

## **Request for Waiver of Transition Phase**

### Introduction and Background

By this Legal STA Request, WXOW-WQOW License, LLC (“WQOW Licensee”) seeks waiver of the post-Incentive Auction Transition Phase assignment, and corresponding testing dates and construction completion deadline, for WQOW(TV), Eau Claire, WI (Fac. ID No. 64550) (“Station” or “WQOW”). Pursuant to the CCR Public Notice, WQOW has been assigned to Transition Phase 2, for which the Phase Completion Date is currently scheduled as April 12, 2019.<sup>1</sup> WQOW Licensee seeks to transition the Station early, on September 7, 2018, with a testing period to commence immediately preceding such date.

Contemporaneous with this Legal STA Request, Wisconsin Educational Communications Board (“ECB”), licensee of WHLA-TV, La Crosse, Wisconsin (Fac. ID No. 18780) (“WHLA”) has filed a similar request also seeking authority to transition early on September 7, 2018 (*see* LMS File No. [0000055116](#)). The two requests are inextricably linked because WQOW’s pre-transition channel is 15, and WHLA’s post-transition channel will be 15, and both stations operate in the same Designated Market Area and belong to the same linked station set. Thus, the bona fides of WQOW’s early transition as set forth in the instant request cannot be considered in a vacuum but must, instead, be considered in the context of the bona fides of ECB’s early transition request for WHLA.

The Transition Scheduling Adoption Public Notice expressly authorized stations to propose “alternative transition solutions that could create efficiencies,” and specifically indicated that a request to modify a station’s transition deadline—including by moving to an earlier phase—would be viewed favorably if the request is “otherwise compliant with [FCC] rules and [has] little or no impact on the phase assignments or transition schedule.”<sup>2</sup> As demonstrated below, WQOW Licensee’s instant request qualifies for such favorable treatment.

### Waiver Standard

The FCC may grant a waiver for “good cause shown.”<sup>3</sup> A waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.<sup>4</sup> In considering a waiver,

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<sup>1</sup> *See Incentive Auction Closing and Channel Reassignment Public Notice: The Broadcast Television Incentive Auction Closes; Reverse Auction and Forward Auction Results Announced; Final Television Band Channel Assignments Announced; Post-Auction Deadlines Announced*, Public Notice, 32 FCC Rcd 2786 (WTB & MB 2017) (“CCR Public Notice”).

<sup>2</sup> *Incentive Auction Task Force and Media Bureau Adopt A Post-Incentive Auction Transition Scheduling Plan*, 32 FCC Rcd 890 (MB 2017) (“Transition Scheduling Adoption Public Notice”), at ¶ 51 (*citing Incentive Auction Task Force and Media Bureau Seek Comment on Post-Incentive Auction Transition Scheduling Plan*, Public Notice, 31 FCC Rcd 10802 (MB 2016) (“Transition Scheduling Proposal Public Notice”)).

<sup>3</sup> 47 C.F.R. § 1.3.

<sup>4</sup> *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

the FCC may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>5</sup> Such a waiver is appropriate if circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.<sup>6</sup>

As demonstrated herein, good cause exists for waiver of WQOW's assigned Transition Phase and its attendant testing and completion dates because it will serve the public interest by facilitating an orderly and efficient transition by freeing up critical resources for deployment during subsequent Transition Phases while also minimizing impacts on broadcast television viewers. Moreover, if WQOW is permitted to complete its transition on September 7, 2018, then WHLA will also transition early in tandem with WQOW, which will result in additional transition-related public interest benefits.

#### WQOW's Early Transition Proposal Complies with All Interference Rules and Policies

The interference implications of this proposal, including linked station sets, is an important consideration. WQOW Licensee has engaged in an interference analysis, which is included in the attached Technical Statement of Lohnes & Culver LLC. As demonstrated in the Technical Statement, WQOW's proposed early transition will comply with all existing interference rules, policies, and constraints applicable to a transitioning station such as WQOW.

Because the analysis shows no cases of outgoing or incoming interference exceeding the normal 0.5% rounding tolerance level to any other protected full-power or Class A television station now operating, no new pairwise interference will be created by the proposed early transition of WQOW. *See* Technical Statement at pp.2 – 3 (concluding that WQOW's early transition "will not create any pairwise interference scenarios or new linked station sets.") The only interference implication of this early transition request is the WQOW/WHLA dependency, which will be resolved by the coordinated early transition of both stations on September 7, 2018. *See* Technical Statement at p.2; *see also* WHLA-TV's Early Transition Request, Legal STA Request, [April 24 No Interference statement and OET 69 Study..pdf](#), LMS File No. [0000055116](#) ("We are given to understand that WHLA-TV and WQOW are coordinating their channel changes so that before WHLA-TV starts transmitting on channel 15, WQOW will have moved to channel 25.").

Thus, the instant proposal complies with the applicable interference standard.

#### Early Transition of WQOW (in Coordination with WHLA) Will Benefit the Overall Transition Plan, and There Will Be No Negative Impacts

The proposed coordinated early transition of WQOW and WHLA will further the overall post-Auction transition because it will facilitate better utilization of resources by engaging vendors and service providers earlier in the overall transition process. WQOW has already taken delivery of its new transmitter, which is scheduled to be installed in mid-July, and the work to install WQOW's new

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<sup>5</sup> *See WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166.

<sup>6</sup> *See Northeast Cellular*, 897 F.2d at 1166.

transmission line will also commence in mid-July.<sup>7</sup> The final step of WQOW's transition plan will be to changeout the tuning section—which is the section of line immediately below the antenna—and “peaking” it to make it operate more efficiently on WQOW's post-transition channel. Two vendors will be involved in these physical aspects of WQOW's transition: GatesAir is the transmitter manufacturer, and Precision Communications, Inc. (“PCI”) is the transmission line vendor/installer. WQOW Licensee has consulted with both vendors, and both have advised that the shift of WQOW from Transition Phase 2 to September 7, 2018, will not hinder their provision of equipment or services to other transitioning stations. To that end, two letters—one from transmitter manufacturer GatesAir and one from PCI—are attached as exhibits to this request. Those letters unambiguously indicate that WQOW's early transition would not affect their provision of equipment and services to other transitioning stations.

Moreover, the climate and weather at the latitudes of the La Crosse-Eau Claire DMA mandate that all meaningful transition site work be performed prior to October 2018 in order for a Transition Phase 2 station to be ready for full operations by the Phase 2 deadline of April 12, 2019. In other words, WQOW's new transmitter and transmission line must be installed during summer 2018 because the climate and weather generally render the WQOW tower site unworkable between October and April of every year.<sup>8</sup> As such, WQOW's vendors are already scheduled to perform this transition work on an “early” basis even if WQOW were to remain a Phase 2 station, leaving only the changeout/peaking of the tuning section for later. PCI's letter makes clear that PCI's preference for scheduling reasons is to perform the tuning section changeout/peaking work during summer 2018 (to facilitate the September 7, 2018, early transition) to obviate the need to return to WQOW during a period of uncertain weather in March/April 2019.<sup>9</sup>

Furthermore, WQOW's early transition would mean that it can “get out of the way” of WHLA, so that WHLA may also transition early. As indicated in WHLA's own early transition request, public interest benefits will flow from WHLA's early transition because a significant loss of service to viewers will be mitigated by a reduction in the amount of time WHLA will need to operate using

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<sup>7</sup> WQOW does not need a new antenna for its post-transition operations.

<sup>8</sup> By way of illustration of the climate/weather impacts in the La Crosse-Eau Claire DMA, the tower work required for WXOW's (WQOW's sister station in La Crosse) early transition was scheduled to commence in April 2018 but had to be delayed until mid-May because of the late wintry weather and snow that affected the north-mid-west. Because WQOW's transmission site is located approximately 80 miles north of WXOW's transmission site, the likelihood of late wintry weather is even greater at WQOW's latitude. *See also* WHLA-TV's Early Transition Request, Legal STA Request, [WHLA Request for Phase Change.pdf](#) at p.2, LMS File No. [0000055116](#) (“WHLA-TV is located in the northern tier of states where major tower work is impractical six or more months of the year, all WHLA-TV tower work must be completed during the prior year's tower construction season, which ends mid-October, 2018.”).

<sup>9</sup> The Commission has previously found climate/weather-based justifications to be decisionally significant in determining to change a station's transition phase to an earlier period. *See, e.g.,* KCDT, LMS File No. [0000026078](#) (weather-related circumstances sufficient to justify change to earlier transition phase).

reduced power interim facilities. See WHLA-TV's Early Transition Request, Legal STA Request, [WHLA Request for Phase Change.pdf](#) at p.2, LMS File No. [0000055116](#). With respect to its own transition, WQOW has been unable to derive a practicable plan to operate meaningful interim facilities of its own. As a result, an early transition for WQOW will mean that service to viewers will not be jeopardized by the threat that weather could interfere with WQOW's ability to complete a transition in April 2018, which—without interim facilities—could result in WQOW being off the air for some unknown period of time. An early transition would eliminate the possibility of such a WQOW loss-of-service scenario.

The Licensee's Experience with Early Transition-Related Consumer Education Uniquely Positions WQOW to Ensure Maximum Rescan Success and Minimal Consumer Impact

WQOW Licensee believes that viewer rescan success will be maximized by a combination of (i) its own, active efforts to educate the public about WQOW's early transition and (ii) WQOW Licensee's recent experience with early transition consumer education and direct consumer interaction to assist with the rescan process during the early transition of in-market, co-owned WXOW, La Crosse, Wisconsin.<sup>10</sup> WQOW Licensee acknowledges that its request for an early transition will increase, by one, the total number of times viewers may need to rescan equipment in order to receive all reassigned stations in the Station's DMA. In its request to transition WHLA early, ECB has submitted materials demonstrating "the proposed early transition of WHLA-TV and WQOW *will not result in the requirement of more than three rescans for any viewers in the DMA.*" See WHLA-TV's Early Transition Request, Legal STA Request, [WHLA Request for Phase Change.pdf](#) at p.3, LMS File No. [0000055116](#) (emphasis in original).<sup>11</sup> Although three rescans

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<sup>10</sup> The fact that WHLA's sister station WPNE-TV, Green Bay, Wisconsin, is transitioning early means that ECB also has significant early transition consumer education and outreach experience, albeit in a different market. See WHLA-TV's Early Transition Request, Legal STA Request, [WHLA Request for Phase Change.pdf](#) at p.4, LMS File No. [0000055116](#). Indeed, consumers in the La Crosse-Eau Claire DMA will receive an unprecedented quantity of practical and effective rescan attention from experienced early transitioners during ECB's and WQOW Licensee's coordinated early transition efforts. As such, WQOW Licensee respectfully submits that any concerns about multiple rescans in the La Crosse-Eau Claire DMA are fully mitigated. See also WHLA-TV's Early Transition Request, Legal STA Request, [WHLA Request for Phase Change.pdf](#) at p.4, LMS File No. [0000055116](#) (demonstrating how the "split" nature of the La Crosse-Eau Claire DMA means that no viewers will be subjected to more than three rescans).

<sup>11</sup> WQOW Licensee supports and agrees with ECB's description and analysis of the split nature of the La Crosse-Eau Claire DMA, and hereby incorporates by reference ECB's proffer in that regard. To the extent that it is helpful, a Longley-Rice contour map depicting the signals of WQOW and its sister station WXOW is attached hereto; by demonstrating the lack of overlap between WQOW, Eau Claire, and WXOW, La Crosse, as a result of the distance separating the two market "centers" and as a result of a ridge—which is a geographic feature in the market that effectively breaks the market into two from a signal reception perspective—the attached map helps to further illustrate the split nature of the DMA, which is directly relevant to the rescan issue.

exceeds the presumptive cap established by the Media Bureau and Incentive Auction Task Force<sup>12</sup> by one scan, a waiver is warranted because the Station will engage in a more comprehensive consumer awareness campaign than is required under the Commission's rules and because both WQOW Licensee and ECB already have extensive—and successful—experiences with early transition consumer education and public outreach.

More specifically, WQOW Licensee plans to engage in a similar volume and frequency of consumer education activities with respect to WQOW's early transition as WQOW Licensee used for WXOW's recent early transition. Here are the consumer education elements WQOW Licensee used for consumer rescan outreach for WXOW's early transition:

- Consumer Education PSAs
  - 8-week on-air schedule
  - More than 1,850 PSAs aired
  - A combination of 15-second and 30-second PSAs aired
  - PSAs aired on all program streams
- Consumer Education Crawls
  - 8-week on-air schedule
  - Nearly 1,800 crawls aired
  - Crawls aired on all program streams
- News Stories
  - Airing of numerous news stories during a variety of local newscasts
  - Explain what is happening, when, rescan process, and how viewers can get assistance if needed
- Website Resources
  - Stories about early transition and need to rescan
  - Links to NAB's TV Answers website (tvanswers.org)
  - "How To Rescan" video and narrative instructions from tvanswers.org
- Education on Other Digital Platforms
  - Station Facebook page featuring local stories and resources from tvanswers.org
  - Use of Station Twitter account to provide rescan reminders and information
- Informational Text Messaging Campaign
  - Station's use of SMS messages approximately one week in advance of transition date
- Informational Telephone Line
  - Station "help line" to assist viewers with rescanning
  - This phone line will be promoted during PSAs, crawls, news stories, digital platform efforts, etc.
- Correspondence to Government Officials
  - Station education of elected officials and their staff who may hear from constituent viewers about the channel change (e.g., viewers who temporarily lose access to the station because of rescan difficulties)

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<sup>12</sup> See Transition Scheduling Adoption Public Notice at ¶¶ 21 & 26.

- Station education of public safety officials in the event of an untimely local emergency, so that help can be provided to viewers who may temporarily lose access to the Station because of rescan difficulties
- Training of Station Staff
  - When viewers call the “help line,” they are routed to knowledgeable Station staff
  - When viewers call other Station phone numbers, Station staff are prepared to assist viewers either directly or by routing them to knowledgeable Station staff

WQOW Licensee plans to use a similar volume, frequency, and mix of consumer education elements for WQOW’s early transition, and WQOW Licensee will be able to draw on its experience with WXOW’s consumer outreach. WXOW received approximately 220 viewer phone calls in the first week after WXOW’s channel change, and WXOW personnel made a handful of home visits to assist consumers in situations where telephonic instructions and guidance were insufficient for the viewer’s needs.

As illustrated above, WQOW Licensee is ready, willing, and able to engage in robust, effective consumer education on WQOW’s broadcast and non-broadcast platforms and, as noted above, believes that its consumer education activities combined with WHLA’s consumer education activities will facilitate full-market preparation and overcome any downside associated with the need for consumers to engage in multiple rescans.

#### WQOW Has Already Sent Its MVPD Notifications

WQOW mailed its MVPD notifications on June 8, 2018, which is more than 90 days in advance of the proposed early transition date of September 7, 2018. WQOW’s MVPD notifications specified September 7, 2018, as the Station’s transition date.<sup>13</sup>

#### Conclusion

In sum, grant of this waiver to permit WQOW (and WHLA) to transition early—i.e., on September 7, 2018, during Phase Zero—will not undermine or delay any post-Auction transition goals, does not require waiver of any interference regulations or policies, and will facilitate a more effective and efficient implementation of the overall policy goals of the Incentive Auction and post-auction transition. Accordingly, grant of this request is in the public interest.

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<sup>13</sup> In the event the instant early transition request is not granted, WQOW will re-notify MVPDs pursuant to Rule Section 73.3700(d)(3).

**TECHNICAL STATEMENT  
IN SUPPORT OF A REQUEST TO  
WAIVE THE FCC PHASE ASSIGNMENT FOR  
WQOW 253 KW-DA 280 M HAAT CH. 25  
EAU CLAIRE, WISCONSIN**

**INTRODUCTION**

This statement was prepared on behalf of WXOW-WQOW License, LLC, the licensee of digital television station WQOW (Facility ID No. 64550), to provide technical information in support of a request to waive the Commission's construction phase assignment for transitioning WQOW to its post-auction channel in the La Crosse-Eau Claire DMA.<sup>1</sup>

WQOW is currently licensed to operate on RF Channel 15 in Eau Claire, WI. As a result of the Incentive Auction and TV Repack process, the station was reassigned to RF Channel 25. WQOW now holds a construction permit for operation on Channel 25 with a maximum directional ERP of 253 kW and an antenna HAAT of 280 m.<sup>2</sup> The FCC engineering database record for the WQOW construction permit facility is attached as Figure 1.

WQOW is seeking a waiver of the Commission's Phase Assignment, Testing Period, and Phase Completion Date in coordination with its linked-station neighbor, WHLA-TV, Facility ID 18780. Such a waiver will enable WQOW and WHLA-TV to transition to their post-transition channels earlier than their designated phase transition dates. This statement demonstrates that WQOW can transition to Channel 25 as

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<sup>1</sup> Nielsen Designated Market Area abbreviated as DMA.

<sup>2</sup> See FCC File No. 0000027863.





authorized in its post-auction construction permit before the original assignment phase date without any disruption to the Commission's transition plans.

## **ASSIGNED PHASE AND LINKED-STATION SET**

WQOW was assigned to transition in Phase 2, which entails a testing period that is scheduled to begin on December 1, 2018. As indicated above, WQOW and WHLA-TV are in a linked-station set.<sup>3</sup> This information is based on the latest FCC Phase Assignment spreadsheet dated May 30, 2018.

WQOW and WHLA-TV are the only two linked-station neighbors in their linked-station set. More specifically, the activation of WHLA-TV's post-auction channel assignment on Channel 15 is dependent upon WQOW transitioning from Channel 15 to Channel 25. According to the Commission's latest linked-station set file dated May 30, 2018, WQOW and WHLA-TV are not associated with any other linked-station sets.

## **INTERFERENCE PROTECTION OF PRE-TRANSITION RECORDS**

An interference analysis of WQOW's post-auction construction permit parameters was conducted using the *TVStudy* program.<sup>4</sup> For this analysis, the setting for protecting pre-transition records not on baseline channel was used. A report reflecting the results is attached as Figure 2.

Figure 2 indicates that there are no scenarios of outgoing (caused) interference exceeding the normal 0.5% rounding tolerance level to any other protected full-power or Class A television stations that are now operating.

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<sup>3</sup> Linked-Station Set, ID Number 13.

<sup>4</sup> *TVStudy* Interference Analysis Software Version 2.2.5.





The study results in Figure 2 also indicate that there are no scenarios of incoming (received) interference in excess of 0.5% to the WQOW Channel 25 construction permit facility.

Based on these results, the transition of the WQOW facility to Channel 25 in advance of its phase transition date will not create any pairwise interference scenarios or new linked station sets.

## **CONCLUSION**

It is concluded that the early transition of the WQOW facility on Channel 25 will not result in any interference scenarios, either caused or received, that would result in the creation or alteration of any linked station sets established in the Incentive Auction repack process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Scott Turpie', is written over a horizontal line.

Scott Turpie  
Technical Consultant  
Lohnes & Culver LLC  
P.O. Box 881  
Silver Spring, MD 20918-0881  
Ph. 301-776-4488

June 10, 2018

### **Attachments**

Figure 1 – FCC Engineering Record for WQOW's CP  
Figure 2 – TVStudy Interference Analysis

**FIGURE 1  
FCC DATABASE RECORD**

Station Data: localhost/WQOW

Service TV digital	Facility ID 64550	Record ID LMS TV 2018-06-07 25076f915c78b6bf015cb169fa2810eb		Country U.S.
Call Sign WQOW	Channel 25 539 MHz	Status CP	City EAU CLAIRE	State WI
File Number BLANK0000027863	Zone II	Freq. Offset (none)	Emission Mask (n/a)	
Latitude (NAD83) N 44 ° 48 ' 0.00 "		Longitude (NAD83) W 91 ° 27 ' 57.00 "		Site Number 1
Height AMSL, ... 558.1	HAAT, m 280.0	Peak ERP, kW 253	Azimuth Pattern DIE-TUP-SP4-8-1 Orient. 0.0 <input type="button" value="View"/> <input type="checkbox"/> Baseline record	
Elevation Pattern (none) <input type="button" value="View"/> <input checked="" type="checkbox"/> May use generic pattern when needed				
		Elec. Tilt 0.50	Mech. Tilt 0.00	Tilt Orient. 0.0

**FIGURE 2**  
**Analysis Results**  
**TVSTUDY, VERSION 2.2.5.**

**STUDY SUMMARY**

Study created: 2018.06.08 14:56:20

Study build station data: LMS TV 2018-06-07

Proposal: WQOW D25 DT CP EAU CLAIRE, WI  
File number: BLANK0000027863  
Facility ID: 64550

Station data: LMS TV 2018-06-07  
Record ID: 25076f915c78b6bf015cb169fa2810eb  
Country: U.S.  
Zone: 11

Build options:  
Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc Status	City, State	File Number	Distance
No	K1MT	D24	DT CP	MASON CITY, IA	BLANK0000027610	177.5 km
No	K1MT	D24	DT BL	MASON CITY, IA	DTVBL66402	177.5
Yes	WHRM-TV	D24	DT APP	WAUSAU, WI	BLANK0000035674	140.4
Yes	WHRM-TV	D24	DT LIC	WAUSAU, WI	BLEDT20051014AAW	140.4
No	KTIN	D25	DT LIC	FORT DODGE, IA	BLEDT20070822ACB	323.1
No	KWKB	D25	DT LIC	IOWA CITY, IA	BLGDT20070130AJQ	341.9
No	WTTW	D25	DT CP	CHICAGO, IL	BLANK0000034877	448.5
No	WTTW	D25	DT BL	CHICAGO, IL	DTVBL10802	448.5
Yes	WPNE-TV	D25	DT CP	GREEN BAY, WI	BLANK0000031831	277.5
Yes	WPNE-TV	D25	DT BL	GREEN BAY, WI	DTVBL18798	277.5
No	KXLI-TV	D26	DT CP	ROCHESTER, MN	BLANK0000027876	153.9
No	KXLI-TV	D26	DT BL	ROCHESTER, MN	DTVBL35906	153.9
No	WKOW	D26	DT LIC	MADISON, WI	BLGDT20111006AAO	247.9

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25  
Latitude: 44 48 0.00 N (NAD83)  
Longitude: 91 27 57.00 W  
Height AMSL: 558.1 m  
HAAT: 280.0 m  
Peak ERP: 253 kW

Antenna: DIE-TUP-SP4-8-1 (ID 1001715) 0.0 deg  
Elev Pattern: Generic  
Elec Tilt: 0.50

39.9 dBu contour:	ERP	HAAT	Distance
Azimuth	ERP	283.5 m	84.1 km
0.0 deg	243 kW	266.9	81.5
45.0	225	280.2	83.6
90.0	243	277.1	83.3
135.0	245	278.7	78.4
180.0	109	278.5	71.0
225.0	27.8	288.5	79.3
270.0	107	274.2	82.6
315.0	233		

Database HAAT does not agree with computed HAAT  
Database HAAT: 280 m Computed HAAT: 278 m

Distance to Canadian border: 360.6 km

Distance to Mexican border: 1884.0 km

Conditions at FCC monitoring station: Allegan MI  
Bearing: 116.9 degrees Distance: 505.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 250.2 degrees Distance: 1238.5 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%

No IX check failures found.

DETAILED RESULTS

tvstudy v2.2.5 (4uc83)  
Database: localhost, Study: WOOW\_BLANK0000027863, Model: Longley-Rice  
Start: 2018.06.08 14:56:20

Study created: 2018.06.08 14:56:20

Study build station data: LMS TV 2018-06-07

Proposal: WOOW D25 DT CP EAU CLAIRE, WI  
File number: BLANK0000027863  
Facility ID: 64550  
Station data: LMS TV 2018-06-07  
Record ID: 25076f915c78b6bf015cb169fa2810eb  
Country: U.S.  
Zone: IT

Build options:  
Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KINT	D24	DT	CP	MASON CITY, IA	BLANK0000027610	177.5 km
No	KINT	D24	DT	BL	MASON CITY, IA	DTVBL66402	177.5
Yes	WHRM-TV	D24	DT	APP	WAUSAU, WI	BLANK0000035674	140.4
Yes	WHRM-TV	D24	DT	LIC	WAUSAU, WI	BLEDT20051014ANW	140.4
No	KITN	D25	DT	LIC	FORT DODGE, IA	BLEDT20070822ACB	323.1
No	KWB	D25	DT	LIC	IOWA CITY, IA	BLGDT20070130AJQ	341.9
No	WTTW	D25	DT	CP	CHICAGO, IL	BLANK0000034877	448.5
No	WTTW	D25	DT	BL	CHICAGO, IL	DTVBL10802	448.5
Yes	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831	277.5
Yes	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	277.5
No	KXL-TV	D26	DT	CP	ROCHESTER, MN	BLANK0000027876	153.9
No	KXL-TV	D26	DT	BL	ROCHESTER, MN	DTVBL35906	153.9
No	WKOW	D26	DT	LIC	MADISON, WI	BLGDT20111006AAO	247.9

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25  
Latitude: 44 48 0.00 N (NAD83)  
Longitude: 91 27 57.00 W  
Height AMSL: 558.1 m  
HAAT: 280.0 m  
Peak ERP: 253 kW  
Antenna: DIE-TUP-SP4-8-1 (ID 1001715) 0.0 deg  
Elev Pattn: Generic  
Elec Tilt: 0.50

39.9 dBu contour:	Azimuth	ERP	HAAT	Distance
0.0 deg	283.5	243	84.1	km
45.0	225	266.9	81.5	
90.0	243	280.2	83.6	
135.0	245	277.1	83.3	
180.0	109	278.7	78.4	
225.0	27.8	278.5	71.0	
270.0	107	288.5	79.3	
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Database HAAT does not agree with computed HAAT  
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Conditions at FCC monitoring station: Allegan MI  
Bearing: 116.9 degrees Distance: 505.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 250.2 degrees Distance: 1238.5 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 BLANK0000035674 APP scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	140.5 km
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	140.4
	WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BMLGDT20040723ADS	145.1
	KINT	D24	DT	CP	MASON CITY, IA	BLANK0000027610	289.1
	WFLD	D24	DT	CP	CHICAGO, IL	BLANK0000034486	376.6
	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831	145.1
Service area				Terrain-limited	IX-free, before	IX-free, after	Percent New IX
30927.1	535.778	30791.0	532.820	30281.1	526.446	30281.1	526.446
Undesired				Total IX	Unique IX, before	Unique IX, after	
WOOW D25 DT BL		139.3		1,757	35.9	35	
WOOW D25 DT CP		143.3		1,757	35.9	35	
WBAY-TV D23 DT LIC		187.3		2,913	91.6	786	
KINT D24 DT CP		254.8		2,500	135.3	506	
WFLD D24 DT CP		48.1		1,198	32.1	926	
WPNE-TV D25 DT CP		95.6		2,127	0.0	0	

Interference to BLANK0000035674 APP scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	140.5 km
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	140.4
	WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BMLGDT20040723ADS	145.1
	KINT	D24	DT	CP	MASON CITY, IA	BLANK0000027610	289.1
	WFLD	D24	DT	CP	CHICAGO, IL	BLANK0000034486	376.6
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	145.1
Service area				Terrain-limited	IX-free, before	IX-free, after	Percent New IX
30927.1	535.778	30791.0	532.820	30281.1	526.446	30281.1	526.446
Undesired				Total IX	Unique IX, before	Unique IX, after	
WOOW D25 DT BL		139.3		1,757	35.9	35	
WOOW D25 DT CP		143.3		1,757	35.9	35	
WBAY-TV D23 DT LIC		187.3		2,913	167.4	2,406	

KIMT D24 DT CP	254.8	2,500	135.3	506	131.3	506	
WFLD D24 DT CP	48.1	1,198	32.1	926	32.1	926	0
WPNE-TV D25 DT BL	19.9	507	0.0	0	0.0	0	
Interference to BLANK000035674 APP scenario 3							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	BLANK0000027610	289.1		
	WFLD D24 DT BL		CHICAGO, IL	DTVBL22211	376.6		
	WPNE-TV D25 DT CP		GREEN BAY, WI	BLANK0000031831	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	91.6	786			
KIMT D24 DT CP	254.8	2,500	135.3	506			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT CP	95.6	2,127	0.0	0			
Interference to BLANK000035674 APP scenario 4							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	BLANK0000027610	289.1		
	WFLD D24 DT BL		CHICAGO, IL	DTVBL22211	376.6		
	WPNE-TV D25 DT BL		GREEN BAY, WI	DTVBL18798	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	91.6	786			
KIMT D24 DT CP	254.8	2,500	135.3	506			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT BL	95.6	2,127	0.0	0			
Interference to BLANK000035674 APP scenario 5							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	DTVBL66402	289.1		
	WFLD D24 DT BL		CHICAGO, IL	BLANK0000034486	376.6		
	WPNE-TV D25 DT CP		GREEN BAY, WI	BLANK0000031831	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	91.6	786			
KIMT D24 DT CP	254.8	2,500	135.3	506			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT BL	95.6	2,127	0.0	0			
Interference to BLANK000035674 APP scenario 6							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	DTVBL66402	289.1		
	WFLD D24 DT BL		CHICAGO, IL	BLANK0000034486	376.6		
	WPNE-TV D25 DT BL		GREEN BAY, WI	DTVBL18798	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	91.6	786			
KIMT D24 DT CP	254.8	2,500	131.3	475			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT BL	19.9	507	0.0	0			
Interference to BLANK000035674 APP scenario 7							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	DTVBL66402	289.1		
	WFLD D24 DT BL		CHICAGO, IL	DTVBL22211	376.6		
	WPNE-TV D25 DT BL		GREEN BAY, WI	BLANK0000031831	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	167.4	2,406			
KIMT D24 DT CP	246.8	2,469	131.3	475			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT BL	19.9	507	0.0	0			
Interference to BLANK000035674 APP scenario 8							
Call	Chan	Svc Status	City, State	File Number	Distance		
Desired:	WHRM-TV D24 DT APP		WAUSAU, WI	BLANK0000035674			
Undesireds:	WOOW D25 DT BL		EAU CLAIRE, WI	DTVBL64550	140.5 km		
	WOOW D25 DT CP		EAU CLAIRE, WI	BLANK0000027863	140.4		
	WBAY-TV D23 DT LIC		GREEN BAY, WI	BMLGDT20040723ADS	145.1		
	KIMT D24 DT CP		MASON CITY, IA	DTVBL66402	289.1		
	WFLD D24 DT BL		CHICAGO, IL	DTVBL22211	376.6		
	WPNE-TV D25 DT CP		GREEN BAY, WI	DTVBL18798	145.1		
Service area	Terrain-limited	IX-free, before	IX-free, after	IX-free, before	IX-free, after	Percent New IX	
30927.1	535,778	30791.0	532,820	30281.1	526,446	0.00	0.00
Undesired	Total IX	Unique IX, before	Unique IX, after				
WOOW D25 DT BL	139.3	1,757	35.9	35			
WOOW D25 DT CP	143.3	1,757		35			
WBAY-TV D23 DT LIC	187.3	2,913	91.6	786			
KIMT D24 DT CP	246.8	2,469	131.3	475			
WFLD D24 DT BL	48.1	1,198	32.1	926			
WPNE-TV D25 DT CP	95.6	2,127	0.0	0			

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
30927.1	535, 778	30791.0	532, 820	30285.0	526, 477	30285.0	526, 477	0.00	0.00
Undesired									
WOOW D25 DT BL	139.3	Total IX	Unique IX, before	Unique IX, after					
WOOW D25 DT CP	143.3	1, 757	39.9	35					
WBAY-TV D23 DT LIC	187.3	2, 913	167.4	2, 406					
KINT D24 DT BL	246.8	2, 469	131.3	475					
WFLD D24 DT BL	48.1	1, 198	32.1	926					
WPNE-TV D25 DT BL	19.9	507	0.0	0					
Interference to BLEDT20051014AAW LIC scenario 1									
Call		Chan	Svc Status	City, State	File Number		Distance		
Desired:	WHRM-TV	D24	DT	WAUSAU, WI	BLEDT20051014AAW				
Undesireds:									
WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550		140.5 km		
WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863		140.4		
WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BWLGDT20040723ADS		145.1		
KINT	D24	DT	CP	MASON CITY, IA	BLANK0000027610		289.1		
WFLD	D24	DT	CP	CHICAGO, IL	BLANK0000034486		376.6		
WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831		145.1		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
26867.1	495, 398	26799.1	495, 174	26444.4	492, 345	26444.4	492, 345	0.00	0.00
Undesired									
WOOW D25 DT BL	39.8	Total IX	Unique IX, before	Unique IX, after					
WOOW D25 DT CP	35.8	104	16.0	78					
WBAY-TV D23 DT LIC	155.4	1, 693	83.6	872					
KINT D24 DT CP	175.3	1, 029	151.4	985					
WFLD D24 DT CP	8.0	29	8.0	29					
WPNE-TV D25 DT CP	71.8	821	0.0	0					
Interference to BLEDT20051014AAW LIC scenario 2									
Call		Chan	Svc Status	City, State	File Number		Distance		
Desired:	WHRM-TV	D24	DT	WAUSAU, WI	BLEDT20051014AAW				
Undesireds:									
WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550		140.5 km		
WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863		140.4		
WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BWLGDT20040723ADS		145.1		
KINT	D24	DT	CP	MASON CITY, IA	BLANK0000027610		289.1		
WFLD	D24	DT	CP	CHICAGO, IL	BLANK0000034486		376.6		
WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798		145.1		
Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX	
26867.1	495, 398	26799.1	495, 174	26444.4	492, 345	26444.4	492, 345	0.00	0.00
Undesired									
WOOW D25 DT BL	39.8	Total IX	Unique IX, before	Unique IX, after					
WOOW D25 DT CP	35.8	104	16.0	78					
WBAY-TV D23 DT LIC	155.4	1, 693	119.5	1, 301					
KINT D24 DT CP	175.3	1, 029	151.4	985					
WFLD D24 DT CP	8.0	29	8.0	29					
WPNE-TV D25 DT BL	35.9	392	0.0	0					
Interference to BLEDT20051014AAW LIC scenario 3									
Call		Chan	Svc Status	City, State	File Number		Distance		
Desired:	WHRM-TV	D24	DT	WAUSAU, WI	BLEDT20051014AAW				
Undesireds:									
WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550		140.5 km		
WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863		140.4		

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Service area										
26867.1	495,398	Terrain-limited		26799.1	495,174	26448.4	492,363	IX-free, before	IX-free, after	Percent New IX
										0.00 0.00
Interference to BLEDT20051014AAW LIC scenario 4										
Desired:										
Call	Chan	Svc Status	City, State	File Number		Distance				
WHRM-TV	D24	DT	LIC WAUSAU, WI	BLEDT20051014AAW						
Undesireds:										
WOOW	D25	DT	BL EAU CLAIRE, WI	DTVBL64550		140.5 km				
WOOW	D25	DT	CP EAU CLAIRE, WI	BLANK0000027863		140.4				
WBAY-TV	D23	DT	LIC GREEN BAY, WI	BMLCDDT20040723ADS		145.1				
KIMT	D24	DT	CP MASON CITY, IA	BLANK0000027610		289.1				
WFLD	D24	DT	BL CHICAGO, IL	DTVBL22211		376.6				
WPNE-TV	D25	DT	BL GREEN BAY, WI	DTVBL18798		145.1				
Service area										
26867.1	495,398	Terrain-limited		26799.1	495,174	26448.4	492,363	IX-free, before	IX-free, after	Percent New IX
										0.00 0.00
Interference to BLEDT20051014AAW LIC scenario 5										
Desired:										
Call	Chan	Svc Status	City, State	File Number		Distance				
WHRM-TV	D24	DT	LIC WAUSAU, WI	BLEDT20051014AAW						
Undesireds:										
WOOW	D25	DT	BL EAU CLAIRE, WI	DTVBL64550		140.5 km				
WOOW	D25	DT	CP EAU CLAIRE, WI	BLANK0000027863		140.4				
WBAY-TV	D23	DT	LIC GREEN BAY, WI	BMLCDDT20040723ADS		145.1				
KIMT	D24	DT	CP MASON CITY, IA	DTVBL66402		289.1				
WFLD	D24	DT	BL CHICAGO, IL	BLANK0000034486		376.6				
WPNE-TV	D25	DT	CP GREEN BAY, WI	BLANK0000031831		145.1				
Service area										
26867.1	495,398	Terrain-limited		26799.1	495,174	26464.4	492,504	IX-free, before	IX-free, after	Percent New IX
										0.00 0.00
Interference to BLEDT20051014AAW LIC scenario 6										
Desired:										
Call	Chan	Svc Status	City, State	File Number		Distance				
WHRM-TV	D24	DT	LIC WAUSAU, WI	BLEDT20051014AAW						
Undesireds:										
WOOW	D25	DT	BL EAU CLAIRE, WI	DTVBL64550		140.5 km				
WOOW	D25	DT	CP EAU CLAIRE, WI	BLANK0000027863		140.4				
WBAY-TV	D23	DT	LIC GREEN BAY, WI	BMLCDDT20040723ADS		145.1				
KIMT	D24	DT	CP MASON CITY, IA	DTVBL66402		289.1				
WFLD	D24	DT	BL CHICAGO, IL	BLANK0000034486		376.6				
WPNE-TV	D25	DT	CP GREEN BAY, WI	BLANK0000031831		145.1				
Service area										
26867.1	495,398	Terrain-limited		26799.1	495,174	26464.4	492,504	IX-free, before	IX-free, after	Percent New IX
										0.00 0.00
Interference to BLEDT20051014AAW LIC scenario 6										
Desired:										
Call	Chan	Svc Status	City, State	File Number		Distance				
WHRM-TV	D24	DT	LIC WAUSAU, WI	BLEDT20051014AAW						
Undesireds:										
WOOW	D25	DT	BL EAU CLAIRE, WI	DTVBL64550		140.5 km				
WOOW	D25	DT	CP EAU CLAIRE, WI	BLANK0000027863		140.4				
WBAY-TV	D23	DT	LIC GREEN BAY, WI	BMLCDDT20040723ADS		145.1				
KIMT	D24	DT	CP MASON CITY, IA	DTVBL66402		289.1				
WFLD	D24	DT	BL CHICAGO, IL	BLANK0000034486		376.6				
WPNE-TV	D25	DT	CP GREEN BAY, WI	BLANK0000031831		145.1				

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Interference to BLEDT20051014AAW LIC scenario 7										
Desired:	WHRM-TV	D24	DT	LIC	WAUSAU, WI	File Number	Distance			
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	140.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	140.4			
	WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BMLCOT20040723ADS	145.1			
	KIMT	D24	DT	BL	MASON CITY, IA	DTVBL66402	289.1			
	WFLD	D24	DT	CP	CHICAGO, IL	BLANK0000034486	376.6			
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	145.1			
Service area										
26867.1	495.398	26799.1	495.174	26468.4	492.504	IX-free, before	Percent New IX			
						26468.4	0.00			
						492.504	0.00			
Undesired						Unique IX, after				
WOOW D25 DT BL		39.8	122	16.0	78	16.0	78			
WOOW D25 DT CP		35.8	104			119.5	1,301			
WBAY-TV D23 DT LIC		155.4	1,693	119.5	1,301	135.5	844			
KIMT D24 DT BL		155.3	870	131.5	826	8.0	29			
WFLD D24 DT CP		8.0	29	8.0	29	0.0	0			
WPNE-TV D25 DT BL		35.9	392	0.0	0	0.0	0			

Interference to BLEDT20051014AAW LIC scenario 8										
Desired:	WHRM-TV	D24	DT	LIC	WAUSAU, WI	File Number	Distance			
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	140.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	140.4			
	WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BMLCOT20040723ADS	145.1			
	KIMT	D24	DT	BL	MASON CITY, IA	DTVBL66402	289.1			
	WFLD	D24	DT	CP	CHICAGO, IL	DTVBL22211	376.6			
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	145.1			
Service area										
26867.1	495.398	26799.1	495.174	26468.4	492.522	IX-free, before	Percent New IX			
						26468.4	0.00			
						492.522	0.00			
Undesired						Unique IX, after				
WOOW D25 DT BL		39.8	122	16.0	78	16.0	78			
WOOW D25 DT CP		35.8	104			83.6	872			
WBAY-TV D23 DT LIC		155.4	1,693	83.6	872	135.5	844			
KIMT D24 DT BL		155.3	870	131.5	826	4.0	11			
WFLD D24 DT CP		4.0	11	4.0	11	0.0	0			
WPNE-TV D25 DT CP		71.8	821	0.0	0	0.0	0			

Interference to BLEDT20051014AAW LIC scenario 8										
Desired:	WHRM-TV	D24	DT	LIC	WAUSAU, WI	File Number	Distance			
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	140.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	140.4			
	WBAY-TV	D23	DT	LIC	GREEN BAY, WI	BMLCOT20040723ADS	145.1			
	KIMT	D24	DT	BL	MASON CITY, IA	DTVBL66402	289.1			
	WFLD	D24	DT	CP	CHICAGO, IL	DTVBL22211	376.6			
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	145.1			
Service area										
26867.1	495.398	26799.1	495.174	26468.4	492.522	IX-free, before	Percent New IX			
						26468.4	0.00			
						492.522	0.00			
Undesired						Unique IX, after				
WOOW D25 DT BL		39.8	122	16.0	78	16.0	78			
WOOW D25 DT CP		35.8	104			119.5	1,301			
WBAY-TV D23 DT LIC		155.4	1,693	119.5	1,301	135.5	844			
KIMT D24 DT BL		155.3	870	131.5	826	4.0	11			
WFLD D24 DT CP		4.0	11	4.0	11	0.0	0			
WPNE-TV D25 DT BL		35.9	392	0.0	0	0.0	0			

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Interference to BLANK0000031831 CP scenario 1										
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831				
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	277.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	277.5			
	WHRM-TV	D24	DT	APP	WAUSAU, WI	BLANK0000035674	145.1			
	WTTW	D25	DT	CP	CHICAGO, IL	BLANK0000034877	282.8			
Service area										
29994.3	1,161,295	29954.5	1,160,631	29878.9	1,159,883	IX-free, before	Percent New IX			
						29878.9	0.00			0.00
Undesired						Unique IX, before	Unique IX, after			
WOOW D25 DT BL		16.1	123	12.1	103		12.1			103
WOOW D25 DT CP		16.1	123				12.0			24
WHRM-TV D24 DT APP		16.0	44	12.0	24		47.6			601
WTTW D25 DT CP		47.6	601	47.6	601					
Interference to BLANK0000031831 CP scenario 2										
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831				
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	277.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	277.5			
	WHRM-TV	D24	DT	LIC	WAUSAU, WI	BLEDT20051014AAW	145.1			
	WTTW	D25	DT	CP	CHICAGO, IL	BLANK0000034877	282.8			
Service area										
29994.3	1,161,295	29954.5	1,160,631	29890.8	1,159,907	IX-free, before	Percent New IX			
						29890.8	0.00			0.00
Undesired						Unique IX, before	Unique IX, after			
WOOW D25 DT BL		16.1	123	12.1	103		12.1			103
WOOW D25 DT CP		16.1	123				0.0			0
WHRM-TV D24 DT LIC		4.0	20	0.0	0		47.6			601
WTTW D25 DT CP		47.6	601	47.6	601					
Interference to BLANK0000031831 CP scenario 3										
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831				
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	277.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	277.5			
	WHRM-TV	D24	DT	APP	WAUSAU, WI	BLANK0000035674	145.1			
	WTTW	D25	DT	BL	CHICAGO, IL	DTVBL10802	282.8			
Service area										
29994.3	1,161,295	29954.5	1,160,631	29871.0	1,159,771	IX-free, before	Percent New IX			
						29871.0	0.00			0.00
Undesired						Unique IX, before	Unique IX, after			
WOOW D25 DT BL		16.1	123	12.1	103		12.1			103
WOOW D25 DT CP		16.1	123				0.0			0
WHRM-TV D24 DT APP		16.0	44	12.0	24		55.5			713
WTTW D25 DT BL		55.5	713	55.5	713					
Interference to BLANK0000031831 CP scenario 4										
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance			
	WPNE-TV	D25	DT	CP	GREEN BAY, WI	BLANK0000031831				
Undesireds:	WOOW	D25	DT	BL	EAU CLAIRE, WI	DTVBL64550	277.5 km			
	WOOW	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	277.5			
	WHRM-TV	D24	DT	APP	WAUSAU, WI	BLANK0000035674	145.1			
	WTTW	D25	DT	BL	CHICAGO, IL	DTVBL10802	282.8			
Service area										
29994.3	1,161,295	29954.5	1,160,631	29871.0	1,159,771	IX-free, before	Percent New IX			
						29871.0	0.00			0.00
Undesired						Unique IX, before	Unique IX, after			
WOOW D25 DT BL		16.1	123	12.1	103		12.1			103
WOOW D25 DT CP		16.1	123				12.0			24
WHRM-TV D24 DT APP		16.0	44	12.0	24		55.5			713
WTTW D25 DT BL		55.5	713	55.5	713					

Lohnes & Culver LLC

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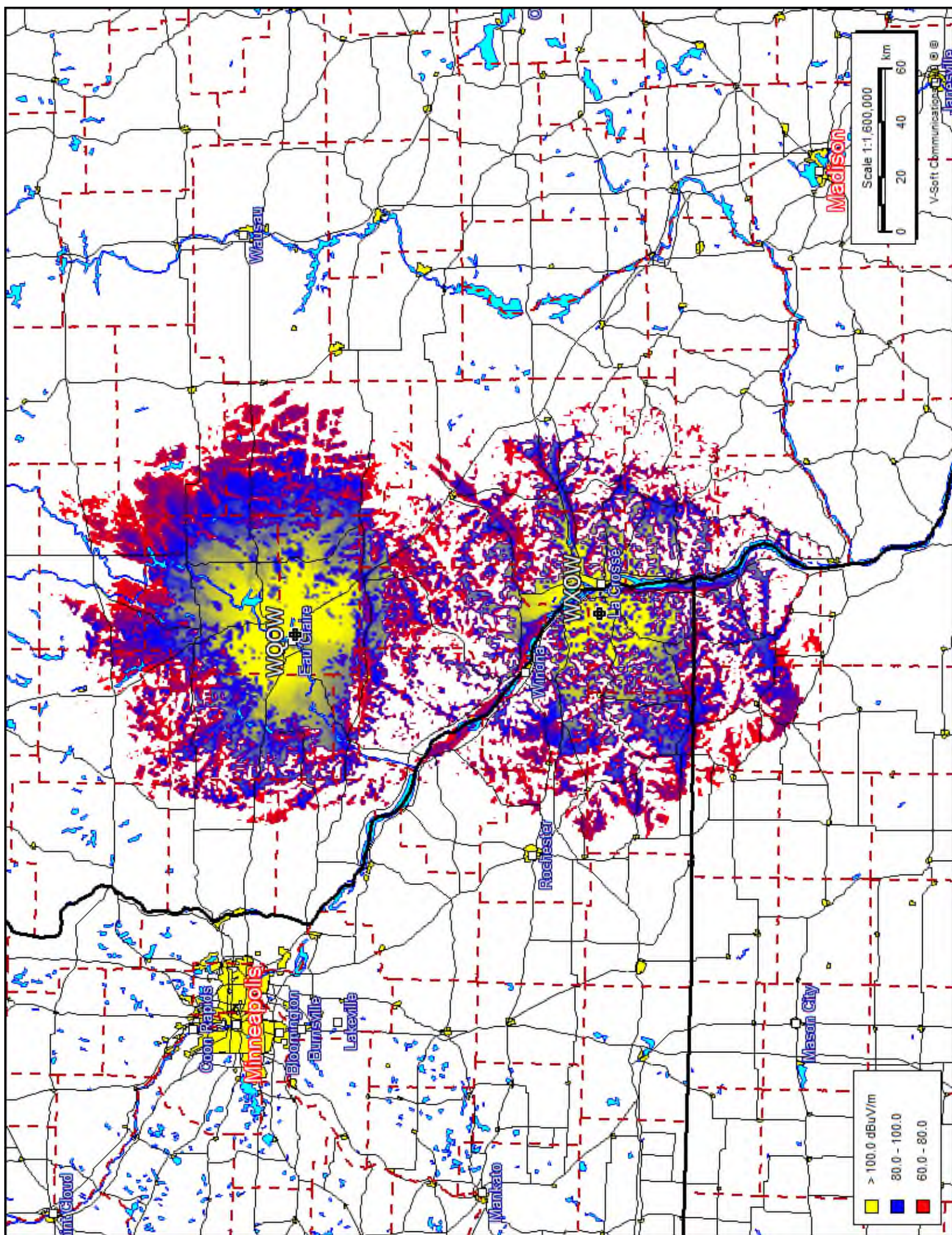


Service area 29994.3 1,161,295	WHRM-TV	D24	DT	LIC	WAUSAU, WI	BLDT20051014AAW	145.1
	WTTW	D25	DT	BL	CHICAGO, IL	DTVBL10802	282.8
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	29954.5 1,160,631		29882.9 1,159,795		29882.9 1,159,795		0.00 0.00
Undesired	WCOB	D25	DT	BL	16.1 123	12.1 103	
	WCOB	D25	DT	CP	16.1 123	12.1 103	
	WHRM-TV	D24	DT	LIC	4.0 20	0.0 0	
	WTTW	D25	DT	BL	55.5 713	55.5 713	
Interference to DTVBL18798 BL scenario 1							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	
	Undesireds:		D25		DT		277.5 km
	WCOB		D25		DT		277.5 km
Service area 26861.2 1,132,117	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	CP	24.1 206	24.1 206	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	26849.1 1,131,948		26813.1 1,131,647		26813.1 1,131,647		0.00 0.00
Undesired	WCOB	D25	DT	BL	4.0 32	0.0 0	
	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	CP	24.1 206	24.1 206	
Interference to DTVBL18798 BL scenario 2							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	
	Undesireds:		D25		DT		277.5 km
	WCOB		D25		DT		277.5 km
Service area 26861.2 1,132,117	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	LIC	12.0 95	7.9 63	
	WTTW	D25	DT	CP	24.1 206	24.1 206	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	26849.1 1,131,948		26817.0 1,131,697		26817.0 1,131,697		0.00 0.00
Undesired	WCOB	D25	DT	BL	4.0 32	4.0 32	
	WCOB	D25	DT	CP	4.0 32	4.0 13	
	WHRM-TV	D24	DT	LIC	4.0 13	4.0 13	
	WTTW	D25	DT	CP	24.1 206	24.1 206	
Interference to DTVBL18798 BL scenario 3							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WPNE-TV	D25	DT	BL	GREEN BAY, WI	DTVBL18798	
	Undesireds:		D25		DT		277.5 km
	WCOB		D25		DT		277.5 km
Service area 26861.2 1,132,117	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	55.5 713	55.5 713	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	26849.1 1,131,948		26809.0 1,131,447		26809.0 1,131,447		0.00 0.00
Undesired	WCOB	D25	DT	BL	4.0 32	0.0 0	
	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	55.5 713	55.5 713	

Service area 26861.2 1,132,117	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	26849.1 1,131,948		26813.0 1,131,497		26813.0 1,131,497		0.00 0.00
Undesired	WCOB	D25	DT	BL	4.0 32	4.0 32	
	WCOB	D25	DT	CP	4.0 32	4.0 32	
	WHRM-TV	D24	DT	LIC	4.0 13	4.0 13	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
Interference to proposal scenario 1							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCOB	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	
	Undesireds:		D24		DT		140.4 km
	WHRM-TV		D25		DT		323.1
Service area 20006.2 369,066	WCOB	D25	DT	CP	4.0 32	0.0 0	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	19459.2 358,576		19363.4 357,547		19363.4 357,547		0.49 0.29
Undesired	KTIN	D25	DT	LIC	4.0 50	4.0 50	
	KTIN	D25	DT	CP	4.0 50	4.0 50	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
Interference to proposal scenario 2							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCOB	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	
	Undesireds:		D24		DT		140.4 km
	WHRM-TV		D25		DT		323.1
Service area 20006.2 369,066	WCOB	D25	DT	CP	4.0 50	4.0 50	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	19459.2 358,576		19363.4 357,547		19363.4 357,547		0.49 0.29
Undesired	KTIN	D25	DT	LIC	4.0 50	4.0 50	
	KTIN	D25	DT	CP	4.0 50	4.0 50	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
Interference to proposal scenario 2							
Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WCOB	D25	DT	CP	EAU CLAIRE, WI	BLANK0000027863	
	Undesireds:		D24		DT		140.4 km
	WHRM-TV		D25		DT		323.1
Service area 20006.2 369,066	WCOB	D25	DT	CP	4.0 50	4.0 50	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	
	Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	19459.2 358,576		19363.4 357,547		19363.4 357,547		0.49 0.29
Undesired	KTIN	D25	DT	LIC	4.0 50	4.0 50	
	KTIN	D25	DT	CP	4.0 50	4.0 50	
	WHRM-TV	D24	DT	APP	12.0 95	7.9 63	
	WTTW	D25	DT	BL	28.2 406	28.2 406	

## Longley-Rice Contour Comparison WQOW and WXOW





## Vendor Letters





5300 Kings Island Dr  
Mason, OH USA 45040  
1 800.622.0022  
gatesair.com

June 11, 2018

Brady Dreasler  
Director of Capital, Engineering and Facilities  
Quincy Media, Inc.  
130 South 5th Street  
Quincy, IL 62301

Dear Mr. Dreasler:

This letter is intended to confirm that GatesAir has the capacity to deliver transmission equipment for station WQOW in time to make your on-air date of 9/7/18. This will not prevent GatesAir from fulfilling other orders or other customer commitments required for earlier phases. In fact, it will allow GatesAir to more efficiently utilize our manufacturing capacity.

Should you have any question, please feel free to contact us for any further clarifications.

Best Regards,

A handwritten signature in blue ink, reading "Raymond A. Miklius".

Raymond Miklius  
Director, Television Transmission Product Line  
GatesAir, Inc.  
[rmiklius@gatesair.com](mailto:rmiklius@gatesair.com)



*Precision  
Communications,  
Inc.*



Precision Communications, Inc.

"Total Customer Satisfaction"

24 Hour Emergency Service 918-786-8084

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June 12, 2018

VIA EMAIL: [bdreasler@quincymedia.com](mailto:bdreasler@quincymedia.com)

Brady W Dreasler  
Corporate Director of Engineering  
Quincy Media, Inc.  
130 South 5th Street  
Quincy, IL 62301

**RE: WQOW REPACK Timeline**

Brady,

This letter confirms our discussions and the scheduling of the transmission line replacement and adjustment (peaking) of the tuning section for the repack project for WQOW, Eau Claire, WI. PCI wants to, is able to, and will complete the work on a timeline that will make it possible for WQOW to transition to its new channel on September 7, 2018.

PCI appreciates the opportunity to complete all of the work for WQOW during the summer of 2018. As you know, we are hesitant to schedule a job for WQOW after October and before April because the weather in northwest Wisconsin is likely to throw off our schedule, which would have deleterious consequences for other repack clients. For example, the weather in April 2018 was so bad that we had to delay the work we scheduled in April at WXOW until things cleared up and made the WXOW site workable in mid-May. I don't want that to happen with WQOW. With the rest of the nationwide transition starting this year, we really don't want to be in the position of having to delay or reschedule any work for WQOW. Getting WQOW done this summer in time for you to transition WQOW in early September is best for PCI, and it will free us up to better serve our other repack clients without having to worry about coming back to finish WQOW on an uncertain schedule in the early spring.

Please let me know if you have or the FCC has any questions or need anything further on this matter.

Thank you,

A handwritten signature in blue ink, appearing to read "Ron Scalfani".

Ron Scalfani  
Logistics Coordinator