



**STATEMENT OF JOHN E. HIDLE, P.E.
IN SUPPORT OF AN APPLICATION FOR
A MINOR MODIFICATION OF A
POST REPACK CONSTRUCTION PERMIT
FILE # 0000025126
WRLH-TV - RICHMOND, VIRGINIA
DTV - CH. 24 - 1000 kW - 328 m HAAT**

Prepared for: WRLH LICENSEE, LLC

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 Licensed Professional Engineer in the Commonwealth of Virginia, License No. 7418, and in the State of New York, License No. 63418.

GENERAL

This office has been authorized by WRLH LICENSEE, LLC, licensee of WRLH-TV, channel 26, facility ID number 412, licensed to Richmond, Virginia, to prepare this statement, FCC Form 2100, Schedule A, its technical sections, and the associated exhibits in support of an application for a minor modification of its post-reassignment construction permit, File # 0000025126, that authorizes WRLH-TV to use channel 24 for its post-reassignment broadcasting. The instant application for modification proposes only to increase WRLH-TV's ERP to 1000 kW.

NON-DIRECTIONAL ANTENNA

The applicant will continue to use its existing authorized shared Dielectric model TUD-O5-14/70H-1-B horizontally polarized omni-directional transmitting antenna with its center of radiation located at a height above ground of 284.8 meters, and a height above average terrain of 328 meters. The existing antenna is currently shared with WRIC-TV, new channel 28, licensed to Petersburg, and WCVW, new channel 29, licensed to Richmond, both Virginia. The antenna manufacturer's vertical plane elevation radiation pattern, illustrating the antenna's radiation characteristics above and below the horizontal plane is shown in Exhibit 2 and tabulated in Exhibit 3.

PREDICTED COVERAGE CONTOURS

The predicted coverage contours were calculated in accordance with the method described in Section 73.625(b) of the Rules, utilizing the appropriate F(50,90) propagation curves (47 CFR Section 73.699, Figure 9), proposed Effective Radiated 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 NED Three Second US Terrain Database as permitted in the FCC Rules. The antenna site elevation and coordinates were determined from FCC antenna registration data. Exhibit 1 shows the predicted Noise Limited (39.76 dBu) contour, and the principal community (48 dBu) contour. The 48 dBu contour completely encompasses the principal community of license, Richmond, Virginia.

ALLOCATION CONSIDERATIONS

Post-Transition DTV Considerations

A study was performed, using the FCC's software, tv_study, v. 2.2.3, to determine if the instant application for construction permit is predicted to cause new prohibited interference to post reassignment DTV stations, construction permits, DTV allotments or Class A DTV stations. The study results, shown in Appendix B, indicate that the instant application for construction permit is predicted to cause no new interference exceeding 0.5% to the populations served by any post reassignment DTV station, construction permit, allotment or Class A DTV stations. (See Appendix B)

International DTV Considerations

The WRLH-TV site is located more than 500 kilometers from the nearest points on either the US-Canadian border or the US-Mexican border, therefore no international coordination is necessary.

BLANKETING AND INTERMODULATION INTERFERENCE

Other broadcast and non-broadcast facilities are either co-located with, or located within 10 km of the proposed WRLH-TV site. The applicant does recognize its responsibility to remedy complaints of interference that might result from this proposal in accordance with applicable Rules.

RADIO_FREQUENCY IMPACT

The FCC's guidelines and procedures for evaluating environmental effects of radio frequency (RF) emissions are generally based on recommendations by the National

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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 define a maximum permissible exposure (MPE) level for occupational or “controlled” situations, and for “uncontrolled” environments that apply in all other cases that might 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 to determine whether FCC-regulated transmitting facilities, operations or devices comply with guidelines for human exposure to radio frequency electromagnetic fields as adopted by the Commission in 1996. OET Bulletin No. 65 contains the technical information necessary to evaluate compliance with the FCC’s policies and guidelines.

The Maximum Permitted Exposure (MPE) level for broadcast facilities that operate on a frequency between 30 MHz and 300 MHz is 200 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) for an “uncontrolled” environment, and is 1,000 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) for a “controlled” environment. The MPE level for broadcast facilities that operate on a frequency between 300 MHz and 1500 MHz, primarily UHF TV stations, is determined for an “uncontrolled” environment by dividing the operating frequency in MHz by 1.5, and is similarly determined for a “controlled” environment by dividing the operating frequency in MHz by 0.3.

The predicted emissions of WRLH-TV must be considered, in addition to predicted emissions from any other proposed or existing stations at the site. For WRLH-TV, which

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will operate on television Channel 24 (530-536 MHz), the MPE is 355.3 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) in an "uncontrolled" environment and 1,776.7 $\mu\text{W}/\text{cm}^2$ in a "controlled" environment. The proposed WRLH-TV facility will operate with a maximum ERP of 1000 kW from an horizontally polarized non-directional transmitting antenna with a centerline height of 284.8 meters above ground level (AGL). Considering a predicted vertical plane relative field factor of 0.300 the WRLH-TV facility is predicted to produce a power density at two meters above ground level of 37.597 $\mu\text{W}/\text{cm}^2$, which is 10.58% of the FCC guideline value for an "uncontrolled" environment, and 2.12% of the FCC's guideline value for "controlled" environments. There are four other full-power DTV station, six LPTV stations and three FM stations that are located at the WRLH-TV site. The total estimated percentage of the ANSI value at the proposed site, including the cumulative radiation from all authorizations located within the relevant proximity, is 43.11% of the limit applicable to "uncontrolled" environments, and 8.62% of the limit for "controlled" environments. (See Appendix A)

OCCUPATIONAL SAFETY

The licensee of WRLH-TV is committed to the protection of station personnel and/or tower contractors working in the vicinity of the WRLH-TV antenna, and is committed to reducing power or ceasing operation during times of maintenance of the transmission systems, when necessary, to ensure protection to personnel.


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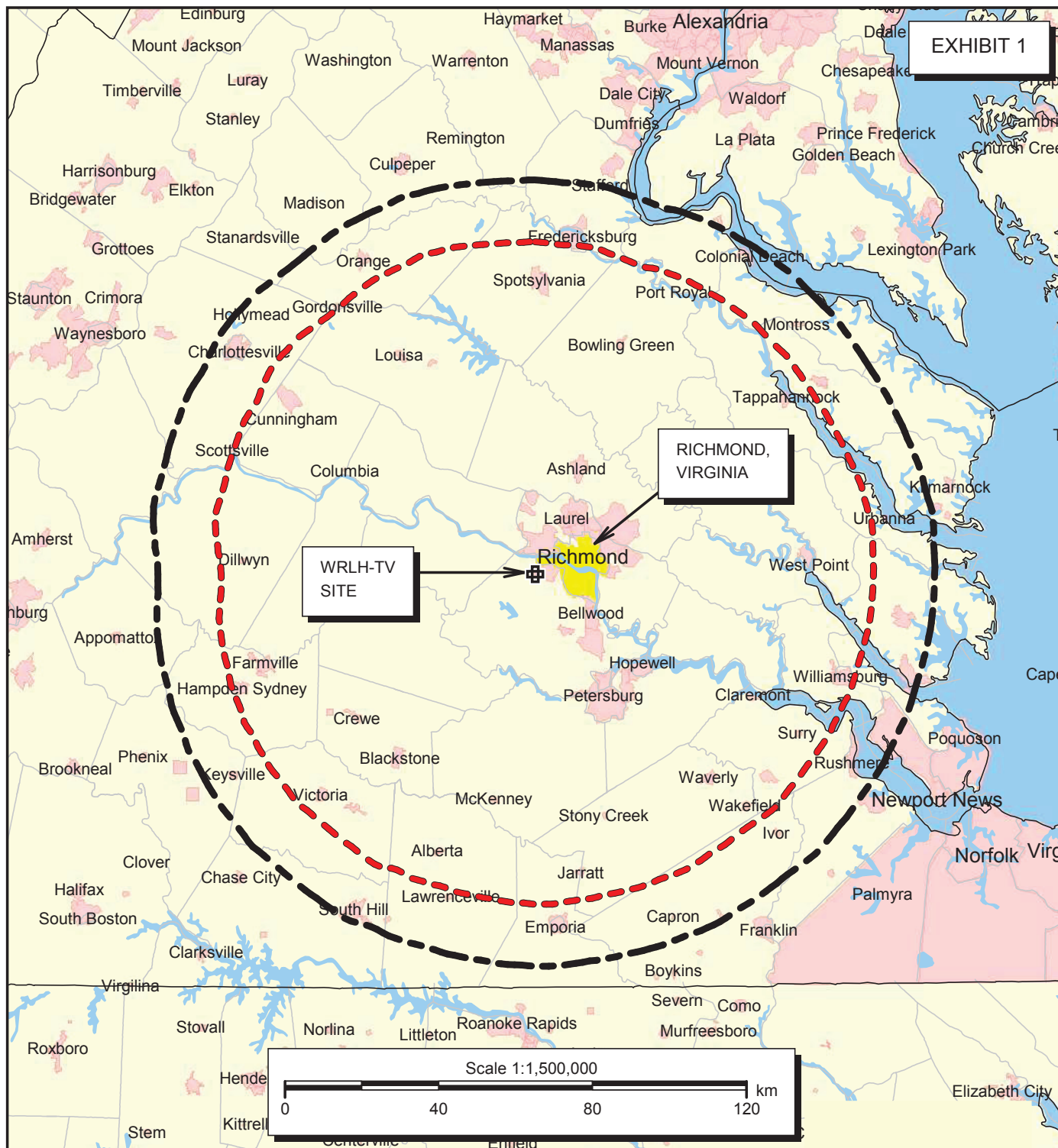
SUMMARY

It is submitted that the instant application for minor modification of its post-reassignment channel 24 construction permit to increase WRLH-TV's ERP to 1000 kW, as described herein, complies with the Rules, Regulations and relevant Policies of the Federal Communications Commission. This statement, FCC Form 2100, its technical sections, 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: October 12, 2017


John E. Hidle, P.E.





PREDICTED COVERAGE CONTOURS

WRLH-TV - RICHMOND, VIRGINIA
DTV Channel 24 - 1000 kW ERP - 327.7 M HAAT
OCTOBER, 2017

Predicted Noise Limited 39.76 dBu
F(50,90) Coverage Contour

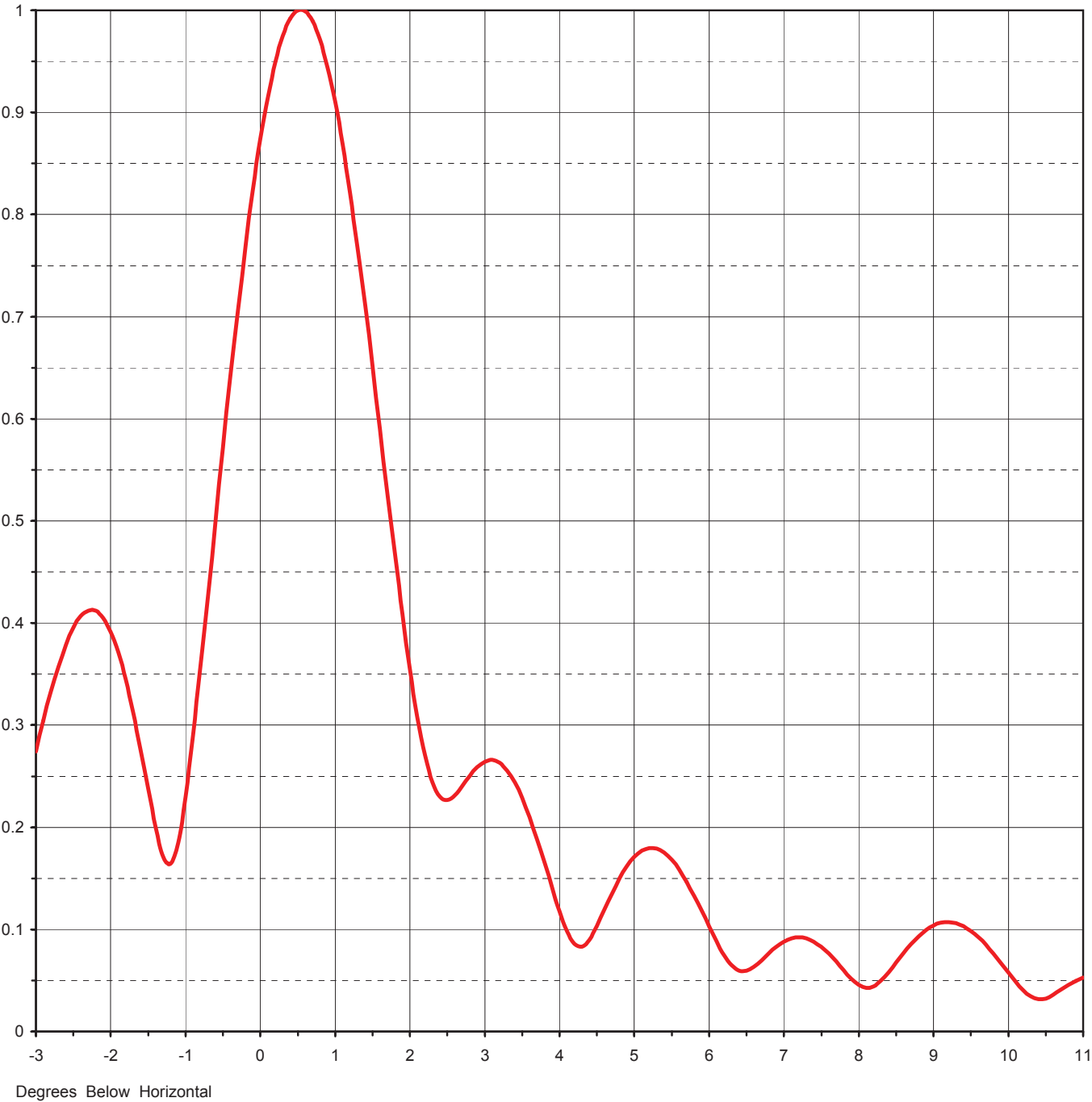


Predicted Principal Community 48 dBu
F(50,90) Coverage Contour

Proposal Number	DCA-9505		
Date	31-Jul-01		
Call Letters	WRLH-DT	Channel	26
Location	Richmond, VA		
Customer			
Antenna Type	TUD-O5-14/70H-1-B		

ELEVATION PATTERN

RMS Gain at Main Lobe	26.70 (14.27 dB)	Beam Tilt	0.50 deg
RMS Gain at Horizontal	20.40 (13.10 dB)	Frequency	545.00 MHz
Calculated / Measured	Calculated	Drawing #	14U267050-545B



Proposal Number **DCA-9505**Date **31-Jul-01**Call Letters **WRLH-DT** Channel **26**Location **Richmond, VA**

Customer

Antenna Type **TUD-O5-14/70H-1-B****TABULATION OF ELEVATION PATTERN**Elevation Pattern Drawing #: **14U267050-545B-90**

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.090	2.4	0.230	10.6	0.032	30.5	0.043	51.0	0.028	71.5	0.109
-9.5	0.059	2.6	0.231	10.8	0.041	31.0	0.023	51.5	0.023	72.0	0.115
-9.0	0.037	2.8	0.250	11.0	0.050	31.5	0.020	52.0	0.015	72.5	0.119
-8.5	0.059	3.0	0.264	11.5	0.053	32.0	0.023	52.5	0.011	73.0	0.119
-8.0	0.056	3.2	0.263	12.0	0.031	32.5	0.021	53.0	0.014	73.5	0.117
-7.5	0.045	3.4	0.244	12.5	0.043	33.0	0.013	53.5	0.017	74.0	0.113
-7.0	0.098	3.6	0.210	13.0	0.072	33.5	0.009	54.0	0.017	74.5	0.108
-6.5	0.148	3.8	0.165	13.5	0.075	34.0	0.016	54.5	0.014	75.0	0.101
-6.0	0.147	4.0	0.118	14.0	0.050	34.5	0.022	55.0	0.012	75.5	0.094
-5.5	0.094	4.2	0.086	14.5	0.024	35.0	0.021	55.5	0.017	76.0	0.085
-5.0	0.054	4.4	0.090	15.0	0.035	35.5	0.015	56.0	0.026	76.5	0.077
-4.5	0.079	4.6	0.119	15.5	0.038	36.0	0.009	56.5	0.034	77.0	0.069
-4.0	0.066	4.8	0.150	16.0	0.023	36.5	0.013	57.0	0.038	77.5	0.060
-3.5	0.119	5.0	0.171	16.5	0.034	37.0	0.016	57.5	0.038	78.0	0.053
-3.0	0.274	5.2	0.180	17.0	0.057	37.5	0.014	58.0	0.034	78.5	0.046
-2.8	0.333	5.4	0.175	17.5	0.061	38.0	0.009	58.5	0.027	79.0	0.040
-2.6	0.379	5.6	0.159	18.0	0.043	38.5	0.013	59.0	0.018	79.5	0.034
-2.4	0.407	5.8	0.133	18.5	0.022	39.0	0.021	59.5	0.013	80.0	0.029
-2.2	0.412	6.0	0.103	19.0	0.028	39.5	0.025	60.0	0.014	80.5	0.025
-2.0	0.391	6.2	0.075	19.5	0.032	40.0	0.023	60.5	0.017	81.0	0.022
-1.8	0.345	6.4	0.060	20.0	0.022	40.5	0.015	61.0	0.017	81.5	0.019
-1.6	0.276	6.6	0.063	20.5	0.030	41.0	0.009	61.5	0.015	82.0	0.018
-1.4	0.200	6.8	0.077	21.0	0.054	41.5	0.012	62.0	0.013	82.5	0.016
-1.2	0.164	7.0	0.088	21.5	0.063	42.0	0.016	62.5	0.017	83.0	0.016
-1.0	0.230	7.2	0.092	22.0	0.052	42.5	0.015	63.0	0.028	83.5	0.015
-0.8	0.357	7.4	0.088	22.5	0.028	43.0	0.010	63.5	0.041	84.0	0.015
-0.6	0.500	7.6	0.076	23.0	0.019	43.5	0.011	64.0	0.054	84.5	0.015
-0.4	0.641	7.8	0.060	23.5	0.024	44.0	0.019	64.5	0.065	85.0	0.015
-0.2	0.769	8.0	0.046	24.0	0.018	44.5	0.026	65.0	0.071	85.5	0.014
0.0	0.873	8.2	0.044	24.5	0.027	45.0	0.027	65.5	0.073	86.0	0.014
0.2	0.949	8.4	0.058	25.0	0.057	45.5	0.022	66.0	0.069	86.5	0.014
0.4	0.992	8.6	0.077	25.5	0.079	46.0	0.014	66.5	0.062	87.0	0.014
0.6	0.999	8.8	0.093	26.0	0.080	46.5	0.009	67.0	0.050	87.5	0.013
0.8	0.971	9.0	0.104	26.5	0.058	47.0	0.013	67.5	0.037	88.0	0.013
1.0	0.910	9.2	0.107	27.0	0.027	47.5	0.016	68.0	0.027	88.5	0.013
1.2	0.821	9.4	0.103	27.5	0.048	48.0	0.015	68.5	0.027	89.0	0.013
1.4	0.711	9.6	0.092	28.0	0.086	48.5	0.011	69.0	0.040	89.5	0.012
1.6	0.590	9.8	0.085	28.5	0.108	49.0	0.010	69.5	0.056	90.0	0.012
1.8	0.467	10.0	0.067	29.0	0.109	49.5	0.018	70.0	0.072		
2.0	0.355	10.2	0.049	29.5	0.095	50.0	0.026	70.5	0.087		
2.2	0.271	10.4	0.034	30.0	0.069	50.5	0.030	71.0	0.099		

SUMMARY OF RADIOFREQUENCY RADIATION STUDY

WRLH-TV, Richmond, VA
Channel 24, 1000 kW, 327.7m HAAT
October, 2017

<u>CALL</u>	<u>SERVICE</u>	<u>CHANNEL</u>	<u>FREQUENCY</u>	<u>POLAR- IZATION</u>	<u>ANTENNA HEIGHT</u>	<u>ERP (kW)</u>	<u>VERT. RELATIVE FIELD FACTOR</u>	<u>WORST-CASE PREDICTED POWER DENSITY ($\mu\text{W}/\text{cm}^2$)</u>	<u>FCC UNCONTROLLED LIMIT ($\mu\text{W}/\text{cm}^2$)</u>	<u>PERCENT OF UNCONTROLLED LIMIT</u>
WRLH-TV	DT	24	533	H	284.8	1000.000	0.300	37.597	355.33	10.58%
WXOB-LP (CP)	DT	17	491	H	266.7	150.000	0.300	6.437	327.33	1.97%
WRIC-TV	DT	28	557	H	284.7	971.000	0.300	36.533	371.33	9.84%
WTVR-TV	DT	23	527	H	303.3	392.000	0.300	12.984	351.33	3.70%
WWBK-LD (CP)	DT	28	557	H	220	15.000	0.300	0.949	371.33	0.26%
WUDJ-LD (APP)	DT	35	599	H	220	15.000	0.300	0.949	399.33	0.24%
WFWG-LD (APP)	DT	38	617	H	220	15.000	0.300	0.949	411.33	0.23%
WCVE-TV	DT	22	521	H	303.3	106.000	0.300	3.511	347.33	1.01%
WCVW	DT	29	563	H	285	83.300	0.300	3.127	375.33	0.83%
WZTD-LD	DT	45	659	H	150.9	15.000	0.300	2.034	439.33	0.46%
WRID-LD	DT	48	677	H	303	15.000	0.300	0.498	451.33	0.11%
W203CB	FM	203	88.5	H & V	116	0.008	1.000	0.041	200.00	0.02%
WCVE-FM	FM	205	88.9	H & V	258	10.000	1.000	10.196	200.00	5.10%
WBTJ	FM	293	106.5	H & V	237	14.500	1.000	17.544	200.00	8.77%
TOTAL PERCENTAGE OF FCC GUIDELINE VALUE =										43.11%

* For television stations a very conservative vertical relative field factor of 0.3 was assumed pursuant to OET Bulletin 65.



WRLH-TV - RICHMOND, VIRGINIA Longley-Rice Interference Analysis

tvstudy v2.2.3 (DAezul)

Database: localhost, Study: WRLH-CP-NOND-1000kW-CPXBL, Model: Longley-Rice
Start: 2017.10.10 14:55:40

Study created: 2017.10.10 14:55:04

Study build station data: LMS TV 2017-10-02 (15)

Proposal: WRLH-TV D24 DT CP RICHMOND, VA
File number: WRLH-CP-NOND-1000kW
Facility ID: 412
Station data: User record
Record ID: 807
Country: U.S.
Zone: I

Search options:

Non-U.S. records included

Stations affected by proposal:

Call	Chan	Svc	Status	City, State	File Number	Distance
WTVR-TV	D23	DT	CP	RICHMOND, VA	BLANK0000024885	0.0 km
WDPB	D24	DT	CP	SEAFORD, DE	BLANK0000026250	215.4
WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	399.7
WUBX-CD	D24	DC	CP	DURHAM, ETC., NC	BLANK0000025139	197.6
WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000028396	347.1
WVAH-TV	D24	DT	CP	CHARLESTON, WV	BLANK0000027764	389.9

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D24
Latitude: 37 30 45.60 N (NAD83)
Longitude: 77 36 4.80 W
Height AMSL: 393.9 m
HAAT: 327.7 m
Peak ERP: 1000 kW
Antenna: Omnidirectional
Elev Pattn: Generic
Elec Tilt: 0.50

39.8 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	1000 kW	333.3 m	102.7 km
45.0	1000	329.0	102.3
90.0	1000	342.7	103.6
135.0	1000	335.5	102.9
180.0	1000	325.6	102.0
225.0	1000	324.4	101.9
270.0	1000	291.0	98.4
315.0	1000	336.4	103.0

Database HAAT does not agree with computed HAAT

Database HAAT: 328 m Computed HAAT: 327 m

**Proposal service area extends beyond baseline plus 1.0%
Proposal service area population is more than 95.0% of baseline

Appendix B - Interference Analysis **WRLH-TV - Richmond, Virginia** **Channel 24 - 1000 kW - Page 2**

Distance to Canadian border: 582.1 km

Distance to Mexican border: 2224.3 km

Conditions at FCC monitoring station: Laurel MD
 Bearing: 20.1 degrees Distance: 195.9 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
 Bearing: 285.6 degrees Distance: 2399.9 km

Study cell size: 2.00 km
 Profile point spacing: 1.00 km

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

----- Interference to BLANK0000024885 CP, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTVR-TV	D23	DT	CP	RICHMOND, VA	BLANK0000024885	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	0.0 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	0.0
	WDVM-TV	D23	DT	CP	HAGERSTOWN, MD	BLANK0000027603	241.0
	WMJF-CD	D23	DC	APP	TOWSON, MD	BLANK0000029914	227.4
	WNJS	D23	DT	CP	CAMDEN, NJ	BLANK0000026717	343.4
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
28935.6 1,808,516		28693.6 1,802,164		28511.0 1,787,216		28518.9 1,787,261	-0.03 -0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WRLH-TV D24 DT BL		8.0 45		8.0 45			
WRLH-TV D24 DT CP		0.0 0				0.0 0	
WDVM-TV D23 DT CP		170.6 14,903		150.8 5,900		150.8 5,900	
WMJF-CD D23 DC APP		19.9 8,812		4.0 0		4.0 0	
WNJS D23 DT CP		12.0 1,527		0.0 0		0.0 0	

----- Interference to BLANK0000024885 CP, scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WTVR-TV	D23	DT	CP	RICHMOND, VA	BLANK0000024885	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	0.0 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	0.0
	WDVM-TV	D23	DT	CP	HAGERSTOWN, MD	BLANK0000027603	241.0
	WNJS	D23	DT	CP	CAMDEN, NJ	BLANK0000026717	343.4
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
28935.6 1,808,516		28693.6 1,802,164		28515.0 1,787,216		28523.0 1,787,261	-0.03 -0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WRLH-TV D24 DT BL		8.0 45		8.0 45			
WRLH-TV D24 DT CP		0.0 0				0.0 0	
WDVM-TV D23 DT CP		170.6 14,903		158.7 13,376		158.7 13,376	
WNJS D23 DT CP		12.0 1,527		0.0 0		0.0 0	

----- Interference to BLANK0000026250 CP, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WDPB	D24	DT	CP	SEAFORD, DE	BLANK0000026250	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	215.4 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	215.4

Appendix B - Interference Analysis
WRLH-TV - Richmond, Virginia
Channel 24 - 1000 kW - Page 3

WMJF-CD	D23	DC	APP	TOWSON, MD	BLANK0000029914	119.4			
WNUV	D25	DT	CP	BALTIMORE, MD	BLANK0000027773	117.4			
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX		
11523.9	594,332	11523.9	594,332	11511.9	594,315	11511.9	594,315	0.00	0.00
Undesired			Total IX	Unique IX, before		Unique IX, after			
WRLH-TV	D24	DT	BL	0.0	0	0.0	0		
WRLH-TV	D24	DT	CP	4.0	17	0.0	0		
WNUV	D25	DT	CP	12.0	17	12.0	17	8.0	0

Interference to BLANK0000028033 CP, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	399.7 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	399.7
	WBTW	D23	DT	LIC	CHARLOTTE, NC	BLCDT19991025AEB	2.4
	WGTA	D24	DT	LIC	TOCCOA, GA	BLANK0000001315	216.5
	WWAY	D24	DT	CP	WILMINGTON, NC	BLANK0000026634	304.1
	WETP-TV	D24	DT	APP	SNEEDVILLE, TN	BLANK0000029748	214.4
	WJZY	D25	DT	CP	BELMONT, NC	BLANK0000027835	2.2
	WZRB	D25	DT	CP	COLUMBIA, SC	BLANK0000027452	145.7
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
39311.4	3,822,849	37751.6	3,747,738	36451.3	3,675,669	36447.3 3,675,659	0.01 0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WRLH-TV D24 DT BL		16.1	1,717	0.0	0		
WRLH-TV D24 DT CP		28.1	2,549			4.0 10	
WBTW D23 DT LIC		512.5	37,353	327.6	25,839	327.6 25,839	
WGTA D24 DT LIC		35.8	508	15.9	475	15.9 475	
WWAY D24 DT CP		396.1	13,707	363.9	11,334	359.9 10,542	
WETP-TV D24 DT APP		131.9	5,929	95.9	5,102	91.9 5,072	
WJZY D25 DT CP		440.9	26,801	256.0	15,287	256.0 15,287	
WZRB D25 DT CP		8.0	130	4.0	112	4.0 112	

Interference to BLANK0000028033 CP, scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	399.7 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	399.7
	WBTW	D23	DT	LIC	CHARLOTTE, NC	BLCDT19991025AEB	2.4
	WGTA	D24	DT	LIC	TOCCOA, GA	BLANK0000001315	216.5
	WWAY	D24	DT	CP	WILMINGTON, NC	BLANK0000026634	304.1
	WETP-TV	D24	DT	BL	SNEEDVILLE, TN	DTVBL18252	214.4
	WJZY	D25	DT	CP	BELMONT, NC	BLANK0000027835	2.2
	WZRB	D25	DT	CP	COLUMBIA, SC	BLANK0000027452	145.7
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
39311.4	3,822,849	37751.6	3,747,738	36547.3	3,680,771	36539.2 3,680,731	0.02 0.00
Undesired		Total IX		Unique IX, before		Unique IX, after	
WRLH-TV D24 DT BL		16.1	1,717	0.0	0		
WRLH-TV D24 DT CP		28.1	2,549			8.1 40	
WBTW D23 DT LIC		512.5	37,353	327.6	25,839	327.6 25,839	
WGTA D24 DT LIC		35.8	508	19.9	475	19.9 475	
WWAY D24 DT CP		396.1	13,707	376.0	11,972	372.0 11,180	
WETP-TV D24 DT BL		15.9	33	0.0	0	0.0 0	
WJZY D25 DT CP		440.9	26,801	256.0	15,287	256.0 15,287	
WZRB D25 DT CP		8.0	130	4.0	112	4.0 112	

Appendix B - Interference Analysis **WRLH-TV - Richmond, Virginia** **Channel 24 - 1000 kW - Page 4**

Interference to BLANK0000025139 CP, scenario 1

Desired:	Call WUBX-CD	Chan D24	Svc DC	Status CP	City, State DURHAM, ETC., NC	File Number BLANK0000025139	Distance
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	197.6 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	197.6
	WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	220.8
	WWAY	D24	DT	CP	WILMINGTON, NC	BLANK0000026634	224.2
Service area		Terrain-limited			IX-free, before	IX-free, after	Percent New IX
1036.3	535,095	1036.3	535,095		1012.2 510,010	1012.2 510,010	0.00 0.00
Undesired				Total IX	Unique IX, before	Unique IX, after	
WRLH-TV	D24 DT BL	8.0	3,971		8.0 3,971		
WRLH-TV	D24 DT CP	20.1	18,870			8.0 3,971	
WCNC-TV	D24 DT CP	4.0	5,499		0.0 0	0.0 0	
WWAY	D24 DT CP	16.1	21,114		12.1 15,615	4.0 6,215	

Interference to BLANK0000028396 CP, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000028396				
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	347.1 km			
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	347.1			
	WDVM-TV	D23	DT	CP	HAGERSTOWN, MD	BLANK0000027603	108.4			
	WPXI	D23	DT	CP	PITTSBURGH, PA	BLANK0000025328	132.6			
	WPXJ-TV	D24	DT	CP	BATAVIA, NY	BLANK0000026968	261.2			
	WNYE-TV	D24	DT	LIC	NEW YORK, NY	BLEDT20071228ABM	376.2			
	WEAO	D24	DT	CP	AKRON, OH	BLANK0000026421	274.5			
	KDKA-TV	D25	DT	LIC	PITTSBURGH, PA	BLCDT20041004ACS	133.5			
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX		
28192.4	1,062,796	23552.9	857,718	23079.1	843,424	23079.1	843,424	0.00	0.00	
Undesired				Total IX	Unique IX, before		Unique IX, after			
WRLH-TV	D24	DT	BL	76.6	3,002	36.4	878			
WRLH-TV	D24	DT	CP	76.6	3,002			36.4	878	
WDVM-TV	D23	DT	CP	208.8	8,960	168.6	6,836	168.6	6,836	
WPXI	D23	DT	CP	64.0	1,864	24.0	780	24.0	780	
WPXJ-TV	D24	DT	CP	4.1	0	4.1	0	4.1	0	
WNYE-TV	D24	DT	LIC	12.0	410	12.0	410	12.0	410	
WEAO	D24	DT	CP	112.6	1,815	84.6	1,130	84.6	1,130	
KDKA-TV	D25	DT	LIC	100.0	2,122	60.0	950	60.0	950	

Interference to BLANK0000027764 CP, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WVAH-TV	D24	DT	CP	CHARLESTON, WV	BLANK0000027764	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	389.9 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	389.9
	WKPI-TV	D23	DT	CP	PIKEVILLE, KY	BLANK0000025330	136.2
	WWHO	D23	DT	CP	CHILLICOTHE, OH	BLANK0000027709	167.7
	WKON	D24	DT	CP	OWENTON, KY	BLANK0000025317	253.4
	WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	346.4
	WEAO	D24	DT	CP	AKRON, OH	BLANK0000026421	298.2
	WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000028396	381.8
	WETP-TV	D24	DT	APP	SNEEDVILLE, TN	BLANK0000029748	251.9
	WUPX-TV	D25	DT	CP	MOREHEAD, KY	BLANK0000027033	161.1
	WLFB	D25	DT	CP	BLUEFIELD, WV	BLANK0000026305	143.8
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
39340.0 1,373,555		37126.5 1,295,383		36649.3 1,276,470		36649.3 1,276,470	0.00 0.00

Appendix B - Interference Analysis
WRLH-TV - Richmond, Virginia
Channel 24 - 1000 kW - Page 5

Undesired		Total IX	Unique IX, before	Unique IX, after
WRLH-TV D24 DT BL	4.0	119	0.0	0
WRLH-TV D24 DT CP	0.0	0		0.0 0
WKPI-TV D23 DT CP	55.6	2,414	39.7	1,935 39.7 1,935
WWHO D23 DT CP	4.0	128	4.0	128 4.0 128
WKON D24 DT CP	7.9	159	4.0	0 4.0 0
WCNC-TV D24 DT CP	11.9	155	11.9	155 11.9 155
WEAO D24 DT CP	87.7	10,251	87.7	10,251 87.7 10,251
WTAJ-TV D24 DT CP	12.0	135	12.0	135 12.0 135
WETP-TV D24 DT APP	147.0	4,330	107.2	3,520 107.2 3,520
WUPX-TV D25 DT CP	23.7	298	23.7	298 23.7 298
WLFB D25 DT CP	179.0	2,318	139.2	1,298 139.2 1,298

Interference to BLANK0000027764 CP, scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WVAH-TV	D24	DT	CP	CHARLESTON, WV	BLANK0000027764	
Undesireds:	WRLH-TV	D24	DT	BL	RICHMOND, VA	DTVBL412	389.9 km
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	389.9
	WKPI-TV	D23	DT	CP	PIKEVILLE, KY	BLANK0000025330	136.2
	WWHO	D23	DT	CP	CHILLICOTHE, OH	BLANK0000027709	167.7
	WKON	D24	DT	CP	OWENTON, KY	BLANK0000025317	253.4
	WCNC-TV	D24	DT	CP	CHARLOTTE, NC	BLANK0000028033	346.4
	WEAO	D24	DT	CP	AKRON, OH	BLANK0000026421	298.2
	WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000028396	381.8
	WETP-TV	D24	DT	BL	SNEEDVILLE, TN	DTVBL18252	251.9
	WUPX-TV	D25	DT	CP	MOREHEAD, KY	BLANK0000027033	161.1
	WLFB	D25	DT	CP	BLUEFIELD, WV	BLANK0000026305	143.8

	Service area	Terrain-limited		IX-free, before		IX-free, after	Percent New IX
	39340.0 1,373,555	37126.5	1,295,383	36677.1	1,277,044	36677.1 1,277,044	0.00 0.00

Undesired		Total IX	Unique IX, before	Unique IX, after
WRLH-TV D24 DT BL	4.0	119	0.0	0
WRLH-TV D24 DT CP	0.0	0		0.0 0
WKPI-TV D23 DT CP	55.6	2,414	39.7	1,935 39.7 1,935
WWHO D23 DT CP	4.0	128	4.0	128 4.0 128
WKON D24 DT CP	7.9	159	4.0	0 4.0 0
WCNC-TV D24 DT CP	11.9	155	11.9	155 11.9 155
WEAO D24 DT CP	87.7	10,251	87.7	10,251 87.7 10,251
WTAJ-TV D24 DT CP	12.0	135	12.0	135 12.0 135
WETP-TV D24 DT BL	111.3	3,605	79.5	2,946 79.5 2,946
WUPX-TV D25 DT CP	23.7	298	23.7	298 23.7 298
WLFB D25 DT CP	179.0	2,318	143.2	1,330 147.1 1,449

Interference to proposal, scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WRLH-TV	D24	DT	CP	RICHMOND, VA	WRLH-CP-NOND-1000kW	
Undesireds:	WDPB	D24	DT	CP	SEAFORD, DE	BLANK0000026250	215.4 km
	WWAY	D24	DT	CP	WILMINGTON, NC	BLANK0000026634	379.5
	WTAJ-TV	D24	DT	CP	ALTOONA, PA	BLANK0000028396	347.1

	Service area	Terrain-limited		IX-free		Percent IX	
	32784.4 2,017,508	32293.0	1,959,111	32224.8	1,958,561	0.21 0.03	
Undesired		Total IX		Unique IX		Prcnt Unique IX	
WDPB D24 DT CP	15.9	0	11.8	0	0.04	0.00	
WWAY D24 DT CP	4.0	0	4.0	0	0.01	0.00	
WTAJ-TV D24 DT CP	52.3	550	48.3	550	0.15	0.03	