

EXHIBIT 6
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ALLOCATION CONSIDERATIONS

Christian Faith Broadcast, Inc.
Ashland, OH

The proposed W33BW Channel 33 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, and also 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 three 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 three DTV facilities to which the proposed W33BW Channel 33 operating facilities will not provide the required contour protection are:

WPXD-DT	Ann Arbor, MI	Channel 33
WNPB-DT	Morgantown, WV	Channel 33
WQHS-DT	Cleveland, OH	Channel 34

Further studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to these three DTV facilities from the proposed W33BW operating 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 Reconsidera-

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tion of the Fifth and Sixth Report and Orders and yielded results 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 the DTV allotment facilities for all three of these stations. They were also conducted on the facilities specified in the pending maximization applications filed by WPXD-DT and WQHS-DT. Although the WNPB-DT construction permit facilities are considered to be “checklist” facilities, and thus not normally subject to evaluation under the OET 69 procedures, interference studies were also conducted on these construction permit facilities to document that the proposed W33BW operating facilities will not cause any interference to these construction permit facilities. In conducting these studies, the “FLR” program was run in the “non-pairwise” mode in all cases in order to evaluate service and interference to the entire area within the proposed or authorized noise limited contours, not just the portions of this area which fall inside the Grade B contour for the analog facilities which are paired with the DTV facilities being studied.

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 maximiza-

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tion application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service population for the facilities being studied below the value which occurs when the same station's DTV allotment facilities are considered.

The results of these studies are tabulated 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 W33BW Channel 33 operating facilities.

As shown by this data, the proposed W33BW operating facilities are not predicted to cause any new interference whatsoever to either the allotment or application/construction permit facilities for any of these three DTV stations. Based on this information, it is obvious that the Channel 33 operating facilities proposed in the attached application will not result in any interference to any of these stations, in spite of the prohibited contour overlap which would occur. 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 this prohibited contour overlap with these three DTV stations.

TABLE 6.0

OET 69 INTERFERENCE STUDIES
 WPXD-DT - DETROIT, MI
(ALLOTMENT FACILITIES)
 Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WPXD-DT	Ann Arbor, MI	33	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WKJG-TV	Fort Wayne, IN	33	NTSC	Licensed	BLCT-19800410KH
WFQX-TV	Cadillac, MI	33	NTSC	Licensed	BLCT-19980803IX
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WHTV-DT	Jackson, MI	34	DTV	Allotment	
WSTR-DT	Cincinnati, OH	33	DTV	Allotment	
WITI-DT	Milwaukee, WI	33	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3667100	18693.4
not affected by terrain losses	3666754	18689.3
lost to NTSC IX	7283	124.9
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	7283	124.9

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3667100	18693.4
not affected by terrain losses	3666754	18689.3
lost to NTSC IX	7283	124.9
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	7283	124.9

TABLE 6.0(cont'd)

OET 69 INTERFERENCE STUDIES
 WPXD-DT - DETROIT, MI
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	3,659,471	3,659,471	0
Percent Loss(Gain)*	(14.47)%	(14.47)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 3,197,000 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
 WPXD-DT - DETROIT, MI
(APPLICATION FACILITIES)
 Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WPXD-DT	Ann Arbor, MI	33	DTV	Application	BPCDT-19990812KH

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WKJG-TV	Fort Wayne, IN	33	NTSC	Licensed	BLCT-19800410KH
WFQX-TV	Cadillac, MI	33	NTSC	Licensed	BLCT-19980803IX
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WHTV-DT	Jackson, MI	34	DTV	Allotment	
WSTR-DT	Cincinnati, OH	33	DTV	Allotment	
WITI-DT	Milwaukee, WI	33	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4657115	22422.9
not affected by terrain losses	4657066	22418.8
lost to NTSC IX	9918	330.3
lost to additional IX by ATV	5930	12.1
lost to ATV IX only	5961	16.1
lost to all IX	15848	342.4

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4657115	22422.9
not affected by terrain losses	4657066	22418.8
lost to NTSC IX	9918	330.3
lost to additional IX by ATV	5930	12.1
lost to ATV IX only	5961	16.1
lost to all IX	15848	342.4

TABLE 6.1(cont'd)

OET 69 INTERFERENCE STUDIES
 WPXD-DT - DETROIT, MI
(APPLICATION FACILITIES)

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	4,641,218	4,641,218	0
Percent Loss(Gain)*	(45.17)%	(45.17)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 3,197,000 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
 WNPB-DT - MORGANTOWN, WV
(ALLOTMENT FACILITIES)
 Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WNPB-DT	Morgantown, WV	33	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WITF-TV	Harrisburg, PA	33	NTSC	Licensed	BMLET-19820217KH
WPBY-TV	Huntington, WV	33	NTSC	Licensed	BLET-19950905KE
WHUT-DT	Washington, DC	33	DTV	Allotment	
WGRZ-DT	Buffalo, NY	33	DTV	Application	BPCDT-19991020ABG
WTAJ-DT	Altoona, PA	32	DTV	Allotment	
WJAC-DT	Johnstown, PA	34	DTV	Allotment	
WTRF-DT	Wheeling, WV	32	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1525785	23445.7
not affected by terrain losses	1396687	21077.1
lost to NTSC IX	60360	689.3
lost to additional IX by ATV	21197	669.3
lost to ATV IX only	35078	873.7
lost to all IX	81557	1358.6

TABLE 6.2(cont'd)

OET 69 INTERFERENCE STUDIES
 WNPB-DT - MORGANTOWN, WV
(ALLOTMENT FACILITIES)

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1525785	23445.7
not affected by terrain losses	1396687	21077.1
lost to NTSC IX	60360	689.3
lost to additional IX by ATV	21197	669.3
lost to ATV IX only	35078	873.7
lost to all IX	81557	1358.6

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	1,315,130	1,315,130	0
Percent Loss(Gain)*	(1.40)%	(1.40)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,297,000 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
 WNPB-DT - MORGANTOWN, WV
(CONSTRUCTION PERMIT FACILITIES)

Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WNPB-DT	Morgantown, WV	33	DTV	CP	BPEDT-20000331AAE

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WITF-TV	Harrisburg, PA	33	NTSC	Licensed	BMLET-19820217KH
WPBY-TV	Huntington, WV	33	NTSC	Licensed	BLET-19950905KE
WHUT-DT	Washington, DC	33	DTV	Allotment	
WGRZ-DT	Buffalo, NY	33	DTV	Application	BPCDT-19991020ABG
WTAJ-DT	Altoona, PA	32	DTV	Allotment	
WJAC-DT	Johnstown, PA	34	DTV	Allotment	
WTRF-DT	Wheeling, WV	32	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	877506	19021.0
not affected by terrain losses	808102	17220.7
lost to NTSC IX	40494	597.4
lost to additional IX by ATV	9516	413.0
lost to ATV IX only	24559	585.4
lost to all IX	50010	1010.4

TABLE 6.3(cont'd)

OET 69 INTERFERENCE STUDIES
 WNPB-DT - MORGANTOWN, WV
(CONSTRUCTION PERMIT FACILITIES)

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	877506	19021.0
not affected by terrain losses	808102	17220.7
lost to NTSC IX	40494	597.4
lost to additional IX by ATV	9516	413.0
lost to ATV IX only	24559	585.4
lost to all IX	50010	1010.4

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	758,092	758,092	0
Percent Loss(Gain)*	41.55%	41.55%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,297,000 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
 WQHS-DT - CLEVELAND, OH
(ALLOTMENT FACILITIES)
 Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WQHS-DT	Cleveland, OH	34	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WNIT	South Bend, IN	34	NTSC	Licensed	BLET-19910307KE
WOSU-TV	Columbus, OH	34	NTSC	Licensed	BMLET-19851106KE
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WSEE-TV	Erie, PA	35	NTSC	CP	BPCT-19990928AAT
WHTV-DT	Jackson, MI	34	DTV	Allotment	
WNYO-DT	Buffalo, NY	34	DTV	Application	BPCDT-19991027ACW
WOUC-DT	Cambridge, OH	35	DTV	Application	BPEDT-20000407ACF
WCET-DT	Cincinnati, OH	34	DTV	Allotment	
WJAC-DT	Johnstown, PA	34	DTV	Allotment	
WPBY-DT	Huntington, WV	34	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3425963	20024.9
not affected by terrain losses	3422892	19909.0
lost to NTSC IX	13516	263.7
lost to additional IX by ATV	8517	239.7
lost to ATV IX only	16546	427.5
lost to all IX	22033	503.4

TABLE 6.4(cont'd)

OET 69 INTERFERENCE STUDIES
 WQHS-DT - CLEVELAND, OH
(ALLOTMENT FACILITIES)

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3425963	20024.9
not affected by terrain losses	3422892	19909.0
lost to NTSC IX	13516	263.7
lost to additional IX by ATV	8517	239.7
lost to ATV IX only	16546	427.5
lost to all IX	22033	503.4

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	3,400,859	3,400,859	0
Percent Loss(Gain)*	(2.28)%	(2.28)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 3,325,000 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
 WQHS-DT - CLEVELAND, OH
(APPLICATION FACILITIES)
 Christian Faith Broadcast, Inc.
 Ashland, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WQHS-DT	Cleveland, OH	34	DTV	Application	BPCDT-19991029ADJ

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Chan- nel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WNIT	South Bend, IN	34	NTSC	Licensed	BLET-19910307KE
WOSU-TV	Columbus, OH	34	NTSC	Licensed	BMLET-19851106KE
WYTV	Youngstown, OH	33	NTSC	Licensed	BLCT-2210
WSEE-TV	Erie, PA	35	NTSC	CP	BPCT-19990928AAT
WHTV-DT	Jackson, MI	34	DTV	Allotment	
WNYO-DT	Buffalo, NY	34	DTV	Application	BPCDT-19991027ACW
WOUC-DT	Cambridge, OH	35	DTV	Application	BPEDT-20000407ACF
WCET-DT	Cincinnati, OH	34	DTV	Allotment	
WJAC-DT	Johnstown, PA	34	DTV	Allotment	
WPBY-DT	Huntington, WV	34	DTV	Allotment	
W33BW	Ashland, OH	33	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4065785	28747.6
not affected by terrain losses	4030739	28455.9
lost to NTSC IX	179737	583.3
lost to additional IX by ATV	26186	459.5
lost to ATV IX only	154795	867.0
lost to all IX	205923	1042.8

TABLE 6.5(cont'd)

OET 69 INTERFERENCE STUDIES
 WQHS-DT - CLEVELAND, OH
(APPLICATION FACILITIES)

STUDY RESULTS WITH PROPOSED W33BW

	POPULATION	AREA (sq km)
within Noise Limited Contour	4065785	28747.6
not affected by terrain losses	4030739	28455.9
lost to NTSC IX	179737	583.3
lost to additional IX by ATV	26186	459.5
lost to ATV IX only	154795	867.0
lost to all IX	205923	1042.8

SUMMARY OF STUDY RESULTS

	Without Proposed <u>W33BW</u>	With Proposed <u>W33BW</u>	<u>Increase/(Decrease)</u>
DTV Service	3,824,816	3,824,816	0
Percent Loss(Gain)*	(15.03)%	(15.03)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 3,325,000 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.