the final tower design.
14. Gray also needs to negotiate revised leases with the owners of property adjacent to the existing tower to accommodate the second set of guy anchors for the replacement tower.
15. Gray currently does not expect the new tower to be ready for several months.
16. Although Gray has considered alternate methods for WVFX to cease operation its pre-auction channel by July 3, 2020, it has determined that none of those options are feasible. Specifically, due to the amount of content broadcast on WVFX and commonly owned WDTV, it would be impossible to maintain each station's full complement of programming at an acceptable bit rate in a channel sharing situation. WVFX cannot temporarily channel share with low power station W22CY because that station is silent due to the loss of its tower lease. And Gray cannot transition to another channel on its existing tower because that tower is overloaded and cannot support another antenna.
17. Gray has established a plan to expedite WVFX's transition to its post-auction channel through the use of an interim facility; however, that facility will not be ready by July 3, 2020. The interim antenna for WVFX is currently scheduled to be delivered by mid-August and a tower crew has been scheduled to be on-site for immediate installation. This will provide the most efficient path for WVFX to transition to its post-auction channel without causing substantial disruption for the station's viewers.
18. Gray anticipates that WVFX will be able to transition to its post-auction channel from its interim facilities no later than September 8, 2020.



Timothy DeFazio
Vice-President

June 26, 2020

Attachment A

ENGINEERING STATEMENT

Request for Waiver of §73.3700(b)(4)(iii) to Remain on Pre-Auction Channel Beyond Transition Period

prepared for

Gray Television Licensee, LLC
WVFX(DT) Clarksburg, WV
Facility ID 10976

This statement is prepared on behalf of *Gray Television Licensee, LLC* (“Gray”), licensee of digital television station WVFX(DT), Facility ID 10976, Clarksburg WV, in support of Gray’s request for waiver of 73.3700(b)(4)(iii) of the FCC’s rules which prohibits stations from operating on their pre-auction channel assignments after July 13, 2020. Reassignment of WVFX from Channel 10 to Channel 13 was specified in the *Incentive Auction Closing and Channel Reassignment Public Notice* (“CCRPN,” DA 17-317, released April 13, 2017). WVFX has been assigned to make the transition to Channel 13 at phase 10 (testing period start date May 2, 2020 and phase completion date July 3, 2020). Gray seeks to delay the transition of WVFX to its reassignment channel until mid-August, 2020. This statement provides engineering details to support the waiver request.

As described in a separate exhibit, implementation of the final WVFX post-auction facility will require construction of a new tower structure. In advance of that, Gray plans to transition WVFX to its reassignment Channel 13 using an interim antenna. The interim antenna will be side-mounted on the existing WVFX tower. As part of that installation the existing WVFX Channel 10 antenna must first be removed, meaning that WVFX will go silent during the antenna replacement process. Gray proposes to continue to operate WVFX on its pre-auction Channel 10 until the interim Channel 13 antenna can be fabricated, delivered, and installed.

The proposed operation on pre-auction Channel 10 beyond phase 10 was evaluated for potential impact to stations downstream of WVFX. An interference study using FCC TVStudy software (OET Bulletin 69) was conducted to determine compliance with the post-auction limit of 0.5 percent new interference caused to pertinent nearby full service and Class A television stations. The TVStudy report is supplied in Table 1 for relevant station operations on their post-auction

channels that may be affected by WVFX's currently licensed operation (BLCDT-20090612AJY) on Channel 10 beyond phase 10. The analysis was conducted using a 2 km cell size and 0.2 km terrain profile increment.

The interference analysis shows that the proposed operation of WVFX beyond phase 10 would not cause interference in excess of 0.5 percent to any other post-auction station, except for WOIO (Facility ID 39746, Ch. 10, Lic file# 0000040178, Shaker Heights OH) which does not represent a conflict for the proposed operation. As shown in Table 1, the WVFX Channel 10 facility causes 0.68 percent interference to WOIO beyond that caused by other post-auction facilities. WOIO was not reassigned in the *CCRPN* and the predicted interference from WVFX remaining on its pre-auction channel would merely continue the existing pairwise situation which has been the "status quo" for over five years. Therefore, the proposal will not result in any new interference to WOIO. *Gray* is also the licensee of WOIO and consents to the interference from WVFX temporarily continuing beyond July 13, 2020.

No other stations are affected. According to the FCC's transition data files,¹ there are no stations downstream of WVFX that are dependent on WVFX's transition from Channel 10. No new dependency or linked station set is created with respect to interference created to other stations. Therefore, the proposed transition delay complies with the 2.0 percent limit of additional interference permitted during the transition as well as the post-auction 0.5 percent interference protection limit of §73.616(d).

Table 2 provides an analysis of incoming interference to WVFX's pre-auction Channel 10 facility for operation beyond phase 10. Pairwise interference from WOWK-TV's reassignment facility (Ch. 10, Huntington WV) results in 2.50 percent unique interference received by the WVFX Channel 10 facility following phase 10. The WVFX Channel 10 facility will receive a total of 3.42 percent incoming interference, considering all authorized post-auction facilities. This is a 1.25 percent increase of interference experienced by WVFX over the pre-auction condition, when WVFX experienced 2.17 percent total incoming interference (see Table 3).

¹ http://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/

During the pre-auction period, Table 3 shows that WSWP-TV (Ch. 10 Grandview WV) contributed 1.25 percent unique interference to WVFX. The pre-auction interference from WSWP-TV will be eliminated at phase 10 when WSWP-TV transitions to its reassignment Channel 8. Therefore, comparing the total interference to WVFX in Table 2 (proposed temporary operation) and Table 3 (all stations with pre-auction facilities), the net change in total interference received by WVFX after phase 10 will be an increase of 1.25 percent.

Gray consents to the temporary increased interference that would be caused by WOWK-TV for the time interval between WOWK-TV's phase 10 transition to Channel 10 and when WVFX ceases operation on Channel 10. Table 2 shows that WVFX will not receive interference in excess of 0.5 percent from any other post-auction station.

List of Attachments

Table 1	TVStudy Analysis – Post-Phase 10 Operation of WVFX on Ch. 10
Table 2	TVStudy Analysis – Incoming Interference WVFX on Pre-Auction Channel 10 For Operation Post-Phase 10
Table 3	TVStudy Analysis – Incoming Interference WVFX on Pre-Auction Channel 10 Analysis of Pre-Auction Scenario

Chesapeake RF Consultants, LLC

Joseph M. Davis, P.E.	June 25, 2020	
207 Old Dominion Road	Yorktown, VA 23692	703-650-9600

Table 1 WVFX TVStudy Analysis of Proposal
Post-Phase 10 Operation of WVFX on Ch. 10
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tvstudy v2.2.5 (4uoc83)
 Database: localhost, Study: WVFX Lic-10 extend 2.0-0.2, Model: Longley-Rice
 Start: 2020.06.24 14:51:51

Study created: 2020.06.24 14:51:51

Study build station data: LMS TV 2020-06-22

Proposal: WVFX D10 DT LIC CLARKSBURG, WV
 File number: BLCDT20090612AJY
 Facility ID: 10976
 Station data: LMS TV 2020-06-22
 Record ID: 02a78d5386f14a44bdc2cf6212b6c0ea
 Country: U.S.
 Zone: I

Search options:
 Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	WTOV-TV	D9	DT	LIC	STEUBENVILLE, OH	BLCDT20111206ACB	118.2 km
No	WVPB-TV	D9	DT	CP	HUNTINGTON, WV	BLANK0000034622	183.9
Yes	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	258.8
Yes	WOIO	D10	DT	LIC	SHAKER HEIGHTS, OH	BLANK0000040178	258.7
No	WHTM-TV	D10	DT	LIC	HARRISBURG, PA	BLANK0000034336	310.9
No	WHTM-TV	D10	DT	APP	HARRISBURG, PA	BLANK0000035787	310.9
No	WWBT	D10	DT	LIC	RICHMOND, VA	BLANK0000108718	317.7
Yes	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	184.0
Yes	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDT20090626AAT	135.5
Yes	WVNS-TV	D11	DT	CP	LEWISBURG, WV	BLANK0000029985	172.7

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D10
 Latitude: 39 18 2.00 N (NAD83)
 Longitude: 80 20 36.00 W
 Height AMSL: 596.0 m
 HAAT: 235.0 m
 Peak ERP: 30.0 kW
 Antenna: DIE-ATC-BC-8PV-10 (ID 44599) 0.0 deg
 Elev Pattn: Generic

36.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	28.3 kW	247.0 m	98.1 km
45.0	7.93	239.5	87.7
90.0	3.91	235.1	82.0
135.0	16.1	251.8	93.9
180.0	26.4	222.8	95.6
225.0	12.6	242.1	91.4
270.0	5.60	215.7	83.4
315.0	8.98	240.0	88.7

Database HAAT does not agree with computed HAAT
 Database HAAT: 235 m Computed HAAT: 237 m

ERP exceeds maximum
 ERP: 30.0 kW ERP maximum: 30.0 kW

Proposal 21.00 dBu contour does not cross Canadian border
 Distance to Canadian border: 316.0 km

Distance to Mexican border: 2138.5 km

Conditions at FCC monitoring station: Laurel MD
 Bearing: 91.7 degrees Distance: 303.6 km

**Table 1 WVFX TVStudy Analysis of Proposal
Post-Phase 10 Operation of WVFX on Ch. 10**
(page 2 of 5)



Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 280.5 degrees Distance: 2122.2 km

Study cell size: 2.00 km
Profile point spacing: 0.20 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

Interference to BLCDT20111206ACB LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTOV-TV	D9	DT	LIC	STEUBENVILLE, OH	BLCDT20111206ACB	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	118.2 km
	WJW	D8	DT	LIC	CLEVELAND, OH	BLCDT20090612AJC	146.1
	WGCT-CD	D8	DC	CP	COLUMBUS, OH	BLANK0000035677	192.7
	WWCP-TV	D8	DT	LIC	JOHNSTOWN, PA	BLANK0000001637	125.9
	WUSA	D9	DT	LIC	WASHINGTON, DC	BLANK0000033300	340.2
	WVPB-TV	D9	DT	CP	HUNTINGTON, WV	BLANK0000034622	246.1
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	147.7
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
31394.3		3,892,886		29742.2		3,615,078	0.07 0.01
				29662.5		3,614,787	
Undesired			Total IX		Unique IX, before		Unique IX, after
WVFX D10 DT LIC			23.8		317		19.8 291
WJW D8 DT LIC			15.9		3,109		4.0 235
WWCP-TV D8 DT LIC			12.0		702		8.0 475
WUSA D9 DT LIC			4.0		227		0.0 0
WVPB-TV D9 DT CP			35.8		361		31.9 335
WOIO D10 DT CP			27.9		7,132		16.0 4,258

Interference to BLCDT20111206ACB LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTOV-TV	D9	DT	LIC	STEUBENVILLE, OH	BLCDT20111206ACB	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	118.2 km
	WJW	D8	DT	LIC	CLEVELAND, OH	BLCDT20090612AJC	146.1
	WGCT-CD	D8	DC	CP	COLUMBUS, OH	BLANK0000035677	192.7
	WWCP-TV	D8	DT	LIC	JOHNSTOWN, PA	BLANK0000001637	125.9
	WUSA	D9	DT	LIC	WASHINGTON, DC	BLANK0000033300	340.2
	WVPB-TV	D9	DT	CP	HUNTINGTON, WV	BLANK0000034622	246.1
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
31394.3		3,892,886		29742.2		3,619,336	0.07 0.01
				29678.5		3,619,045	
Undesired			Total IX		Unique IX, before		Unique IX, after
WVFX D10 DT LIC			23.8		317		19.8 291
WJW D8 DT LIC			15.9		3,109		15.9 3,109
WWCP-TV D8 DT LIC			12.0		702		8.0 475
WUSA D9 DT LIC			4.0		227		0.0 0
WVPB-TV D9 DT CP			35.8		361		31.9 335

Interference to BLANK0000035655 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	258.8 km
	WILX-TV	D10	DT	LIC	ONONDAGA, MI	BLCDT20120404ACG	263.9
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	322.1
	WTOL	D11	DT	APP	TOLEDO, OH	BLANK0000035661	141.9

**Table 1 WVFX TVStudy Analysis of Proposal
Post-Phase 10 Operation of WVFX on Ch. 10**
(page 3 of 5)

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
25661.8 4,110,896	24759.6 4,011,592	24622.9 4,005,270	24494.4 3,985,527	0.52 0.49
2482.7 171	2482.7 171	2482.7 171	2482.7 171	0.00 0.00
(in Canada)				

Undesired	Total IX	Unique IX, before	Unique IX, after
WVFX D10 DT LIC	144.4 20,162		128.5 19,743
WILX-TV D10 DT LIC	84.6 4,917	23.9 493	23.9 493
WOWK-TV D10 DT CP	40.0 989	40.0 989	24.0 570
WTOL D11 DT APP	72.8 4,840	12.1 416	12.1 416

Interference to BLANK0000035655 CP scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	258.8 km
	WILX-TV	D10	DT	LIC	ONONDAGA, MI	BLCDT20120404ACG	263.9
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	322.1
	WTOL	D11	DT	LIC	TOLEDO, OH	BLCDT20090622ABU	141.9

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
25661.8 4,110,896	24759.6 4,011,592	24626.9 4,005,298	24498.5 3,985,555	0.52 0.49
2482.7 171	2482.7 171	2482.7 171	2482.7 171	0.00 0.00
(in Canada)				

Undesired	Total IX	Unique IX, before	Unique IX, after
WVFX D10 DT LIC	144.4 20,162		128.5 19,743
WILX-TV D10 DT LIC	84.6 4,917	36.1 3,199	36.1 3,199
WOWK-TV D10 DT CP	40.0 989	40.0 989	24.0 570
WTOL D11 DT LIC	56.6 2,106	8.1 388	8.1 388

Interference to BLANK0000040178 LIC scenario 1

****IX: 0.68% interference caused**

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WOIO	D10	DT	LIC	SHAKER HEIGHTS, OH	BLANK0000040178	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	258.7 km
	WILX-TV	D10	DT	LIC	ONONDAGA, MI	BLCDT20120404ACG	265.3
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	323.3
	WTOL	D11	DT	APP	TOLEDO, OH	BLANK0000035661	143.7

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
21747.4 3,821,233	20909.2 3,754,437	20769.1 3,747,878	20620.9 3,722,526	0.71 0.68
1552.9 0	1552.9 0	1552.9 0	1552.9 0	0.00 0.00
(in Canada)				

Undesired	Total IX	Unique IX, before	Unique IX, after
WVFX D10 DT LIC	172.2 26,732		148.3 25,352
WILX-TV D10 DT LIC	92.2 3,721	80.2 3,238	80.2 3,238
WOWK-TV D10 DT CP	59.8 3,321	47.9 2,838	27.9 1,493

Interference to BLANK0000034807 CP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	184.0 km
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	322.1
	WBIR-TV	D10	DT	LIC	KNOXVILLE, TN	BLCDT20090619ADG	317.3

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
39347.4	1,348,830	37953.8	1,258,986	37918.0	1,258,221	37750.3	1,253,836	0.44	0.35
Undesired		Total IX		Unique IX, before		Unique IX, after			
WVFX	D10 DT LIC	187.6	4,598			167.7	4,385		
WOIO	D10 DT CP	27.8	386	27.8	386	11.9	173		

**Table 1 WVFX TVStudy Analysis of Proposal
Post-Phase 10 Operation of WVFX on Ch. 10**
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WBIR-TV D10 DT LIC		7.9	379	7.9	379	4.0	379		

Interference to BLANK0000034807 CP scenario 2									
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807			
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDDT20090612AJY	184.0 km		
	WOIO	D10	DT	LIC	SHAKER HEIGHTS, OH	BLANK0000040178	323.3		
	WBIR-TV	D10	DT	LIC	KNOXVILLE, TN	BLCDDT20090619ADG	317.3		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
39347.4	1,348,830	37953.8	1,258,986	37941.9	1,258,542	37762.2	1,254,009	0.47	0.36
Undesired		Total IX		Unique IX, before		Unique IX, after			
WVFX D10 DT LIC		187.6	4,598			179.7	4,533		
WOIO D10 DT LIC		4.0	65	4.0	65	0.0	0		
WBIR-TV D10 DT LIC		7.9	379	7.9	379	4.0	379		

Interference to BLCDDT20090626AAT LIC scenario 1									
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDDT20090626AAT			
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDDT20090612AJY	135.5 km		
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	173.4		
	WJZ-TV	D11	DT	CP	BALTIMORE, MD	BLANK0000032917	314.7		
	WVTT-CD	D11	DC	CP	OLEAN, NY	BLANK0000033365	275.3		
	WTOL	D11	DT	APP	TOLEDO, OH	BLANK0000035661	310.5		
	WBRE-TV	D11	DT	LIC	WILKES-BARRE, PA	BLCDDT20051123AJX	356.9		
	WVNS-TV	D11	DT	CP	LEWISBURG, WV	BLANK0000029985	308.2		
	WBOY-TV	D12	DT	LIC	CLARKSBURG, WV	BLANK0000033150	137.0		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
27695.1	3,393,365	25970.8	3,240,181	25830.4	3,219,870	25830.4	3,219,870	0.00	0.00
Undesired		Total IX		Unique IX, before		Unique IX, after			
WVFX D10 DT LIC		4.0	65			0.0	0		
WJZ-TV D11 DT CP		20.2	1,025	16.1	570	16.1	570		
WTOL D11 DT APP		104.3	18,958	104.3	18,958	104.3	18,958		
WBRE-TV D11 DT LIC		8.0	617	4.0	162	4.0	162		
WVNS-TV D11 DT CP		8.0	101	8.0	101	8.0	101		
WBOY-TV D12 DT LIC		4.0	65	4.0	65	0.0	0		

Interference to BLCDDT20090626AAT LIC scenario 2									
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance		
	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDDT20090626AAT			
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDDT20090612AJY	135.5 km		
	WOIO	D10	DT	CP	SHAKER HEIGHTS, OH	BLANK0000035655	173.4		
	WJZ-TV	D11	DT	CP	BALTIMORE, MD	BLANK0000032917	314.7		
	WVTT-CD	D11	DC	CP	OLEAN, NY	BLANK0000033365	275.3		
	WTOL	D11	DT	LIC	TOLEDO, OH	BLCDDT20090622ABU	310.5		
	WBRE-TV	D11	DT	LIC	WILKES-BARRE, PA	BLCDDT20051123AJX	356.9		
	WVNS-TV	D11	DT	CP	LEWISBURG, WV	BLANK0000029985	308.2		
	WBOY-TV	D12	DT	LIC	CLARKSBURG, WV	BLANK0000033150	137.0		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
27695.1	3,393,365	25970.8	3,240,181	25878.4	3,233,090	25878.4	3,233,090	0.00	0.00
Undesired		Total IX		Unique IX, before		Unique IX, after			
WVFX D10 DT LIC		4.0	65			0.0	0		
WJZ-TV D11 DT CP		20.2	1,025	16.1	570	16.1	570		
WTOL D11 DT LIC		56.2	5,738	56.2	5,738	56.2	5,738		
WBRE-TV D11 DT LIC		8.0	617	4.0	162	4.0	162		
WVNS-TV D11 DT CP		8.0	101	8.0	101	8.0	101		
WBOY-TV D12 DT LIC		4.0	65	4.0	65	0.0	0		

**Table 1 WVFX TVStudy Analysis of Proposal
Post-Phase 10 Operation of WVFX on Ch. 10**
(page 5 of 5)

Interference to BLANK0000029985 CP scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance				
Desired:	WVNS-TV	D11	DT	CP	LEWISBURG, WV	BLANK0000029985					
Undesireds:	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	172.7 km				
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	154.5				
	WJZ-TV	D11	DT	CP	BALTIMORE, MD	BLANK0000032917	393.0				
	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDT20090626AAT	308.2				
	WSPA-TV	D11	DT	CP	SPARTANBURG, SC	BLANK0000081004	322.1				
	WVEC	D11	DT	LIC	HAMPTON, VA	BLANK0000113317	389.6				
	WVPT	D12	DD	CP	STAUNTON, VA	BLANK0000028448	129.6				
	WBOY-TV	D12	DT	LIC	CLARKSBURG, WV	BLANK0000003150	171.2				
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX			
38039.6	1,062,816	32987.0		748,829	32827.0		745,031	32827.0	745,031	0.00	0.00
Undesired				Total IX	Unique IX, before		Unique IX, after				
WVFX	D10	DT	LIC	12.1	0	0.0		0			
WOWK-TV	D10	DT	CP	23.7	878	19.8	858	19.8	858		
WJZ-TV	D11	DT	CP	4.0	0	4.0	0	4.0	0		
WPCW	D11	DT	LIC	72.3	264	60.3	244	56.3	244		
WSPA-TV	D11	DT	CP	48.1	2,527	48.1	2,527	48.1	2,527		
WVEC	D11	DT	LIC	4.0	136	4.0	136	4.0	136		
WVPT	D12	DD	CP	11.9	13	11.9	13	11.9	13		
WBOY-TV	D12	DT	LIC	8.0	0	0.0	0	0.0	0		

Table 2
TVStudy Analysis – Incoming Interference
WVFX on Pre-Auction Channel 10
For Operation Post-Phase 10



Study build station data: LMS TV 2020-06-22

Proposal: WVFX D10 DT LIC CLARKSBURG, WV
File number: BLCDT20090612AJY
Facility ID: 10976
Station data: LMS TV 2020-06-22
Record ID: 02a78d5386f14a44bdc2cf6212b6c0ea
Country: U.S.
Zone: I

Channel: D10
Latitude: 39 18 2.00 N (NAD83)
Longitude: 80 20 36.00 W
Height AMSL: 596.0 m
HAAT: 235.0 m
Peak ERP: 30.0 kW
Antenna: DIE-ATC-BC-8PV-10 (ID 44599) 0.0 deg
Elev Pattn: Generic

Study cell size: 2.00 km
Profile point spacing: 0.20 km

Interference to proposal scenario 1
3.42% interference received

Desired:	Call WVFX	Chan D10	Svc DT	Status LIC	City, State CLARKSBURG, WV	File Number BLCDT20090612AJY	Distance
Undesireds:	WTOV-TV	D9	DT	LIC	STEUBENVILLE, OH	BLCDT20111206ACB	118.2 km
	WVPB-TV	D9	DT	CP	HUNTINGTON, WV	BLANK0000034622	183.9
	WOIO	D10	DT	LIC	SHAKER HEIGHTS, OH	BLANK0000040178	258.7
	WHTM-TV	D10	DT	LIC	HARRISBURG, PA	BLANK0000034336	310.9
	WWBT	D10	DT	LIC	RICHMOND, VA	BLANK0000108718	317.7
	WOWK-TV	D10	DT	CP	HUNTINGTON, WV	BLANK0000034807	184.0
	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDT20090626AAT	135.5
Service area		Terrain-limited			IX-free	Percent IX	
25591.2	731,193	24124.7	647,245		23415.1	625,126	2.94 3.42
Undesired				Total IX	Unique IX	Prcnt Unique IX	
WTOV-TV D9 DT LIC		64.5	4,652		28.2	2,886	0.12 0.45
WOIO D10 DT LIC		28.1	591		12.1	246	0.05 0.04
WOWK-TV D10 DT CP		665.3	18,912		617.0	16,181	2.56 2.50
WPCW D11 DT LIC		16.1	1,482		4.0	75	0.02 0.01

WVFX will receive 2.50 percent unique interference from WOWK-TV when WOWK-TV commences operation on its reassignment Channel 10 at Phase 10. Total interference to WVFX will be 3.42 percent, which is an increase of 1.25 percent beyond total interference experienced for the pre-auction scenario (see Table 3).

Table 3
TVStudy Analysis – Incoming Interference
WVFX on Pre-Auction Channel 10
Analysis of Pre-Auction Scenario



Study build station data: LMS TV 2017-07-30 LMSTV

Proposal: WVFX D10 DT LIC CLARKSBURG, WV
File number: BLCDT20090612AJY
Facility ID: 10976
Station data: LMS TV 2017-07-12 LMSTV
Record ID: 02a78d5386f14a44bdc2cf6212b6c0ea
Country: U.S.
Zone: I

Channel: D10
Latitude: 39 18 2.00 N (NAD83)
Longitude: 80 20 36.00 W
Height AMSL: 596.0 m
HAAT: 235.0 m
Peak ERP: 30.0 kW
Antenna: DIE-ATC-BC-8PV-10 (ID 44599) 0.0 deg
Elev Pattn: Generic

Study cell size: 2.00 km
Profile point spacing: 0.20 km

Interference to proposal scenario 2
2.17% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WVFX	D10	DT	LIC	CLARKSBURG, WV	BLCDT20090612AJY	
Undesireds:	WTOV-TV	D9	DT	LIC	STEUBENVILLE, OH	BLCDT20111206ACB	118.2 km
	WOIO	D10	DT	LIC	SHAKER HEIGHTS, OH	BLANK0000040178	258.7
	WHTM-TV	D10	DT	LIC	HARRISBURG, PA	BLANK0000034336	310.9
	WSWP-TV	D10	DT	LIC	GRANDVIEW, WV	BLCDT20100210AAQ	165.9
	WPCW	D11	DT	LIC	JEANNETTE, PA	BLCDT20090626AAT	135.5
Service area		Terrain-limited		IX-free		Percent IX	
25591.2	731,193	24124.7	647,245	23731.2	633,201	1.63	2.17
Undesired		Total IX		Unique IX		Prcnt Unique IX	
WTOV-TV	D9 DT LIC	64.5	4,652	36.3	3,590	0.15	0.55
WOIO	D10 DT LIC	28.1	591	4.0	174	0.02	0.03
WSWP-TV	D10 DT LIC	345.1	10,038	300.9	8,106	1.25	1.25
WPCW	D11 DT LIC	16.1	1,482	4.0	75	0.02	0.01

This analysis considers all stations on their pre-auction channels. Total interference to WVFX was 2.17 percent for the pre-auction scenario.