

EXHIBIT 42  
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DTV AND ANALOG TV PROTECTION

Ace TV, Inc.  
Appleton, WI

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to other TV broadcast facilities, both NTSC and DTV, requiring protection consideration from the proposed WACY-DT 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 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 all NTSC and DTV facilities for which the proposed WACY-DT site is located within the distances outlined in Table 7 of OET Bulletin 69 of the Grade B or Noise Limited contour. The results of the interference studies toward all stations located within this "culling distance", based on population data from the 2000 U. S. Census, are tabulated in Table 42.0. As shown by this data, the proposed WACY-DT facilities will result in a net increase in interference to the

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presently licensed Channel 27 analog operating facilities of WCMV - Cadillac, Michigan. This table shows that 688 persons (0.7% of the WCMV Grade B population) are predicted to receive new interference from the implementation of the proposed WACY-DT facilities. This slight increase in interference to WCMV complies with the 2% de minimus interference standard outlined in Section 73.623(c)(2) of the FCC Rules, but does not comply with the 0.1% "no interference" criteria utilized in evaluating the channel elections made as part of the DTV channel election process. It does not appear that this "no interference" standard is applicable to this situation, however, since the interference involved is to the presently licensed analog facilities of WCMV and will only exist until the end of the DTV transition in 2009. This interference will not impact the post-transition DTV operation of WCMV-DT on Channel 17. Out of an utmost of caution, however, a waiver of the protection requirements to the presently licensed analog operation of WCMV is requested if one is deemed to be necessary.

Table 42.0 also shows that the proposed modifications to the WACY-DT facilities will not result in new interference exceeding either the 0.1% "no interference" criteria or the 2% de minimis criteria to any other station requiring protection consideration. Additional studies also determined that there are no Class A TV stations operating on channels which require protection from the proposed WACY-DT operating facilities which are located close enough to the WACY-DT site to be a protection consideration for the proposed operating facilities.

TABLE 42.0

**SUMMARY OF WACY-DT OET 69  
INTERFERENCE CALCULATIONS**

Ace TV, Inc.  
Appleton, WI

<u>Call</u>	<u>Location</u>	<u>Status</u>	<u>Channel</u>	<u>Baseline Population</u>	<u>New Interference From WACY CP</u>		<u>New Interference From Proposed WACY</u>		<u>Net Change In Interference</u>		<u>Total Interference</u>	
WGBA	Green Bay, WI	Licensed	26 NTSC	1,021,610	0	0.0%	0	0.0%	0	0.0%	24,366	2.4%
WKOW-DT	Madison, WI	Allotment <sup>1</sup>	26 DTV	1,212,524	0	0.0%	0	0.0%	0	0.0%	10,083	0.8%
WKOW-DT	Madison, WI	CP	26 DTV	1,394,270	0	0.0%	0	0.0%	0	0.0%	3,251	0.2%
WCIU-DT	Chicago, IL	Allotment	27 DTV	9,109,409	0	0.0%	0	0.0%	0	0.0%	(2,419)	0.0%
WCIU-DT	Chicago, IL	CP	27 DTV	9,253,708	0	0.0%	0	0.0%	0	0.0%	123	0.0%
WCMV	Cadillac, MI	Licensed	27 NTSC	102,993	0	0.0%	688	0.7%	688	0.7%	729	0.7%
WKOW-TV	Madison, WI	Licensed	27 NTSC	992,504	8,682	0.9%	6,800	0.7%	(1,882)	(0.2)%	10,753	1.1%
WHWC-DT	Menomonie, WI	Allotment	27 DTV	376,366	11	0.0%	0	0.0%	(11)	0.0%	(17,491)	(4.6)%
WHWC-DT	Menomonie, WI	Licensed	27 DTV	550,955	2	0.0%	2	0.0%	0	0.0%	(4,228)	(0.8)%
WTMJ-DT	Milwaukee, WI	Allotment <sup>1</sup>	28 DTV	3,014,307	1,137	0.0%	1,169	0.0%	32	0.0%	60,944	2.0%
WTMJ-DT	Milwaukee, WI	Licensed	28 DTV	2,859,956	2,035	0.1%	2,035	0.1%	0	0.0%	(3,682)	(0.1)%

Notes:

All population data based on 2000 U. S. Census.

1) The allotment facilities for WKOW-DT and WTMJ-DT should no longer be entitled to separate protection consideration because the July 1, 2005 “use it or lose it” deadline for both stations has passed.