Displacement Application Narrative

Call Sign: WUDI-LD

Facility ID: 182491

Applicant respectfully submits the attached displacement application pursuant to the terms set forth in the *Special Displacement Window Public Notice*.[1] Applicant has used *TVStudy* to identify Channel 36 as an available channel and verifies that the displacement facility proposed will not create harmful interference.

Applicant is eligible to participate in the Special Displacement Window. WUDI-LD qualifies as both "operating" and "displaced" as defined under the FCC's eligibility criteria.[2] Applicant's displacement proposal does not move the station's facilities an impermissible distance.[3]

The interference analysis completed utilizing *TVStudy,* indicates WUDI-LD, Facility ID: 182491's interference amount is less than the 0.5 percent interference allowance for predicted loss of service to DTV, authorized Class A or digital Class A stations.[4] The *TVStudy* analysis shows that WUDI-LD will not cause unacceptable interference to the predicted service of (1) all other primary users in the repacked TV Band or in adjacent bands (including land mobile operations); (2) licenses and valid construction permits for LPTV/translator stations; (3) licenses and valid construction permits for full power and Class A stations that were not reassigned; (4) the post-auction channels of reassigned full power and Class A stations as reflected in the *Closing and Reassignment Public Notice*; and (5) the alternate channels and expanded facilities proposed during the two filing windows by reassigned full power and Class A stations. [5]

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1 *See Incentive Auction Task Force and Media Bureau Announce Post-Incentive Auction Special Displacement Window April 10, 2018, through May 15, 2018, and Make Location and Channel Data Available*, Public Notice, DA 18-124 (IATF & MB Feb. 9, 2018) ("*Special Displacement Window Public Notice*").

2 *See id.* ¶ 5.

3 *See id.* ¶ 6 (citing 47 C.F.R. §§ 76.53, 74.787(a)(4) and 73.3572(a)(4)(i)).

4 *See* 47 C.F.R. § 74.793.

5 *See The Incentive Auction Task Force and Media Bureau Announce Procedures for Low Power Television, Television Translator and Replacement Translator Stations During the Post-Incentive Auction Transition*, Public Notice, 32 FCC Rcd 3860 ¶ 11 (IATF & MB May 12, 2017).