

Exhibit 9 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Polnet Communications, Ltd.**  
WPVN-CA Aurora, Illinois  
Facility ID 72079  
Ch. 20 (Digital) 15 kW (MAX-DA)

*Polnet Communications, Ltd.* (“*Polnet*”) is the licensee of analog Class A television station WPVN-CA, Channel 24, Aurora, Illinois, Facility ID 72079 (BLTTL-19990716JA); permittee of the facility authorized in the analog construction permit (BPTTA-20090817ABN); and the licensee of the digital companion low power television station, WPVN-LD, Channel 20, (BLDTL-20100315ABN)<sup>1</sup>. *Polnet* proposes herein to “flash-cut” to digital the WPVN-CA facility at a different location using Channel 20 due to displacement. Upon construction of the WPVN-CA facility requested herein, the WPVN-LD facility will cease operation.

**Nature of the Proposal**

The instant application qualifies as a “displacement” per §73.3572(a)(4)(iii) of the Commission’s Rules due to WPVN-CA’s proximity to WTLJ(TV) (Ch. 24, Muskegon, MI, 258 km distant). This co-channel facility is within the qualifying 265 km spacing specified in §73.3572(a)(4)(iv)(A) of the Rules for a displaced Class A UHF television facility.

The proposed antenna system for the digital WPVN-CA is a directional antenna (Dielectric Model TLP-8E, FCC antenna ID 19180, rotated 270°), which will be side-mounted on a existing top mounted decorative tower structure atop a building in downtown Chicago (FAA Aeronautical Study No. 2009-AGL-6739-OE). The building and associated roof mounted tower has not yet been registered with the Commission as an antenna structure by the building owner. Nonetheless, no change in structure overall height is necessary to carry out this proposal. Since no change to the structure’s overall height is proposed, no change to structure marking/lighting requirements set forth in the aeronautical study will result.

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<sup>1</sup> The Commission’s engineering database also shows a construction permit specifying operation of WPVN-LD on Channel 22 (see BDCCDTL-20061025ABB). This construction permit has since expired and does not warrant any further consideration.

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The attached **Exhibit 9 - Figure 1** supplies a plot of the WPVN-CA directional relative field pattern of antenna ID 19180 after a rotation of 270° and properly oriented with respect to True North. **Exhibit 9 - Figure 2** supplies a plot of the vertical (elevation) plane relative field pattern.

The proposed digital facility will operate on Channel 20 using a “stringent” out of channel emission mask, a maximum effective radiated power of 15 kW, and an antenna height of 572.7 meters AMSL. **Exhibit 9 - Figure 3** depicts the coverage contours of the authorized (analog 74 dBμ) and the proposed (digital 51 dBμ) facilities. As demonstrated on the provided map, the service area overlap shown demonstrates compliance with §73.3572(a)(4)(iii) for displacement of a Class A television facility.

**Allocation Considerations**

The instant proposal complies with the Commission’s interference protection requirements toward all DTV, television translator, LPTV, and Class A stations. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering and Technology Bulletin No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)<sup>2</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

In performing the OET-69 interference study, the licensed facility for the WPVN-LD digital companion facility (BLDTL-20100315ABN) was omitted from consideration. The facility proposed herein will replace the WPVN-LD facility. Further, the pending application for WGN-TV, Channel 19, Chicago, Illinois (see BPCDT-20080619AFN) is predicted to cause 2.5% interference to the instant proposal. Commission correspondence to WGN-TV indicates a defect in the application requiring a corrective amendment (see Letter 1800E3-TN, dated March 8, 2011). Since the WGN facility has not received Commission approval, *Polnet* agrees to accept the predicted interference. If

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<sup>2</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission’s implementation of OET-69 show excellent correlation.

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acceptance of the interference requires a waiver of the Commission's Rules, such a waiver is respectfully requested on behalf of the applicant.

The interference study results, summarized in **Exhibit 9 - Table I**, shows that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

#### **International Coordination**

The proposed transmitter site is located 370 km from the U.S.-Canadian border, which is greater than the 100 km required coordination distance specified for digital low power television stations in the Letter of Understanding<sup>3</sup> and but is less than the 400 km coordination distance for full service facilities. As demonstrated in **Exhibit 9 – Figure 4**, the worst-case interfering contour of 12.4 dBμ F(50,10)<sup>4</sup> does not reach the Canadian border. Thus, it is believed that international coordination will not be necessary for the instant proposal.

#### **Other Allocation Considerations**

The nearest FCC monitoring station is at Allegan, MI, at a distance of 159.2 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no

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<sup>3</sup> The Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border, September 29, 2000, paragraph 12.

<sup>4</sup> Ibid., Appendix 2. The worst-case interfering contour for UHF digital facilities is the co-channel DTV into DTV interference, defined as 19.5 dB below the 39 dBμ protected contour using the F(10,10) contour. 7.1 dBμ is then subtracted from 19.5 dBμ F(10,10) to obtain the equivalent 12.4 dBμ F(50,10) worst-case interfering contour.

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AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.



Date  
Call Letters  
Location  
Customer  
Antenna Type

22 Mar 2011  
WPVN-CA Channel 20  
Aurora, IL  
Polnet Communications, Ltd.  
TLP-8E

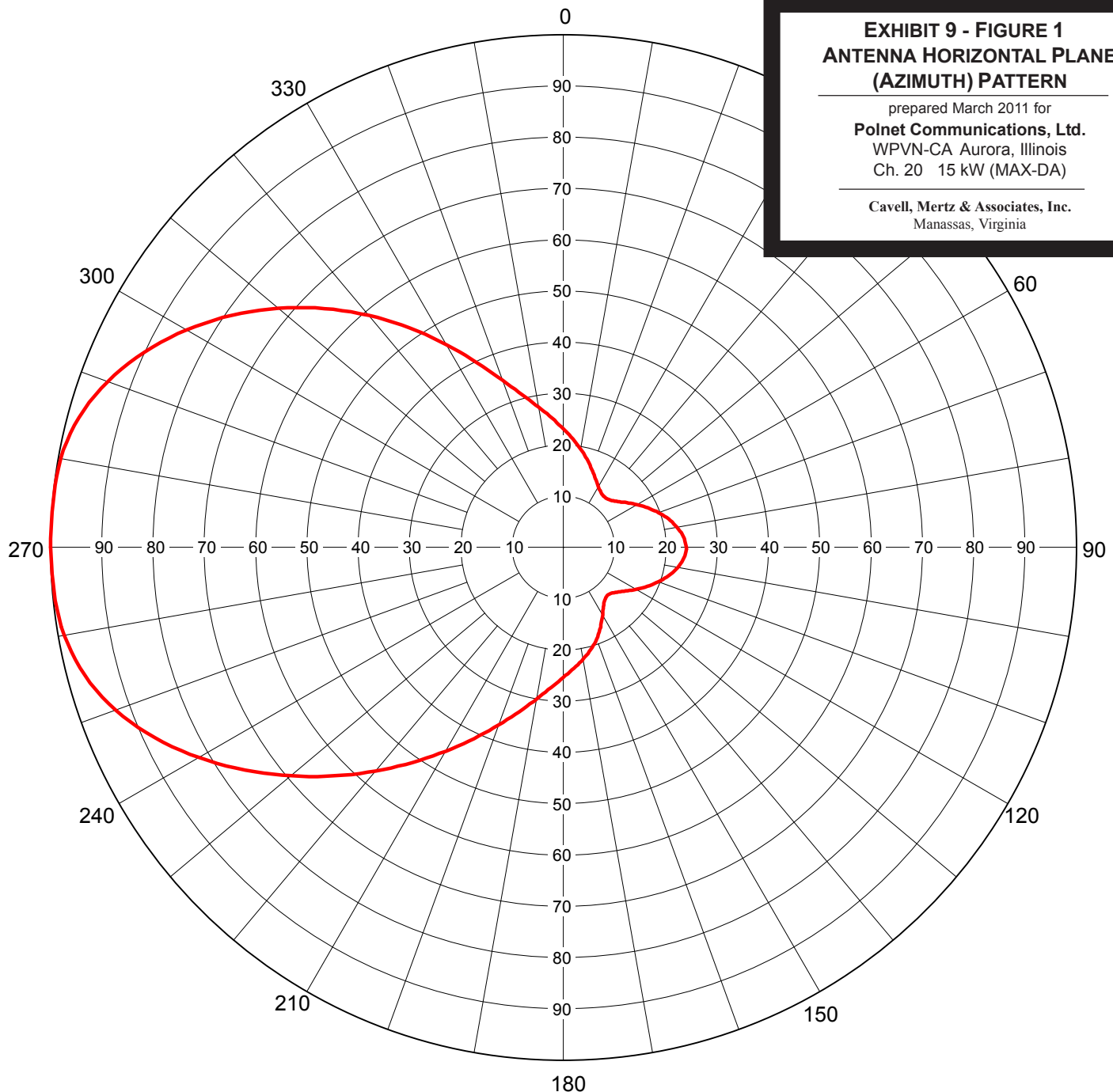
### AZIMUTH PATTERN

Gain  
Calculated / Measured

3.90 (5.91 dB)  
Calculated

Frequency  
Drawing #

509 MHz  
TLP-E



Remarks: Commission Standard Pattern ID 19180 after 270° rotation

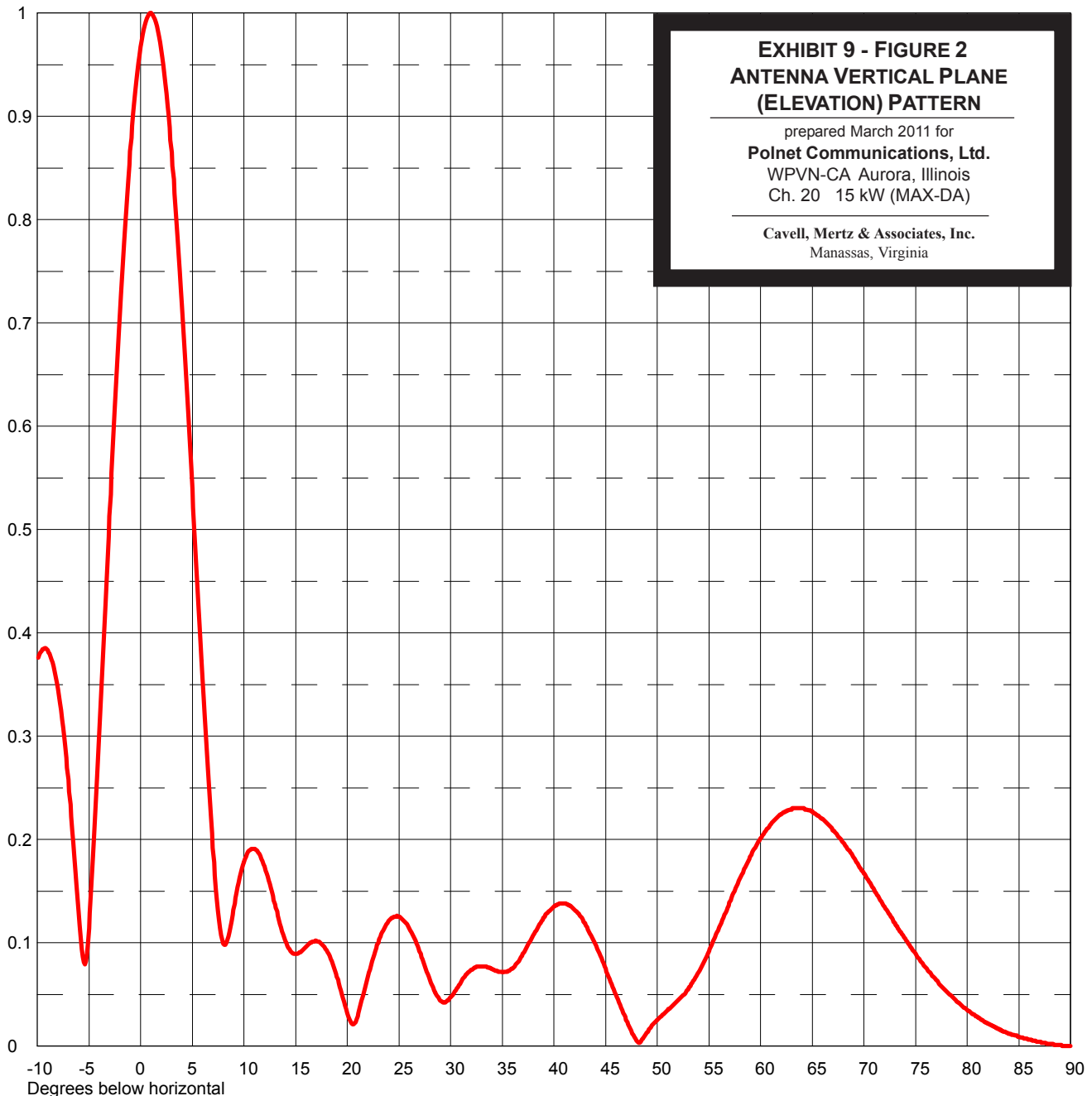


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### ELEVATION PATTERN

RMS Gain at Main Lobe	8.0 (9.03 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	7.5 (8.75 dB)	Frequency	509.00 MHz
Calculated / Measured	Calculated	Drawing #	08L080100-90



Remarks:



Exhibit 9 - Table I  
**INTERFERENCE STUDY RESULTS**  
 prepared for  
**Polnet Communications, Ltd.**  
 WPVN-CA Aurora, IL  
 Facility Id: 72079  
 Ch. 20 15 kW (MAX-DA)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
18	WEID-LP	Elkhart, IN	BLTT-20001011AEF			---	No Interference	---
18	WHNW-LD	Gary, IN	BSTA-20070309ACD			---	No Interference	---
19	W19DE-D	Champaign/Urbana, IL	BDCCDTL-20061026ACW			---	No Interference	---
19	WGN-TV	Chicago, IL	BPCDT-20080619AFN			---	No Interference	---
19	WGN-TV	Chicago, IL	BMLCDT-20080201APP			---	No Interference	---
19	W19CX	Sterling-Dixon, IL	BDFCDT-20060330AMI			---	No Interference	---
19	W19CX	Sterling-Dixon, IL	BLTT-20070806AFB			---	No Interference	---
19	WXMI	Grand Rapids, MI	BPCDT-20080619AKI			---	No Interference	---
19	WXMI	Grand Rapids, MI	BLCDT-20030117ABD			---	No Interference	---
19	WMTV	Madison, WI	BLCDT-20040823ABP			---	No Interference	---
19	WMTV	Madison, WI	BPCDT-20080609ABR			---	No Interference	---
20	K16EL	Davenport, IA	BDISDTL-20090813ACX			---	No Interference	---
20	NEW	Chillicothe, IL	BNPDTL-20100510AGG			---	No Interference	---
20	W20DG-D	Fort Wayne, IN	BNPDTL-20090825AVL			---	No Interference	---
20	WHMB-TV	Indianapolis, IN	BPCDT-20090424ACR	2,506,657	17,930	17,930	0	0.000 %
20	WHMB-DR	Indianapolis, IN	BPRM-20080619AEU			---	No Interference	---
20	WUVI-LD	West Lafayette, IN	BSTA-20100706CUS	71,530	893	1,385	492	0.688 %
20	WUVI-LD	West Lafayette, IN	BLDTL-20110120ADG	71,530	893	1,385	492	0.688 %
20	WOTV	Battle Creek, MI	BLCDT-20030721AHS	2,107,211	22,683	23,904	1,221	0.058 %
20	WOTV	Battle Creek, MI	BPCDT-20091104AEK	2,167,166	22,285	24,784	2,499	0.115 %
20	WHNE-LD	Flint, MI	BDISDTL-20101223ACD			---	No Interference	---
20	W20DK-D	Roscommon, MI	BNPDTL-20100223ACY			---	No Interference	---
20	W20DI-D	Traverse City, MI	BNPDTL-20100301ADA			---	No Interference	---
20	WOTH-LD	Cincinnati, OH	BLDTL-20110128AAX			---	No Interference	---
20	NEW	Findlay, OH	BDCCDTL-20061026AGA			---	No Interference	---
20	WLWD-LP	Springfield, OH	BLTT-20051219ADW			---	No Interference	---
20	WHA-TV	Madison, WI	BLEDT-20091229ACK	1,356,616	11,974	12,030	56	0.004 %
20	WMKE-LD	Milwaukee, WI	BDCCDTL-20061030AFR	1,449,643	30,135	40,310	10,175	0.702 %
21	WBKM-LP	Chana, IL	BDCCDTL-20061030AMY			---	No Interference	---
21	WYCC	Chicago, IL	BLEDT-20030501ABC	8,979,748	18,823	57,195	38,372	0.427 %
21	WMKE-LD	Milwaukee, WI	BDISDTL-20100406AAS			---	No Interference	---
22	W22AJ	Arlington Heights, IL	BLTT-19991020AAO			---	No Interference	---
22	DW17DD	Joliet, IL	BPTTL-20020423ABE			---	No Interference	---
23	WWME-CA	Chicago, IL	BSTA-20041208ABO			---	No Interference	---
23	WWME-CA	Chicago, IL	BLTTA-20040129AOW			---	No Interference	---
23	WWME-CA	Chicago, IL	BPTTA-20081023AAZ			---	No Interference	---
24	WPVN-CA	Aurora, IL	BPTTA-20090817ABN	871,426	813	813	0	0.000 %
24	WPVN-CA	Aurora, IL	BLTTL-19990716JA	51,025	0	0	0	0.000 %
24	WHVI-LP	Valparaiso, IN	BLTTL-19921102JE			---	No Interference	---
24	WMLW-CA	Milwaukee, WI	BDISTTA-20081230ACP			---	No Interference	---

