

Exhibit 42 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Access.1 New Jersey License Company
WMGM-DT Wildwood, New Jersey
Facility ID 61111
Ch. 36 205 kW (MAX-DA) 127 m

Access.1 New Jersey License Company (“*Access.1*”) herein proposes to decrease the height above average terrain (“HAAT”) and increase the effective radiated power (“ERP”) authorized by the WMGM-DT Construction Permit (“CP”, BPCDT-19991029AFH). Under the instant proposal, WMGM-DT will operate at its presently authorized site with a directional antenna pattern. The increase in ERP will not result in an impermissible increase in interference to any other station.

The proposal’s ERP/HAAT combination (205 kW / 127 m) exceeds that which was allotted to WMGM-DT (50 kW / 128 m). The site specified herein for the proposed WMGM-DT facility is the same as the reference site for this station as established under §73.622(d)(1). 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 WMGM-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 contour location

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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will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.²

The ongoing August 3, 2004 "freeze" is an initial step in the Commission's digital channel election process in MB Docket 03-15.³ As part of this process, *Access.I* filed FCC Form 381 "Pre-Election Certification Form" (BCERCT - 20041105AII) indicating that it intends to operate WMGM-DT post-transition at maximized facilities as authorized by the existing CP (BPCDT-19991029AFH). Subsequently, *Access.I* elected to employ the present DTV channel for WMGM-DT (Ch. 36) in the first-round election by filing FCC Form 382 (BFRECT - 20050125AHS).

As indicated on **Exhibit 42 – Figure 4**, the WMGM-DT service area will not be extended by the instant proposal, and the resulting impact to the ongoing channel election process may be considered not significant. **Exhibit 42 – Figure 4** demonstrates that WMGM-DT would still operate with maximized facilities (205 kW / 127 meters) well in excess of the 50 kW / 128 meter allotment and comparable to the existing CP (200 kW / 128 m) over land area.

The nearest FCC monitoring station is 177.8 km distant at Laurel, MD. 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 WMGM-DT transmitter site, based on information contained within the Commission's database.

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

³*Report and Order, Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket 03-15, FCC 04-192, released September 7, 2004.

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

Exhibit 42 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
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 Ch. 36 205 kW (MAX-DA) 127 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 (4)</u>	<u>Percentage (5)</u>	
WDCA-DT (Ref)	Washington, DC 35	203.3				----no interference caused by proposal----		
WDCA-DT (CP)	Washington, DC 35	200.7				----no interference caused by proposal----		
WNJU-DT (Ref)	Linden, NJ 36	187.6	16,271,000	17,557,872	17,557,872	0	0.00	0.00
WNJU-DT (CP)	Linden, NJ 36	192.3	16,271,000	19,798,863	19,798,863	0	0.00	0.00
WTTG-DT (Ref)	Washington, DC 36	201.5	6,533,000	7,342,045	7,341,984	61	0.00	0.00
WTTG-DT (Lic)	Washington, DC 36	201.5				----checklist facility, evaluation not required----		
WITF-DT (Ref)	Harrisburg, PA 36	225.6	1,804,000	1,934,936	1,934,936	0	0.00	0.00

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)</u>		<u>Percentage Reduction of Baseline Population ("10 percent" test) (6)</u>
						<u>Population (4)</u>	<u>Percentage (5)</u>	
WITF-DT (Lic)	Harrisburg, PA 36	225.6				-----checklist facility, evaluation not required-----		
WCDC-DT (Ref)	Adams, MA 36	415.0				-----no interference caused by proposal-----		
WCDC-DT (CP)	Adams, MA 36	412.7				-----checklist facility, evaluation not required-----		

Exhibit 42 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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NTSC Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated</u> "Before" Service <u>Population</u> (2)	<u>Calculated</u> "After" Service <u>Population</u> (3)	<u>Net "New" Interference ("2 percent" test)</u>		<u>Total Interference from DTV only ("10 percent" test)</u>	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
WCPB(TV) (Lic)	Salisbury, MD 28	109.0							
WTXF-TV (Lic)	Philadelphia, PA 29	109.5							
WYBE(TV) (Lic)	Salisbury, MD 35	109.5							
WENY-TV (Lic)	Elmira, NY 36	376.0							
WGPT(TV) (Lic)	Oakland, MD 36	392.0							
WGPT(TV) (CP)	Oakland, MD 36	392.0							
WSBE-TV (Lic)	Providence, RI 36	408.1							
WUNP-TV (Lic)	Roanoke Rapids, NC 36	415.0							

Exhibit 42 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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- 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*

**EXHIBIT 42 - FIGURE 4
COVERAGE CONTOUR COMPARISON**

prepared August 2005 for
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Facility ID 61111
Ch. 36 205 kW 127 m

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