

EXHIBIT 44.2  
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CLASS A TV PROTECTION  
Christian Faith Broadcast, Inc.  
Sandusky, OH

The proposed WGGN-DT operating facilities will provide the contour protection required by Section 73.623(c)(5) of the FCC Rules to all but two authorized Class A TV stations:

WXCB-CA	Delaware, OH	Channel 42
WOHZ-CA(CP)	Mansfield, OH	Channel 41

In this situation, Section 73.623(b)(5)(iii) of the FCC Rules permits the use of the methodology outlined in FCC OET Bulletin 69 to document that there will be no increase in the predicted interference to these Class A stations in support of a request for a waiver of these contour protection requirements.

Studies were conducted utilizing this methodology to evaluate the predicted new interference to WXCB-CA and WOHZ-CA from the proposed modifications to the WGGN-DT operating 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. 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 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.

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These interference studies were conducted using 1990 census data, a one kilometer cell size, and a 74 dBu protected contour to provide sufficient detail and properly reflect the protected contour for UHF Class A stations. 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 which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which were authorized based on a maximization application, the maximized facilities were considered in these studies. In addition to the high power TV and DTV facilities normally included as interfering stations in this analysis when a high power TV broadcast station is being studied, these studies also included interference from LPTV and TV translator facilities, both analog and digital.

The results of these studies for WXCBCA are tabulated in Table 44.2.0 and those for WOHZ-CA are tabulated in Table 44.2.1. 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 the facilities authorized by the present WGGN-DT maximization construction permit and with the modified facilities proposed in the attached application.

As shown by this data, the modifications proposed to the WGGN-DT operating facilities in the attached application are not predicted to cause any new interference whatsoever to the WOHZ-CA construction permit facilities. They will, however, cause new interference to 33 persons, or 0.07% of the population predicted to receive 74 dBu

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service from WXCB-CA, which is less than the 0.5% rounding tolerance which is permitted in this situation. Based on this data, a waiver of Section 73.623(b)(5) of the FCC Rules is respectfully requested with regard to this situation to permit the attached amendment to be granted in spite of this prohibited contour overlap with these Class A TV stations.

TABLE 44.2.0

OET 69 INTERFERENCE STUDIES  
WXCB-CA - DELAWARE, OH  
 Christian Faith Broadcast, Inc.  
 Sandusky, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WXCB-CA	Delaware, OH	42	NTSC	Licensed	BLTTA-20030402AAU

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WCLJ	Bloomington, IN	42	NTSC	Licensed	BLCT-19870904KG
WOSU-TV	Columbus, OH	34	NTSC	Licensed	BMLET-19851106KE
W43BZ	Columbus, OH	43	NTSC	Licensed	BLTTL-20031121AOO
WLIO	Lima, OH	35	NTSC	Licensed	BMLCT-20041201BDE
WOHZ-CA	Mansfield, OH	41	NTSC	CP	BPTTL-20000731AEY
WOCB-CA	Marion, OH	39	NTSC	Licensed	BLTTA-20031212AAO
WPBO	Portsmouth, OH	42	NTSC	Licensed	BLET-19930707KE
WNDU-DT	South Bend, IN	42	DTV	Licensed	BLCDDT-20060717AAG
WKLE-DT	Lexington, KY	42	DTV	Licensed	BLEDT-20060926AJQ
WOSU-DT	Columbus, OH	38	DTV	Licensed	BLEDT-20060926AJQ
WCLL-LD	Columbus, OH	35	DTV	CP	BDCCDTL-20061024AAE
WPMY-DT	Pittsburgh, PA	42	DTV	Licensed	BLCDDT-20060608AAB
WGGN-DT	Sandusky, OH	42	DTV	Applicant	

STUDY RESULTS FOR WGGN-DT CONSTRUCTION PERMIT FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	44530	381.4
not affected by terrain losses	44530	381.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

TABLE 44.2.0(cont'd)

OET 69 INTERFERENCE STUDIES  
WXCB-CA - DELAWARE, OH

STUDY RESULTS FOR PROPOSED WGGN-DT FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	44530	381.4
not affected by terrain losses	44530	381.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	33	2.0
lost to all IX	33	2.0

SUMMARY OF STUDY RESULTS

	WGGN-DT Construction <u>Permit</u>	Proposed <u>WGGN-DT</u>	<u>Decrease</u>
NTSC Service	44,530	44,497	33 (0.07%)

TABLE 44.2.1

OET 69 INTERFERENCE STUDIES  
WOHZ-CA - MANSFIELD, OH  
 Christian Faith Broadcast, Inc.  
 Sandusky, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WOHZ-CA	Mansfield, OH	41	NTSC	CP	BPTTL-20000731AEY

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WOTV	Battle Creek, MI	41	NTSC	Licensed	BLCT-19961120KE
WBNX-TV	Akron, OH	55	NTSC	Licensed	BLCT-20011113ADL
W33BW	Ashland, OH	33	NTSC	Licensed	BLTTL-20020211ABL
WOSU-TV	Columbus, OH	34	NTSC	Licensed	BMLET-19851106KE
WCPX-LP	Columbus, OH	48	NTSC	Licensed	BLTTL-20001221AAX
WXCB-CA	Delaware, OH	42	NTSC	Licensed	BLTTA-20030402AAU
WOCB-CA	Marion, OH	39	NTSC	Licensed	BLTTA-20031212AAO
W41AP	Sandusky, OH	41	NTSC	Licensed	BLTTL-19891227IS
W41AA	Wheeling, WV	41	NTSC	Licensed	BLTT-1606
WXYZ-DT	Detroit, MI	41	DTV	Licensed	BLCDDT-20030325ABI
WHIO-DT	Dayton, OH	41	DTV	Licensed	BLCDDT-20040614AEY
WKBN-DT	Youngstown, OH	41	DTV	CP	BPCDDT-19991025ACU
WHIZ-DT	Zanesville, OH	40	DTV	CP	BMPCDDT-20020314AAE
WCHS-DT	Charleston, WV	41	DTV	Licensed	BLCDDT-20050621AAQ
WGGN-DT	Sandusky, OH	42	DTV	Applicant	

STUDY RESULTS FOR WGGN-DT CONSTRUCTION PERMIT FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	129105	883.3
not affected by terrain losses	128680	872.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	271	6.0
lost to all IX	271	6.0

TABLE 44.2.1(cont'd)

OET 69 INTERFERENCE STUDIES  
WOHZ-CA - MANSFIELD, OH

STUDY RESULTS FOR PROPOSED WGGN-DT FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	129105	883.3
not affected by terrain losses	128680	872.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	271	6.0
lost to all IX	271	6.0

SUMMARY OF STUDY RESULTS

	WGGN-DT Construction <u>Permit</u>	Proposed <u>WGGN-DT</u>	<u>Decrease</u>
NTSC Service	128,409	128,409	0 (0.00%)