

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of PAPPAS TELECASTING OF WISCONSIN, A CALIFORNIA LIMITED PARTNERSHIP, permittee of WMMF-DT, Channel 44 in Fond du Lac, Wisconsin, in support of its Application for Modification of Construction Permit BMPCDT-20000908ABG, to specify a change in transmitter site and an increase in effective radiated power.

Exhibit B provides directional antenna pattern data, and proposed operating parameters are tabulated in Exhibit C. Exhibit D is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 48 dBu service contour. Since the proposed ERP is greater than that specified in the allotment in certain directions, and since the proposed site is not within 5 kilometers of the allotment site, an interference study is included in Exhibit E. A power density calculation is provided in Exhibit F.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate near the new WMMF-DT site. However, if such should occur, the owner of WMMF-DT recognizes its obligation to take whatever corrective actions are necessary.

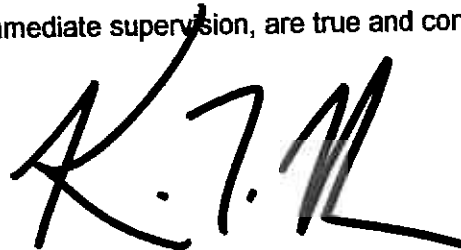
Since no change in the overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. In addition, the FCC issued Antenna Structure Registration Number 1241313 to this tower.

EXHIBIT A

WMMF-DT and Fond du Lac, its city of license, are located in the Green Bay DMA. Based on the land area within the service contours of the other DTV authorizations in the market, the facility proposed herein does not exceed the largest of these service areas, as shown in the following tabulation:

| <u>Call</u> | <u>City State</u> | <u>CH.</u> | <u>File Number</u> | <u>41 dBu Land Area (sq. km.)</u> |
|-------------|-------------------|------------|--------------------|-----------------------------------|
| WACY-DT | Appleton, WI | 59 | BPCDT-19990902AAF | 19,550 |
| WBAY-DT | Green Bay, WI | 23 | BLCDT-20020429ABC | 23,075 |
| WFRV-DT | Green Bay, WI | 56 | BMPCDT-20020201AAM | 20,300 |
| WGBA-DT | Green Bay, WI | 41 | BPCDT-19990902AAG | 19,775 |
| WLUK-DT | Green Bay, WI | 51 | BMPCDT-20020424AAU | 21,375 |
| WMMF-DT | Fond du Lac, WI | 44 | Proposed | 17,253 |

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



KEVIN T. FISHER

January 14, 2004

ELEVATION PATTERN

| | | |
|----------------------|-----------------------|--------------|
| TYPE: | ATW30HS3H | |
| Directivity: | Numeric | dBd |
| Main Lobe: | 30.00 | 14.77 |
| Horizontal: | 18.02 | 12.56 |
| Beam Tilt: | 0.75 | |
| Polarization: | Horizontal | |
| Frequency: | 44 (Digital) | |
| Location: | Fon Du Lac, WI | |

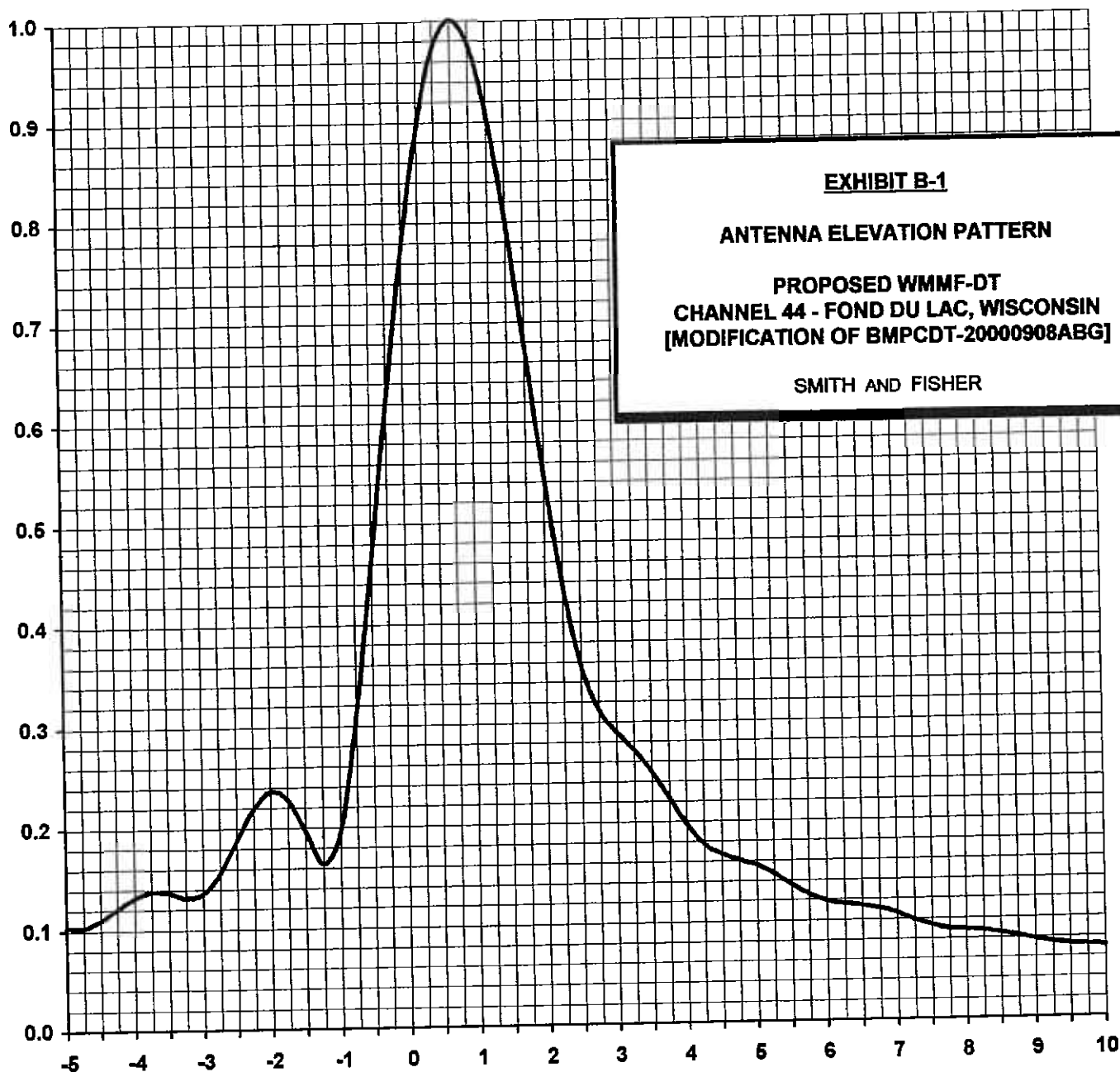


EXHIBIT B-1

ANTENNA ELEVATION PATTERN

PROPOSED WMMF-DT
CHANNEL 44 - FOND DU LAC, WISCONSIN
[MODIFICATION OF BMPCDT-20000908ABG]

SMITH AND FISHER

AZIMUTH PATTERN

| | | |
|---------------|----------------|------|
| TYPE: | CH44AZ-H-T1 | |
| | Numeric | dB |
| Directivity: | 1.77 | 2.48 |
| Peak(s) at: | | |
| Polarization: | Horizontal | |
| Frequency: | 44 (Digital) | |
| Location: | Fon Du Lac, WI | |

Note: Pattern shape and directivity may vary with channel and mounting configuration.

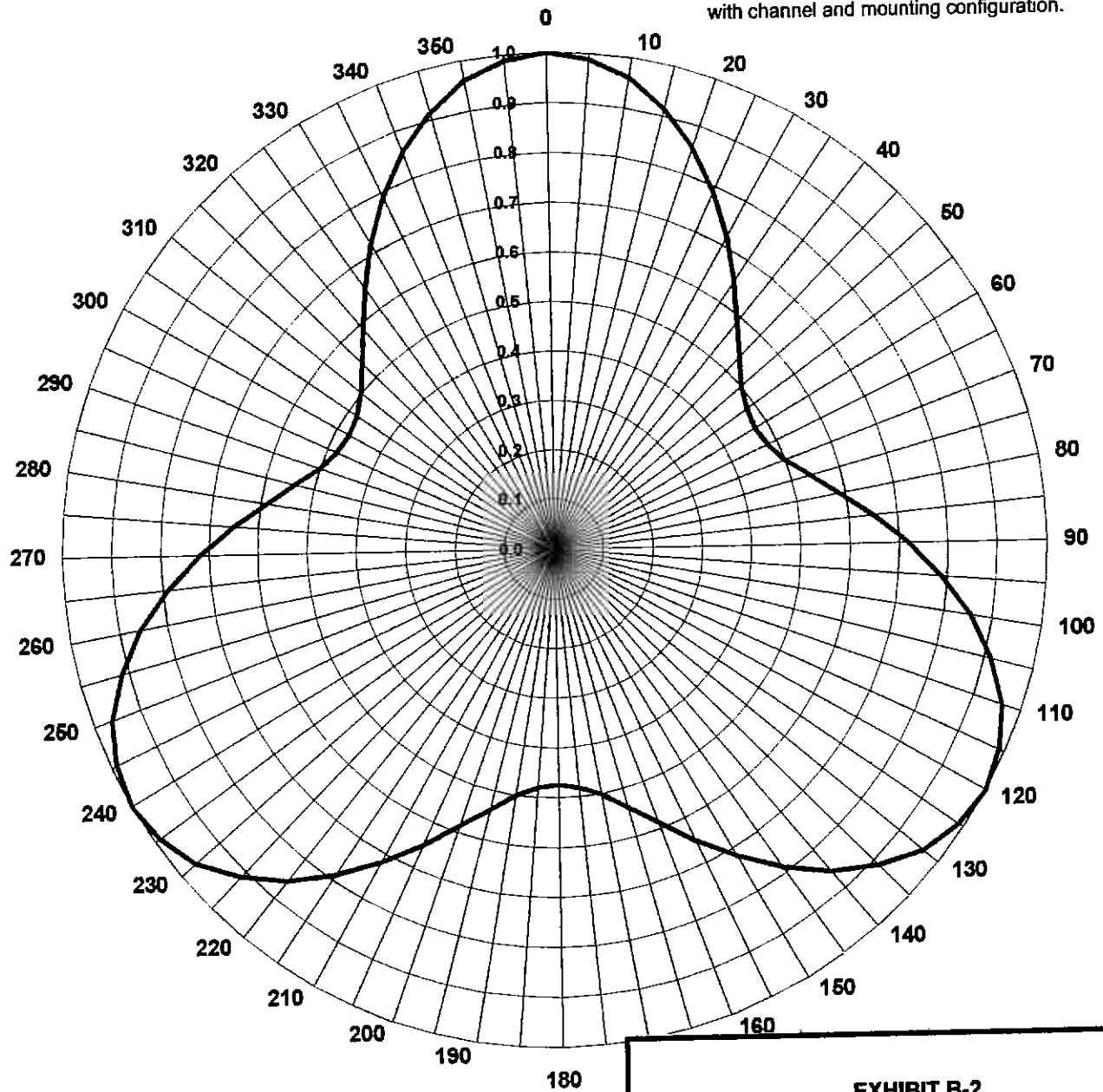


EXHIBIT B-2

ANTENNA AZIMUTH PATTERN

PROPOSED WMMF-DT
CHANNEL 44 - FOND DU LAC, WISCONSIN
[MODIFICATION OF BMPCDT-20000908ABG]

SMITH AND FISHER

ANTENNA AZIMUTH PATTERN DATA

PROPOSED WMMF-TV
CHANNEL 44 – FOND DU LAC, WISCONSIN
[MODIFICATION OF BMPCDT-20000908ABG]

| <u>Azimuth</u> <u>(° T)</u> | <u>Relative</u> <u>Field</u> | <u>ERP</u> <u>(dbk)</u> | <u>Azimuth</u> <u>(° T)</u> | <u>Relative</u> <u>Field</u> | <u>ERP</u> <u>(dbk)</u> |
|--------------------------------|---------------------------------|----------------------------|--------------------------------|---------------------------------|----------------------------|
| 0 | 1.000 | 28.5 | 180 | 0.473 | 22.0 |
| 10 | 0.961 | 28.2 | 190 | 0.501 | 22.5 |
| 20 | 0.856 | 27.1 | 200 | 0.587 | 23.9 |
| 30 | 0.718 | 25.6 | 210 | 0.718 | 25.6 |
| 40 | 0.587 | 23.9 | 220 | 0.856 | 27.1 |
| 50 | 0.501 | 22.5 | 230 | 0.961 | 28.2 |
| 60 | 0.473 | 22.0 | 240 | 1.000 | 28.5 |
| 70 | 0.501 | 22.5 | 250 | 0.961 | 28.2 |
| 80 | 0.587 | 23.9 | 260 | 0.856 | 27.1 |
| 90 | 0.718 | 25.6 | 270 | 0.718 | 25.6 |
| 100 | 0.856 | 27.1 | 280 | 0.587 | 23.9 |
| 110 | 0.961 | 28.2 | 290 | 0.501 | 22.5 |
| 120 | 1.000 | 28.5 | 300 | 0.473 | 22.0 |
| 130 | 0.961 | 28.2 | 310 | 0.501 | 22.5 |
| 140 | 0.856 | 27.1 | 320 | 0.587 | 23.9 |
| 150 | 0.718 | 25.6 | 330 | 0.718 | 25.6 |
| 160 | 0.587 | 23.9 | 340 | 0.856 | 27.1 |
| 170 | 0.501 | 22.5 | 350 | 0.961 | 28.2 |

EXHIBIT C

PROPOSED OPERATING PARAMETERS

PROPOSED WMMF-DT
CHANNEL 44 – FOND DU LAC, WISCONSIN
[MODIFICATION OF BMPCDT-20000908ABG]

| | |
|--|--------------------------|
| Transmitter Power Output: | 29.2 kw |
| Transmission Line Efficiency: | 87.7% |
| Antenna Power Gain – Main Lobe: | 27.31(H, V) |
| Effective Radiated Power – Main Lobe: | 700 (H, V) |
| Transmitter Make and Model: | Type-accepted |
| Rated Output | 30 kw |
| Transmission Line Make and Model: | Andrew MACX675 |
| Size and Type: | 6 1/8" rigid |
| Length: | 490 feet |
| Antenna Make and Model: | Andrew ATW30HS3-CTT1-44H |
| Orientation | 0, 120, 240 degrees true |
| Beam Tilt | 0.75 degrees |
| Effective Height Above Ground: | 143 meters |
| Effective Height Above Mean Sea Level: | 491 meters |

INTERFERENCE STUDY
PROPOSED WMMF-DT
CHANNEL 44 – FOND DU LAC, WISCONSIN
[MODIFICATION OF BMPCDT-20000908ABG]

The Commission allotted Channel 44 to WMMF-DT with a nominal ERP of 123 kw (directional) at 506 meters above average terrain. The instant application specifies an ERP of 700 kw (directional) at 195 meters, which we have determined to be allowable under the FCC's *de minimis* standards with respect to various NTSC and DTV facilities.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe II" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a signal resolution of 2 kilometers and an increment spacing of 1.0 kilometer along each radial, unless otherwise noted. In addition, we utilized the 1990 U.S. Census. Changes in interference caused by WMMF-DT to other pertinent stations are tabulated in Exhibit E-2.

With respect to the pending application for NTSC Channel 44 in Green Bay, Wisconsin (BPCT-19960920YF), proposed WMMF-DT causes interference to 13.5 percent of its service population. However, a Longley-Rice analysis indicates that the Green Bay proposal causes interference to 5.5 percent of the service population of WMMF-DT, as authorized under BMPCDT-20000908ABG. Accordingly, the Green Bay application must necessarily be dismissed by the FCC and thus does not require interference protection from the instant proposal.

Regarding the allotment facility of WWRS-DT, Channel 43 in Mayville, Wisconsin, the proposed WMMF-DT facility causes unmasked interference to 11.6 percent of the WWRS-DT

EXHIBIT E-1

service population. However, the WMMF-DT allotment facility causes interference to 12.1 percent of the WWRS-DT allotment facility's service population. Therefore, a grant of the instant proposal would represent a decrease in interference to the WWRS-DT allotment service population. In addition, it is important to note that proposed WMMF-DT does not cause any interference to the WWRS-DT authorized facility (BPCDT-19991029AEV).

As far as the other facilities are concerned, the proposed WMMF-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its authorized service area.

A Longley-Rice interference study reveals that the proposed WMMF-DT facility does not cause interference within the protected 74 dBu contour of any potentially affected Class A low power television station, including WMLW-CA, Channel 41 in Milwaukee, Wisconsin.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

EXHIBIT E-2

INTERFERENCE STUDY SUMMARY
 PROPOSED WMMF-DT
 CHANNEL 44 – FOND DU LAC, WISCONSIN
 [MODIFICATION OF BMPCDT-20000908ABG]

| <u>Call Sign</u> | <u>City, State</u> | <u>CH.</u> | <u>Coverage Population</u> | <u>Interference Population From WMMF-DT</u> | <u>%</u> | <u>Total DTV Interference</u> | <u>%</u> |
|------------------------------|---------------------|------------|--------------------------------|---|----------|-----------------------------------|----------|
| WSNS-TV BLCT-20000110AAU | Chicago, IL | 44 | 8,214,750 | 36,383 | 0.4 | 77,342 | 0.9 |
| WZPX-DT BLCDT-20020510AAG | Battle Creek, MI | 44 | 1,833,715 | 0 | 0 | 28,893 | 1.6 |
| WVCY-TV BLCT-19830119KI | Milwaukee, WI | 30 | 1,843,362 | 1,527 | <0.1 | 45,494 | 2.5 |
| WMVT(TV) BPET-19940610KE | Milwaukee, WI | 36 | 1,879,396 | 4,970 | 0.3 | 7,718 | 0.4 |
| WMVT(TV) BLET-19810501KE | Milwaukee, WI | 36 | 2,045,601 | 0 | 0 | 97 | <0.1 |
| *APPL. BPCT-19960920YF | Green Bay, WI | 44 | 854,029 | 115,289 | 13.5 | 115,289 | 13.5 |
| APPL. BPCT-19960722KN | Richland Center, WI | 45 | 600,498 | 7,614 | 1.3 | 27,427 | 4.6 |
| WMSN-TV BMLCT-20010817AAS | Madison, WI | 47 | 826,896 | 0 | 0 | 36,563 | 4.4 |
| WJUE-DT Allotment | Battle Creek, MI | 44 | 1,867,704 | 0 | 0 | 27,474 | 1.5 |
| **WWRS-DT Allotment | Mayville, WI | 43 | 755,865 | 87,490 | 11.6 | 181,290 | 24.0 |

*This application will be dismissed; see Exhibit E-1.

**Proposed WMMF-DT causes no more interference to WWRS-DT allotment than does WMMF-DT allotment; see Exhibit E-1.

EXHIBIT F

POWER DENSITY CALCULATION

PROPOSED WMMF-DT
CHANNEL 44 – FOND DU LAC, WISCONSIN

[MODIFICATION OF BMPCDT-20000908ABG]

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Fond du Lac facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 700 kw (H, V), an effective antenna height of 143 meters above ground, and the elevation pattern of the Andrew antenna, maximum power density two meters above ground of 0.0025 mw/cm^2 is calculated to occur 27 meters from the base of the tower. Since this is only 0.6 percent of the 0.43 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 44 (650-656 MHz), a grant of this proposal may be considered a minor environmental action with respect to public and occupational ground-level exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.