

EXHIBIT 6  
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ALLOCATION CONSIDERATIONS

On the Map, Inc.  
Tarboro, NC

The proposed WNCR-LP operating facilities will provide the required contour protection to all analog TV broadcast stations requiring protection consideration pursuant to Section 74.705 of the FCC Rules. These proposed facilities will also provide the required contour protection to all LPTV, Class A TV, and TV Translator stations requiring protection consideration pursuant to Sections 74.707 and 74.708 of the FCC Rules. With two exceptions, they will also provide the required contour protection to all DTV facilities requiring protection consideration pursuant to Section 74.706 of the FCC Rules.

The two exceptions involve the following stations:

WVEC-DT	Hampton, VA	Channel 41
WRAY-DT	Wilson, NC	Channel 42

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to both of these DTV facilities from the proposed WNCR-LP facilities. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. The version of the "FLR" program utilized in conducting these studies employed the same 2 kilometer cell size as was employed by the FCC in conducting the initial DTV allotment studies. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268 and yielded results

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essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the “FLR” program faithfully reproduces the results obtained by the FCC in their implementation of this program.

These interference studies were conducted on both the allotment and licensed facilities for WVEC-DT and both the allotment and construction permit facilities for WRAY-DT, since the authorizations for both stations specify maximized facilities. Additionally, both WVEC-DT and WRAY-DT have been granted Special Temporary Authority (“STA”) by the FCC permitting interim operation with lesser facilities than those specified in their present authorizations. To insure that the proposed operation of WNCR-LP will not result in interference to the interim operation of these two stations, OET 69 interference studies were also conducted for the facilities authorized by both stations’ STA’s. In conducting these studies, the “FLR” program was run in the “unpaired” mode, since the noise limited contour for the DTV allotment facilities for both of these stations is congruent to the Grade B contour for their present analog operating facilities.

In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they re-

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duced the DTV Service population for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

The results of these studies are presented in Tables 6.0 through 6.5. These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program both with and without the proposed WNCR-LP facilities. As shown by this data, the proposed WNCR-LP facilities are not predicted to cause any new interference whatsoever to the allotment, construction permit, or STA facilities for WRAY-DT or to the allotment or STA facilities for WVEC-DT. While these proposed facilities will result in a very slight amount of new interference to the licensed facilities of WVEC-DT, this new interference falls well below the 0.5% rounding tolerance which is employed to evaluate new interference in this situation and, thus, is not cognizable. This OET 69 analysis serves as the basis for the certification in response to Question 13(b) of Section III of FCC Form 346 that the proposed facilities protect DTV facilities as required by Section 74.706 of the FCC Rules.

If it is deemed to be necessary, a waiver of Section 74.706 of the FCC Rules is respectfully requested with regard to this situation to permit the attached application to be granted in spite of the prohibited contour overlap with these DTV facilities.

TABLE 6.0

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(ALLOTMENT FACILITIES)

On the Map, Inc.  
Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WVEC-DT	Hampton, VA	41	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WHTJ	Charlottesville, VA	41	NTSC	Licensed	BLET-19890421KE
WUTB-DT	Baltimore, MD	41	DTV	Allotment	
WRAY-DT	Wilson, NC	42	DTV	CP	BPCDT-19991101AFB
WDRL-DT	Danville, VA	41	DTV	Allotment	
WTKR-DT	Norfolk, VA	40	DTV	CP	BPCDT-20001116ABE
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1715158	28330.1
not affected by terrain losses	1715156	28326.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1829	52.2
lost to ATV IX only	1829	52.2
lost to all IX	1829	52.2

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1715158	28330.1
not affected by terrain losses	1715156	28326.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1829	52.2
lost to ATV IX only	1829	52.2
lost to all IX	1829	52.2

TABLE 6.0(cont'd)

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,713,327	1,713,327	0
Percent Loss(Gain)*	0.10%	0.10%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,715,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.1

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(LICENSED FACILITIES)

On the Map, Inc.  
Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WVEC-DT	Hampton, VA	41	DTV	Licensed	BLCDT-20020412AAT

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WHTJ	Charlottesville, VA	41	NTSC	Licensed	BLET-19890421KE
WUTB-DT	Baltimore, MD	41	DTV	Allotment	
WRAY-DT	Wilson, NC	42	DTV	CP	BPCDT-19991101AFB
WDRL-DT	Danville, VA	41	DTV	Allotment	
WTKR-DT	Norfolk, VA	40	DTV	Allotment	
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1803808	31841.6
not affected by terrain losses	1803808	31841.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	3795	76.3
lost to ATV IX only	3795	76.3
lost to all IX	3795	76.3

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1803808	31841.6
not affected by terrain losses	1803808	31841.6
lost to NTSC IX	45	16.1
lost to additional IX by ATV	3795	76.3
lost to ATV IX only	3795	76.3
lost to all IX	3840	92.4

TABLE 6.1(cont'd)

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(LICENSED FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,800,013	1,799,968	(45)
Percent Loss(Gain)*	(4.957)%	(4.954)%	0.003%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,715,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.2

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(STA FACILITIES)  
On the Map, Inc.  
Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WVEC-DT	Hampton, VA	41	DTV	STA	BDSTA-20020322ACQ

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WHTJ	Charlottesville, VA	41	NTSC	Licensed	BLET-19890421KE
WUTB-DT	Baltimore, MD	41	DTV	Allotment	
WRAY-DT	Wilson, NC	42	DTV	CP	BPCDT-19991101AFB
WDRL-DT	Danville, VA	41	DTV	Allotment	
WTKR-DT	Norfolk, VA	40	DTV	CP	BPCDT-20001116ABE
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1683622	26706.7
not affected by terrain losses	1683622	26706.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	995	48.2
lost to ATV IX only	995	48.2
lost to all IX	995	48.2

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1683622	26706.7
not affected by terrain losses	1683622	26706.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	995	48.2
lost to ATV IX only	995	48.2
lost to all IX	995	48.2

TABLE 6.2(cont'd)

OET 69 INTERFERENCE STUDIES  
WVEC-DT - HAMPTON, VA  
(STA FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,682,627	1,682,627	0
Percent Loss(Gain)*	1.89%	1.89%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,715,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.3

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
(ALLOTMENT FACILITIES)

On the Map, Inc.  
 Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WRAY-DT	Wilson, NC	42	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WTVI	Charlotte, NC	42	NTSC	Licensed	BLET-19920827KG
WVPY	Front Royal, VA	42	NTSC	Licensed	BLET-19961015KF
WVBT	Virginia Beach, VA	43	NTSC	Licensed	BLCT-19960531KF
WMPT-DT	Annapolis, MD	42	DTV	Allotment	
WDRL-DT	Danville, VA	41	DTV	Allotment	
WVEC-DT	Hampton, VA	41	DTV	Licensed	BLCDT-20020412AAT
WMSY-DT	Marion, VA	42	DTV	CP	BPEDT-19990527KG
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1282945	22235.0
not affected by terrain losses	1282859	22222.9
lost to NTSC IX	1316	72.3
lost to additional IX by ATV	1319	124.5
lost to ATV IX only	1647	164.7
lost to all IX	2635	196.8

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1282945	22235.0
not affected by terrain losses	1282859	22222.9
lost to NTSC IX	1316	72.3
lost to additional IX by ATV	1319	124.5
lost to ATV IX only	1647	164.7
lost to all IX	2635	196.8

TABLE 6.3(cont'd)

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,280,224	1,280,224	0
Percent Loss(Gain)*	(0.10)%	(0.10)%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,279,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.4

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
 (CONSTRUCTION PERMIT FACILITIES)

On the Map, Inc.  
 Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WRAY-DT	Wilson, NC	42	DTV	CP	BPCDT-19991101AFB

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WTVI	Charlotte, NC	42	NTSC	Licensed	BLET-19920827KG
WFXB	Myrtle Beach, SC	43	NTSC	Licensed	BLCT-19970711KE
WVPY	Front Royal, VA	42	NTSC	Licensed	BLET-19961015KF
WVBT	Virginia Beach, VA	43	NTSC	Licensed	BLCT-19960531KF
WMPT-DT	Annapolis, MD	42	DTV	Allotment	
WLXI-DT	Greensboro, NC	43	DTV	CP	BMPCDT-20020201AAN
WDRL-DT	Danville, VA	41	DTV	Allotment	
WVEC-DT	Hampton, VA	41	DTV	Licensed	BLCDDT-20020412AAT
WMSY-DT	Marion, VA	42	DTV	CP	BPEDT-19990527KG
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	2083370	41502.9
not affected by terrain losses	2079720	41277.8
lost to NTSC IX	13259	289.4
lost to additional IX by ATV	30340	1362.4
lost to ATV IX only	41209	1555.3
lost to all IX	43599	1651.8

TABLE 6.4(cont'd)

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
(CONSTRUCTION PERMIT FACILITIES)

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	2083370	41502.9
not affected by terrain losses	2079720	41277.8
lost to NTSC IX	13259	289.4
lost to additional IX by ATV	30340	1362.4
lost to ATV IX only	41209	1555.3
lost to all IX	43599	1651.8

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	2,036,121	2,036,121	0
Percent Loss(Gain)*	(59.20)%	(59.20)%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,279,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 6.5

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
(STA FACILITIES)  
 On the Map, Inc.  
 Tarboro, NC

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WRAY-DT	Wilson, NC	42	DTV	STA	BDSTA-20021127AJF

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WTVI	Charlotte, NC	42	NTSC	Licensed	BLET-19920827KG
WVPY	Front Royal, VA	42	NTSC	Licensed	BLET-19961015KF
WVBT	Virginia Beach, VA	43	NTSC	Licensed	BLCT-19960531KF
WMPT-DT	Annapolis, MD	42	DTV	Allotment	
WLXI-DT	Greensboro, NC	43	DTV	CP	BMPCDT-20020201AAN
WDRL-DT	Danville, VA	41	DTV	Allotment	
WVEC-DT	Hampton, VA	41	DTV	Licensed	BLCDDT-20020412AAT
WMSY-DT	Marion, VA	42	DTV	CP	BPEDT-19990527KG
WCVE-DT	Richmond, VA	42	DTV	Allotment	
WNCR-LP	Tarboro, NC	41	NTSC	Applicant	

STUDY RESULTS WITHOUT WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1442397	22882.1
not affected by terrain losses	1441763	22858.0
lost to NTSC IX	2653	76.3
lost to additional IX by ATV	1279	140.5
lost to ATV IX only	3180	168.6
lost to all IX	3932	216.8

TABLE 6.5(cont'd)

OET 69 INTERFERENCE STUDIES  
 WRAY-DT - WILSON, NC  
(STA FACILITIES)

STUDY RESULTS INCLUDING PROPOSED WNCR-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1442397	22882.1
not affected by terrain losses	1441763	22858.0
lost to NTSC IX	2653	76.3
lost to additional IX by ATV	1279	140.5
lost to ATV IX only	3180	168.6
lost to all IX	3932	216.8

SUMMARY OF STUDY RESULTS

	<u>Without WNCR-LP</u>	<u>With Proposed WNCR-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,437,831	1,437,831	0
Percent Loss(Gain)*	(12.42)%	(12.42)%	0.00%

\*Percent Loss calculations are based on the benchmark DTV Service value of 1,279,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.