ENGINEERING STATEMENT
IN SUPPORT OF AN APPLICATION FOR
CONSTRUCTION PERMIT
FOR THE PROPOSED DIGITAL TV OPERATION OF
WFQX-DT, CADILLAC, MICHIGAN
APRIL 2009

This engineering statement has been prepared on behalf of Cadillac Telecasting Co. ("CTC"), licensee of television station WFQX-TV, Cadillac, Michigan and is in support of its application for a construction permit to operate on TV Channel 32 (578-584 MHz) for station's digital TV operation.

At present WFQX-TV, Facility ID Number 25396, is authorized to operate its analog TV facilities on Channel 33 with 776 kW effective radiated power (ERP) and 297 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. In MB Docket 08-252, RM-11509, the Commission has allotted TV Channel 32 (578-584 MHz) for the DTV operation of WFQX-DT with 175 kW ERP, 426 meters HAAT and a directional TV antenna. CTC is filing the instant application for a construction permit to operate on DTV Channel 32 with 175 kW ERP and 422 meters HAAT. The proposed operation would be with a directional TV antenna which is slightly different than requested with the petition for rule making filed for DTV Channel 32. However, as indicated in the attached map (Figure 1) the proposed 41 dBu contour does not extend the allotted 41 dBu contour in any direction. Therefore, the proposed operation is compatible with the Commission's allotted facilities and it is believed the proposal does not require further coordination with Canada.

The following information provides pertinent data for the proposed WFQX-DT operation.

Name of the Licensee:	Cadillac Telecasting Co.
Station Location:	MI-Cadillac
Channel:	32

Hours of Operation:	Unlimited			
Transmitter:	Type Accepted			
Antenna Type:	MCI, 975124-32			
Beam Tilt:	1.0 degrees			
Antenna Coordinates:	North Latitude:	44 deg	08 min	12 sec
	West Longitude:	85 deg	20 min	33 sec
Transmitter output power:	As required to achieve authorized ERP			

Maximum effective radiated power (Average):	175 kW 22.43 dBk
Elevation of site above mean sea level:	519.5 meters
Overall height of the tower above ground:	393.3 meters
Height of radiation center above ground (meters):	305 meters
Height of radiation center above mean sea level (meters):	824.5 meters
Height of radiation center above average terrain (meters):	422 meters
Antenna Structure Registration No.:	1002422

Response to questions listed on the FCC Form 301, Section III-D-DTV

Engineering

Question 1. (a)

WFQX-TV is proposing digital television operation on TV Channel 32 as allotted by the Commission in MB Docket No. 08-252, RM-11509.

Question 1. (d)

An interference study conducted (see attached Table I) according to the FCC OET Bulletin 69 indicates the proposed WFQX-DT operation would not cause any interference to other DTV stations exceeding the Commission's guidelines.

Question 1. (e)

The proposed DTV operation on Channel 32 would serve 506,271 people within the noise limited service area as compared to 512,000 or 98.9% of the predicted population listed in MB Docket No. 08-252.

Question 2.

The attached environmental statement demonstrates that there will not be any significant environmental impact from the proposed DTV operation in accordance with 47 C.F.R. Section 73.1307.

Question 3.

The attached map shows the proposed WFQX-DT 48 dBu contour will encompass the allotted principal community of Cadillac, Michigan (see Figure 2).

Question 4.

The proposed WFQX-DT facility complies with Section 73.1030 of the Commission's rules; therefore, notification to radio astronomy installations, radio receiving installations and FCC monitoring stations is not required.

Question 5.

WFQX-DT would be operating from the existing tower which is registered (ASR No. 1002422) by the Commission and no changes are proposed to require a change in the registration.

Table I

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TW Census data selected 2000
 Post Transition Data Base Selected /space/software/cdbs/pt_tvdb.sff

             TV INTERFERENCE and SPACING ANALYSIS PROGRAM


 Date: 04-30-2009    Time: 10:08:03

 Record Selected for Analysis

 WFQX-TV  USERRECORD-01              CADILLAC             MI US
 Channel 32 ERP 175.   kW   HAAT  422. m  RCAMSL 00825 m
 Latitude 044-08-12  Longitude 0085-20-33
 Status APP       Zone 2    Border
 Dir Antenna Make usr  Model WFQX-NEWDA      Beam tilt N  Ref Azimuth 135.
 Last update           Cutoff date           Docket
 Comments
 Applicant



 Cell Size for Service Analysis 2.0 km/side

 Distance Increments for Longley-Rice Analysis 1.00 km


 Facility meets maximum height/power limits

    Azimuth     ERP        HAAT   41.0 dBu F(50,90)
     (Deg)      (kW)       (m)        (km)
      0.0       51.504     390.9       82.3
     45.0       71.456     422.1       86.3
     90.0      140.964     435.5       91.7
    135.0      175.000     441.8       93.7
    180.0      138.151     407.9       90.1
    225.0       69.017     434.8       86.7
    270.0       52.170     436.9       84.9
    315.0       66.621     407.3       85.0



                   Evaluation toward Class A Stations


No Spacing violations or contour overlap to Class A stations


                   Class A Evaluation Complete


                   SPACING VIOLATION FOUND BETWEEN STATION

 WFQX-TV  32 CADILLAC             MI USERRECORD01


 and station


 SHORT TO: WGTU     29 TRAVERSE CITY        MI BLCT      20041012AIJ
 044-44-53  0085-04- 8
 Req. separation => 24.1 <=  96.6 Actual separation  71.3 Short  25.3( 47.2) km


 SHORT TO: WFQX-DR  32 CADILLAC             MI BPRM      20080620AOP
 044-08-12  0085-20-33
 Req. separation 223.7 Actual separation   0.0 Short 223.7 km
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 SHORT TO: WACY     32 APPLETON             WI BSTA      20090219AAP
 044-21-30  0087-58-48
 Req. separation 244.6 Actual separation 212.1 Short  32.5 km


 SHORT TO: WACY     32 APPLETON             WI BMLCT     19990831LF
 044-21-30  0087-58-48
 Req. separation 244.6 Actual separation 212.1 Short  32.5 km

                   LANDMOBILE SPACING VIOLATIONS FOUND


                   NONE


 Proposed facility OK to FCC Monitoring Stations

 Proposed facility OK toward West Virginia quiet zone

 Proposed facility OK toward Table Mountain

 Proposed facility is within the Canadian coordination distance
 Distance to border =   232.5km

 Proposed facility is beyond the Mexican coordination distance

 Proposed station is OK toward AM broadcast stations

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                        Start of Interference Analysis


              Proposed Station
Channel     Call         City/State               ARN
   32      WFQX-TV    CADILLAC MI                 USERRECORD01

     Stations Potentially Affected by  Proposed Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 29   WOMS-CA  MUSKEGON MI              113.6  LIC    BLTTA     -20060926AEA
 31   WPXD     ANN ARBOR MI             221.4  CP MOD BMPCDT    -20080619AHZ
 31   WPXD     ANN ARBOR MI             221.4  PLN    DTVPLN    -DTVP1142
 32   WBUW     JANESVILLE WI            354.7  LIC    BLCDT     -20040930BHL
 32   WBUW     JANESVILLE WI            354.7  PLN    DTVPLN    -DTVP1200
 33   WOHO-CA  HOLLAND MI               154.9  CP     BDFCDTA   -20060330AMF
 33   WOHO-CA  HOLLAND MI               154.9  APP    BMPDTA    -20080804ADV

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     Analysis of Interference to Affected Station   1


Analysis of current record
Channel     Call          City/State        Application Ref. No.
   29      WOMS-CA    MUSKEGON MI              BLTTA     -20060926AEA

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 21   WCMW     MANISTEE MI               91.6  CP     BPEDT     -20080222ABG
 21   WCMW     MANISTEE MI               91.6  PLN    DTVPLN    -DTVP0763
 21   WCMW     MANISTEE MI               91.6  APP    BMPEDT    -20080617ABS
 26   WCMU-TV  MOUNT PLEASANT MI         88.5  CP MOD BMPEDT    -20080619AFX
 26   WCMU-TV  MOUNT PLEASANT MI         88.5  PLN    DTVPLN    -DTVP0952
 29   WMAQ-TV  CHICAGO IL               199.9  LIC    BLCDT     -20010531ACY
 29   WMAQ-TV  CHICAGO IL               199.9  PLN    DTVPLN    -DTVP1063
 29   WTTK     KOKOMO IN                375.1  CP MOD BMPCDT    -20080620AHB
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29	WTTK	KOKOMO IN	375.1	PLN	DTVPLN	-DTVP1064
29	WTTK	KOKOMO IN	325.1	LIC	BLCT	-19880523KI
29	WUHQ-LP	GRAND RAPIDS MI	46.0	LIC	BLTTL	-20030404AAA
29	WGTU	TRAVERSE CITY MI	183.7	CP	BPCDT	-20080619AJY
29	WGTU	TRAVERSE CITY MI	183.7	PLN	DTVPLN	-DTVP1068
29	WGTU	TRAVERSE CITY MI	183.7	LIC	BLCT	-20041012AIJ
29	WGTE-TV	TOLEDO OH	280.8	LIC	BLEDT	-20031110AKO
29	WGTE-TV	TOLEDO OH	280.8	PLN	DTVPLN	-DTVP1081
29	W29DJ	SHEBOYGAN WI	149.3	CP	BPTTL	-20080311ABX
32	WFQX-DR	CADILLAC MI	113.6	APP	BPRM	-20080620AOP
43	WZPX	BATTLE CREEK MI	104.7	LIC	BLCT	-19961017KE
44	WZPX	BATTLE CREEK MI	104.7	LIC	BLCDT	-20020510AAG
44	WZPX	BATTLE CREEK MI	104.7	PLN	DTVPLN	-DTVP1577
32	WFQX-TV	CADILLAC MI	113.6	APP	USERRECORD	-01

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WPXD	ANN ARBOR MI	BMPCDT -20080619AHZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WEYI-TV	SAGINAW MI	97.9	LIC	BLCDT -20040123ASH
30	WEYI-TV	SAGINAW MI	97.9	PLN	DTVPLN -DTVP1105
30	WBNX-TV	AKRON OH	225.1	LIC	BLCDT -20070430AXX
30	WBNX-TV	AKRON OH	225.1	PLN	DTVPLN -DTVP1110
30	WBNX-TV	AKRON OH	225.1	APP	BPCDT -20080619AFL
31	WFLD	CHICAGO IL	299.1	CP	BPCDT -20080616AAN
31	WFLD	CHICAGO IL	299.1	PLN	DTVPLN -DTVP1136
31	WFLD	CHICAGO IL	299.1	LIC	BLCDT -20050606ABF
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20080313AAW
31	WANE-TV	FORT WAYNE IN	169.5	PLN	DTVPLN -DTVP1137
32	WFQX-DR	CADILLAC MI	221.4	APP	BPRM -20080620AOP
32	WFQX-TV	CADILLAC MI	221.4	APP	USERRECORD -01

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WPXD	ANN ARBOR MI	DTVPLN -DTVP1142

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WEYI-TV	SAGINAW MI	97.9	LIC	BLCDT -20040123ASH
30	WEYI-TV	SAGINAW MI	97.9	PLN	DTVPLN -DTVP1105
30	WBNX-TV	AKRON OH	225.1	LIC	BLCDT -20070430AXX
30	WBNX-TV	AKRON OH	225.1	PLN	DTVPLN -DTVP1110
30	WBNX-TV	AKRON OH	225.1	APP	BPCDT -20080619AFL
31	WFLD	CHICAGO IL	299.1	CP	BPCDT -20080616AAN
31	WFLD	CHICAGO IL	299.1	PLN	DTVPLN -DTVP1136
31	WFLD	CHICAGO IL	299.1	LIC	BLCDT -20050606ABF
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20080313AAW
31	WANE-TV	FORT WAYNE IN	169.5	PLN	DTVPLN -DTVP1137
32	WFQX-DR	CADILLAC MI	221.4	APP	BPRM -20080620AOP

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 32   WFQX-TV  CADILLAC MI               221.4  APP    USERRECORD-01

 Proposed station is beyond the site to
 nearest cell evaluation distance

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     Analysis of Interference to Affected Station   4


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   32      WBUW       JANESVILLE WI             BLCDT     -20040930BHL

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 31   WFLD     CHICAGO IL               200.0  CP     BPCDT     -20080616AAN
 31   WFLD     CHICAGO IL               200.0  PLN    DTVPLN    -DTVP1136
 31   WFLD     CHICAGO IL               200.0  LIC    BLCDT     -20050606ABF
 31   WFXS-DR  WITTENBERG WI            222.9  APP    BPRM      -20080612ADX
 31   WFXS     WITTENBERG WI            222.9  PLN    DTVPLN    -DTVP1160
 31   WFXS     WITTENBERG WI            222.9  CP MOD BMPCDT    -20081117ACB
 32   WTJR     QUINCY IL                374.9  CP MOD BMPCDT    -20080919ABT
 32   WTJR     QUINCY IL                375.0  PLN    DTVPLN    -DTVP1176
 32   WFQX-DR  CADILLAC MI              354.7  APP    BPRM      -20080620AOP
 32   WCCO-TV  MINNEAPOLIS MN           367.5  LIC    BLCDT     -20010921ABB
 32   WCCO-TV  MINNEAPOLIS MN           367.5  PLN    DTVPLN    -DTVP1180
 33   WITI     MILWAUKEE WI             129.2  APP    BMPCDT    -20081204ADM
 33   WITI     MILWAUKEE WI             129.2  PLN    DTVPLN    -DTVP1234
 33   WITI     MILWAUKEE WI             128.6  CP MOD BMPCDT    -20080620ANH
 32   WFQX-TV  CADILLAC MI              354.7  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   5


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   32      WBUW       JANESVILLE WI             DTVPLN    -DTVP1200

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 31   WFLD     CHICAGO IL               200.0  CP     BPCDT     -20080616AAN
 31   WFLD     CHICAGO IL               200.0  PLN    DTVPLN    -DTVP1136
 31   WFLD     CHICAGO IL               200.0  LIC    BLCDT     -20050606ABF
 31   WFXS-DR  WITTENBERG WI            222.9  APP    BPRM      -20080612ADX
 31   WFXS     WITTENBERG WI            222.9  PLN    DTVPLN    -DTVP1160
 31   WFXS     WITTENBERG WI            222.9  CP MOD BMPCDT    -20081117ACB
 32   WTJR     QUINCY IL                374.9  CP MOD BMPCDT    -20080919ABT
 32   WTJR     QUINCY IL                375.0  PLN    DTVPLN    -DTVP1176
 32   WFQX-DR  CADILLAC MI              354.7  APP    BPRM      -20080620AOP
 32   WCCO-TV  MINNEAPOLIS MN           367.5  LIC    BLCDT     -20010921ABB
 32   WCCO-TV  MINNEAPOLIS MN           367.5  PLN    DTVPLN    -DTVP1180
 33   WITI     MILWAUKEE WI             129.2  APP    BMPCDT    -20081204ADM
 33   WITI     MILWAUKEE WI             129.2  PLN    DTVPLN    -DTVP1234
 33   WITI     MILWAUKEE WI             128.6  CP MOD BMPCDT    -20080620ANH
 32   WFQX-TV  CADILLAC MI              354.7  APP    USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   6
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Analysis of current record

Channel	Call	City/State	Application Ref. No.
33	WOHO-CA	HOLLAND MI	BDFCDTA -20060330AMF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
32	WFQX-DR	CADILLAC MI	154.9	APP	BPRM -20080620AOP
33	WSTR-TV	CINCINNATI OH	419.5	APP	BMPCDT -20080620AHH
33	WSTR-TV	CINCINNATI OH	419.5	PLN	DTVPLN -DTVP1221
33	WSTR-TV	CINCINNATI OH	419.5	CP MOD	BMPCDT -20070720AAM
33	WITI	MILWAUKEE WI	160.9	APP	BMPCDT -20081204ADM
33	WITI	MILWAUKEE WI	160.8	PLN	DTVPLN -DTVP1234
33	WITI	MILWAUKEE WI	161.5	CP MOD	BMPCDT -20080620ANH
34	WHTV	JACKSON MI	129.7	CP MOD	BMPCDT -20070125ACI
34	WHTV	JACKSON MI	125.1	PLN	DTVPLN -DTVP1253
34	WHTV	JACKSON MI	129.7	APP	BPCDT -20080620AGY
34	WISN-TV	MILWAUKEE WI	163.8	LIC	BLCDT -20050412ADP
34	WISN-TV	MILWAUKEE WI	163.8	PLN	DTVPLN -DTVP1275
32	WFQX-TV	CADILLAC MI	154.9	APP	USERRECORD-01

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
33	WOHO-CA	HOLLAND MI	BMPDTA -20080804ADV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
32	WFQX-DR	CADILLAC MI	154.9	APP	BPRM -20080620AOP
33	WSTR-TV	CINCINNATI OH	419.5	APP	BMPCDT -20080620AHH
33	WSTR-TV	CINCINNATI OH	419.5	PLN	DTVPLN -DTVP1221
33	WSTR-TV	CINCINNATI OH	419.5	CP MOD	BMPCDT -20070720AAM
33	WITI	MILWAUKEE WI	160.9	APP	BMPCDT -20081204ADM
33	WITI	MILWAUKEE WI	160.8	PLN	DTVPLN -DTVP1234
33	WITI	MILWAUKEE WI	161.5	CP MOD	BMPCDT -20080620ANH
34	WHTV	JACKSON MI	129.7	CP MOD	BMPCDT -20070125ACI
34	WHTV	JACKSON MI	125.1	PLN	DTVPLN -DTVP1253
34	WHTV	JACKSON MI	129.7	APP	BPCDT -20080620AGY
34	WISN-TV	MILWAUKEE WI	163.8	LIC	BLCDT -20050412ADP
34	WISN-TV	MILWAUKEE WI	163.8	PLN	DTVPLN -DTVP1275
32	WFQX-TV	CADILLAC MI	154.9	APP	USERRECORD-01

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	WFQX-TV	CADILLAC MI	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
31	WPXD	ANN ARBOR MI	221.4	CP MOD	BMPCDT -20080619AHZ
31	WPXD	ANN ARBOR MI	221.4	PLN	DTVPLN -DTVP1142
32	WBUW	JANESVILLE WI	354.7	LIC	BLCDT -20040930BHL
32	WBUW	JANESVILLE WI	354.7	PLN	DTVPLN -DTVP1200

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 Total scenarios =   2


Result key:        1
Scenario        1  Affected station        8
Before Analysis

Results for: 32A MI CADILLAC             USERRECORD01           APP
   HAAT  422.0 m, ATV ERP  175.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      510404      24616.8
   not affected by terrain losses    506296      24412.6
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV          25          8.0
   lost to ATV IX only                   25          8.0
   lost to all IX                        25          8.0

 Potential Interfering Stations Included in above Scenario     1

32A WI JANESVILLE           BLCDT     20040930BHL  LIC

Result key:        2
Scenario        2  Affected station        8
Before Analysis

Results for: 32A MI CADILLAC             USERRECORD01           APP
   HAAT  422.0 m, ATV ERP  175.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      510404      24616.8
   not affected by terrain losses    506296      24412.6
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV          25          8.0
   lost to ATV IX only                   25          8.0
   lost to all IX                        25          8.0

 Potential Interfering Stations Included in above Scenario     2

32A WI JANESVILLE           DTVPLN    DTVP1200     PLN

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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ENVIRONMENTAL PROTECTION ACT

Since WFQX-DT will be using its currently licensed tower (ASR No. 1002422), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 175 kW and a radiation center of 305 meters above ground level, the proposed Channel 32 DTV operation would have a maximum of 2.5 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.2 in the downward direction.

The Commission's guidelines for Channel 32 are 1,927 $\mu W/cm^2$ for the occupational/controlled, and 385 $\mu W/cm^2$ for the general population/uncontrolled environment.

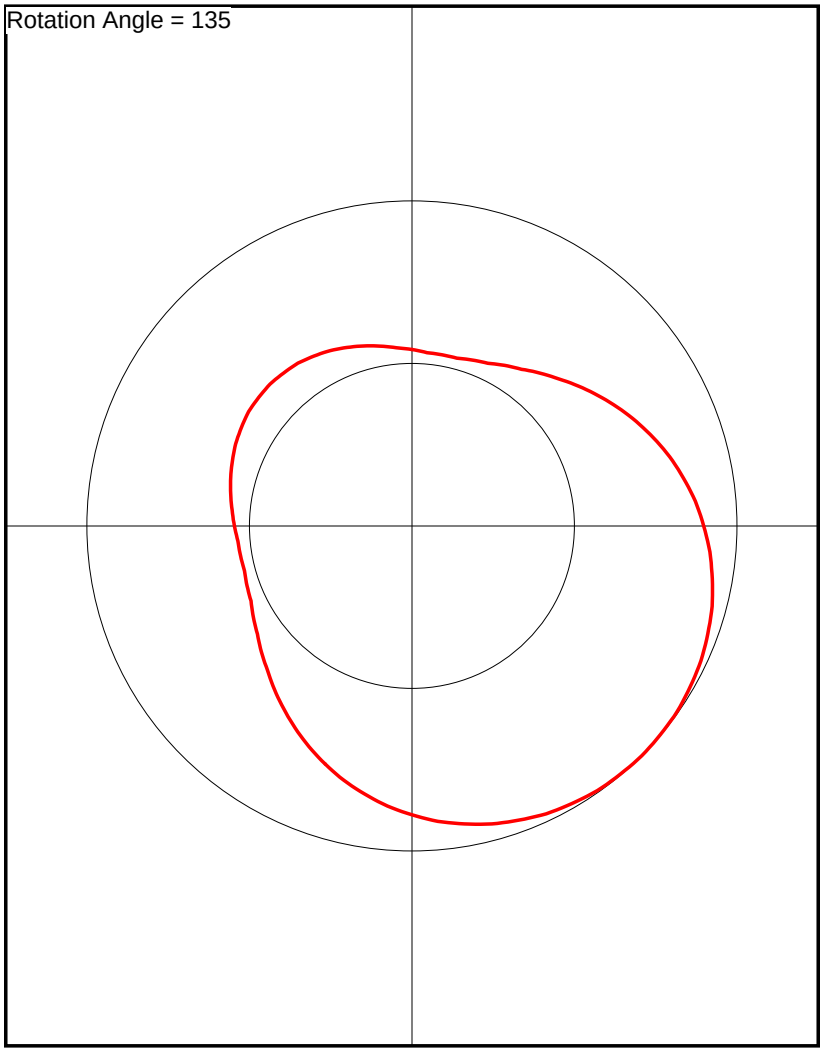
The above analysis indicates that members of the public and personnel working around the WFQX-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, WFQX-DT will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.

WFQX-DT Antenna Pattern

Pre-Rotation Antenna Pattern....

Azimuth (deg)	Effective Field
0.0	1.000
10.0	0.994
20.0	0.977
30.0	0.949
40.0	0.912
50.0	0.865
60.0	0.810
70.0	0.749
80.0	0.687
90.0	0.628
100.0	0.580
110.0	0.546
120.0	0.533
130.0	0.537
140.0	0.555
150.0	0.577
160.0	0.598
170.0	0.613
180.0	0.617
190.0	0.611
200.0	0.595
210.0	0.573
220.0	0.550
230.0	0.535
240.0	0.534
250.0	0.552
260.0	0.588
270.0	0.639
280.0	0.699
290.0	0.761
300.0	0.821
310.0	0.875
320.0	0.920
330.0	0.956
340.0	0.981
350.0	0.996



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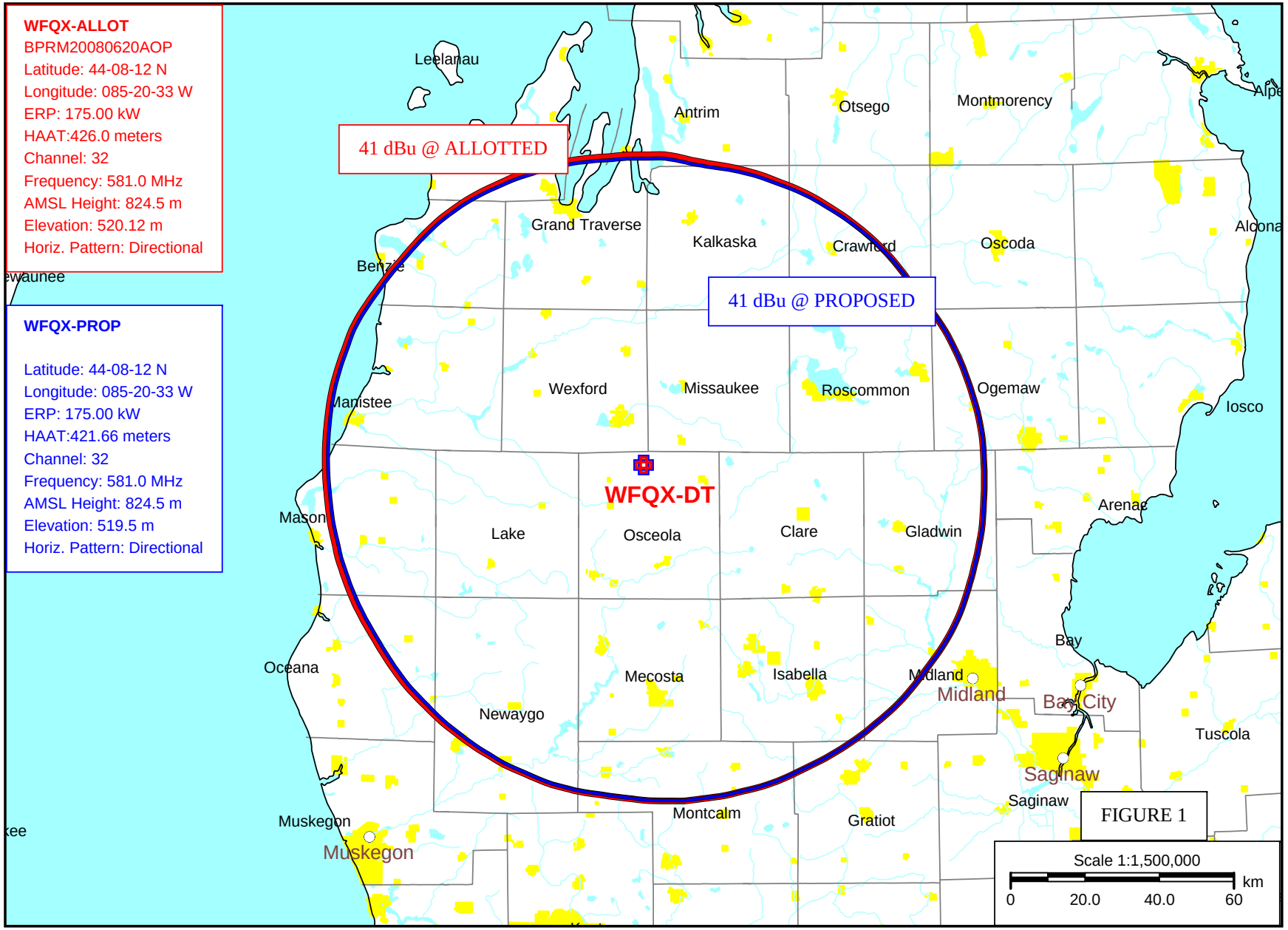

FIGURE 1

COMPUTED 41 dBu CONTOURS FOR THE ALLOTTED AND PROPOSED DTV OPERATION OF WFQX-DT, CADILLAC, MICHIGAN

KHANNA & GUILL, Inc. - Consulting Engineers

APRIL 2009

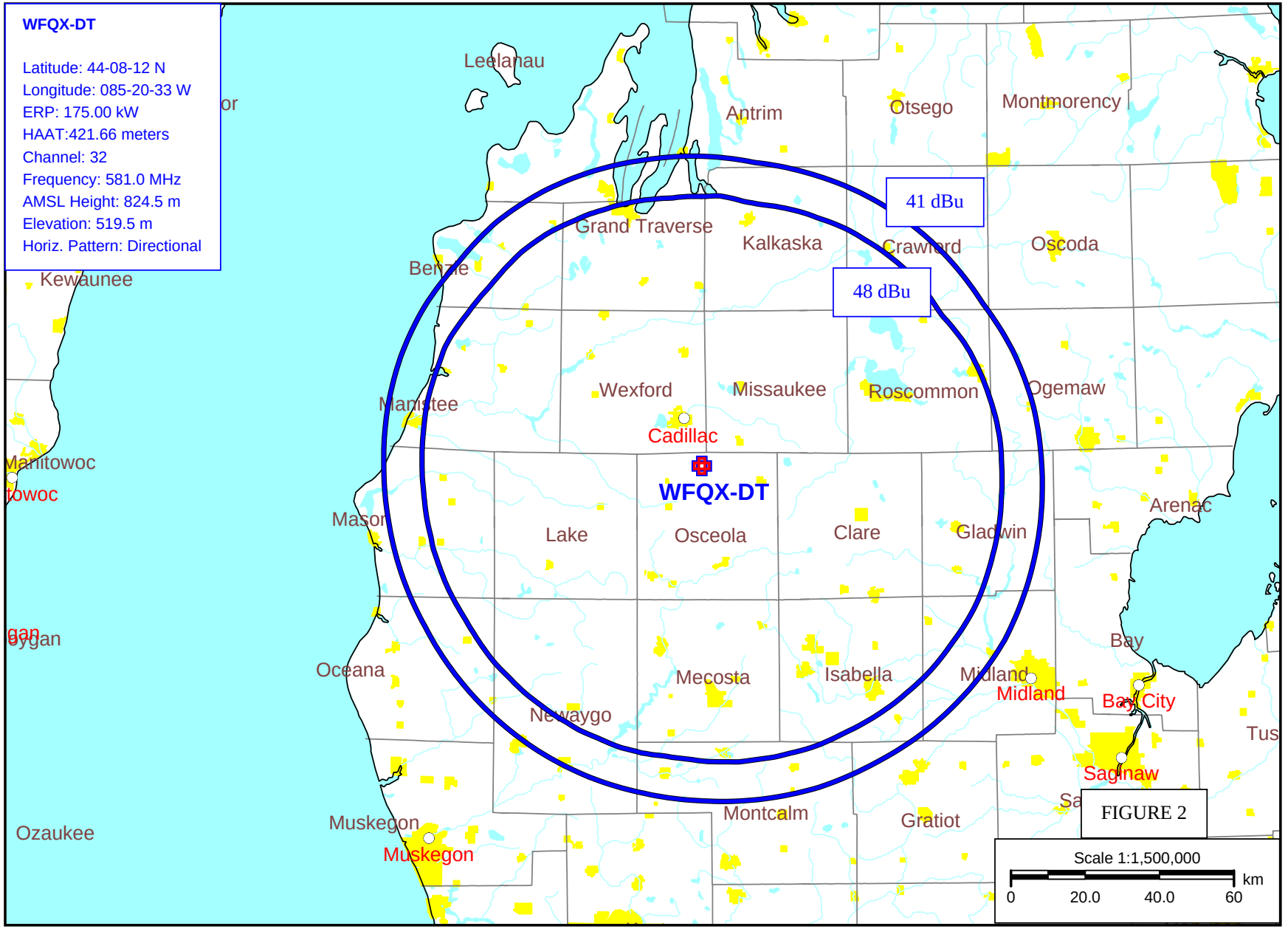

FIGURE 2

COMPUTED COVERAGE CONTOURS FOR THE PROPOSED DTV OPERATION OF WFQX-DT, CADILLAC, MICHIGAN