FCC Form 346
Venture Technologies Group, LLC
WAWA-LP
Syracuse, NY, Channel 14
Facility ID 10320
Exhibit 6

Interference

This technical statement supports this application to make changes in WAWA-LP on channel 14 in Syracuse. FCC File No. BLTTL – 199990629JB, Facility ID 10320.

In this application, the Applicant is proposing to modify WAWA-LP to change antenna, antenna height, and ERP. As illustrated in _Attachment A_, this is a minor change with the proposed 74dBu contained within the authorized 74dBu contour.

The proposed channel 14 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in _Attachment B._ The program lists in a column labeled "Clearance" the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. The "Total Pop" and "Old Pop" reflect the existing station's coverage without this proposed station. The "New Pop%" and "New Pop" show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In _Attachment C_, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed Syracuse operation to pertinent surrounding analog television allotments and assignments. Interference to these stations was studied

by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Fac. ID	File Number	Location	Ch.	Service Population	Total Interference	New Interference
870331LW (CP)	72623	BPCT19870331LW	Bath, NY	14	161,567	144 (0.09%)	0 (0.09%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (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. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed Syracuse operation to pertinent surrounding digital television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Fac. ID	File Number	Location	Ch.	Service Population	Total Interference	New Interference
WUTV-DT (DTV Allot)	415	BPCDT19991101ACJ	Buffalo, NY	14	1,570,159	23 (0.00%)	23 (0.00%)
WPTZ (DTV Allot)	57476	DTV Allotment	North Pole, NY	14	424,451	0 (0.00%)	0 (0.00%)
WUTV (DTV Allot)	415	DTV Allotment	Buffalo, NY	14	1,344,519	0 (0.00%)	0 (0.00%)
WPTZ (DTV Allot)	57476	BPCDT19991020ACA	North Pole, NY	14	550,704	0 (0.00%)	0 (0.00%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments (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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The "Clearance" to all low power television stations are positive numbers. Accordingly, FCC rule 74.707 is fully and no waivers are required.

This application does not cause any predicted interference to any of the other proposals. The applicant requests a waiver of Section 74.705, 74.706, and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.