

### **Engineering Statement and Interference Analysis**

This technical statement supports this application to modify the licensed facility of WCHU-LD on channel 33 in Chicago, IL, Facility ID 129745, FCC File No. BLDTL-20110928ALC.

#### **Digital Displacement Relief**

In this application, the Applicant seeks displacement relief and proposes to move WCHU-LD to channel 7 in Chicago, IL. WCHU-LD is displaced because it receives between 367,505 persons (Scenarios 3 and 15) and 2,061,255 persons (Scenario 4) interference from WMEU-LD, Channel 32, Chicago, IL, WITI, Channel 33, Milwaukee, WI and WEDE-CA, Channel 34, Arlington Heights, IL. This represents between 5.68% and 31.85%. See Attachment A for Interference Analysis.

The proposed facility on channel 7 was studied using the Techware's tv\_process\_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census.

Channel 7 has been utilized in Chicago by WLS Television, Inc. ("WLS") for the last few years under Special Temporary Authority (FCC Facility ID 73226, FCC File No. BDSTA 20110912AAD). Additionally, WLS has a pending DTV Replacement Translator application for channel 7 at Chicago, IL (FCC File No. BDRTCDT-20090817ACC). However, on March 22, 2013, WLS filed an extension request of that CP to operate on channel 7 for only until April 24, 2014.

On March 22, 2013, WLS filed their most recent Extension of Existing Engineering STA for the use of channel 7 (FCC File No. BEDSTA-20130322AFO). In the Attachment 36, WLS includes "Legal Justification for STA Extension," in which they state that they have completed the transition from channel 7 to channel 44<sup>1</sup> and would stop using the channel no later than 2014. In fact, they state in the very first paragraph of that attachment that they have already stopped using the channel but:

WLS Television, Inc. ("WLS Television"), licensee of digital television station WLS-TV, Chicago, Illinois ("WLS"), respectfully requests a thirty-day extension of its current engineering special temporary authority ("STA") 1 to enable it to broadcast on channel 7 in Chicago, Illinois ("Channel 7 Facility") until April 24, 2103 [*sic*] if such broadcasts are necessitated by adverse weather conditions. As explained herein, WLS Television has commenced broadcasts with the Permanent Channel 44 Facility (as defined herein) and, thus, no longer requires the Channel 7 Facility to serve its viewers on an ongoing and daily basis. Nevertheless, to the extent the Permanent Channel 44 Facility becomes unavailable over the next thirty days due to weather conditions, it may be necessary to rely temporarily on the Channel 7 Facility in order to serve those

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<sup>1</sup> Ironically, WCHU-LD formerly operated on channel 44 before it was displaced by WLS when it moved from channel 7 to 44.

portions of its viewing area that cannot otherwise receive an over-the-air signal from WLS's channel 44 auxiliary facilities. Importantly, because WLS has transitioned to the Permanent Channel 44 Facility and worked with its viewers to ensure a smooth transition, WLS has no plans to broadcast from channel 7 on an ongoing basis but rather will use the Channel 7 Facility solely as necessary as a result of severe weather conditions as described herein.

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

#### **Digital TV Station Protection**

The proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

#### **Class A, Low Power TV and TV Translator Station Protection**

The proposed facility causes less than 0.5% interference to surrounding low power and Class A authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.