

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Section 73.622,	)	MB Docket No. _____
Digital Television Table of Allotments for	)	RM- _____
Full Power Television Station Construction	)	
Permit, TV-PST29, Wittenberg, WI	)	
	)	
	)	
To: Chief, Media Bureau	)	

**AMENDED PETITION FOR RULEMAKING**

TV-49, Inc. (“TV-49”), holder of the full power television station construction permit, TV-PST29, Wittenberg, Wisconsin, hereby requests that the FCC initiate a rulemaking proceeding for the purpose of amending the DTV Table of Allotments contained in Section 73.622(j) of the Commission’s rules.<sup>1</sup> Specifically, TV-49 requests that the FCC: (1) delete Channel 31 at Wittenberg, Wisconsin and add Channel 31 at Shawano, Wisconsin; and (2) modify construction permit TV-PST29 to specify Shawano, Wisconsin as its community of license. This change will result in a more preferential arrangement of allotments by providing the significantly larger community of Shawano with its first local television service.

It bears emphasis that this community of license change would not result in any loss of *existing* service in Wittenberg, given that the construction permit for Channel 31 was only recently issued.<sup>2</sup> To the extent necessary, however, TV-49 requests that the Commission waive its policy

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<sup>1</sup> See 47 CFR §§ 1.401, 1.420(i), 73.622(j).

<sup>2</sup> See *Amendment of Section 73.202(B), Table of Allotments, FM Broadcast Stations. (Lake Havasu City, Arizona, and Laughlin, Nevada)*, Report and Order, 15 FCC Rcd 11664, 11665, para. 3 (MM June 30, 2000) (“[T]he proposed reallocation of Channel 34+ to Laughlin would

with respect to changes of communities of license when the allotment subject to change is the existing community's sole local transmission outlet.<sup>3</sup> As the Commission has noted previously, it "will entertain a request to waive its general prohibition on the removal of a community's sole first local service in the rare circumstance where such a removal might serve the public interest, for example, providing a first reception service to a significantly sized population."<sup>4</sup> Providing Shawano, the county seat and a significantly larger community than Wittenberg, with its first local television service is in fact such a rare instance where removal will serve the public interest.

## **I. Discussion**

Pursuant to Section 1.420(i) of the Commission's Rules, the Commission may modify the permit of a television broadcast station to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest.<sup>5</sup> The

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remove the only television channel allotted to Lake Havasu City. However, as Station KMCC has not commenced operation at Lake Havasu City, the reallocation proposal would not represent a loss of service to the residents of that community.") (*KMCC Community of License Change Order*); *Amendment of Section 73.606(B), Table of Allotments, Television Broadcast Stations (Farmington and Gallup, New Mexico)*, Report and Order, 11 FCC Rcd 2357, 2360, para. 19 (MM Feb. 23, 1996) ("Thus, while we are concerned with the potential loss of service which will occur with the activation of Channel 3 at Farmington and not Gallup, we believe this loss is mitigated by the fact that Station KOAV-TV is, at this time, an unconstructed station and not a service upon which the public has come to rely on.") (*KOAV Community of License Change Order*).

<sup>3</sup> See *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, MM Docket No. 88-526, Report and Order, 4 FCC Rcd 4870, 4874, para. 28 (1989) (*Change in Community of License R&O*), *recon. granted in part*, 5 FCC Rcd 7094 (1990); see also 47 CFR § 1.925.

<sup>4</sup> See *Amendment of Section 73.622(i) Post-Transition Table of DTV allotments Television Broadcast Stations (Superior and York, Nebraska)*, MB Docket No. 21-60, Report and Order, 36 FCC Rcd 12756, 12758, para. 9 (MB 2021) (*KSNB Community of License Change Order*).

<sup>5</sup> See 47 CFR § 1.420(i); see also *Amendment of Section 73.622(i), Digital Television Broadcast Stations (Bridgeport and Stamford, Connecticut)*, MB Docket No. 18-126, Notice of Proposed Rulemaking, 33 FCC Rcd 3918, 3918-19, para. 3 (MB 2018) (*WEDW Community of License Change NPRM*).

Commission has explained that it applies “this procedure in the limited circumstances in which: (1) the new allotment will be mutually exclusive with a station’s existing allotment; (2) the new allotment will result in a preferential arrangement of the allotments according to the Commission’s television allotment priorities; and (3) the new allotment will not deprive a community of its sole local transmission outlet.”<sup>6</sup> However, the Commission will consider requests to remove a community’s sole local transmission outlet in the rare circumstance where such removal would serve the public interest.<sup>7</sup> As explained below, this change would be mutually exclusive with the current allotment, would allocate the first full power television service to a community that serves as the county seat and is deserving of an allotment, and would be in the public interest as it would result in a preferential arrangement of the Commission’s allotment priorities.

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<sup>6</sup> *WEDW Community of License Change NPRM*, 33 FCC Rcd at 3919, para. 3. The Commission applies the television allotment priorities set forth in the *TV Allocation Sixth Report and Order*: (1) provide at least one television service to all parts of the United States; (2) provide each community with at least one television broadcast station; (3) provide a choice of at least two television services to all parts of the United States; (4) provide each community with at least two television broadcast stations; and (5) assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities. *Amendment of Section 3.606 of the Commission’s Rules and Regulations*, Sixth Report and Order, 41 F.C.C. 148, 167-173 (1952) (*TV Allocation Sixth Report and Order*).

<sup>7</sup> See *KSNB Community of License Change Order*, 36 FCC Rcd at 12758, para. 9; *Amendment of Section 73.622(i) Digital Television Broadcast Stations (Block Island And Newport, Rhode Island)*, MB Docket No. 18-153, Report and Order, 33 FCC Rcd 8773, 8776, para. 7 (MB 2018) (*WPXQ Community of License Change Order*).

**A. The New Allotment Is Mutually Exclusive with the Existing Allotment**

TV-49's proposal to reallocate Channel 31 from Wittenberg, Wisconsin to Shawano, Wisconsin satisfies the requirement that the amended allotment be mutually exclusive with the existing allotment.<sup>8</sup> As detailed in the Technical Exhibit prepared by consulting engineers du Treil, Lundin & Rackley, Inc. and attached as Exhibit A hereto, Channel 31 can be allotted to Shawano in compliance with the FCC's minimum distance separation requirements in Section 73.623(d) with respect to all stations and allotments with the exception of TV-49's construction permit allotted to Wittenberg.<sup>9</sup> Moreover, the same technical exhibit demonstrates that the proposed Shawano allotment site would also satisfy the requirement in Section 73.625(a) of the Commission's rules to place a 48 dBu contour over the entire principal community of license.<sup>10</sup>

**B. Shawano Is a Community Deserving of a DTV Channel Allotment**

Shawano, Wisconsin is the county seat of Shawano County, and home to 9,243 residents as of the 2020 U.S. Census.<sup>11</sup> Shawano is located on Shawano Lake about 40 miles west of Green Bay, Wisconsin and fewer than six miles south of the Menominee Indian Reservation, home to the federally recognized Menominee Indian Tribe of Wisconsin. Shawano is governed

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<sup>8</sup> 47 CFR § 1.420(i).

<sup>9</sup> See Exhibit A.

<sup>10</sup> See 47 CFR § 73.625(a); see also Exhibit A.

<sup>11</sup> See *Quick Facts, Shawano city, Wisconsin*, U.S. Census Bureau, available at <https://www.census.gov/quickfacts/fact/dashboard/shawanocitywisconsin/PST045222> (last visited Apr. 27, 2023). The city of Shawano is home to approximately 23% of the population of Shawano County, which had a total of 40,881 residents at the time of the 2020 U.S. Census. See *Quick Facts, Shawano County, Wisconsin*, U.S. Census Bureau, available at <https://www.census.gov/quickfacts/fact/dashboard/shawanocountywisconsin/PST045222> (last visited Apr. 27, 2023).

by a Mayor and a six Alderpersons, who collectively comprise the city's Common Council.<sup>12</sup>

The Shawano School District, headquartered in Shawano, operates five public schools for the children of Shawano, in addition to three religiously-affiliated private schools that also educate in Shawano.<sup>13</sup> For higher education, Northeast Wisconsin Technical College operates a Regional Learning Campus in Shawano and the College of Menominee Nation, a tribal Land Grant college chartered by the Menominee People, has its main campus is in Keshena, Wisconsin, just a few miles north of Shawano.<sup>14</sup> Shawano provides a variety of municipal services including the Shawano-Bonduel Municipal Court, the Shawano Department of Public Works, the Shawano Police Department, and Shawano Municipal Utilities, among other services.<sup>15</sup> Shawano Lake, Shawano's 23 city parks, and variety of other local attractions draw significant numbers of vacationers and visitors, particularly during the summer months.<sup>16</sup> Given the foregoing, it is clear that Shawano has the population and public services indicative of a community deserving of its own television station.

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<sup>12</sup> See City of Shawano, Common Council, <https://www.cityofshawano.com/500/Common-Council> (last visited Apr. 27, 2023).

<sup>13</sup> See Shawano School District, <https://www.shawanoschools.com/> (last visited Apr. 27, 2023); City of Shawano, Educational Opportunities, <https://www.cityofshawano.com/653/Educational-Opportunities> (last visited Apr. 27, 2023).

<sup>14</sup> See Northeast WI Technical College, NWTC Shawano, <https://www.nwtc.edu/about-nwtc/nwtc-locations/shawano> (last visited Apr. 27, 2023); College of Menominee Nation, <https://www.menominee.edu/> (last visited Apr. 27, 2023).

<sup>15</sup> See City of Shawano, Departments, <https://www.cityofshawano.com/148/Departments> (last visited Apr. 27, 2023).

<sup>16</sup> See City of Shawano, Parks & Recreation, <https://www.cityofshawano.com/200/Parks-Recreation> (last visited Apr. 27, 2023); City of Shawano, Police, <https://www.cityofshawano.com/206/Police> (last visited Apr. 27, 2023); Shawano Country, <https://www.shawanocountry.com/> (last visited Apr. 27, 2023).

**C. TV-49's Proposed Reallotment Will Result in a More Preferential Arrangement of Allotments**

The proposal to reallot Channel 31 in the Green Bay-Appleton DMA from Wittenberg, Wisconsin to Shawano, Wisconsin also satisfies the requirement that any change result in a more preferential arrangement of allotments consistent with the Commission's allotment priorities established in the *TV Allocation Sixth Report and Order*.<sup>17</sup> As this would be Shawano's first television broadcast station, it would advance the Commission's second allotment priority. Although Wittenberg would lose the first television channel allotted to it, the Commission has indicated that it will entertain such a removal where doing so would serve the public interest, "for example, [by] providing a first reception service to a significantly sized population."<sup>18</sup> Moreover, because the Wittenberg station remains unbuilt, no viewers would lose any existing service on which they have come to rely, which is one of the Commission's particular concerns in this context.<sup>19</sup>

As explained above, Shawano is home to nearly 10,000 people and is the county seat of Shawano County. By contrast, the Village of Wittenberg (which also lies within Shawano County) had a population of approximately 1,015 people as of the 2020 U.S. Census, nearly 90%

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<sup>17</sup> See *Change in Community of License R&O*, 4 FCC Rcd at 4874, para. 28.

<sup>18</sup> *KSNB Community of License Change Order*, 36 FCC Rcd at 12758, para. 9; see also *WPXQ Community of License Change Order*, 33 FCC Rcd at 8776, para. 7.

<sup>19</sup> See, e.g., *KOAV Community of License Change Order*, 11 FCC Rcd at 2360, para. 19 (explaining that: "the Commission is particularly concerned with the removal of an existing service, whether it is a transmission or reception service, or both. The Commission went on to define an existing service for purposes of this rule as a station which has been constructed. In this case, Station KOAV-TV is unbuilt and thus not operational. Therefore, there is no present service which the residents of Gallup and the surrounding area have come to rely on.").

fewer residents than the city of Shawano.<sup>20</sup> This population disparity is in line with precedent where the FCC has found the specific circumstance of a proposed community of license change justify a waiver of “the Commission's policy disfavoring the removal of a sole local service allotted to a community.”<sup>21</sup> And as noted above, because TV-49 is a permittee, it has not yet commenced operations in Wittenberg, and thus no viewers have come to rely on any existing service, which the FCC has previously found to be a mitigating factor in the context of community of license change petitions that would remove the sole channel allotted to a community.<sup>22</sup> In fact, as explained in the attached technical exhibit, six currently operating TV stations provide noise-limited contour service to 100% of the Wittenberg city limits.<sup>23</sup> On the whole, it is clear that TV-49’s proposal to change the community of license is in the public interest and a waiver of the Commission’s policy disfavoring the removal of a sole local service allotted to a community is justified.

## **II. Conclusion**

For the foregoing reasons, TV-49 respectfully requests that the Commission grant this Petition and commence a rulemaking proceeding to: (1) delete Channel 31 at Wittenberg,

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<sup>20</sup> See U.S. Census Bureau, Wittenberg village, Wisconsin, <https://data.census.gov/profile?g=160XX00US5588325> (last visited Apr. 27, 2023).

<sup>21</sup> See *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Superior and York, Nebraska)*, MB Docket No. 21-60, Notice of Proposed Rulemaking, 36 FCC Rcd 4284, 4285-86, 4288, paras. 3-4, 12 (MB 2021) (*KSNB Community of License Change NPRM*) (explaining that the population of Superior is merely a quarter of the population of York).

<sup>22</sup> See *KMCC Community of License Change Order*, 15 FCC Rcd at 11665, para. 3; *KOAV Community of License Change Order*, 11 FCC Rcd at 2360, para. 19.

<sup>23</sup> See Exhibit A; see also *WPXQ Community of License Change Order*, 33 FCC Rcd at 8775, para. 3, n.18 (“The Commission considers a community “well-served” when it is served by at least five full power over-the-air signals.”).

Wisconsin and add Channel 31 at Shawano, Wisconsin; and (2) modify construction permit TV-PST29 to specify Shawano as its community of license.

Respectfully Submitted,

**TV-49, Inc.**

By: /s/  
Matthew S. DelNero  
John Cobb

COVINGTON & BURLING LLP  
850 Tenth Street, N.W.  
Washington, D.C. 20001  
202.662.6000  
mdelnero@cov.com  
jcobb@cov.com

*Counsel for TV-49, Inc.*

September 7, 2023



TECHNICAL EXHIBIT  
AMENDMENT TO  
PETITION FOR RULE MAKING TO  
AMEND THE DTV TABLE OF ALLOTMENTS  
WITTENBERG AND SHAWANO, WISCONSIN  
DTV CHANNEL 31

Technical Narrative

The Technical Exhibit, of which this narrative is part, was prepared on behalf of TV-49, Inc. (TV-49), the permittee of an unbuilt DTV station on channel 31 at Wittenberg, Wisconsin.<sup>1</sup> TV-49 has proposed to amend the Table of DTV allotments to delete channel 31 at Wittenberg and substitute channel 31 at Shawano, Wisconsin as that community's first local television service. TV-49 has also proposed to modify TV-49's construction permit (CP) to specify Shawano as the community of license. This amendment proposes to reduce the allotment ERP from 1000 kW to 65 kW. No other changes are proposed. Therefore, in support of TV-49's amended proposal, it is demonstrated herein that DTV channel 31 is available for allotment and use at Shawano.

The instant proposal is filed pursuant to the provisions of Section 1.420(i) of the Commission's Rules which permits the modification of a station authorization to specify a new community of license without affording other interested parties an opportunity to file competing expressions of interest where the amended allotment would be mutually exclusive with the licensee's or permittee's present allotment.<sup>2</sup>

In addition, the proposal will result in a preferential arrangement of allotments because it will provide Shawano city, which has a 2020 Census population of 9,243 persons and is the ninety-ninth (99th) largest city in Wisconsin<sup>3</sup>, with its first local television service which falls within the second of the Television allotment priorities as set forth in the *Television Sixth Report and Order*.<sup>4</sup> Furthermore,

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<sup>1</sup> Construction Permit, FCC File No. 0000195584.

<sup>2</sup> See Modification of FM and TV Authorizations to Specify a New Community of License ("Change of Community R&O"), 4 FCC Rcd 4870 (1989), recon. granted in part, ("Change of Community MO&O"), 5 FCC Rcd 7094 (1990).

<sup>3</sup> See [Cities in Wisconsin by Population \(2022\) \(worldpopulationreview.com\)](https://worldpopulationreview.com/cities-in-wisconsin-by-population-2022/)

<sup>4</sup> These priorities are to: (1) provide at least one television service to all parts of the United States; (2) provide each community with at least one television broadcast station; (3) provide a choice of at least two television services to all parts of the United States; (4) provide each community with at least two television broadcast stations; and (5) assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities.

although the proposal will remove the only television channel allotted to Wittenberg village, which has a 2020 Census population of 1,015 persons and is the three hundred eighty-sixth (386<sup>th</sup>) largest city in Wisconsin<sup>5</sup>, TV-49 has not commenced its CP operation at Wittenberg and, therefore, the reallocation proposal would not represent a loss of service to the residents of Wittenberg.<sup>6</sup> Moreover, it has been determined that six (6) licensed DTV stations currently provide noise-limited contour service to 100% of the Wittenberg city limits.<sup>7</sup>

It has been determined that DTV channel 31 is available for allotment to Shawano, Wisconsin in compliance with the FCC's minimum distance separation requirements of Section 73.623(d). The geographic coordinates for the proposed DTV channel 31 allotment at Shawano are North Latitude 44-46-56 and West Longitude 88-36-32 (NAD83).<sup>8</sup> Specifically, as demonstrated by Figure 1, DTV channel 31 can be allotted to Shawano in compliance with the FCC's minimum distance separation requirements of Section 73.623(d) with respect to all stations and allotments with the exception of TV-49's channel 31 CP operation. As noted on Figure 1, the short-spacing between the channel 31 allotment site at Shawano and TV-49's channel 31 CP site establishes mutual exclusivity as required by Section 1.420(i).

Furthermore, as demonstrated by the map included as Figure 2, a UHF DTV channel 31 facility operating from the Shawano allotment site (located in TV Zone II) utilizing an ATC model ATC-BCH489CF-31 directional antenna (DA, FCC Antenna ID 1009821) with a maximum ERP of 65 kW, an HAAT 168 meters and an RCAMSL 428.8 meters, would provide the requisite 48 dBu, f(50,90) principal community coverage to 100% of the Shawano city limits as required by Section 73.625(a). The location of the 48 dBu, f(50,90) contour was based on consideration of actual terrain (using a 1-second terrain database and 72 equally spaced radials) as well

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<sup>5</sup> See [Cities in Wisconsin by Population \(2022\)](https://worldpopulationreview.com/cities-in-wisconsin/) ([worldpopulationreview.com](https://worldpopulationreview.com))

<sup>6</sup> See Report and Order in MM Docket No. 99-114, FM 8902, DA 00-1448 (June 2000), Amendment of Section 73.202(b), Table of Allotments, TV Broadcast Stations and Amendment of Section 73.622(b), DTV Table of Allotments, Lake Havasu City, Arizona and Laughlin, Nevada at paragraph 3 ("as Station KMCC has not commenced operation at Lake Havasu City, the reallocation proposal would not represent a loss of service to the residents of that community.").

<sup>7</sup> The 6 stations providing service are: WSAW-TV, Ch. 7, Wausau, WI; WAOW, Ch. 9, Wausau, WI; WBAY-TV, Ch. 23, Green Bay, WI; WHRM-TV, Ch. 24, Wausau, WI; WJFW-TV, Ch. 16, Rhinelander, WI; and WTPX-TV, Ch. 19 Antigo, WI.

<sup>8</sup> The reference point coordinates are those listed for Shawano, Wisconsin in the Geographic Names and Information System (GNIS) database.

as presuming uniform terrain. The Shawano city limits are based on 2020 US Census data.

In addition, as demonstrated by the *TVStudy* analysis exhibit attached as Figure 3, the proposed channel 31 UHF allotment facility complies with the FCC's interference protection requirements to all pertinent stations (including Class A). As also indicated, the proposal will provide interference-free service to 378,419 persons (2010 Census) within the noise-limited service contour [40.4 dBu, f(50,90)]. The *TVStudy* analysis utilized a cell size of 1 km and profile resolution of 0.1 point/km.

Finally, the proposed maximum UHF DTV channel 31 facility operating from the Shawano allotment site will not adversely impact any authorized LPTV stations.

#### Summary

Therefore, it is respectfully requested that the FCC amend the DTV Table of Allotments, Section 73.622(i) of the FCC's rules as follows:

City and State	Channel No.	
	Present	Amended
Shawano, Wisconsin	-	31
Wittenberg, Wisconsin	31	-

The attached technical statement has been prepared by or under the direct supervision of W. Jeffrey Reynolds with the firm of du Treil, Lundin and Rackley, Inc., a telecommunications consulting firm located in Sarasota, Florida, who states that his qualifications are a matter of record with the Federal Communications

Commission, having been presented on previous occasions. All data and statements contained herein are true and correct to the best of his knowledge and belief.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.  
5212 Station Way  
Sarasota, Florida 34233  
941-329-6013

August 28, 2023

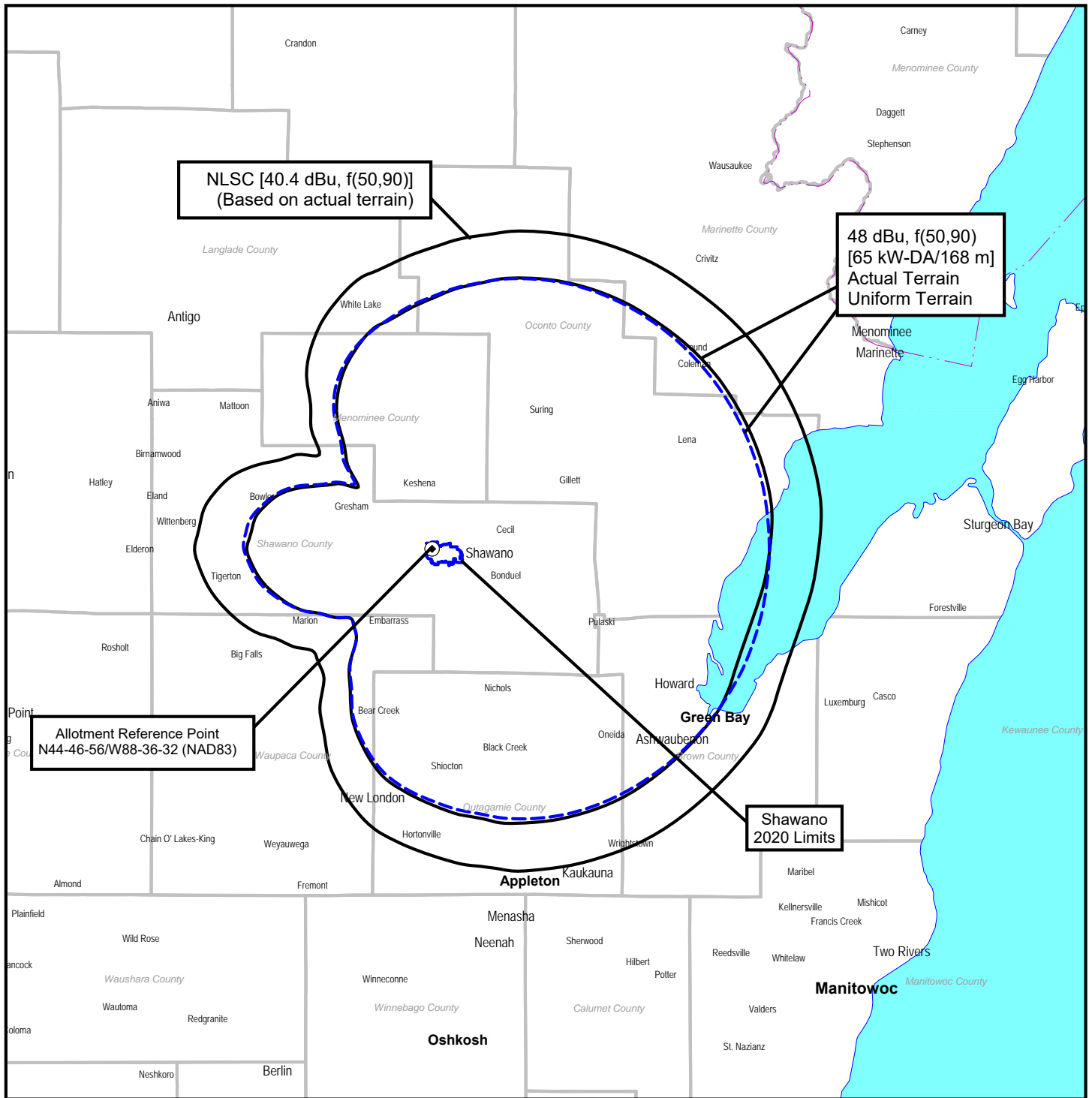
**DTV Channel 31 Separation Study**  
**Shawano, Wisconsin Allotment Reference Point**

**Type:** DT      **Zone:** II      **Date:** 05/01/2023  
**Channel:** 31      **Coordinates:** 044-46-56 088-36-32 (NAD 83)      **Page:** 1 of 1  
**Class:** EX      **Buffer Distance:** 50 km

Callsign	Status	Chan.	Serv.	Zone	City		State	Latitude	Dist.(km)	Min.(km)	Spacing(km)	
Fac. ID	ARN			Class	DA	Ant. ID	ERP(kW)	HAAT(m)	Longitude	Bear.(deg)	Max.(km)	Comment
776266	CP	31	DT	2	WITTENBERG		WI	044-49-06	33.8	223.7	-189.9	
	BLANK	0000195584			D	1009821	17	96	089-01-58.7	276.99	223.7	<b>SHORT<sup>1</sup></b>
<b>WVCY-TV</b>	CP	31	DT	1	MILWAUKEE		WI	043-05-26	196.45	196.3	0.15	
72342	BLANK	0000087194			D	1002299	1000	316	087-53-50.3	162.9	196.3	<b>CLOSE</b>
<b>WITI</b>	CP	31	DT	1	MILWAUKEE		WI	043-05-26	196.46	196.3	0.16	
73107	BLANK	0000086971			D	1002299	1000	316	087-53-49.7	162.9	196.3	<b>CLOSE</b>

<sup>1</sup> This short-spacing with the TV-49 channel 31 CP establishes the required mutual exclusivity pursuant to Section 1.420(i).

Figure 2



## COMPLIANCE WITH SECTION 73.625(a)

DTV CHANNEL 31  
SHAWANO, WISCONSIN  
ERP 65 KW-DA HAAT 168 M DA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

TVSTUDY ANALYSIS FOR SHAWANO, WISCONSIN  
HYPOTHETICAL CHANNEL 31 ALLOTMENT FACILITY

tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: Allot D31 Shawano G 65KW, Model: Longley-Rice

Start: 2023.08.25 15:28:12

Study created: 2023.08.25 15:28:12

Study build station data: LMS TV 2023-08-24 #264

Proposal: NEW D31 DT APP WITTENBERG, WI

File number: Allot D31 Shawano G 65KW

Facility ID: 776266

Station data: User record

Record ID: 525

Country: U.S.

Individual records excluded:

776266 NEW D31 DT BL WITTENBERG, WI DTVBL776266

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	WPXE-TV	D30	DT	LIC	KENOSHA, WI	BLANK0000087614	196.5 km
No	WQAD-TV	D31	DT	LIC	MOLINE, IL	BLANK0000120809	411.6
No	WNIT	D31	DT	LIC	SOUTH BEND, IN	BLANK0000215059	403.0
No	WMKG-CD	D31	DC	LIC	MUSKEGON, MI	BLANK0000107817	262.0
No	WRPT	D31	DT	LIC	HIBBING, MN	BLEDT20090603AAY	442.3
No	KARE	D31	DT	LIC	MINNEAPOLIS, MN	BLANK0000218442	357.9
Yes	WITI	D31	DT	LIC	MILWAUKEE, WI	BLANK0000086971	196.5
No	WFQX-TV	D32	DT	LIC	CADILLAC, MI	BLCDT20091217ACU	268.9
No	WFQX-TV	D32	DT	CP	CADILLAC, MI	BLANK0000035809	268.9
No	WJMN-TV	D32	DT	LIC	ESCANABA, MI	BLANK0000063727	198.4
No	WTMJ-TV	D32	DT	LIC	MILWAUKEE, WI	BLANK0000086939	196.3

No non-directional AM stations found within 0.8 km

Directional AM stations within 3.2 km:

WTCH 960 L DAN D SHAWANO, WI BML20031105AJL

WTCH 960 L DAN N SHAWANO, WI BML20031105AJL

Record parameters as studied:

Channel: D31  
Latitude: 44 46 56.00 N (NAD83)  
Longitude: 88 36 32.00 W  
Height AMSL: 428.8 m  
HAAT: 168.0 m  
Peak ERP: 65.0 kW  
Antenna: ATC-ATC-BCH48CF-31 (ID 1009821) 90.0 deg  
Elev Pattn: Generic

40.4 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	3.26 kW	163.6 m	52.1 km
45.0	31.4	174.1	63.7
90.0	65.0	168.2	66.8
135.0	30.9	174.4	63.7
180.0	3.23	179.4	53.1
225.0	0.026	168.2	27.9
270.0	0.385	159.6	41.1
315.0	0.044	153.1	29.5

Proposal 25.42 dBu contour does not cross Canadian border

Distance to Canadian border: 359.1 km

Distance to Mexican border: 2010.4 km

Conditions at FCC monitoring station: Allegan MI

Bearing: 137.7 degrees Distance: 322.5 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 255.1 degrees Distance: 1453.1 km

Study cell size: 1.00 km  
Profile point spacing: 0.10 km

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

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Interference to BLANK0000086971 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	WITI	D31	DT	LIC	MILWAUKEE, WI	BLANK0000086971	
Undesireds:	NEW	D31	DT	APP	WITTENBERG, WI	Allot D31 Shawano G 65	196.5 km
	WQAD-TV	D31	DT	LIC	MOLINE, IL	BLANK0000120809	284.3
	WNIT	D31	DT	LIC	SOUTH BEND, IN	BLANK0000215059	215.9
	WMKG-CD	D31	DC	LIC	MUSKEGON, MI	BLANK0000107817	137.0
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	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	26841.9	3,111,623	26529.4	3,080,388	26073.6	3,058,704	25934.0 3,043,693 0.54 0.49
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Undesired				Total IX	Unique IX, before	Unique IX, after	
NEW D31 DT APP			142.7	15,145		139.6	15,011
WQAD-TV D31 DT LIC			449.7	21,543	436.6	18,473	436.6 18,473
WNIT D31 DT LIC			13.1	2,894	4.0	137	1.0 3
WMKG-CD D31 DC LIC			8.1	338	1.0	4	1.0 4

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Interference to proposal scenario 1  
6.41% interference received

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	NEW	D31	DT	APP	WITTENBERG, WI	Allot D31 Shawano G 65	
Undesireds:	WITI	D31	DT	LIC	MILWAUKEE, WI	BLANK0000086971	196.5 km
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	Service area		Terrain-limited		IX-free	Percent IX	
	8541.5	404,477	8518.4	404,341	8236.7	378,419	3.31 6.41
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Undesired				Total IX	Unique IX	Prcnt Unique IX	
WITI D31 DT LIC			281.7	25,922	281.7	25,922	3.31 6.41