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ALLOCATION CONSIDERATIONS

Magnum Radio, Inc.
Tomah, WI

WDLS-LP is presently licensed to operate on Channel 35 with a nondirectional effective radiated power of 16 kilowatts. There are, however, three DTV allotments on Channel 35 located within 265 kilometers of the WDLS-LP transmitter site:

KRIN-DT - Waterloo, Iowa
KARE-DT - Minneapolis, Minnesota
WMVT-DT - Milwaukee, WI

Thus, pursuant to Section 73.3572(a)(4)(iv) of the FCC Rules, WDLS-LP is eligible for displacement relief. WDLS-LP presently holds a displacement construction permit (BPTTL-20000830BUV) authorizing operation on Channel 58, which is located outside the core spectrum. Subsequent to the grant of this Channel 58 displacement construction permit, WDLS-LP was able to identify a suitable core channel which is available for displacement use. As a result, the attached displacement application, which specifies operation on Channel 51, is being filed. This application requests a new displacement construction permit, not a modification of the existing Channel 58 displacement construction permit, and also requests that, upon the grant of a construction permit to cover the attached application, the Channel 58 displacement construction permit be canceled.

The proposed WDLS-LP Channel 51 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

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Rules. It should be noted that the proposed WDLS-LP facilities will not provide the contour protection required by Section 74.707 of the FCC Rules to the facilities proposed in four pending applications for new LPTV stations on Channel 51:

BNPTTL-20000802ABS - Winona, MN¹
BNPTT-20000830BHO - Chippewa Falls, WI
BNPTTL-20000829AVJ - Eau Claire, WI
BNPTT-20000830BGN - Milladore, WI

While this would normally violate Section 74.707 of the FCC Rules, Section 73.3572(a)(4)(ii) of the FCC Rules excludes DTV displacement applicants, such as WDLS-LP in this case, from having to provide any protection consideration to prior filed, but ungranted, applications for new LPTV stations. Thus, the failure to protect these pending new station applications should not serve as an impediment to the grant of the attached displacement application.

The proposed facilities also fail to provide the contour protection required by Section 74.706 of the FCC Rules to three DTV broadcast facilities requiring protection consideration:

KGAN-DT	Cedar Rapids, IA	Channel 51
WPWR-DT	Gary, IN	Channel 51
WLUK-DT	Green Bay, WI	Channel 51

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted interference to all three of these DTV facilities from the pro-

¹On September 11, 2003, subsequent to the August 15, 2003 filing of the WDLS-LP Channel 51 displacement application, this application for a new LPTV station on Channel 51 in Winona, Minnesota was inadvertently granted by the FCC. This action by the FCC was clearly improper since the facilities specified in the Winona application clearly fail to comply with the protection requirements to the WDLS-LP Channel 51 displacement application, which, as a DTV displacement application, is accorded priority over the Winona application by Section 73.3572(a)(4)(ii) of the FCC Rules. As a result, the improper grant of the Winona application should be rescinded.

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posed WDLS-LP 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 both the allotment and licensed facilities for all three of these DTV stations, since the authorizations for all three of these stations specify maximized facilities. In conducting these studies, the "FLR" program was run in the "paired" mode for KGAN-DT and WLUK-DT, since the DTV allotments for both of these stations specify the maximum permitted effective radiated power of 1000 kilowatts and yield a noise limited contour which does not quite replicate the Grade B contour for the paired analog facility. The "FLR" program was run in the "unpaired" mode for WPWR-DT, since the noise limited contour for the WPWR-DT DTV allotment facilities is congruent to the Grade B contour for the present WPWR-TV analog operating facilities.

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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 for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

The results of these studies are presented in Tables 6.0 through 6.5. These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program both with and without the proposed WDLS-LP facilities. As shown by this data, the proposed WDLS-LP facilities are not predicted to cause any new interference whatsoever to either the allotment or construction permit facilities for WPWR-DT. While these proposed facilities will result in a very slight amount of new interference to both the allotment and construction permit facilities of both KGAN-DT and WLUK-DT, this new interference, in all cases, falls well below the

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0.5% rounding tolerance which is employed to evaluate new interference in this situation and, thus, is not cognizable. This OET 69 analysis serves as the basis for the certification in response to Question 13(b) of Section III of FCC Form 346 that the proposed facilities protect DTV facilities as required by Section 74.706 of the FCC Rules.

If it is deemed to be necessary, a waiver of Section 74.706 of the FCC Rules is respectfully requested with regard to this situation to permit the attached application to be granted in spite of the prohibited contour overlap with these DTV facilities.

TABLE 6.0

OET 69 INTERFERENCE STUDIES
 KGAN-DT - CEDAR RAPIDS, IA
(ALLOTMENT FACILITIES)
 Magnum Radio, Inc.
 Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KCRG-DT	Cedar Rapids, IA	52	DTV	Allotment	
KDIN-DT	Des Moines, IA	50	DTV	Allotment	
WPWR-DT	Gary, IN	51	DTV	CP	BPCDT-19991101ALA
KAUN-DT	Sioux Falls, SD	51	DTV	CP	BPCDT-20010618AAI
WLUK-DT	Green Bay, WI	51	DTV	Allotment	
WISC-DT	Madison, WI	50	DTV	CP	BPCDT-19991027ABG
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	913234	41565.5
not affected by terrain losses	866212	40403.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	49481	3501.4
lost to ATV IX only	49481	3501.4
lost to all IX	49481	3501.4

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	913234	41565.5
not affected by terrain losses	866212	40403.8
lost to NTSC IX	2376	242.0
lost to additional IX by ATV	48074	3412.7
lost to ATV IX only	49481	3501.4
lost to all IX	50450	3654.7

TABLE 6.0(cont'd)

OET 69 INTERFERENCE STUDIES
 KGAN-DT - CEDAR RAPIDS, IA
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	Without <u>WDLS-LP</u>	With Proposed <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	816,731	815,762	(969)
Percent Loss(Gain)*	(0.96)%	(0.84)%	0.12%

*Percent Loss calculations are based on the benchmark DTV Service value of 809,000 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.

TABLE 6.1

OET 69 INTERFERENCE STUDIES
 KGAN-DT - CEDAR RAPIDS, IA
(CONSTRUCTION PERMIT FACILITIES)

Magnum Radio, Inc.
 Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KGAN-DT	Cedar Rapids, IA	51	DTV	CP	BMPCDT-20020911AAM

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KCRG-DT	Cedar Rapids, IA	52	DTV	Allotment	
KDIN-DT	Des Moines, IA	50	DTV	Allotment	
WPWR-DT	Gary, IN	51	DTV	CP	BPCDT-19991101ALA
KAUN-DT	Sioux Falls, SD	51	DTV	CP	BPCDT-20010618AAI
WLUK-DT	Green Bay, WI	51	DTV	CP	BMPCDT-20020424AAU
WISC-DT	Madison, WI	50	DTV	CP	BPCDT-19991027ABG
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	910625	41444.5
not affected by terrain losses	895120	40791.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	20380	1004.4
lost to ATV IX only	20380	1004.4
lost to all IX	20380	1004.4

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	910625	41444.5
not affected by terrain losses	895120	40791.0
lost to NTSC IX	1449	161.4
lost to additional IX by ATV	20047	968.1
lost to ATV IX only	20380	1004.4
lost to all IX	21496	1129.5

TABLE 6.1(cont'd)

OET 69 INTERFERENCE STUDIES
 KGAN-DT - CEDAR RAPIDS, IA
(CONSTRUCTION PERMIT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without</u> <u>WDLS-LP</u>	<u>With Proposed</u> <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	874,740	873,624	(1,116)
Percent Loss(Gain)*	(8.13)%	(7.99)%	0.14%

*Percent Loss calculations are based on the benchmark DTV Service value of 809,000 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.

TABLE 6.2

OET 69 INTERFERENCE STUDIES
 WPWR-DT - GARY, IN
(ALLOTMENT FACILITIES)
 Magnum Radio, Inc.
 Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WPWR-DT	Gary, IN	51	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WEIU-TV	Charleston, IL	51	NTSC	CP	BPET-20030212ABF
WPWR-TV	Gary, IN	50	NTSC	Licensed	BLCT-19870128KL
WGVK	Kalamazoo, MI	52	NTSC	Licensed	BLET-19841012KH
WWRS-TV	Mayville, WI	52	NTSC	Licensed	BLCT-20011115ADW
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	
WLS-DT	Chicago, IL	52	DTV	Allotment	
WLAJ-DT	Lansing, MI	51	DTV	CP	BMPCDT-20030423AAW
WKEF-DT	Dayton, OH	51	DTV	Allotment	
WLUK-DT	Green Bay, WI	51	DTV	Allotment	
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	8334909	25888.9
not affected by terrain losses	8334813	25884.9
lost to NTSC IX	450	4.0
lost to additional IX by ATV	11201	92.3
lost to ATV IX only	11651	96.3
lost to all IX	11651	96.3

TABLE 6.2(cont'd)

OET 69 INTERFERENCE STUDIES
WPWR-DT - GARY, IN
(ALLOTMENT FACILITIES)

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	8334909	25888.9
not affected by terrain losses	8334813	25884.9
lost to NTSC IX	450	4.0
lost to additional IX by ATV	11201	92.3
lost to ATV IX only	11651	96.3
lost to all IX	11651	96.3

SUMMARY OF STUDY RESULTS

	Without <u>WDLS-LP</u>	With Proposed <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	8,323,162	8,323,162	0
Percent Loss(Gain)*	0.02%	0.02%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 8,325,000 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.

TABLE 6.3

OET 69 INTERFERENCE STUDIES
WPWR-DT - GARY, IN
(CONSTRUCTION PERMIT FACILITIES)

Magnum Radio, Inc.
Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WPWR-DT	Gary, IN	51	DTV	CP	BPCDT-19991101ALA

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WEIU-TV	Charleston, IL	51	NTSC	CP	BPET-20030212ABF
WPWR-TV	Gary, IN	50	NTSC	Licensed	BLCT-19870128KL
WGVK	Kalamazoo, MI	52	NTSC	Licensed	BLET-19841012KH
WWRS-TV	Mayville, WI	52	NTSC	Licensed	BLCT-20011115ADW
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	
WLS-DT	Chicago, IL	52	DTV	Allotment	
WLAJ-DT	Lansing, MI	51	DTV	CP	BMPCDT-20030423AAW
WKEF-DT	Dayton, OH	51	DTV	Allotment	
WLUK-DT	Green Bay, WI	51	DTV	Allotment	
WISC-DT	Madison, WI	50	DTV	CP	BPCDT-19991027ABG
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	8696135	36412.8
not affected by terrain losses	8691708	36316.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	9825	244.9
lost to ATV IX only	9825	244.9
lost to all IX	9825	244.9

TABLE 6.3(cont'd)

OET 69 INTERFERENCE STUDIES
WPWR-DT - GARY, IN
(CONSTRUCTION PERMIT FACILITIES)

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	8696135	36412.8
not affected by terrain losses	8691708	36316.5
lost to NTSC IX	778	20.1
lost to additional IX by ATV	9047	224.8
lost to ATV IX only	9825	244.9
lost to all IX	9825	244.9

SUMMARY OF STUDY RESULTS

	Without <u>WDLS-LP</u>	With Proposed <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	8,681,883	8,681,883	0
Percent Loss(Gain)*	(4.29)%	(4.29)%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 8,325,000 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.

TABLE 6.4

OET 69 INTERFERENCE STUDIES
 WLUK-DT - GREEN BAY, WI
(ALLOTMENT FACILITIES)
 Magnum Radio, Inc.
 Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WLUK-DT	Green Bay, WI	51	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WWRS-TV	Mayville, WI	52	NTSC	Licensed	BLCT-20011115ADW
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	
WPWR-TV	Gary, IN	51	DTV	CP	BPCDT-19991101ALA
WLAJ-DT	Lansing, MI	51	DTV	CP	BMPCDT-20030423AAW
WPBN-DT	Traverse City, MI	50	DTV	Allotment	
WISC-DT	Madison, WI	50	DTV	CP	BPCDT-19991027ABG
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1009514	33245.5
not affected by terrain losses	1008776	33193.2
lost to NTSC IX	3235	76.5
lost to additional IX by ATV	1793	88.6
lost to ATV IX only	3269	132.8
lost to all IX	5028	165.0

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1009514	33245.5
not affected by terrain losses	1008776	33193.2
lost to NTSC IX	3713	92.6
lost to additional IX by ATV	1520	80.5
lost to ATV IX only	3269	132.8
lost to all IX	5233	173.1

TABLE 6.4(cont'd)

OET 69 INTERFERENCE STUDIES
WLUK-DT - GREEN BAY, WI
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	Without <u>WDLS-LP</u>	With Proposed <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,003,748	1,003,543	(205)
Percent Loss(Gain)*	0.32%	0.34%	0.02%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,007,000 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.

TABLE 6.5

OET 69 INTERFERENCE STUDIES
WLUK-DT - GREEN BAY, WI
(CONSTRUCTION PERMIT FACILITIES)

Magnum Radio, Inc.
Tomah, WI

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WLUK-DT	Green Bay, WI	51	DTV	CP	BMPCDT-20020424AAU

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WWRS-TV	Mayville, WI	52	NTSC	Licensed	BLCT-20011115ADW
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	
WPWR-TV	Gary, IN	51	DTV	CP	BPCDT-19991101ALA
WLAJ-DT	Lansing, MI	51	DTV	CP	BMPCDT-20030423AAW
WPBN-DT	Traverse City, MI	50	DTV	Allotment	
WISC-DT	Madison, WI	50	DTV	CP	BPCDT-19991027ABG
WDLS-LP	Tomah, WI	51	NTSC	Applicant	

STUDY RESULTS WITHOUT WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1015218	32722.2
not affected by terrain losses	1014473	32645.7
lost to NTSC IX	1777	100.6
lost to additional IX by ATV	666	48.3
lost to ATV IX only	1535	92.6
lost to all IX	2443	148.9

STUDY RESULTS INCLUDING PROPOSED WDLS-LP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1015218	32722.2
not affected by terrain losses	1014473	32645.7
lost to NTSC IX	2335	136.9
lost to additional IX by ATV	532	36.2
lost to ATV IX only	1535	92.6
lost to all IX	2867	173.1

TABLE 6.5(cont'd)

OET 69 INTERFERENCE STUDIES
 WLUK-DT - GREEN BAY, WI
(CONSTRUCTION PERMIT FACILITIES)

SUMMARY OF STUDY RESULTS

	Without <u>WDLS-LP</u>	With Proposed <u>WDLS-LP</u>	<u>Increase/(Decrease)</u>
DTV Service	1,012,030	1,011,606	(424)
Percent Loss(Gain)*	(0.50)%	(0.46)%	0.04%

*Percent Loss calculations are based on the benchmark DTV Service value of 1,007,000 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.