

Exhibit 42 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Gray Television Licensee, Inc.
WSAW-DT Wausau, Wisconsin
Facility ID 6867
Ch. 40 49.9 kW (MAX-DA) 387 m

Gray Television Licensee, Inc. ("Gray") herein proposes to increase the height above average terrain ("HAAT") and decrease the effective radiated power ("ERP") authorized by the WSAW-DT Construction Permit ("CP", BPCDT-19991029ADR). Under the instant proposal, WSAW-DT will operate with a directional antenna at a replacement tower adjacent to its presently authorized site.

Although the proposal's ERP/HAAT combination (49.9 kW / 387 m) does not exceed that which was allotted to WSAW-DT (836 kW / 369 m), the proposed HAAT exceeds by 18 meters that of the WSAW-DT reference allotment. As such, the instant proposal is "non-checklist" and a detailed interference study has been conducted. A detailed interference study per OET Bulletin 69¹ shows that the proposal complies with the Commission's 2% / 10% *de minimis* interference limits. The results of the interference study, summarized in **Exhibit 42 – Table 1**, indicate that any additional interference to nearby pertinent stations (when compared to the WSAW-DT allotment facility) meets the Commission's 2% / 10% interference limits. The instant proposal does not involve prohibited contour overlap to any authorized Class A station. Thus, this proposal complies with the provisions of §73.623(c)(2) of the Commission's rules.

The map attached as **Exhibit 42 - Figure 4** supplies a comparison of the presently authorized and proposed 41 dBμ noise-limited DTV service contour locations. No extension in

¹FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 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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contour location will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.²

WSAW-DT has successfully received a tentative post-transition channel assignment corresponding to the present WSAW-TV Channel 7, and will "carry-over" its replication facility back to Channel 7. As shown below, the proposed facility would serve 81.9% of the target baseline service population, which satisfies the 80% baseline population match requirement of the DTV Channel Election process³.

WSAW-DT Population Match Determination⁴

WSAW-TV Facility	ERP/HAAT	Interference-Free Service Population (2000 Census)	Percent Match of Target
NTSC Ch. 7 (1997 baseline facility)	316 kW / 369 m	464,897	--
DTV Ch. 40 DTV Allotment	836 kW / 369 m	524,961	--
DTV Ch. 40 Proposed	49.9 kW / 387 m	380,904	81.9%

The nearest FCC monitoring station is 395.8 km distant at Allegan, MI. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM stations within 3.2 kilometers of the WSAW-DT transmitter site, based on information contained within the Commission's database.

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

²Public Notice "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.

³See Report and Order, "Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television," FCC 04-192, released September 7, 2004.

⁴Interference-free service population is population within contour less population subject to terrain blockage and interference per FCC OET Bulletin 69. Target population for "Percent Match" is the smaller of the 1997 NTSC facility and DTV allotment.

Exhibit 42 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Gray Television Licensee, Inc.
 WSAW-DT Wausau, Wisconsin
 Facility ID 6867
 Ch. 40 49.9 kW (MAX-DA) 387 m

DTV Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated "Before" Service Population (2)</u>	<u>Calculated "After" Service Population (3)</u>	<u>Net "New" Interference ("2 percent" test)</u>		<u>Percentage Reduction of Baseline Population ("10 percent" test) (6)</u>
						<u>Population</u>	<u>Percentage</u>	
WEAU-DT (Ref)	Eau Claire, WI 39	104.5	711,000	760,479	796,147	-35,668	-5.02	0.00
WEAU-DT (CP)	Eau Claire, WI 39	104.5		-----checklist facility, evaluation not required-----				
WFRV-DT (RM)	Green Bay, WI 39	150.1		-----no interference caused by proposal-----				
WFRV-DT (CP)	Green Bay, WI 39	150.1		-----no interference caused by proposal-----				
WPXE-DT (Ref)	Kenosha, WI 40	277.2	2,080,000	2,301,514	2,307,388	-5,874	-0.28	0.00
WPXE-DT (Lic)	Kenosha, WI 40	248.1	2,080,000	2,882,353	2,941,405	-59,052	-2.84	0.00
KPXM-DT (Ref)	St. Cloud, MN 40	320.1		-----no interference caused by proposal-----				

Exhibit 42 - Table 1
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DTV Facilities

(continued)

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated "Before" Service Population (2)</u>	<u>Calculated "After" Service Population (3)</u>	<u>Net "New" Interference ("2 percent" test) Population Percentage (4) (5)</u>		<u>Percentage Reduction of Baseline Population ("10 percent" test) (6)</u>
KPXM-DT (Lic)	St. Cloud, MN 40	320.1				-----no interference caused by proposal-----		
WWTV-DT (Ref)	Cadillac, MI 40	356.5				-----no interference caused by proposal-----		
WWTV-DT (CP)	Cadillac, MI 40	356.5				-----checklist facility, evaluation not required-----		
WGBA-DT (Ref)	Green Bay, WI 41	149.4				-----no interference caused by proposal-----		
WGBA-DT (CP)	Green Bay, WI 41	149.4				-----no interference caused by proposal-----		
WKBT-DT (RM)	Lacrosse, WI 41	159.8				-----no interference caused by proposal-----		
WKBT-DT (CP)	Lacrosse, WI 41	159.8				-----no interference caused by proposal-----		

Exhibit 42 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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NTSC Facilities

Stations <u>Considered</u>	City, State <u>Channel</u>	Distance <u>(km)</u>	Baseline <u>Population</u> (1)	Calculated "Before" Service <u>Population</u> (2)	Calculated "After" Service <u>Population</u> (3)	Net "New" Interference ("2 percent" test) <u>Population</u> <u>Percentage</u> (4) (5)		Total Interference from DTV only ("10 percent" test) <u>Population</u> (7)	<u>Percentage</u> (8)
WLEF-TV (Lic)	Park Falls, WI 36	122.7				-----no interference caused by proposal-----			
KFXB(TV) (Lic)	Dubuque, IA 40	277.3				-----no interference caused by proposal-----			

- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table
For NTSC stations, total population within noise-limited contour
 - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
 - (3) Service population after reduction from terrain and interference losses, considering proposal
 - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.
 - (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
 - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
 - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
 - (8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total.

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice *Additional Application Processing Guidelines for Digital Television*

