

CONTOUR OVERLAP AND
LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED LOW POWER TELEVISION STATION W61DH
CHANNEL 34 - MONTGOMERY, ALABAMA

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D-2. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to four stations: WCFT-DT, Channel 34 in Tuscaloosa, Alabama; WHBR-DT, Channel 34 in Pensacola, Florida; WCOV-TV, Channel 20 in Montgomery, Alabama; and, WDFX-TV, Channel 34 in Ozark, Alabama.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed W61DH) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-3. They conclude that the facility proposed herein causes no significant interference to any of the referenced full-power facilities.

As a result, waivers of Section 74.705 of the Commission's Rules with respect to interference to WCOV-TV and WDFX-TV, and Section 74.706 with regard to WCFT-DT and WHBR-DT, are requested and believed to be justified based on the aforementioned Longley-Rice studies.

It is important to note that WCFT-DT was originally assigned to operate on Channel 34 in Tuscaloosa, Alabama. However, as a result of BPRM-20020703ABJ, and its subsequent grant by the Commission recently, WCFT-DT will operate on Channel 5.

SMITH AND FISHER

EXHIBIT D-2

PROPOSED W61DH
CH. 34 - MONTGOMERY ALREFERENCE
32 24 13 N
86 11 47 W

LPTV Pwr = 29.9 kW, HAMS L COR= 207 M

DISPLAY DATES
DATA 02-22-03
SEARCH 07-25-03

..... Channel 34+, 590 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin
WCFT-D CP	34	Tuscaloosa	AL 166.04	316.4	> 340.49	-182.45
WHBR-D CP	34	Pensacola	FL 240.46	215.2	> 336.89	-96.43
WHBR-D ST	34	Pensacola	FL 240.46	215.2	> 317.62	-77.16
WCOVTV CP	20Z	Montgomery	AL 47.70	176.1	> 114.05	-66.35
WCOVTV LI	20Z	Montgomery	AL 11.48	228.4	> 072.25	-60.77
WDFXTV CP	34-	Ozark	AL 143.57	157.4	> 201.55	-57.98
WDFXTV LI	34-	Ozark	AL 143.57	157.4	> 194.02	-50.45
NEW*	AP	34+ Magee	MS 316.99	265.2	> 309.66	7.33
WLTZ-D*CPM	35	Columbus	GA 123.43	86.8	> 115.74	7.69
W34BI LI	34Z	Birmingham	AL 132.25	332.7	> 112.41	19.84
WANN-L LI	34+	Rome	GA 222.21	23.5	> 196.69	25.52
WLTZ ALD	35	COLUMBUS	GA 123.43	86.8	> 093.24	30.19
NEW AP	34Z	Weston	GA 153.28	105.7	> 114.27	39.01
WCFTTV LI	33Z	Tuscaloosa	AL 166.04	316.4	> 126.73	39.31
WDFX-D CP	33	Ozark	AL 143.57	157.4	> 091.98	51.59
WIIQ LI	41Z	Demopolis	AL 157.30	269.0	> 100.00	57.30
WUVG LI	34Z	Athens	GA 289.69	48.0	> 230.75	56.94
WLTZ-D ST	35	Columbus	GA 123.43	86.8	> 060.90	62.53
AP440 AP	34+	Magee	MS 351.64	260.4	> 288.57	63.07
NEW AP	19-	Columbus	GA 111.95	84.7	> 042.34	69.61
WDFXTV ALD	33	OZARK	AL 143.57	157.4	> 073.79	69.78
WOTM-L LI	19+	Montevallo	AL 102.57	324.5	> 031.84	70.73
NEW AP	33-	Columbus	GA 111.96	84.7	> 037.11	74.85

* Actual radials antenna height and directional patterns used (if any)

INTERFERENCE SUMMARY

PROPOSED LOW POWER TELEVISION STATION W61DH
CHANNEL 34 - MONTGOMERY, ALABAMA

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
WCFT-DT BPCDT-19991026ACL	CP	Tuscaloosa, AL	34	1,670,539	5,194	0.3
WHBR-DT BPCDT-19991028AFO	CP	Pensacola, FL	34	1,206,155	0	0
WHBR-DT BDSTA-20021018ABK	STA	Pensacola, FL	34	1,003,144	0	0
WCOV-TV BPCT-19960726KH	CP	Montgomery, AL	20	720,985	0	0
WCOV-TV BLCT-2256	Lic.	Montgomery, AL	20	416,247	0	0
WDFX-TV BPCT-19960726KG	CP	Ozark, AL	34	316,226	0	0
WDFX-TV BLCT-19910228KE	Lic.	Ozark, AL	34	246,617	3	<0.1