

EXHIBIT 6
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ALLOCATION CONSIDERATIONS

Tu Programacion Hispana, LLC
Fort Myers, FL

The proposed WTPH-LP Channel 14 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. The proposed facilities will also provide the required 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. They will also comply with the protection requirements outlined in Section 74.709 of the FCC Rules to the use of Channel 14 in the Miami, Florida area by land mobile stations.

The proposed WTPH-LP Channel 14 facilities will operate from a transmitter site located within the noise limited contour for the licensed operating facilities of first adjacent channel DTV station WBBH-DT - Fort Myers, Florida, which operates on Channel 15. Further studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to WBBH-DT from the proposed WTPH-LP 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.

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 reduced the DTV Service population below the value which occurs when the same station’s DTV allotment facilities are considered or if it was obvious by inspection that the maximized facilities had a much greater potential to cause interference to the station being studied than the associated allotment facilities.

The results of these studies are tabulated in Table 6.0. This table contains a complete listing of the stations which were included in these studies and the facilities which were considered for each station included. They also contain the output of the “FLR” program both with and without the proposed WTPH-LP Channel 14 operating facilities.

As shown by this data, the proposed WTPH-LP operating facilities are not predicted to cause any interference whatsoever to WBBH-DT’s licensed operating facilities.

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Thus, the proposed WTPH-LP operating facilities comply with the applicable protection requirements to WBBH-DT, pursuant to Section 74.706(d)(2)(ii) of the FCC Rules.

Because the attached application proposes operation on Channel 14, the applicant recognizes the potential for interference to existing land mobile users in the adjacent 460 to 470 MHz band and accepts the responsibility, pursuant to Section 74.703(e) of the FCC Rules, to take the necessary steps while conducting equipment tests with the proposed facilities to identify and eliminate any objectionable interference which the proposed facilities might cause to existing land mobile radio facilities in this band which were authorized prior to the grant of a construction permit to cover the attached application.

TABLE 6.0

OET 69 INTERFERENCE STUDIES
WBBH-DT - FORT MYERS, FL
(LICENSED FACILITIES)
Tu Programacion Hispana, LLC
Fort Myers, FL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WBBH-DT	Fort Myers, FL	15	DTV	Licensed	BLCDT-20030620AAA

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WCEU	New Smyrna Beach, FL	15	NTSC	Licensed	BLCT-19880129KF
WUSF-TV	Tampa, FL	16	NTSC	Licensed	BLET-19810123KG
WRDQ-DT	Orlando, FL	14	DTV	Allotment	
WPBF-DT	Tequesta, FL	16	DTV	CP	BPCDT-19991101AEG
WTPH-LP	Fort Myers, FL	14	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED WTPH-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1262024	36082.6
not affected by terrain losses	1262024	36082.6
lost to NTSC IX	177	16.1
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	177	16.1

STUDY RESULTS WITH PROPOSED WTPH-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1262024	36082.6
not affected by terrain losses	1262024	36082.6
lost to NTSC IX	177	16.1
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	177	16.1

TABLE 6.0 (cont'd)

OET 69 INTERFERENCE STUDIES
 WBBH-DT - FORT MYERS, FL
(LICENSED FACILITIES)

SUMMARY OF STUDY RESULTS

	Without Proposed <u>WTPH-LP</u>	With Proposed <u>WTPH-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,261,847	1,261,847	0
Percent Loss(Gain)*	(48.98)%	(48.98)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 847,000 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.